



Breckland
COUNCIL

Breckland Local Plan Full Update

Draft Issues and Options Consultation Feedback Report

May 2024

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Preface

This Regulation 18 Consultation Statement has been prepared under the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) (hereafter referred to in this report as 'Regulation 18') which requires the publication of a statement setting out which bodies and persons were invited to make representations under Regulation 18; how those bodies and persons were invited to make such representations; a summary of the main issues raised by those representations, and how those main issues will be addressed as the new Local Plan progresses.

This document consists of a core summary report with appendices containing more detailed information.

A Regulation 18 consultation represents the scoping stage to decide what should be included in a Local Plan, and consultation with key stakeholders helps to ensure that it is based on up to date, robust evidence.

1. Introduction

- 1.1 Breckland District Council is preparing a new Local Plan that will be used to guide development in the district to 2046. This Feedback Report has been prepared to summarise and conclude the Issues & Options consultation which forms the first formal stage in the preparation of the new Local Plan.
- 1.2 Once adopted, the new Local Plan will set a new planning strategy for the district, helping to co-ordinate the delivery of much needed housing, employment, and infrastructure, whilst ensuring that our natural, historic, and built environments are protected and enhanced for future generations to enjoy.
- 1.3 This report covers:
 - First Conversation Consultation (Issues and Options) March to May 2023
 - Continuing Regulation 18 consultation May to November 2023
 - Focussed Issues and Options (Development Strategy Options/Settlement Boundary Principles/Call for Sites) January to February 2024
- 1.4 Between 10th March 2023, and 30th November 2023 (First conversation and continuing community engagement), Breckland District Council consulted on its new Local Plan Issues & Options in accordance with the requirements of Regulation 18. The consultation documents comprised of the Issues & Options Consultation Paper, Breckland Landscape and Settlement Character Assessment, and Norfolk Study Older Person Housing.
- 1.5 Between 8th January 2024, and 19th February 2024 Breckland District Council undertook a further focussed Issues & Options Regulation 18 consultation. The consultation documents comprised of Development Strategy Options paper, Settlement Boundary Principles paper and a Call for Sites analysis and report.
- 1.6 This report provides a summary of the responses received for each consultation period including quantitative analysis and summaries of comments from a variety of stakeholders inclusive of residents; landowners / developers / agents; businesses; statutory consultees; parish and town councils; Member of Parliament, community, trusts and other interest groups; as well as district and parish and town councillors commenting in a personal capacity, submitted in response to the consultation.
- 1.7 Both the First Conversation Issues & Options Consultation and Focussed Issues & Options Consultation covering Development Strategy Options, Settlement Boundary Principles and Call for Sites set out a range of challenges and opportunities relating to how Breckland District could change and grow over the next 25 years. These challenges and opportunities relate to a number of important, interconnected themes that together will contribute to achieving a sustainable vision for the district over the next 25 years. It focuses in particular

on how important planning issues and possible options for future development in Breckland over the next 25 years to 2046 should be tackled. It covers everything from climate change and affordable housing needs to supporting jobs and promoting biodiversity. Comments were invited from residents, key stakeholders and other interested parties on the current Local Plan vision for Breckland.

Duty to Cooperate

- 1.8 The Localism Act 2011 sets out that local authorities must cooperate with prescribed bodies and neighbouring local authorities to maximise the effectiveness of local plans. They must engage constructively, actively and on an ongoing basis on strategic matters relating to sustainable development.
- 1.9 Breckland District Council has a Duty to Cooperate (DTC) with Norfolk County Council and a range of adjoining authorities on strategic planning matters to maximise the effectiveness of respective local plans. The DTC also requires the Council to co-operate with other prescribed bodies and statutory consultees, such as Natural England and the Environment Agency.
- 1.10 As part of the consultation process, the Council contacted the following prescribed and other statutory consultation bodies to invite them to make representations on the consultation Paper. Please note this list is not intended to be exhaustive:
 - Norfolk County Council
 - Kings Lynn and West Norfolk
 - South Norfolk District Council
 - West Suffolk Borough Council
 - Suffolk County Council
 - Natural England
 - Historic England
 - Environment Agency
 - Anglian Water
 - Norfolk Constabulary
 - Civil Aviation Authority
 - Norfolk Coastal Partnership
 - National Grid
 - Network Rail
 - Sport England

Norfolk Strategic Planning Member Forum (NSPF)

- 1.11 Breckland District Council, together with neighbouring authorities in Norfolk, are working together as part of the Norfolk Strategic Planning Member Forum (NSPF) which oversees the production of the Norfolk Strategic Planning Framework (NSPF) document. The NSPF provides a structure for tackling

planning issues across the county, especially those which have a strategic impact across local authority boundaries. It includes guidance relating to housing, economic growth, infrastructure and the environment. The NSPF informs the Local Plans produced by all the authorities. The latest version of the document was endorsed by all stakeholder authorities in 2021.

Wider Engagement Protocol

- 1.12 As part of the wider effort to foster a closer collaboration between local planning authorities, and other health service organisations to plan for future growth and to promote health, an engagement protocol has been produced between local planning authorities, the Norfolk and Waveney Sustainability and Transformation Partnership, Clinical Commissioning Groups, Health Partners and Public Health Norfolk and Public Health Suffolk.

2. First Conversation Consultation

Issues and Options Paper 2023

- 2.1 In accordance with Regulation 18, between 10th March 2023 and 19th May 2023, the Council consulted on the Issues and Options Paper document. This document set out a range of high-level challenges and opportunities for delivering homes and jobs, supporting commercial development, delivering infrastructure, supporting health, community and culture and protecting and enhancing our environment.
- 2.2 The feedback and key themes emerging from this initial consultation, along with the further community engagement that followed undertaken by the Council's appointed consultants -Filigree Communications Limited, will inform the strategic spatial options, District and settlement visions and themes which will be presented in the following Preferred Options Consultation / Draft Local Plan (Regulation 19) due to be published Spring 2024.

Call for Sites March 2022

- 2.3 In March 2022, the Council issued a 'Call for Sites' in order to gather information from landowners and developers about the potential availability of land – particularly brownfield / previously developed land – that might be considered suitable for development, including meeting future needs for housing, employment, retail, Local Green Space designation and other uses. In light of a number of potentially significant new sites becoming available and the relatively early stage the new Local Plan was at, the Council continued to allow sites to be submitted for consideration until December 2022.
- 2.4 The Call for Sites responses were published on the Council's Local Plan community engagement platform, Commonplace. At this early stage of the Local Plan, publication of the submitted sites was for local stakeholders to view purposes only, and not for receiving feedback on.
- 2.5 At the time of preparing this Feedback Report these sites are currently in the process of being assessed against a range of thematic suitability criteria. The site appraisal process will be adapted and improved to support a fuller site selection process as the new Local Plan progresses.

Summary of Consultation Process

Public Engagement

- 2.6 In line with the Council's Statement of Community Involvement (SCI), a variety of methods were used to promote the consultation (Issues and Options) and engage with interested parties as set out below. The consultation period for the Issues and Options Paper document coincided with the Easter school holiday,

and as a result a decision was taken to extend the consultation period from the statutory minimum of 6 weeks to a full 10 weeks.

- 2.7 The Council continued the public engagement process beyond the consultation period until the end of November 2023 to reach out to local communities who did not get to make a response to the Issues and Options Consultation Paper, see further below.

2.8 Advanced publicity of the forthcoming formal public consultation was carried out in accordance with the Council's adopted [Statement of Community Involvement \(SCI\)](#) and included:

Publicity and Notification

- 2.8 Advanced publicity of the forthcoming formal public consultation was carried out in accordance with the Council's adopted [Statement of Community Involvement \(SCI\)](#) and included:

- Publication in the resident's magazine, Transforming Breckland, reaching over 65K households across the district.
- Email notifications – statutory consultees and Planning Policy Mailing List.
- Publication on the Council's website

Methods

Issues and Options Paper

- 2.9 During the formal Issues and Options consultation both the full document and a booklet setting out the main points were made available across the district.
- 2.10 The Issues and Options Paper set out a range of spatial challenges and opportunities relating to how Breckland can change and grow over the next 25 years. These challenges and opportunities relate to a number of important, interconnected themes that together will contribute to achieving a sustainable vision for the district. The document set out issues and options for both the development and the protection of areas of the district, addressing issues including housing, the economy, leisure, retail, the environment and infrastructure. In considering where development should and should not be located, four different scenarios in terms of the potential distribution of development in the district over the plan period were set out for consultees to consider and choose their favourite as given below:
- Option 1: Do you think development should be concentrated within the market towns?
 - Option 2: Do you think more housing should be dispersed within rural areas/villages?

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- Option 3: Should there be a new settlement Garden Town/Village developed within Breckland and the 15-minute neighbourhood concept be introduced?
 - Option 4: Should development be concentrated on the main transport routes (A47, A11 or others)?
- 2.11 This consultation has been an important step along with the extended community engagement events in exploring the advantages and disadvantages of different strategy options, alongside the contribution these options can make to fulfilling the objectives of the district and its diverse settlements.
- 2.12 The Issues and Options Consultation Report, and the accompanying Breckland Landscape and Settlement Character Assessment, and Norfolk Study Older Person Housing were published between 10th March 2023 and 19th May 2023.
- 2.13 The full set of documents, including ‘quick links’ were published online at <https://www.breckland.gov.uk/article/19942/Local-Plan-Full-Update> along with a link to the Commonplace community engagement platform at <https://brecklandlocalplan.commonplace.is/> .

Issues and Options Extended Community Engagement

Public Events

- 2.14 The consultation was undertaken by the Council’s appointed community engagement consultants – Filigree Communications Ltd. Events included five external ‘drop-by’ public events at five different locations at well-known and accessible public locations, coinciding with market days in the District, on weekdays and one Saturday during the day, allowing the public to view display boards, publicity posters, to ask questions, including on the Local Plan process, and give feedback on their views. Paper comment forms were also available at these events for those attendees without internet access, or who may have found it easier to handwrite a consultation response. Attendees could also take away QR code business cards which they could scan and access the Commonplace platform.

Virtual online Events

- 2.15 Two virtual online events were also undertaken by Filigree Communications Ltd, (via prior registration).
- 2.16 Attendance rates were recorded as set out below in Table 1: Events Schedule. Exact attendance counts were unable to be taken for the ‘drop-by’ public events, however an estimated range is indicated below.

Social Media

- 2.17 A sustained social media campaign, to promote public engagement throughout the extended community engagement process period, including posts on

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Facebook, Instagram, Twitter and LinkedIn between 21st September and 10 October 2023. These comprised general publicity about the consultation (e.g., housing, climate change or the economy), and details of public events taking place. Collectively, these posts achieved a reach of 10,316 views.

Table 1: Public Events Schedule

Date	Time	Venue	No. of Visitors
27/09/23	11.00am-2.00pm	Watton Library, George Trollope Road, Watton	27 (estimated)
03/10/23	11.00am-2.00pm	Thetford Marketplace, Thetford	28 (estimated)
05/10/23	11.00am-2.00pm	Attleborough Market, Attleborough	47 (estimated)
11/10/23	6.30pm-7.30pm	Virtual online via Zoom	13
14/10/23	12.00pm-3.00pm	Swaffham Market, Swaffham	44 (estimated)
17/10/23	10.00am-1.00pm	Dereham Market, Marketplace, Dereham	60 (estimated)
22/11/23	6.60pm-7.30pm	Virtual online via Zoom	23

Response Rate

Issues and Options Consultation Paper

- 2.18 A total of 2,221 submitted responses were received to the Issues and Options Consultation Paper document. Respondents included individual residents and businesses, representative bodies including Parish/Town Councils and community groups, those representing the development industry such as landowners and site promoters, as well as statutory consultees.
- 2.19 The vast majority of comments were submitted via paper and email (approximately 2,017 [90.8%]), with the remainder submitted online via the Commonplace portal (204) [9.2%].

Table 2: Consultation Submission Methods

Submission Method (Total no. of Submissions 2,221)	No. of Responses (comments)	%
Commonplace portal	204	9.2
Email / paper	2,017	90.8
Total No. of Submissions	2,221	100

- 2.20 A small number of submissions were received after the consultation deadline of 5pm on Friday 19th May 2023. Given that this consultation formed an early stage of the development of the new Local Plan, these were accepted where the late submission was justified. For future consultation stages a stricter process will apply to receiving late submissions.

Processing Issues and Options Consultation Comments

- 2.21 All comments received were reviewed and any discriminatory or sensitive information redacted before being recorded as duly made. The consultation comprised a range of questions giving a variety of options, for example, to provide a ‘yes’ or ‘no’ answer or to comment on each. The majority of respondents (1,670) made a single submission to Question 13: Should there be a new settlement Garden Town / Village developed within Breckland, or responded to only a few questions, rather than expressing a view on every question in the Issues and Options Paper.

Consultation Summaries

- 2.22 After all comments were processed in the manner described above, the representations received were reviewed and analysed on a question-by-question basis (i.e., for each of the questions set out in the Issues and Options Paper), with the prevailing issues summarised. These summaries and analyses are presented in the relevant tables further below in Appendix 1 of this report.
- 2.23 The summaries are a reflection of the issues raised during the consultation. They do not record every single comment or view that was made during the consultation.
- 2.24 The tally of comments in each question response summary (submission) represents the number of submissions received for that question. It is the nature of the particular planning issues raised in comments that is most critical to effective plan-making and not necessarily the number of comments received.
- 2.25 The key themes emerging from the comments received during this consultation have been taken into account and used to inform the preparation of the next stage of the Local Plan process, the emerging ‘Alternative Development Strategy Options’ consultation. A further Local Plan consultation, the ‘Preferred Options / Draft Local Plan will follow. This will begin to set out the draft policies and prospective locations for the following Regulation 19 Stage, which will guide how planning and development takes place across Breckland District to 2046. This will present future opportunities for all stakeholders, including the local community, to have their say in the future direction of the Local Plan.

Summary of Consultation Responses

- 2.26 This section provides summaries of the representations received in response to the consultation. It provides an overview of responses received from

statutory consultees and stakeholders. A summary and analysis of **all the representations** received in response to the First Conversation consultation can be found in **Appendix 1** to this Report. A definitive summary of **all statutory consultee’s representations** can be found in **Appendix 2** to this Report.

- 2.27 Representations included statutory consultees, individual representations and other stakeholders (planning agents, developers and other interested organisations).
- 2.28 For key headline findings relating to the consultation, please refer to Section 5.

Key Report Headlines

Headline 1: Responses and Respondents

- 2.29 This report presents a broad range of findings based on the large number of questions asked in the Consultation Document, summarised and presented in further detail in Appendices 1 and 2 to this Report.
- 2.30 In total, 2,221 representation submissions were received to the consultation Report. Not all representations responded to all of the questions. Many responded to the topics that interested them the most.
- 2.31 These respondents comprised a wide range of different stakeholders, including local residents/businesses; agents/developers/landowners; town, parish and parish meetings; statutory/non-statutory- organisations and trusts; and local campaign groups.

Question 13. Should there be a new settlement Garden Town/Village developed within Breckland?

- 2.32 A total of 1,670 individual responses were submitted by two separate campaign groups to Question 13. Should there be a new settlement Garden Town/Village developed within Breckland? A grand total of 2,263 individual responses were made to Question 13 from 2,221 representation submissions.

Headline 2: Vision and Objectives

- 2.33 A total of 385 responses were made to the corresponding questions (Q.1. and Q.2), with Q.1 being the third most answered question within the consultation Report (206 responses).

Vision

- 2.34 64% of respondents to Q.1 agreed that the vision in the Adopted Local Plan was still right and consistent with economic, social and environmental

objectives of sustainable development. However, many respondents did suggest changes and inclusions, as summarised below:

Suggested changes and inclusions to the vision

- Improved infrastructure accessibility for the disabled.
- Prioritise 15 min / 20 min neighbourhoods to maximise holistic balance between development and nature.
- Protection of environment.
- Links between Nature Recovery Network, any Biodiversity Action Plans, Local Nature Partnerships, Rights of way Improvement Plans and Green Infrastructure Strategies.
- Focus on public services.
- Housing delivery needs to reflect the population / need e.g., affordable housing.
- Improvement to cultural, recreational and tourism appeal. Which would help with economic sustainability.
- Acknowledge that Strategic Growth Locations already have had significant growth committed, and that new growth will be outside of these.
- Smaller housing projects – more than 10%
- Include what development will be delivered.
- Reflect recent government policy to achieve Net Zero by 2050.
- Balanced spatial distribution is important but needs to be directed towards sustainable locations – market towns, and should take advantage of transport links (A11, A47).
- More focus on use of brownfield land.
- Include ‘enhance’ historic environment.

2.35 Respondents who did not agree to, or expressed views on the vision gave reasons/views as summarised below:

Reasons for not agreeing or unsure with the vision

- Lack of infrastructure to support house growth.
- Growth aimed at existing towns where infrastructure can be enhanced.
- Focus on affordable housing in rural areas.
- Sustainability for existing residents more important and well-being.
- Ignores rural villages with no services.
- Greater consideration for the environment.
- More emphasis on climate change needed.
- Visions should draw together agreed vision in the latest Breckland Corporate Plan.
- Vision needs to be more specific.

- Too much emphasis on businesses and not communities.
- Transport links need improving (A47)

Objectives

- 2.36 47% of respondents to Q.2. agreed that the existing objectives in the Adopted Local Plan are still broadly relevant. Many respondents did propose inclusions to make the objectives more specific and less subjective as summarised below:

Suggested inclusions to the objectives

- Objectives should acknowledge that existing SUEs (Attleborough and Thetford) are already committed and that new growth will need to be in and around Dereham, Swaffham and Watton
- A new garden community should be an objective.
- There needs to be an objective linking job growth to housing growth.
- More emphasis on tourism economy
- Objectives relating to 'strong economy' should acknowledge role of service industries (care, health and well-being) to job growth.
- Objectives need to be expanded to reinforce importance of developer funding for investment in physical and social infrastructure provision.
- Objective 6 could be strengthened through reference to working positively with landowners and developers.
- Objectives should include measurable targets.

- 2.37 Respondents who did not agree to, or expressed views on the objectives gave reasons/views as summarised below:

Reasons for not agreeing or unsure with the objectives

- Emphasis on a healthy environment and existing community protection – should be at heart of the vision.
- More emphasis on Net zero
- Emphasis on enhancing quality of life by improving infrastructure and protecting Norfolk way of life / ruralness.
- Self-sufficiency targets should be referenced.
- Concern that new or enhanced infrastructure is dependent on new housing growth.
- Objectives should be consulted with local residents, particularly allocation of sites.
- The Local Plan must continue to evolve with demographic, economic and cultural shifts.
- Infrastructure first before housing growth

- Sustainability for existing communities and business are more important.
- Emphasis on smaller clusters of development to avoid shock impacts.
- Flexible approach to housing growth required.
- Objectives need to consider the relaxing of the 300,000 annual housing targets.
- Objective 18 should focus on affordable housing for rent for enabling families to stay in the area.
- Housing objectives should acknowledge problems from demand and provision of executive type housing and second homes from outside of the district.
- Brandon should be included in acknowledging housing need.

Headline 3: Housing

- 2.38 A total of 5,176 individual responses were made to the corresponding questions in Section 4 Housing: The Issues, of the consultation Report, with Q.13. being the most answered question (2,261 responses) within Section 4, and the Report as a whole.

Q.13. Should there be a new settlement Garden Town/Village developed within Breckland?

- 2.39 97% of respondents to Q.13. indicated that they opposed the proposal of a new settlement Garden Town/Village, a summary of common reasons are set out below:

Reasons for opposing a new settlement Garden Town/Village

- Destruction /impacts on ecosystems, biodiversity, countryside, fragile landscape and much needed farmland (food production) to produce a commuter ghetto that does nothing to support the rural young nor support rural industry.
- Lack of infrastructure.
- Increased traffic / pollution.
- Impact on existing water supply / sewage treatment; loss of tranquillity and dark skies.
- Impact on existing community identity.
- Better located in existing area of development where people have access to transport, jobs and infrastructure.
- Provision of affordable homes to meet local needs best provided in modest numbers spread over an area close to where people have their work and to enhance trade for existing small local businesses.

Housing Amount

- 2.40 A total of 193 responses were made to the corresponding question (Q.3.) with a majority of 44% (85) of respondents indicating support that the full objectively assessed housing need should be based on the Standard Method.
- 2.41 Many of those who agreed (comprising largely of planning agents on behalf of developers) also indicated that a higher figure should / could be planned for, giving factors such as past poor delivery of affordable housing, economic growth (e.g., Cambridge - Norwich Tech Corridor) requiring aligned housing growth to avoid in/out commuting, and requirement for new / enhanced infrastructure.
- 2.42 Respondents who responded “no” (27%) or “unsure” (27%) largely indicated lower levels of housing development, and more emphasis should be given to increasing affordable housing for local people.

Development Principles

- 2.43 A total of 199 responses were made to the corresponding question (Q.10.), which asked respondents to list in order of importance a given ten¹ development principles for developing a development strategy in the Local Plan.
- 2.44 An analysis of Q.10. set out to establish the most and least important principle. The most important principle was option 1 (44% of respondents to this question), “*Maximise re-use of previously developed (brownfield) land,*” followed by option 2 (19% of respondents to this question), “*Focus development in locations where there is greatest accessibility to employment, local services and facilities*”, and then by option 5 (17% of respondents to this question), “*Locate development to minimise its impact on protected or locally important landscapes, heritage and biodiversity.*”
- 2.45 The least most important principle was option 7 (19% of respondents to this question), “*Focus on sites that can be delivered quickly to ensure a flexible development supply,*” followed by option 8 (14% of respondents to this question), “*Provide new housing and facilities to help sustain rural settlements.*”
- 2.46 Many of the respondents to this question indicated that all of the principles were equally important, with many citing that focus should be on brownfield sites and sustainable locations where there was existing infrastructure and community services that could be further enhanced giving opportunity for greater densities.

¹ It is acknowledged that spatial principles 6 and 7 were in error repeated at 10 and 11, and of which have been taken into account during the analyses of responses to this question.

- 2.47 Many respondents also indicated that growth in the form of smaller and medium sites should be distributed across the district where appropriate enabling a more efficient rate of delivery to meet need.

Development Locations – Market Towns

- 2.48 A total of 200 responses were made to the corresponding question (Q.11.), which asked *Do you think development should be concentrated within the market towns?* 74% of respondents to this question indicated that development should be concentrated within the market towns.
- 2.49 Many of these respondents considered that the market towns have a better range of services and employment as well as better transport links and should be the focus for further planned growth.
- 2.50 Key concerns regarding availability of infrastructure (in particular health provision) and traffic congestion were also identified.
- 2.51 Several responses considered that it is important that as the current development strategy concentrates development in two large sustainable urban extensions at Attleborough and Thetford, this results in a much lesser number of smaller allocations in the other towns and larger villages.
- 2.52 Some responses also indicated that development should be on appropriate sites throughout the settlement hierarchy so that the Local Service Centres and Villages with Boundaries benefit from coordinated development which brings affordable housing and S106 contributions. It was cited that this would help fund important services and facilities within the settlements, rather than being subject to small schemes, which fall under the thresholds and lead to an increase of the population but without the benefits of slightly larger schemes.

Development Locations – Rural Areas/Villages

- 2.53 A total of 214 responses were made to the corresponding question (Q.12.), which asked *Do you think more housing should be dispersed within rural areas/villages?* 54% of respondents to this question indicated that more housing should not be dispersed within the rural areas/villages. 32% of respondents indicated that they did think more housing should be dispersed and 14% said they were unsure.
- 2.54 A number of different opinions were expressed as summarised below:

Should housing be dispersed within rural areas/villages?

- Everywhere should have their fair share of development but villages need to have a few houses only to protect the countryside, land, wildlife etc.
- The potential of cities (Norwich) and market towns should be fully explored before any rural or new town developments are considered.

- Infill and small developments can be very beneficial to rural communities, and they should be part of the policy.
- There should be a supply of housing that enables local people to stay local, and this should be from starter and social housing through to family homes and homes for the elderly.
- Villages don't have work opportunities or services so it will increase traffic on the roads. The roads are of poor quality and not maintained so this would make a bad situation worse.
- Housing should be on brownfield sites.
- Smaller developments of maximum of 10/20 houses suit villages better.
- Dispersal of some (non-strategic) growth is important to support rural communities and smaller settlements.
- The smaller towns and villages do not have the sustainable transport links of the larger towns, so this option is likely to increase car commuting.
- Any growth strategy that directs the development to a large number of smaller sites, which would not contribute to any major infrastructure improvements and are likely to be limited by their impact on the character of smaller settlements, should not be supported.
- Should allow for the minor growth of every rural parish via windfall development during the proposed plan period up to a 5-dwelling limit (Refer to Greater Norwich Local Plan).

Development Locations – Main Transport Routes

- 2.55 A total of 198 responses were made to the corresponding question (Q.14), *Should development be concentrated on the main transport routes (A47, A11 or others)?* 70% of respondents to this question indicated that development should be concentrated on the main transport routes. Respondents' comments supporting this option are summarised below:

Reasons why development should be concentrated on the main transport routes.

- New development should be close to well-developed transport routes. People need to get to places where they work.
- Massive investment has been made on these main routes and this should be capitalised on to make Norwich accessible to people for work.
- Amenities and infrastructure already exist, transport routes more acceptable to volumes of traffic. Closer to jobs/bus links/retail/rail links, more suitable for construction traffic.
- The district is well-served by the A11 and A47 trunk roads. It is entirely sensible for the Council to capitalise on the links that these roads provide, particularly given the infrastructure improvements planned for the road network. If the Council wants to capitalise on

these links, it should not solely direct all growth to the market towns that have access to these transport corridors. It will be necessary to consider how growth in the rural settlements in close proximity to these roads can also play a role in capitalising on these links.

- A key consideration when identifying locations for development should be the opportunity existing / proposed transport infrastructure plays in relation to the scale and density of development that can be accommodated. On this basis, key infrastructure routes in the district, such as the A47, A11, and existing infrastructure, will be key considerations in locations for growth.

Settlement Boundaries

2.56 A total of 184 responses were made to the corresponding question (Q.15), *Do you think that the Local Plan should continue to define settlement boundaries or rely on a criteria-based policy?* 53% of respondents indicated that they agreed with retaining settlement boundaries as they provided certainty, with some agreeing that a criteria-based policy should also be incorporated.

2.57 Respondents who indicated ‘no’ (21%) to settlements boundaries mostly expressed the requirement for a criteria-based policy approach. It should be noted that 27% of responses to this question indicated they were “unsure”.

2.58 Comments are summarised below:

Should the Local Plan continue to define settlement boundaries or rely on a criteria-based policy?

- Criteria-based policy could result in more legal disputes – developers seeking to stretch parameters.
- Criteria-based policy allows for infill development reducing large-scale development allowing services to incrementally increase to accommodate residents.
- Criteria-based approach should be less rigid than proposed. Could include a definition of what is defined as a built-up area, with proposed development within and adjacent to such areas deemed acceptable in principle – see Huntingdon DC approach: built-up area is considered to be a distinct group of buildings that includes 30 or more homes. Land which relates more to the group of building rather than to the surrounding countryside is also considered to form part of the built-up area.
- Settlement boundary approach would result in over-development in some places with other communities missing out.
- Removal of settlement boundary would see a decrease in exception sites for affordable housing.

- Settlement boundaries preserve the countryside.
- Settlement boundaries for small settlements only.
- Some settlement boundaries could be expanded.
- Settlement boundaries should be extended around committed sites / allocations at edge of settlements.
- Should be led by service needs.
- Should be based on merits guarding against sprawl into countryside.
- Flexible approach to windfall is needed on edge of higher order settlements where good access to services.
- Should consider a flexible mechanism that ensures policies do not restrict development when a 5-year housing land supply cannot be demonstrated.
- New tier should be created for small other villages / hamlets not captured by settlement boundaries – specific policy to allow small appropriate housing schemes to come forward.

Headline 4: The Economy

2.59 A total of 1,279 individual responses were made to the corresponding questions in Section 5 The Economy: The Issues of the consultation Report, with Q.22. (150 responses) and Q.23. (157 responses) being the most answered questions.

Q.22. Should the Council plan for the minimum economic growth needs required to meet the minimum increase in housing need or seek to increase or maximise inward investment and local employment opportunities by planning for across the plan period?

2.60 41% of respondents to this question indicated support for minimum economic growth with comments summarised below:

Reasons for minimum economic growth

- The council is more likely to attract inward investment if it has a clearly defined aim and objectives throughout the plan period.
- Economic growth should not come at the cost of greenfield sites and should only meet the needs of minimum housing growth.
- If The Brecks are prioritised as a National Park/Landscape, some additional economic growth should be planned for, due to increasing needs of tourism.
- Forward looking businesses will find own solutions.

2.61 25% of responses to this question indicated support for maximum growth with comments summarised below:

Reasons for maximum economic growth

- Only via environmentally sustainable industries.
- Aim for more than minimum as setbacks and chances of hitting target are increased.
- Should always maximise the local economy without altering “the working character of the countryside” (Issues & Options Report). Economic activity should be focused on the under-performing market towns.
- A district wide approach to address imbalances between urban and rural communities.
- Housing growth in the district is not the dynamic behind economic growth.
- Increase the range, size and location of employment sites to diversify economic activity.
- Social and environmental factors need to be considered.
- The level of new homes should be supported by significant employment growth.
- Planning for an appropriately higher but sustainable level of economic growth allows more flexibility.
- Local Plan provides an opportunity for further growth to boost investment – demand for employment space continues to decline (IPMA), i.e., demand outstrips supply.
- Norfolk is developing as an economic growth area.

2.62 It should be noted that 35% of responses to this question indicated they were unsure or gave no direct preference, of which comments are summarised below:

Other economic growth comments

- Economic growth is not the main factor.
- There should be an Economic Development Strategy prepared that assesses the land and property infrastructure necessary to support agreed housing need, and to deliver new businesses in higher paid, growth sectors.
- Para.5.7 of consultation Report – of the given scenarios there is concern about there not being enough jobs for the local workforce, resulting in a higher unemployment rate or unsustainable commuting.
- NPPF para 81 – provides a clear direction, “...policies and decisions should help create the conditions in which businesses can invest...”
- Plan ahead, not behind.
- A full update of the Employment Growth Study should be undertaken to inform employment strategy and allocations.

Q.23. Do you agree with the current approach of concentrating industrial space in the market towns and Snetterton?

- 2.63 66% of responses to this question indicated support for concentrating industrial space in the market towns and Snetterton, due to proximity to major link roads and services, support of housing growth and mitigating the need for commuting. A summary of comments is set out below:

Reasons for concentrating industrial space in the market towns and Snetterton.

- Not all market towns have good transport links.
- Swaffham is close to A47, ideal for East West traffic but serious traffic issues in the town centre caused by North South traffic.
- Market towns provide opportunity than other categories.
- Support needed for flexible “starter units” in villages and smaller towns to provide employment opportunities.
- Restriction on size of development should apply.
- Preserves rural areas.
- Residential areas should be away from industrial areas.
- Use brownfield sites.
- Snetterton - yes but only after adjacent towns have infrastructure improved.
- Snetterton close to A11 and away from residential areas.
- Snetterton has opportunity for allocation of additional employment land, e.g., Twells Business Park.
- Should not preclude alternative mixed-use locations e.g., Robertsons Barracks.
- A balanced approach with flexibility to allow existing businesses to grow.
- Continue to focus growth on locations such as Attleborough to support growth within the SUE.
- The Council should recognise the opportunity for development on the edge of Brandon.

- 2.64 12% of responses to this question indicated that they did not support the proposed approach. It should be noted that 22% of respondents indicated that they were either unsure or gave comments indicating neither preference. A mix of comments are summarised below:

Other economic growth comments

- Need for green energy on sites.
- There are several disused MoD sites.
- Inadequate small roads.

- Where possible industry should be in proximity to rail links to minimise road freight.
- Develop existing sites further.
- Snetterton is not a market town, would impact heavily and overwhelm surrounding villages.
- Snetterton – increased industrialisation does not benefit its residents, impacts the environment, local consultation is required.
- Snetterton is one of the highest points in Norfolk – building height must be kept low.
- Eccles – no as greener community.
- Dereham is over subscribed.
- Swaffham should be prioritised.
- Breckland is strategically well placed for economic growth due to its location on the Cambridge – Norwich Tech corridor with train and key road links.
- Approach is too fixed, should look at each settlement.

Headline 5: Assets of Community Value

2.65 A total of 116 responses were made to the corresponding question in section 6, Assets of Community Value: The Options.

Q.34. Do you think the Council should develop policies towards providing greater protection for the rural community facilities such as public houses and local shops and valued facilities?

2.66 89% of responses indicated support for policies for greater protection of rural facilities to ensure the sustainability of villages, promoting independence, and that policies should be flexible. Comments are summarised below:

Reasons for policies for greater protection of rural facilities

- Policies should be flexible to allow facilities to become ‘one-stop shops’.
- Only where there is a need.
- Start-up funding would help.
- Provide support to Parish Councils who are best place to identify ACV and NDHAs.
- Provided it does not mean redundant buildings as a consequence.
- A nuanced, location-by-location, facility by facility, approach has to be provided for.

Headline 6: The Built Environment

- 2.67 A total of 558 responses were made to the corresponding questions in section 7, The Built Environment: The Issues, with Q.39 being the most answered question (128 responses).

Q.39. Do you think the council should introduce special controls that prevent the demolition of non-designated, locally important heritage assets?

- 2.68 84% of responses to this question indicated that there should be special controls to prevent demolition of locally important heritage assets. Few comments were made of which are summarised below:

Comments in support of special controls

- Sites should be listed within a schedule of non-designated heritage assets.
- Use local knowledge within Town/Parish Councils and NPs.
- Landscapes should be included.
- Include WW2 Nissen Huts.
- In relation to the Watton NP.

Headline 7: The Natural Environment

- 2.69 A total of 825 responses were made to the corresponding questions in section 8, The Natural Environment, with Q.45. (150 responses) pertaining to water quality being the most answered question.

Q.45. Do you think that the Local Plan should introduce specific policies including ones around agricultural development to help address issues over water quality of our rivers? Please explain what these should be.

- 2.70 81% of responses to this question indicated that local policies should be introduced to address issues over water quality addressing agricultural practices and development. Many comments were made including from the Environment Agency and Natural England, of which are summarised below:

Reasons / comments for introduction of policies to address water quality issues.

- Stricter controls to protect from agricultural pollutants.
- Farmers with riparian rights over watercourses must be compelled to maintain and remove any growth that impedes the watercourse natural flow.

- Consideration to proposals for Change of Use as farmers diversify. Resilience of water supply/treatment must be carefully assessed when considering any development.
- No developments on agricultural land.
- No development should be allowed unless the appropriate infrastructure is already in place to deal with water issues including a restriction on agricultural usage.
- No large developments / industrial scale poultry farming should be allowed near our rivers.
- Control over intensive farming infrastructure for chickens/cows. Encourage construction of tailing dams to reduce slurry runoff to rivers. Encourage facilities for processing farm waste for re-use.
- New development should be connected to sewage works.
- Arrangements for surface water run-off and piping away surface water to avoid local pollution should be embodied in a 'polluter pays' principle for all new development. Development should be accompanied by requirements for on-site treatment and mitigation. If not practicable the treatment should be specified and required elsewhere to neutralise any discharges.
- Carbon neutrality and zero environmental impact would cover such requirements.
- Farmers should be encouraged to use organic and sustainable farming methods.
- New installations should be allowed with consideration of water treatment e.g., reed bed.
- Specific 'criteria-based' policy referable to the River Wensum, flood plains and tributaries should be devised to determine a geographical distance (catchment) e.g. 1 km, wherein any strategic / major residential or commercial development is to be restricted and subject to a sequential test (alternative locations / sites) and environmental impact assessment based on parameters to be agreed with Breckland DC and Natural England, such as assessing alternative locations first and if no realistic alternatives are available, then assessing water quality / nutrient impacts and requiring developers to demonstrate 'nutrient neutrality' if the sequential test is passed, that adequate infrastructure is in place and that there is no risk of negative impacts on the River Wensum flood plain in order for sites to proceed.
- Watton Brook is a rare chalk stream. It gets filled with silt because of run-off from fields and the Environment Agency's policy is not to dredge chalk streams. We ask that planning policy recognises this rare stream and that any outflow from businesses has very secure back-up systems so that untreated water does not enter the stream.
- Environment Agency - We note you have included in 8.11 that "A ministerial statement in July this year has proposed via the future Levelling Up Bill that a statutory duty is placed on Water Companies to ensure that relevant Wastewater Treatment works are upgraded to filter out all nutrient pollutants from development to the highest

technical achievement, which should alleviate some of the nutrient pressures on these protected water ways.” It is not passable to filter out all nutrient and so this will need to be edited. The words ‘out all’ should be cut out and the phrase, highest technical achievement should be amended to highest technical limit to make this statement accurate.

- Environment Agency - SUDS are also useful for recharging aquifers and reducing pressure on sewage treatment infrastructure.
- The plan should be developed to leave scope for anticipated improvements to water efficiency of building fitments such as toilets and showers, as identified in the recently published DEFRA’s plan for water.
- Environment Agency (East Anglia) - Policies to ensure the light sandy soils are not washed into the rivers by inappropriate farming practices.
- Policies to help reduce flood risk to developments downstream by using natural flood risk management by identifying land use adjacent to watercourses for such schemes rather than farming right up to the river, and reconnecting the flood plain so nutrient and silt rich flood water drops its load onto natural flood plains.
- Natural England - specific policies that help to address water quality issues, promote sustainable drainage systems (SuDS) and water sensitive design as part of a wider green infrastructure approach.

Biodiversity Net Gain: Q43. Do you consider that a higher biodiversity percentage than the statutory minimum of 10% should be delivered by new development in the district? If so what % and give reasons for your answer.

- 2.71 It is important to note that Q.43. (129 responses) received a modest 59% of responses indicating that a higher percentage of biodiversity should be delivered. A range of percentages were called for, from 15% to 100%. A 20% Biodiversity Net Gain figure was the most popular percentage called for.

Headline 8: Tackling Climate Change

- 2.72 A total of 196 responses were made to the corresponding questions in section 9, Tackling Climate Change: The Options, with Q.48. the most answered question (128 responses).

Q.48. Would you be supportive of any of the above proposals within Breckland’s development and design policies? Please state which ones and reasons why.,

- 2.73 76% of responses indicated support for the proposals with development and design policies, with many indicating that all of the policies were supported to mitigate climate change, as well as emphasising the more important ones. Comments are summarised below:

Reasons for supporting proposals.

- It is important that the sustainability policies do not restrict the delivery of housing across the district to meet the requirements of the NPPF, these policies must be supported by a robust evidence base and viability assessment that demonstrates policies and targets are deliverable.
- Passivhaus standards.
- Solar panels.
- Clean energy on all new builds. More electric car charging points. Wind turbines to supply some power to industrial areas as in Eye, Suffolk. There should be ongoing subsidies and grants to assist existing homeowners to upgrade and adopt as many of the options as possible.
- District heat and power may be unattainable with the possible exception of Snetterton.
- Cycle ways, green spaces, local shops.
- Photo voltaic cells in appropriate locations, grey water recycling, cycle ways, allotments.
- Greywater - incentivise homeowners. The real need is cheaper energy. Better broadband for home working, reduce light pollution, green infrastructure.
- Using regulatory powers to influence change including, planning, waste, recycling, and environmental protection.
- Breckland's biggest contribution to CO2 emissions is car use. Housing and economic development must be within or next to existing settlement where walking, cycling or appropriate public transport are all available.
- Construction standards should include under the maximisation of sustainable energy policies to require the fitting of solar panels to new south-facing domestic and commercial roof spaces.
- Provided it is demonstrated they are needed. And is viable.
- Don't go far enough. Strict zero tolerance for climate change issues should be enforced.
- Tree planting in urban areas is encouraged - Natural England refers you to the urban tree manual from Forest Research, which provides advice on ensuring the right tree in the right place in urban areas. Policy should ensure that all planting is done in accordance with British Standard BS 8545:2014.

Headline 9: A Safe and Convenient Transport Network

2.74 A total of 302 responses were made to the corresponding questions in section 10, A Safe and Convenient Transport Network, with Q.50. being the most answered question (155 responses). This question formed a ranking style question asking respondents to rank in order which option they considered the most important option. Most respondents (39%) favoured option 1.

Development should seek to minimise the need to travel i.e., be located to facilities and services as the most important, followed by option 4. Improved digital connectivity (21%), and then option 5. (13%) Improved, realistic and safe cycle and walking routes within market towns and from rural villages to market towns within a reasonable distance.

- 2.75 Many respondents indicated that all of the options were equally important, with some respondents proposing other options and general comments as summarised below:

Other proposed options / comments

- Build a railway from Kings Lynn to Great Yarmouth linking up Breckland market towns.
- Use offshore energy locally.
- Enhanced public transport.
- Sustainable travel e.g., active travel and trains.
- Leave rural areas alone.
- No 20 min city proposals.
- Introduce Three Phase electricity to allow people with 'spare' land to harness solar power to feed back into the grid.
- Reduce speed limits to encourage active travel on country roads.
- Dereham – deliver major active travel routes and open spaces networks via development.
- The options should all be a combined set of expectations.
- Development in market towns provides opportunity for sustainable development.
- Improvements should be part of a wider sustainable transport strategy.
- National policy indicates a range of measures which should be included within any sustainable transport strategy.
- Network Rail – introduce policies to make communities safer by targeting closure of level crossings, as well as seek costs for these from development to mitigate impacts.

Headline 10: Infrastructure

Renewable Energy - Q53. Do you think the current policies are working to encourage more renewable energy development in Breckland? If no, what other options should the Plan consider?

2.76A total of 221 responses were made to the corresponding questions in section 11, Providing infrastructure which supports development, local communities, and businesses with Q.53. being the most answered question (135 responses).

- 2.77 In the analyses of responses to this question, overall responses indicated that more needed to be done locally or nationally to enable more implementation of renewable energy. There was also much emphasis for support for solar power and heat pumps to be implemented in new developments.
- 2.78 50% of responses to Q.53. indicated that they were unsure, or gave no preference, or commented generally. A mix of comments are summarised below:

Renewable Energy Comments

- Localised wind turbines and solar arrays where possible. If a community has a certain number of residents, then it should be positively pushed towards the installation of a technology to help reduce carbon footprint. These schemes should help reduce energy bills.
- Evidence required.
- Affordable EV charging points in Dereham.
- Community-owned power generation.
- More wind farms.
- Anglian Water would welcome a criteria-based policy for renewable energy development where it supports the zero carbon targets of essential infrastructure providers and enables energy security and greater resilience for our operations. Whilst the installation of some renewable energy development such as solar, on our operational land is permitted development, we would welcome positive policies for renewable energy where this provides further opportunities for securing net zero ambitions within or close to our operational sites.
- The Council should actively seek to improve the power infrastructure for the district, and this shall include improving distribution and capacity of the existing network in key growth locations as well as renewable energy development and as other forms of power generation such as AD plants to support local power requirements.
- NWT are aware of the national legal requirement to reach net zero by 2050. Given the impacts of a rapidly changing climate on Norfolk's wildlife, would urge the Council to adopt sufficient policy measures to ensure that this target is reached as soon as possible. We would welcome additional policy support for renewable energy provision targets on all new development, where practicable, given the efficiencies of inclusion in the original build versus retrofitting.

- 2.79 39% of responses to Q.53. indicated that they did not think the current policies were working to encourage more renewable energy, of which Comments are summarised below:

Renewable Energy - Reasons why Policies are not Working.

- All new build developments should incorporate air/ground source heat pumps and PV with battery storage for heating and lighting. Glazing should exceed that required under the current Building Control Regulations. Grey water systems and porous driveways should be the norm.
- Grants / support for solar and heat pumps.
- Promote guidance for reducing carbon footprints.
- EV charging points.
- More spatial planning for renewable energy – identifying suitable areas.
- Solar parks on low grade sites.
- Snetterton power station has a massive expanse of roof space that can be used to install solar panels, but they aren't allowed.
- Design guides and other means should be sought and found to ensure that solar panels become compulsory for new south-facing roof spaces, both on domestic and commercial properties.
- Relaxation of rules for small scale domestic wind generation (1-3kw) to a permitted development level similar to that existing for solar. This will help bridge the gap between solar in the sunny seasons and winter when the energy is needed for heating. Promote individual investment into wind farm facilities in return for reduced/offset energy rates.
- Greater emphasis on major solar schemes and creating additional grid capacity and private wire connections to new planned and existing employment uses is required.
- Pollution.
- Increased encouragement and explicit support for all forms of renewable energy schemes should be included including direct reference to how such schemes will be assessed when planning applications are submitted, and how the need for renewable energy will be balanced with other factors.

2.80 It should be noted that only 10% of responses indicated that they thought the policies were working.

Headline 11: Open Space, Sport and Recreation

2.81 A total of 372 responses were made to the corresponding questions in section 12, Open Space, Sport and Recreation, with Q.57. the most answered question (111 responses).

2.82 It should be noted that most responses (48%) to this question indicated that they were unsure or expressed an opinion, with many indicating that more green open spaces were needed, particularly large open spaces.

- 2.83 33% of responses indicated that the policies were not working with many comments indicating that more open spaces were needed, and that policy needed to reflect this. Comments are summarised below:

Reasons / comments as to why policies are not working.

- Given all the clay below Swaffham I'm surprised that nobody has proposed a reservoir to mitigate the increased likelihood of dry summers and provide a lido for waterworks.
- A more innovative approach should be adopted by delivering a variety of open spaces with different approaches within the same area e.g. children's play in close proximity to community gardens and green wilder areas. Active transport routes should lead to open space provision.
- All the newer developments do not have enough green space; gardens are too small.
- Lack of delivery. New policies should be put in place in the emerging Local Plan to link and cross-fund semi-natural recreational and sports spaces to new planned housing and employment growth. Priority should be given to development proposals that deliver new major open spaces.
- Maintenance and security are poor. Facilities often abused.
- Green space is unprotected and access to it is poor.
- Not robust enough or adhered to.
- The Open Space Assessment underpinning the current Local Plan is significantly out of date (2015) and a fresh assessment is required.
- Current Open Space policy fails to recognise the contribution that informal green space can make to the quality of a development, and to quality of life, focusses solely on formal sports provision and Childrens' play. This is considered to be an outdated approach that needs to be revised. A greater degree of flexibility is required to enable developments to respond to specific local needs, and greater emphasis should be given to the quality of open spaces rather than just quantity. Greater clarity is needed on how off-site contributions will be calculated; this should be contained within a Supplementary Planning Document.
- Policy ENV04 in the current local plan restricts the loss of designated open space, it being only permitted if it can demonstrate that there is an excess of open space, or if recreational facilities can be improved by the proposed development or alternative better open space is being provided. We know of examples in Watton where this policy of restricting loss of designated open space has not been applied. We have little such space in Watton and need all we can get. We also are concerned that BDC decides where open space will be and that not necessarily in the town/village where the development is built.

- Just because somewhere is rural does not mean you can ignore access to open spaces particularly when it is within the gift of landowners to include it in development plans, there is no incentive for them to do so.

2.84 19% of responses indicated that the policies were working.

Headline 12: Any other Issues or Options?

2.85 A total of 109 responses were made to the corresponding question (Q.60. Do you have any additional views or suggestions with regards the Local Plan and the issues it should address?), with 70% of responses offering views / suggestions regarding the Local Plan with many identifying issues it should address. A summary of the issues can be viewed in Appendix 1 to this Report.

2.86 Many of the responses expressed the view that whilst the Issues and Options questionnaire was very comprehensive it was too long, i.e., too many questions of which few questions appeared to have errors (ranking questions where options were repeated – noted in the officer’s analyses), and that the Issues and Options Consultation Report was too complex and difficult to understand with use of technical terminology and phrases. Some comments suggested that to be able to answer the questions, a requirement was needed to read supporting technical documents which were also too long and complex.

3. Focussed Issues & Options Consultation (Development Strategy Options/Settlement Boundary Principles/Call for Sites)

- 3.1 In accordance with Regulation 18, between 8th January 2024 and 19th February 2024, the Council consulted on the Regulation 18 (Development Strategy Options/Settlement Boundary Principles/Call for Sites Phase 1 Analysis) documents. These papers sought views on alternative development scenarios to consider how growth could be distributed across the district, approaches to defining settlements and protecting the countryside and a full list of sites submitted with each assessed according to proposed criteria.
- 3.2 The feedback and key themes emerging from this consultation will inform the strategic spatial options, District and settlement visions and themes which are presented in the Preferred Options Consultation / Draft Local Plan (Regulation 18) due to be published Spring 2024.

Summary of Consultation Process

Public Engagement

- 3.3 In line with the Council's Statement of Community Involvement (SCI), a variety of methods were used to promote the Regulation 18 consultation and engage with interested parties as set out below. The consultation ran for a statutory 6-week period avoiding the Christmas school holiday.

Publicity and Notification

- 3.4 Advanced publicity of the forthcoming formal public consultation was carried out in accordance with the Council's adopted [Statement of Community Involvement \(SCI\)](#) and included: Email notifications to statutory consultees and via the Planning Policy Mailing List and Publication on the Council's website.

Methods

- 3.5 During the formal Regulation 18 consultation both the full topic papers and summary information setting out the key points were available across the district.
- 3.6 The Regulation 18 topic papers covered:
 - Alternative development strategies - sought views on six alternative development scenarios that explore how growth could be split across the towns and villages and also focused on larger previously developed, 'brownfield' sites.
 - Settlement Boundary Principals – sought views on approaches to defining settlements and protecting the countryside from development.

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- Call for Sites - containing the full list of sites submitted with each site assessed according to the proposed criteria.
- 3.7 This consultation also sought views via the Commonplace webpage on the following questions:
- Do you agree with the methodology for deciding which parishes should be Local Service Centres?
 - Should Breckland continue with a settlement boundary approach or develop a robust criteria-based policy?
 - Do you agree with this new criteria for assessing sites?
 - Please drag and move the options below to rank in order of preference, the six alternative development scenarios
 - If you think there are any other development strategies that could be considered, or areas that you think should have more or less development, please share your ideas.
- 3.7 This consultation has been an important step along with the previous consultation exercise in gathering feedback to support the development of the Draft Local Plan exploring the options for the development strategy and how the sites proposed can fulfil the objectives of the district and its diverse settlements.
- 3.8 The full set of documents, including ‘quick links’ were published online at <https://www.breckland.gov.uk/article/19942/Local-Plan-Full-Update> along with a link to the Commonplace community engagement platform at <https://brecklandlocalplan.commonplace.is/>

Community Engagement

Public Events

- 3.9 The consultation was undertaken by the Council’s appointed community engagement consultants – Filigree Communications Ltd. Events included two external ‘drop by’ public events at Attleborough Charter Market and Dereham Market allowing the public to view display boards, publicity posters, to ask questions, including on the Local Plan process, and give feedback on their views. Paper comment forms were also available at these events for those attendees without internet access, or who may have found it easier to handwrite a consultation response. Attendees could also take away QR code business cards which they could scan and access the Commonplace platform.

Virtual Online Events

- 3.10 One virtual online event was also undertaken by Filigree Communications Ltd, (via prior registration).

Social Media

- 3.11 A sustained social media campaign, to promote public engagement throughout the extended community engagement process period, including posts on Facebook, Instagram, Twitter and LinkedIn between 8th January 2024 and 19th February 2024. These comprised general publicity about the consultation (e.g., housing, climate change or the economy), and details of public events taking place.

Response Rate

- 3.12 The consultation consisted of four focus main subjects with the aim to identify how and where to direct development in the district. The four subjects were the following:
- Alternative Development Strategy Options (387 responses)
 - Potential Development Sites (178 responses)
 - Sustaining Rural Community Services (197 responses)
 - Towns, Villages, Countryside (180 responses)
- 3.13 A total of 1,186 submitted responses were received to the Regulation 18 Consultation with respondents including individual residents and businesses, representative bodies including Parish/Town Councils and community groups, those representing the development industry such as landowners and site promoters, as well as statutory consultees.
- 3.14 The vast majority of comments were submitted via the Commonplace portal (942 [79.4%]), with the remainder submitted by email or post (244 [20.6%]).

Table 3: Consultation Submission Methods

Submission Method	No. of Responses (comments)	%
Commonplace portal	942	79.4
Email / paper	244	20.6
Total No. of Submissions	1186	100

Processing the Consultation Comments

- 3.15 All comments received were reviewed and any discriminatory or sensitive information redacted before being recorded as duly made. During the consultation respondents ranked six alternative development scenarios that explore how growth could be split across the towns and villages or whether

to focus on larger previously developed, ‘brownfield’ sites. In addition to ranking the development scenario options, many of the respondents made additional comments when asked if they think there are any other development strategies that could be considered, or areas that they think should have more or less development. Consultees were also asked for their views on proposed new criteria for assessing potential development sites and Local Service Centres and whether Breckland should continue with a settlement boundary approach or develop a robust criteria-based policy.

Consultation Summaries

- 3.16 This section provides summaries of the representations received in response to the consultation. It provides an overview of responses received from statutory consultees and stakeholders. A summary and analysis of **all the representations received** in response to the consultation can be found in **Appendix 3** to this Report. A definitive summary of **all statutory consultees representations** can be found in **Appendix 4** to this Report.
- 3.17 After all comments were processed in the manner described above, the representations received were reviewed and analysed, looking at each comment individually, with the prevailing issues summarised. These summaries and analyses are presented in the relevant tables further below in this report.
- 3.18 The summaries are a reflection of the alternative development options, preferences and issues raised during the consultation. They do not record every single comment or view that was made during the consultation.
- 3.19 The key themes emerging from the comments received during this consultation will be taken into account and used to inform the preparation of the next stage of the Local Plan process.

Summary of Consultation Responses

- 3.20 This section provides summaries of the representations received in response to the consultation. It provides an overview of responses received from statutory consultees and stakeholders.
- 3.21 Representations included statutory consultees, individual representations and other stakeholders (planning agents, developers and other interested organisations).

Key Report Headlines

Headline 1: Responses and Respondents

- 3.22 This report presents a range of findings based on the ranking exercise and additional views expressed, summarised, and presented in this report.
- 3.23 In total, 1186 submissions were received during the consultation. Many responded to the topics that interested them the most, out of the four consultation subjects, the Alternative Development Strategy Options got the most responses with 387 responses.
- 3.24 These respondents comprised a wide range of different stakeholders, including local residents/businesses; agents/developers/landowners; town, parish and parish meetings; statutory/non-statutory- organisations and trusts; and local campaign groups.

Table 4: Respondents Connection to Area

Connection	Total number of responses
Resident	500
Employer	3
Councillor	62
Other	40
Unknown	284

- 3.25 As set out in the table below, when examining the responses related to age, the majority of individuals who responded fall into the 55-64 age group, with 218 respondents. Following are those aged 65-74, with 162 respondents, and the 35-44 age group, which had 101 respondents.

Table 5: Respondents Age Group

Age	Total number of responses
13-15	0
16-24	1
25-34	22
35-44	101
45-54	97
55-64	218
65-74	162
75-84	86
85 or over	15
Prefer not to say	26
Unknown	191

Alternative Development Option Strategies

3.26 This section of the consultation asked for views on six alternative development scenarios that explore how growth could be split across the towns and villages and also focused on larger previously developed, 'brownfield' sites. This was done through a ranking exercise, respondents were asked to drag and move the six options to rank in order of preference, the six alternative development scenarios.

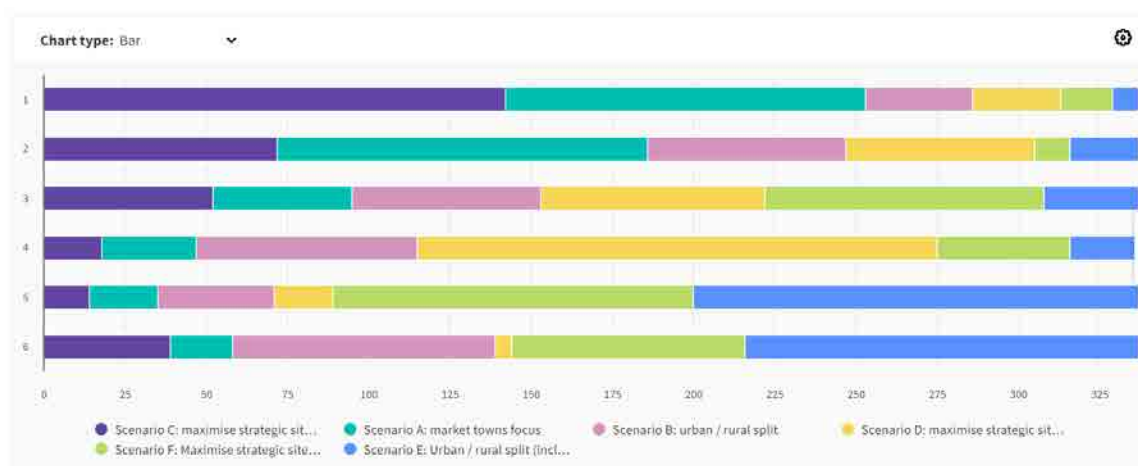
The development scenarios were the following:

- A: Market towns focus
- B: Urban / rural split
- C: Maximise strategic sites
- D: Maximise strategic sites and urban / rural split
- E: Urban / rural split (including Villages with Boundaries)
- F: Maximise strategic site and urban rural split (including Villages with Boundaries)

A total of 451 comments were made in addition to the ranking exercise. Most respondents were acceptant towards some form of the proposed growth options and provided further suggestions, while some of the respondents opposed to all growth options.

3.27 Below is a chart that explains in which order of preference people ranked the different the six proposed scenarios. From the responses, scenario C Maximising strategic sites came out as the most popular option followed by scenario A Market town focus and in third place is scenario F Maximising strategic site and urban rural split (including Villages with Boundaries).

Chart 1: Alternative Scenarios Ranked by Preference



3.28 In addition to the ranking exercise, respondents made the following comments summarised below:

- North Lopham, Mattishall, Mundford, Beeston, Thompson, Watton, Harling, Carbrook Village lacks necessary infrastructure.
- New housing should be considered near existing sites of major employment.
- Development should be directed near existing infrastructure.
- Development should support and be complimentary to villages.
- There should be a clear focus on infrastructure including new/improved road, public transport, schools, health facilities, shops,
- More development welcome in villages but keep main focus to market towns.
- Keep historical balance between sizes of towns and villages.
- Avoid rural/village development.
- Market town preference with scaled up infrastructure.
- Beeston lacks necessary infrastructure to meet LSC requirements.
- Housing growth should be focused near jobs and infrastructure, reducing the need to travel by car.
- Avoid development in areas prone to floods (Yaxham, Saham Toney, Attleborough).
- Prevent villages merging.
- Distribute growth regardless of settlement hierarchy.
- Recognise settlements / villages that are part of a group of settlements centred around a Local Service Centre, creating village clusters.
- New Town either side of the A11 near Wretham Heath.

3.29 As set out in the table below, when examining the responses related to age, the majority of individuals who responded fall into the 55-64 age group, with 96 respondents. Following are those aged 65-74, with 57 respondents, and the 45-54 age group, which had 50 respondents.

Table 6: Respondents Age Group

Age Group	Number of Responses
13-15	0
16-24	1
25-34	9
35-44	41
45-54	50
55-64	96
65-74	57

75-84	38
85 or over	5
Prefer not to say	6
Unknown	84

3.30 Regarding respondents' connection to Breckland, 239 residents, 2 employers and 23 councillors expressed their views on development growth options in Breckland.

Table 7: Respondents Connection to Area

Connection	Number of Responses
Resident	239
Employer	2
Councillor	23
Other	18
Unknown	105

Potential Development Sites

- 3.31 The Potential Development Sites consultation aimed to uncover respondents' views on a proposed new criteria for assessing potential development sites. The proposed criteria – or checklist for assessing sites – considers a number of aspects such as whether it is a 'brownfield' site i.e. previously developed land or 'greenfield'; whether there is suitable access to roads, footpaths; the visual impact development might have on the landscape; as well as whether the site is immediately available.
- 3.32 For each site, the Council proposes to indicate potential suitability against these considerations using a traffic light system (red = likely not suitable, amber = might be suitable and green = likely suitable).
- 3.33 Out of 178 response 84 agreed with the traffic light proposal while 85 respondents were against and 9 didn't give an answer to the question.
- 3.34 When analysing the responses focusing on age, of the people who support the proposal, the largest group of respondents were in the 55-64 with 23 counts, followed by 65-74 with 11 counts and the 35-44 age group with 9 counts. 7 people responded from two groups, 45-54 and 75-84 and 1 respondent was aged 85 or over. 19 respondents' age is unknown and 3 preferred not to disclose their age.
- 3.35 Of those who responded with 'No' to the consultation, 21 identified in the 55-64 age group followed by 20 respondents in the 65-74 bracket and 13 in the 35-44 group. 8 people who responded were between 45-54 and 7 were between 75-

84 while one person was aged 85 or over. 12 respondents' age is unknown and 3 preferred not to disclose their age.

Table 8: Respondents Age Group

Age group	Number of 'Yes' responses	Number of 'No' responses
13-15	0	0
16-24	0	0
25-34	4	0
35-44	9	13
45-54	7	8
55-64	23	21
65-74	11	20
75-84	7	7
85 or over	1	1
Prefer not to say	3	3
Unknown	19	12

- 3.36 In terms of respondents' connection to Breckland, 32 residents and 6 councillors support the proposed site assessment method while 49 residents and 8 councillors objected.

Table 9: Respondents Connection to Area

Connection to Breckland	Number of 'Yes' responses	Number of 'No' responses
Resident	32	49
Employer	0	0
Councillor	6	8
Other	6	3
Unknown	40	25

- 3.37 Upon analysing the data segmented by villages, we observed the following top 4 villages with the highest number of 'yes' and 'no' responses.

Table 11: Response by Settlement

Parish / Village	Yes	Parish / Village	No
Rocklands	9	Rocklands	15
Yaxham	7	Thompson	7
Beeston with Bittering	5	Old Buckenham	5
Dereham	5	Beeston with Bittering	4

Sustaining Rural Community Services

- 3.38 Within the Settlement Hierarchy, a Local Service Centre is defined as a parish that has five key elements – a primary school, a village shop, public transport, a community facility (such as a village hall, pub, restaurant or cafe) and employment. Consultees were asked whether they agree with the methodology for deciding which parishes should be Local Service Centres.
- 3.39 Out of the total respondents 197, 97 indicated a negative response ('no'), while 95 responded affirmatively ('yes') while 5 respondents didn't give a direct answer.
- 3.40 When respondents were asked to explain their answer to deciding Local Service Centres, the following points were made:
- Some respondents expressed confusion about the criteria for a village to be considered a Local Service Centre. Pointing out inconsistencies that some village needing to meet 5 services while only 3 in another.
 - There were concerns about the lack of infrastructure and services, and the impact on sewage and water distribution. Respondents felt that these factors were not being adequately considered when designating a village as a Local Service Centre.
 - Some respondents felt that there should be a minimum number of services available for a village to become an LCS. They also suggested that transport should always be one of the three services.
 - Some respondents felt that a village should not have to fit every criteria to be considered a Local Service Centre. They suggested that a village with everything apart from a shop may still be suitable for development, and the additional houses and residents could then help to support and justify a shop.
 - Further key point raised were key points raised included the need for development to meet the needs of present and future residents, concerns about whether the current infrastructure levels can sustain more people, and the importance of local employment opportunities.
- 3.41 When analysing the responses with a focus on age, the largest group of supporters for the proposal falls within the 65-74 age range, with 19 respondents. Following closely are the 55-64 age group, which had 18 respondents, and the 75-84 age group, with 11 respondents. From the 35-44, 45-54 and 85 or over age groups, 6 people responded from each, and there was 1 respondent from the 25-34 bracket. 24 respondents' age is unknown and 4 preferred not to disclose their age.
- 3.42 Among those who responded 'No' to the consultation, 21 individuals fell into the 55-64 age group, followed by 17 respondents in the 35-44 bracket, and 14 in the 65-74 group. Additionally, 8 people who responded were between 45-54, 5 were between 25-34, and 4 people were aged 75-84. The age of 24 respondents is unknown, and 4 preferred not to disclose their age.

Table 12: Respondents Age Group

Age Group	Number of 'Yes' Responses	Number of 'No' Responses
13-15	0	0
16-24	0	0
25-34	1	5
35-44	6	17
45-54	6	8
55-64	18	21
65-74	19	14
75-84	11	4
85 or over	6	0
Prefer not to say	4	4
Unknown	24	24

- 3.43 Taking a look at people’s connection to Breckland, 42 residents and 4 councillors support the proposed methodology for determining LCSs, while 50 residents, 8 councillors and 1 employer objected.

Table 13: Respondents Connection to Area

Connection	Number of 'Yes' Responses	Number of 'No' Responses
Resident	42	50
Employer	0	1
Councillor	4	8
Other	6	0
Unknown	43	38

- 3.44 Upon analysing the data segmented by villages, we observed the following top 3 villages with the highest number of ‘yes’ and ‘no’ responses.

Table 14: Response by Settlement

Parish / Village	Yes	Parish / Village	No
Rocklands	18	Beeston with Bittering	32
Yaxham	7	Rocklands	9
Beeston with Bittering	5	Mundford	5

Towns, Villages, Countryside

- 3.44 The current Local Plan signals that development beyond settlement boundaries should be restricted. For some places, this can generate pressure for development. Some feedback shared so far suggests that these boundaries are too restrictive.
- 3.45 The consultation was seeking views on either continuing with a settlement boundary approach or an alternative criteria-based approach, which could mean proposed development would be considered against a defined criteria rather than an outright ‘yes or no’ based on the boundary line.
- 3.46 Out of the total respondents 180, 125 is supporting the settlement boundary approach, 46 is supporting to develop a criteria-based policy, while 9 respondents didn’t give a direct answer.
- 3.47 When respondents were asked to explain their answer regarding the settlement policies, the following points were made:
- There concerns that small villages are being designated as Local Service Centres through a tick box exercise. There’s a suggestion to develop a criteria-based policy for this.
 - While there’s a lack of detail on what a criteria-based system would look like in practice, some believe it could potentially offer greater protection to the countryside than the current system provides. However, it’s also noted that criteria-based systems can be subject to interpretation and could potentially be open to loopholes.
 - The responses also highlight the issue that most housing in some villages is too large, which doesn’t meet the housing need.
 - Maintaining settlement boundaries minimizes the risk of habitat fragmentation and allowing species to thrive in their natural environment without the disruptions caused by development.
 - Being inside the settlement boundary provides a degree of certainty as to whether the principle of development would be supported.
 - The criteria-based policy approach can help accommodate specialized housing needs, including older persons’ homes, care facilities, and self and custom builds (SCBs). These specialized housing needs may not fit neatly within the confines of traditional settlement boundaries.
- 3.48 When analysing the responses with a focus on age, the largest group of supporters of the settlement boundary approach falls within the 65-74 age range, with 33 respondents. Following closely are the 55-64 age group, which had 26 respondents, and the 75-84 age group, with 15 respondents. Additionally, 14 people responded aged between 45-54, 11 people from the 35-44 age group, and 1 respondent was between 25-34 and 1 was aged 85 or over.

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The age of 19 respondents is unknown, and 5 preferred not to disclose their age.

- 3.49 Among those who prefer a criteria-based policy approach, 13 individuals fell into the 55-64 age group, followed by 8 respondents in the 65-74 bracket, and 4 each from the groups of 35-44, 45-54 and 75-84. Additionally, 2 people who responded were between 25-34, and 1 person was aged 85 or over. The age of 9 respondents is unknown, and 1 preferred not to disclose their age.

Table 15: Respondents Age Group

Age Group	Number of responses supporting the settlement boundary approach	Number of responses supporting a criteria-based policy approach
13-15	0	0
16-24	0	0
25-34	1	2
35-44	11	4
45-54	14	4
55-64	26	13
65-74	33	8
75-84	15	4
85 or over	1	1
Prefer not to say	5	1
Unknown	19	9

- 3.50 Taking a look at people's connection to Breckland, 68 residents and 10 councillors are supporting the settlement boundary approach, while 20 residents and 3 councillors are supporting a criteria-based policy approach.

Table 16: Respondents Connection to Area

Connection	Number of responses supporting the settlement boundary approach	Number of responses supporting a criteria-based policy approach
Resident	68	20
Employer	0	0
Councillor	10	3
Other	4	3
Unknown	43	20

3.51 Upon analysing the data segmented by villages, we observed the following top 4 villages with the highest numbers of ‘Settlement Boundary Approach’ and ‘Criteria-based Policy Approach’ responses.

Table 16: Response by Settlement

Parish/Village	Settlement Boundary Approach	Parish/Village	Criteria-based Policy Approach
Rocklands	39	Thetford	4
Yaxham	9	Thompson	3
Mundford	6	Whissonsett	3
Thompson	5	Mattishall	3

4. Next Steps

Emerging Development Strategy

Progression and Draft Local Plan

- 4.1 Following the emerging strategy consultation a draft Local Plan has been prepared for consultation in Spring 2024. This consultation is planned to commence 3rd June 2024 and run for six weeks to the 15th July 2024. The responses to this consultation will be used to inform and develop the Publication Draft (Regulation 19) which will be prepared from July 2024 to December 2024.
- 4.2 As the new Local Plan progresses, the key themes raised through previous consultation have been taken into account and have informed the decisions that are made on the strategy, vision, and policies of the Draft Plan.
- 4.3 The Council continues to develop the technical evidence base that sits behind the new Local Plan and will take into account the comments received on potential gaps in this evidence base or any opportunities that require further assessment.
- 4.4 The Council will also continue to work with a range of partners including Norfolk County Council, adjoining local authorities, infrastructure providers and other statutory consultees to ensure that the implications of potential strategy and policy options on the local economy, environment, society, and infrastructure are well understood and given proper weight in decision-making.
- 4.5 The Council maintains a public timetable for its new Local Plan called the Local Development Scheme. This is published online and updated as required to provide an up-to-date timetable for future stages of public consultation.

Appendix 1. First Conversation Summary and Analysis of Representations by Question

Summary and analyses of First Conversation (Issues & Options) March to May 2023 Representations by Question

Elements & Question No.	No. of responses received	Summary of Representations
Strategic Vision: The Options		
<p>Q1. Breckland has a vision that seeks for our residents and business to thrive. Do you think this is still the right Strategic Vision for Breckland? Y/N</p> <p>Please suggest any changes that you think should be made to the Vision for the Local Plan Update.</p>	<p>206: (yes:132 no:51, unsure/other:23)</p>	<p>A significant number of respondents agreed that the vision was still right / sound and consistent with economic, social and environmental objectives of sustainable development, but many did suggest changes and inclusions, summarised below –</p> <ul style="list-style-type: none"> • Improved infrastructure accessibility for the disabled. • Prioritise 15 min / 20 min neighbourhoods to maximise holistic balance between development and nature. • Protection of environment. • Links between Nature Recovery Network, any Biodiversity Action Plans, Local Nature Partnerships, Rights of way Improvement Plans and Green Infrastructure Strategies. • Focus on public services. • Housing delivery needs to reflect the population / need e.g., affordable housing. • Improvement to cultural, recreational and tourism appeal. Which would help with economic sustainability. • Acknowledge that Strategic Growth Locations already have had significant growth committed, and that new growth will be outside of these. • Smaller housing projects – more than 10% • Include what development will be delivered. • Reflect recent government policy to achieve Net Zero by 2050. • Balanced spatial distribution is important but needs to be directed towards sustainable locations – market towns, and should take advantage of transport links (A11, A47). • More focus on use of brownfield land. • Include ‘enhance’ historic environment. <p>Respondents who did not agree or were unsure gave reasons of which are summarised below</p> <ul style="list-style-type: none"> • Lack of infrastructure to support house growth.

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Elements & Question No.	No. of responses received	Summary of Representations
		<ul style="list-style-type: none"> • Growth aimed at existing towns where infrastructure can be enhanced. • Focus on affordable housing in rural areas. • Sustainability for existing residents more important and well-being. • Ignores rural villages with no services. • Greater consideration for the environment. • More emphasis on climate change needed. • Visions should draw together agreed vision in the latest Breckland Corporate Plan. • Vision needs to be more specific. • Too much emphasis on businesses and not communities. • Transport links need improving (A47)
<p>Strategic Objectives: The Issues</p>		
<p>Q2. These objectives are based on the existing adopted Local Plan.</p> <p>Do you think these objectives are still relevant? If not, please explain why and how you think they could be improved.</p>	<p>179 (yes:85 no:58 unsure/other:38)</p>	<p>The majority of respondents agreed that the existing objectives are still broadly relevant. Many of these responders did propose inclusions to make the objectives more specific and less subjective, and that they needed to be met–</p> <ul style="list-style-type: none"> • There should be an overarching statement underlying the importance of all areas of the Plan to address impacts of climate change. • 19 objectives are excessive – should be streamlined • Needs to be a high level objective reflecting commitment to the Local Nature recovery Strategy • Net Zero objective • Public transport • Objectives should highlight potential opportunities which can be unlocked from highway infrastructure improvements (A11 and A47) • Improved infrastructure access for the disabled, and • Villages should be included in isolation • Should reference brownfield first approach – needs to align with NPPF • Objectives should acknowledge limited brownfield land, with greenfield sites needed to deliver sustainable development • Flexible approach needed in development • Objectives should acknowledge existing SUEs (Attleborough and Thetford) are already committed and that new growth will need to be in and around Dereham, Swaffham and Watton

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Elements & Question No.	No. of responses received	Summary of Representations
		<ul style="list-style-type: none"> • A new garden community should be an objective • Needs to be an objective linking job growth to housing growth • More emphasis on tourism economy • Objectives relating to ‘strong economy’ should acknowledge role of service industries (care, health and well-being) to job growth • Objectives need to be expanded to reinforce importance of developer funding for investment in physical and social infrastructure provision • Objective 6 could be strengthened through reference to working positively with landowners and developers • Objectives should include measurable targets <p>Respondents who did not agree or were unsure gave the following reasons-</p> <ul style="list-style-type: none"> • Need emphasis on a healthy environment and existing community protection – should be at heart of the vision • More emphasis on Net zero • Emphasis on enhancing quality of life by improving infrastructure and protecting Norfolk way of life / ruralness • Self sufficiency targets should be referenced • Concern that new or enhanced infrastructure is dependent on new housing growth – this is a passive approach to growth and development • Objectives should be consulted with local residents, particularly allocation of sites • The Local Plan must continue to evolve with demographic, economic and cultural shifts • Infrastructure first before housing growth • Sustainability for existing communities and business are more important • Emphasis on smaller clusters of development to avoid shock impacts • Flexible approach to housing growth required • Objectives need to consider the relaxing of the 300,000 annual housing target • Objective 18 should focus on affordable housing for rent for enabling families to stay in the area • Housing objectives should acknowledge problems from demand and provision of executive type housing and second homes from outside of the district • Brandon should be included in acknowledging housing need

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Elements & Question No.	No. of responses received	Summary of Representations
Housing Amount: The Options		
<p>Q3. As a minimum do you think the Local Plan Update should plan for Breckland's full objectively assessed housing needs based upon the most up to date Standard Methodology published by MHCLG (672 per annum) or do you think there are any issues affecting housing growth in Breckland that may justify a higher figure for example, to support any identified strategic infrastructure, greater levels of affordable housing or an opportunity to maximise economic growth?</p>	<p>193 (yes:85 no:52 unsure:52 neither yes, no or unsure:4)</p>	<p>The majority of respondents agreed that the full objectively assessed housing need should be based on the Standard Method. Many of those who agreed also indicated that a higher figure should / could be planned for giving factors such as past poor delivery of affordable housing, economic growth (e.g., Cambridge - Norwich Tech Corridor) requiring aligned housing growth to avoid in/out commuting, and requirement for new / enhanced infrastructure. There was also support for a lower figure. The proposed HEDNA was also supported to establish evidence of housing need which could indicate either a lower or higher housing figure. Those who did agree with using the Standard Method comprised largely of planning agents on behalf of developers. Other factors / comments included</p> <ul style="list-style-type: none"> • Important to ensure regeneration and add growth without destroying the 'village feel' • Sustainable development to address climate change requires a higher housing figure • Various levels of environment protection in the District should allow for a lower housing figure • Need for affordable housing not justified for a higher housing figure • Higher percentage of affordable housing required especially in villages, could provide special circumstance for a higher housing figure • Small scale housing required in villages for local people • Allow flexible development within smaller villages and hamlets without settlement boundaries • LA should build social housing for local people • Cost of new homes has compromised the ability of current and future generations to meet their own needs for a home of their own • Lack of infrastructure for a higher level of housing • Windfall allowance not sufficient to maintain delivery in rural areas, limits growth • Infrastructure requirements need identifying before using housing to help provide it • Dangerous to expect housing to be a key lever for providing more economic growth • Wrong type of houses being built • Need for specialist affordable housing • Issue of NN requires higher housing figure to safeguard delivery of housing requirements • Lower housing figure would exacerbate housing crisis and issue of affordability • 15% buffer requires evidence

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Elements & Question No.	No. of responses received	Summary of Representations
		<ul style="list-style-type: none"> • 20% buffer would provide flexibility and choice in the market, ensuring overall housing requirement can be met in full • Housing growth should account for Covid-19 impact, new Census data, Ukrainian war and cost of living crisis • Issues and Options stage should be about considering options to inform decisions and as such no conclusion about housing numbers should have been reached. • Appendix 1 – Thetford SUE, the Council has underestimated delivery within a stable economy <p>Respondents who responded “no” or “unsure” largely indicated lower levels of housing development, and more emphasis should be given to increasing affordable housing for local people. Some indicated support for a higher figure. Many of those who were unsure did comment. Some commented that the question was lengthy and difficult to understand. A mix of comments included</p> <ul style="list-style-type: none"> • Housing development should be spread out on smaller sites and in rural villages, minimising local impacts to complement strategic developments • More homes will allow for second homes bringing economic benefit • Problem of second homes needs considering • Need has been shown to exceed- minimum required figure • Climate change has precluded growth beyond minimal level • Protection afforded to the lowland forest and ancient heathland should be supported – may justify a lower figure • Strategies to improve business growth may need more affordable housing • Number of elderly persons and lack of community infrastructure justifies a higher figure • No incentive for older homeowners to downsize and release family homes • Above average level of median house price to median salary ratio necessitates an increased supply to make housing more affordable • Affordable housing should be a high priority especially in villages • More evidence needed nationally • Housing figure should be flexible ensuring a robust 5 yr housing land supply • Affordable housing need should not justify an overall housing need • Higher percentage of affordable housing required from developers • Existing planning permissions should be utilised first

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Elements & Question No.	No. of responses received	Summary of Representations
		<ul style="list-style-type: none"> • Existing allocations should be delivered first • Number generated by Standard Method should be the maximum • Figure should be based on national demand • Figure too low as housebuilding never catches up to the need • Higher delivery required due to NN, affordable housing deficit and maximisation of economic growth • Higher buffer required • 672 is a central government imposed figure – should be driven by local objective evidence • Not a case of more houses but the right scale, type, quality and location with priority for young people and families whilst not outgrowing rate of infrastructure improvement • Investors should be excluded from buying houses to rent out • A specific number should not be used, just an outline Plan factoring in agreed scenarios and be flexible • Economies change locally and nationally • Area is oversaturated with development – ruralness should remain so • Infrastructure improvements are required before allowing large developments • Local Plan review should be mindful of proposed changes to NPPF • Building beyond boundaries should not be considered until suitable sites within villages are exhausted • Repurpose / redevelop non-operational business sites to residential • Housing need should be identified on a location by location basis
Settlement Criteria: (The Options)		
Q4. Do you think the settlement categories as defined in the hierarchy above should be carried forward into the Local Plan Update?	167 (yes:89 no:30 unsure:40 neither yes, no:10)	<p>The majority of respondents agreed with the existing settlement hierarchy in that it remained relevant, clear, with many calling for flexibility and review, with regard to development. Comments included</p> <ul style="list-style-type: none"> • Include smaller settlement options with small clusters in villages within boundaries • Local Service Centres should be subdivided based on size • Without infrastructure new development creates additional issues for existing residents • Individual locations should not be overwhelmed • Settlement boundaries may change with more development • Criteria is too basic, does not mean that demand from population growth will be met

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Elements & Question No.	No. of responses received	Summary of Representations
		<ul style="list-style-type: none"> • Brownfield first to protect environment and farmland • Brandon should be included • Needs to be comprehensive understanding of the needs of communities for well-planned growth • Growth of market towns should not be restricted by administrative boundaries • Lower 3 categories should be for affordable housing only • Dereham should be considered as a key settlement area due to low output from the SUEs, proximity to Norwich, has capacity for growth • Swaffham should be a Tier 1 Market Town as could accommodate sustainable growth as unaffected by NN <p>Respondents who responded “no” or “unsure” expressed concerns about lack of infrastructure to support growth and that a generalisation of distribution of 10% was not fair. Many comments indicated a review / assessment of towns and villages should be undertaken. Some commented that they did not understand the question. Comments included</p> <ul style="list-style-type: none"> • Development should focus on existing towns with a robust infrastructure • Evidence to support settlement categories is limited • Open to developer abuse using ‘added value to the community’ without highlighting impacts • Small villages should not be expanded due to lack of infrastructure • Spaces between towns and villages must be preserved • Allowance must be made for Custom and Self-build beyond boundaries when appropriate • Issues to consider – prime farmland, flood plains, protected areas and NN • Pros and cons of a village boundary unclear • Some villages with settlement boundaries should be classed as Local Service Centres due to overdevelopment e.g., Beeston • A new category, “Cluster Villages” should be introduced recognising connection to other settlement and be apportioned growth accordingly • Swaffham only should sit below Thetford as a Tier 1 Market Town as the next most sustainable location to accommodate growth
Q5. Are there any settlements that you think should be added,	108 (yes:39 no:39 unsure / other: 30)	There was an even split between ‘yes’ and ‘no’ responses. Many comments indicated that specific towns and villages should be reviewed to either be upgraded or downgraded based

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Elements & Question No.	No. of responses received	Summary of Representations
removed, or moved into a different category?		<p>on infrastructure and capacity. There was also suggestion for new categories of settlements to be introduced. Comments included</p> <ul style="list-style-type: none"> • Attleborough should be removed – lack of infrastructure • Dereham should be removed due to road congestion • Snetterton should be removed – road incapacity due to development • Scarning should be removed – lack of infrastructure capacity • Bawdeswell should be removed – lack of infrastructure • North Elmham and Gressenhall should be removed / downgraded – developed to capacity • Brandon should be included to list of Market Towns – NW area of Brandon falls within Breckland and should be recognised • Eccles should be removed as not on mains sewage, lack of infrastructure, surrounding wetland • Clint Green and Yaxham should be moved into village without boundaries • Banham should be downgraded – lack of infrastructure • Development should be focused around larger conurbations – existing infrastructure • Village locations should be moved into a different category • Last category should not be identified as villages without boundaries as all villages have boundaries • Should be a further distinction between villages that have a single shop and those which have a range of shops • Settlements with no infrastructure should be avoided • Settlements / parishes adjacent to Market Towns should be acknowledged e.g., Carbrooke next to Watton <p>Respondents who responded “no” or “unsure” expressed mixed concerns from no change to the settlement hierarchy, lack of infrastructure, protection of farmland and ruralness. Comments included</p> <ul style="list-style-type: none"> • Farmland should be removed – vital to economy and environment, focus on brownfield sites

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Elements & Question No.	No. of responses received	Summary of Representations
		<ul style="list-style-type: none"> • Population numbers should be considered alongside area measurement e.g., Local Service Centres with 5,000 or less – cross reference with size of village to establish additional growth • Infrastructure is the main issue • No need for proposed new settlement – lack of infrastructure • All villages should have boundaries • Dereham, Swaffham, Watton and surrounding villages are not well equipped for growth – lack of transport infrastructure • Outdated criteria, needs review – consultation needed with service providers • Should not be bound- to only delivering homes in villages with facilities – can lead to cycle of decline# • All towns and villages should have apportioned growth to aid sustainability
<p>Q6. Do you agree with the methodology for classifying Local Service Centres? Y/N</p>	<p>140 (yes:63 no:35 unsure/other:43)</p>	<p>The majority of respondents agreed that the methodology was relevant, clear and sound, but many also indicated there needed to be flexibility i.e. re-assessment. Comments included</p> <ul style="list-style-type: none"> • When does a Service Centre become a town? • Is “employment” in the village /Local Service Centre still relevant? • Doubt if Local Service Centres meet suitable criteria in terms of public service provision i.e., healthcare • The minimal level of service needed for a Local Serve Centre should be quantified – would make enable sustainability • New policy could allow for a new Local Service Centre to be considered for inclusion post adoption of the Local Plan where new services introduced • Methodology should consider potential for service provision growth through new allocations • Evidence base should include assessments of level of services • A new settlement would provide opportunity to create a walkable 15 minute Local Centre – opportunity to decarbonise <p>Respondents who did not agree with the methodology or who were unsure indicated concerns for long term viability of services within village locations as well as little infrastructure provision / capacity. Comments included</p>

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Elements & Question No.	No. of responses received	Summary of Representations
		<ul style="list-style-type: none"> • Categories too basic / broad – suggest Access to public transport with frequent services to higher settlements, Provision of community facility, Provision of some employment in a village, Provision of a school • Does not account for environment impacts • No clarity as to how “some employment” is quantified, or how much is needed to fulfil this criterion • Criteria unclear - e.g., how is employment quantified? • As locations develop more areas will satisfy the classification • Criteria outdated • Provision /access to health services should be included • Suitable digital connectivity should be included • Imposes strain on the 3 Towns already not coping with growth • Local consultation / physical assessment required • Clint Green & Yaxham should be re-classified as a single Local Service Centre as Yaxham is an extended linear settlement – Yaxham Primary School is in Clint Green area of Yaxham, Yaxham has employment and services • “Employment within the village” – on-site employment is no longer significant as it was pre-Covid 19 pandemic • Too rigid, more definition required. How would policy apply if services ceased to exist? • Future proposed growth will need careful monitoring and should be flexible • A robust evidence base should be provided i.e., an assessment
<p>Q7. Would you add, add to or remove any of the five qualifying criteria: Access to public transport, provision of community facility, employment, shop and school? Y/N</p>	<p>150 (Yes:89 no:44 unsure/other:27)</p>	<p>The majority of respondents considered that the criteria needed to be reviewed, with many indicating access to healthcare as a priority. Some indicated that the criteria was too rigid with more definition / grading required. Comments included</p> <ul style="list-style-type: none"> • Public transport access • Quantify employment against population • Quantify village size against all facilities – after a certain size, retail, health services, schools, public transport, eateries etc., village hall and public open space should be included • Include water/sewerage infrastructure • Include protected areas • Include cycle / footpath access • Include youth centre

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Elements & Question No.	No. of responses received	Summary of Representations
		<ul style="list-style-type: none"> • Include connectivity • Add access to main roads as development creates private car use in rural areas with country roads not facilitating larges buses • Employment criteria not relevant due to changes in hybrid working etc., and general mobility, particularly to Local Service Centres • Remove shop <p>Respondents who indicated for no change or unsure expressed that the criteria remained relevant and important for sustainability. Comments included</p> <ul style="list-style-type: none"> • Yaxham is a good example where a range of facilities exist but underused due to a lack of planned growth, e.g., right housing type, and as a result an ageing population • Policies need to be flexible to take account of changing circumstances • A qualitative assessment and consultation is needed • Flexibility needed – should be assessed holistically
<p>Q8. Do you think that all 5 criteria need to be met to be classified as a Local Service Centre?</p>	<p>141 (yes:106 no:19 yes: unsure /other:20)</p>	<p>The majority of respondents agreed to all of the criteria having to be met with some indicating that it was a starting point and should be flexible. Comments included</p> <ul style="list-style-type: none"> • Should be exceeded where possible to show if a Centre is just functioning or thriving • Frequency and cost of public transport should be considered • Must include other criteria – health services, leisure, adequate roads • “Community facility” needs defining • Criteria too broad • Must include basic needs as not a Service Centre • Retains sustainability of a location • All criteria must be met to safeguard from development • Without any one component the classification becomes meaningless • If not met a settlement should be considered unsustainable – additional growth would be unjustified • Should only be for the market towns, not villages • Providing the housing is for affordable housing • Important to recognise that Yaxham & Clint Green function as a single linear and connected settlement • Important that communities are supported by appropriate facilities especially where future development may be supported

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Elements & Question No.	No. of responses received	Summary of Representations
		<ul style="list-style-type: none"> • Up to date information needs to be applied • Factor in decarbonisation • Concept of local villages combining is a strong step forward <p>Respondents who did not agree or who were unsure / other indicated a need for flexibility and holistic assessment, and that there was no need for an employment criteria. Comments included</p> <ul style="list-style-type: none"> • Provision of a shop not necessary as most people have access to own transport • Local Centres in some cases can provide more in one sector than others and be better placed as a sustainable location • Negatively ensures development focussed in a few locations • Needs considering on a case by case basis • Most of the criteria are inadequate or unable to cope with demand • Local consultation is needed with a qualitative assessment
<p>Q9. Do you think that some villages could be considered together around key services they share?</p>	<p>141 (yes:56 no:63 unsure / other:22)</p>	<p>Most respondents did not support this approach due to issues with transport and existing and future lack of services capacity. Comments included</p> <ul style="list-style-type: none"> • Safe walking access required • Would encourage infill and edge of settlement development • Each village should be considered on own merits • Not in accordance with 'green agenda' • Village identity would be lost • Pressure on service providers e.g., where a single school serving many villages – would put pressure on County Council <p>Respondents who did support this approach indicated that it would retain viability and vitality of villages, allowing for further development, and that it worked well in other rural districts. Comments included</p> <ul style="list-style-type: none"> • Will avoid further traffic congestion on already unsuitable roads • Must be within walking distance e.g., Bawdeswell and Foxley • Only if capacity of existing services was increased

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Elements & Question No.	No. of responses received	Summary of Representations
		<ul style="list-style-type: none"> • Depends on population size and proximity • Allows small sites to come forward for development in satellite villages • Would work well for Longham, in proximity to Beeston, Gressenhall, each with a shop and a pub, and primary school in Beeston • Villages are not parishes • Litcham and Beeston • Yaxham and Clint Green as the village of Yaxham • Gressenhall and Beetley – linked by paths, fulfil criteria, would allow more development than the 7% • Para.79 NPFF supports this approach • Little Fransham in proximity to Litcham and Shipdham (both Local Service Centres) • An Integrated Water Management Study would identify such locations as some villages share the same sewerage catchment, and therefore available capacity for growth • Garvestone, Reymerston and Thuxton • Eccles, North end, Wilby and Larling • Settlements in proximity to a higher order • Eccles Road and Snetterton – suitable location for growth
<p>Development Principles: Options</p>		
<p>Q10. Which of the spatial principles listed below do you consider are most important in developing a strategy for development in the Local Plan? Please rank (1) for most important and (12) for least important</p> <p>1. Maximise re-use of previously developed (brownfield) land</p> <p>2. Focus development in locations where there is greatest accessibility to employment, local services and facilities</p>	<p>199</p>	<p>It is acknowledged that spatial principles 6 and 7 were in error repeated at 10 and 11, and of which have been taken into account during the analysis of this question.</p> <p>Analysis set out to establish the most important principle and most least important principle, presented as a percentage of the total respondents to this question: Most important principle was option 1(44%), followed by options 2(19%) and 5 (17%)- respectively. Most least important principle was option 7(19%), followed by options 8(14%) and 10(13%) respectively.</p> <p>Many respondents indicated that all of the principles were equally important, with many citing that focus should be on brownfield sites and sustainable locations where there was existing infrastructure and community services that could be further enhanced giving opportunity for greater densities. Many respondents also indicated that growth by way of smaller and medium</p>

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Elements & Question No.	No. of responses received	Summary of Representations
<p>3. Respect the character of the existing settlement pattern including maintaining gaps between settlements</p> <p>4. Focus development in locations where there is greatest potential to maximise sustainable travel (public transport, walking and cycling)</p> <p>5. Locate development to minimise its impact on protected or locally important landscapes, heritage and biodiversity</p> <p>6. Focus on locations and development that will deliver or contribute most to infrastructure and local facilities</p> <p>7. Focus on sites that can be delivered quickly to ensure a flexible development supply</p> <p>8. Provide new housing and facilities to help sustain rural settlements</p> <p>9. Locate development to maximise use of existing available infrastructure capacity (e.g., transport, wastewater treatment)</p> <p>10. Focus on sites that can be delivered quickly to ensure a flexible development supply</p> <p>11. Focus on locations and development that will deliver or</p>		<p>sites should be distributed across the District where appropriate enabling a more efficient rate of delivery to meet need. Comments are summarised below:</p> <ul style="list-style-type: none"> • Houses should be within a 10 min walking distance of services • This criterion should not be used to determine sites. Homes should be built to the highest environmental standards • Environment, heritage and local characteristics must be protected • Investment in executive housing would attract talent to the area • Apply principles of sustainable development as set out by NPPF • Spatial principles should not be overly prescriptive • Future growth must take account of climate change mitigation

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Elements & Question No.	No. of responses received	Summary of Representations
contribute most to infrastructure and local facilities 12. Seek to increase development densities in locations close to local facilities or with good public transport links		
Development Locations: Options		
Q11. Do you think development should be concentrated within the market towns?	200 (yes:148, no:35, unsure:17)	<p>There was a fairly even split across the towns in the District, with several respondents suggesting more than one town as suitable locations for development. Where they were specified as being suitable for development is detailed below with the number of responders:</p> <ul style="list-style-type: none"> •Attleborough 20 •Dereham 36 •Swaffham 22 •Thetford 28 •Watton 24 <p>A number of representations considered that the market towns have a better range of services and employment as well as better transport links and should be the focus for further planned growth because of this. Key concerns regarding the availability of infrastructure (in particular health provision) and traffic congestion were also identified.</p> <p>Some responses considered that it is important that as the current development strategy concentrates development in two large sustainable urban extensions at Attleborough and Thetford, this results in a much lesser number of smaller allocations in the other towns and larger villages. Responses indicated that development should be on appropriate sites throughout the settlement hierarchy so that the Local Service Centres and Villages with Boundaries benefit from coordinated development which brings affordable housing and S106 contributions which can help fund important services and facilities within the settlements, rather than being subject to small schemes, which fall under the thresholds and lead to an increase of the population but without the benefits of slightly larger schemes.</p>

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Elements & Question No.	No. of responses received	Summary of Representations
<p>Q12. Do you think more housing should be dispersed within rural areas/villages?</p>	<p>214 (yes:68, no:116, unsure:30)</p>	<p>A number of different opinions were expressed as summarised below:</p> <ul style="list-style-type: none"> • Everywhere should have their fair share of development but villages need to have a few houses only to protect the countryside, land, wildlife etc • The potential of cities (Norwich) and market towns should be fully explored before any rural or new town developments are considered. • Infill and small developments can be very beneficial to rural communities and they should be part of the policy. • There should be a supply of housing that enables local people to stay local, and this should be from starter and social housing through to family homes and homes for the elderly • Villages don't have work opportunities or services so it will increase traffic on the roads. The roads are of poor quality and not maintained so this would make a bad situation worse. • Housing should be on brownfield sites. • Smaller developments of maximum of 10/20 houses suit villages better. • Dispersal of some (non-strategic) growth is important to support rural communities and smaller settlements. • The smaller towns and villages do not have the sustainable transport links of the larger towns, so this option is likely to increase car commuting. • Any growth strategy that directs the development to a large number of smaller sites, which would not contribute to any major infrastructure improvements and are likely to be limited by their impact on the character of smaller settlements, should not be supported. • Should allow for the minor growth of every rural parish via windfall development during the proposed plan period up to a 5 dwelling limit (Refer to Greater Norwich Local Plan).
<p>Q13. Should there be a new settlement Garden Town/Village developed within Breckland?</p>	<p>2,261* (yes:44, no:2,199, unsure:18) *Inclusive of two campaigns, and one from 35 parish councils</p>	<p>The most common themes from those opposed to the proposal are summarised below:</p> <ul style="list-style-type: none"> • Destruction of ecosystems and much needed farmland (food production) to produce a commuter ghetto that does nothing to support the rural young nor support rural industry. • Lack of infrastructure. • Impacts on biodiversity • Increased traffic / pollution

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Elements & Question No.	No. of responses received	Summary of Representations
		<ul style="list-style-type: none"> • Impact on existing water supply / sewage treatment; loss of tranquillity and dark skies. • Impact on existing community identity. • Better located in existing area of development where people have access to transport, jobs and infrastructure. • Provision of affordable homes to meet local needs best provided in modest numbers spread over an area close to where people have their work and to enhance trade for existing small local businesses. • Irreparable damage to the countryside and fragile landscape.
Q13A. If so, should the 15 minute neighbourhood concept be introduced?	As above	Key issues raised by those in favour were that a 15 minute neighbourhood is compact and connected, and one where the everyday needs of residents can be met within a short walk or cycle. Such a proposal would be consistent with sustainable transport policies, and in particular in promoting the use of walking, cycling and public transport, limiting the need to travel, supporting an appropriate mix of uses in areas, and minimising journeys for most activities.
Q14. Should development be concentrated on the main transport routes (A47, A11 or others)?	198 (yes:138, no:31, unsure:29)	<p>Respondents comments supporting this option are summarised below:</p> <ul style="list-style-type: none"> • New development should be close to well-developed transport routes. People need to get to places where they work. • Massive investment has been made on these main routes and this should be capitalised on to make Norwich accessible to people for work. • Amenities and infrastructure already exist, transport routes more acceptable to volumes of traffic. Closer to jobs/bus links/retail/rail links, more suitable for construction traffic. • The district is well-served by the A11 and A47 trunk roads. It is entirely sensible for the Council to capitalise on the links that these roads provide, particularly given the infrastructure improvements planned for the road network. If the Council wants to capitalise on these links, it should not solely direct all growth to the market towns that have access to these transport corridors. It will be necessary to consider how growth in the rural settlements in close proximity to these roads can also play a role in capitalising on these links. • A key consideration when identifying locations for development should be the opportunity existing / proposed transport infrastructure plays in relation to the scale and density of development that can be accommodated. On this basis, key infrastructure routes in the District, such as the A47, A11, and existing infrastructure, will be key considerations in locations for growth.

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Elements & Question No.	No. of responses received	Summary of Representations
		<p>Other comments included:</p> <ul style="list-style-type: none"> • The A47 is already extremely over used at present and the roads feeding onto it are very busy at peak times. • This would only create two densely packed corridors. • The A11 is adequate and suitable for development as it has good access via A14 to the whole of the country but the A47 is more congested and dangerous and does not have additional rail access and suffers from North South traffic congestion (Dereham and Swaffham). • Development should also be close to mainline train stations. • The identification of development around main transport routes is logical, but growth needs to be dispersed across the District to sustain local communities.
Settlement Boundaries: The Options		
Q15. Do you think that the Local Plan should continue to define settlement boundaries or rely on a criteria-based policy?	184 (yes:97 no:38 unsure / other:49)	<p>Most respondents agreed with retaining settlement boundaries as they provided certainty, with some agreeing that a criteria-based policy should be incorporated also. Respondents who indicated 'no' to settlements boundaries mostly expressed the requirement for a criteria-based policy approach. Comments are summarised below:</p> <ul style="list-style-type: none"> • Criteria-based policy could result in more legal disputes – developers seeking to stretch parameters • Criteria-based policy allows for infill development reducing large-scale development allowing services to incrementally increase to accommodate residents • Criteria-based approach should be less rigid than proposed. Could include a definition of what is defined as a built-up area, with proposed development within and adjacent to such areas deemed acceptable in principle – see Huntingdon DC approach: built-up area is considered to be a distinct group of buildings that includes 30 or more homes. Land which relates more to the group of building rather than to the surrounding countryside is also considered to form part of the built-up area • Settlement boundary approach would result in over-development in some places with other communities missing out • Removal of settlement boundary would see a decrease in exception sites for affordable housing

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Elements & Question No.	No. of responses received	Summary of Representations
		<ul style="list-style-type: none"> • Settlement boundaries preserve the countryside • Settlement boundaries for small settlements only • Some settlement boundaries could be expanded • Settlement boundaries should be extended around committed sites / allocations at edge of settlements • Should be led by service needs • Should be based on merits guarding against sprawl into countryside • Flexible approach to windfall is needed on edge of higher order settlements where good access to services • Should consider a flexible mechanism that ensures policies do not restrict development when a 5 year housing land supply cannot be demonstrated • New tier should be created for small other villages / hamlets not captured by settlement boundaries – specific policy to allow small appropriate housing schemes to come forward
<p>Q16. If settlement boundaries are to be retained, should they still be applied to the villages set out in paragraph 4,9 of this Report or should some be removed or added? If so, which settlements should be changed?</p>	<p>138 (yes:70 no:12 unsure/other:56)</p>	<p>The majority of respondents agreed to retaining settlement boundaries. There were few indications as to what should be added or removed. Comments are summarised below:</p> <ul style="list-style-type: none"> • Scarning should have a boundary • Beachamwell should be added to “Village with Boundaries” category • Periphery of Brandon should be considered to have its own settlement boundary around a future allocation • Eccles settlement boundary should be extended to allow development at Land North of Station Road, with South farm Plantation acting as a natural land use boundary • Hockham settlement boundary should be reviewed to support sustained growth • Regular reviews required • Settlement boundaries should be added to all villages in ‘Villages without Boundaries’ category if an appropriate / proactive policy is not adopted which allows appropriate sites within and on the edge of settlement to come forward • All villages should be given boundaries, always room for organic growth within boundaries which can be ‘broken’ if communities approve • Need settlement boundaries to stop ribbon development <p>Comments where respondents who indicated “no” or who were “unsure”, or made other comments to retaining settlement boundaries, are summarised below:</p>

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Elements & Question No.	No. of responses received	Summary of Representations
		<ul style="list-style-type: none"> • Mattishall should be removed as a Local Service Centre • Little Dunham do not want a settlement boundary • Existing infrastructure and environmental issues should be considered • There should be no development between Scarning and Wendling – there are large areas between Old and New Scarning suitable for development • Villages should not have settlement boundaries – restricts development • District Council should consider comments/objections from Parish Councils with local knowledge to determine if a development is appropriate in the context of a village, even when the village fails to satisfy Local Service Centre criteria • For smaller settlements only • Boundaries could be based on population, picking the top30 by highest population • Merit based • Should be flexible
<p>Providing the Right Types of Homes: The Options</p>		
<p>Q17. Do you have any views on the particular types of homes which are required in your locality?</p>	<p>167 (yes:115 no:27 unsure/other:29)</p>	<p>A significant number of responses indicated that more housing was needed in their locality or generally in the District. There was significant support for more affordable/social housing tenures, smaller sized housing as well as housing for older and disabled persons. Many indicated the type of housing needed. There were few respondents who indicated that they did not need any new homes in their locality. The mix of comments are summarised below:</p> <ul style="list-style-type: none"> • Need to await HEDNA • Should be environment and location friendly with solar power, higher levels of insulation and air source heat pumps • Starter homes • Affordable housing for single people • Starter homes North Tuddenham • Multigenerational homes as limited retirement homes • Affordable key worker homes in towns • Family sized dwellings • Executive housing to attract talent • Bungalows for elderly to enable independent living • Assisted living

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Elements & Question No.	No. of responses received	Summary of Representations
		<ul style="list-style-type: none"> • Young people need to become invested in local towns to improve demographics ensuring economic growth • Where there is good connectivity for active travel • Low density • Mix is important, and range of prices • 50% affordable housing • More affordable housing in Whissonsett • Self & Custom Build plots • Holiday homes <p>Those who indicated “no”, “unsure” or other, comprised a mix of comments as summarised below:</p> <ul style="list-style-type: none"> • No homes at all • No homes required in Mundford • No homes in Podmore – will change locality • Should be led by market need and responded to in areas with strongest need • Needs to align with Neighbourhood Plans • Allocation of additional sites in excess of the Standard Method to recover undersupply of affordable housing
<p>Q18. Would you support the allocation of sites or policies that would allow for the development of the following types of housing where a local need or connection could be identified? Please state which and why</p> <ul style="list-style-type: none"> • Housing solely for Build to Rent • that provides specialist accommodation for a group of people with specific needs (such as 	<p>165 (yes:95 no:37 unsure/other:31)</p>	<p>The majority of respondents indicated that they would support the allocation of sites or policies. Many responses indicated strong support for affordable housing generally and for a mix of housing types. There was strong support for affordable housing on rural exception sites with policies including identified need and local connection, as well as strong support for specialist elderly accommodation. Comments are summarised below:</p> <ul style="list-style-type: none"> • Starter homes- for local village residents who resident for 5 years • Sheltered housing for 60 + years to encourage downsizing • No to self builds unless high quality • Yes, to self & custom build • No to build to rent in rural areas as no employment or transport, also without controls fear of second / holiday homes • Mixed housing – works better • Purpose built accommodation for service families

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Elements & Question No.	No. of responses received	Summary of Representations
<p>purpose-built accommodation for service families, the elderly or students).</p> <ul style="list-style-type: none"> to be developed by people who wish to build or commission their own homes; or is exclusively for affordable housing, an entry-level exception site or a rural exception site 		<ul style="list-style-type: none"> Housing with specific needs should be dispersed within communities to ensure inclusivity Local connection should be identified for retirement accommodation Self-build list should be reviewed to ensure robustness, otherwise could overstate demand Policy should support housing development within rural areas to meet identified need, and should make it clear that a proportion of market housing will be considered where required to make a rural exception site viable Consideration for specialist housing on rural exception sites, as such developments are less viable than general needs housing and unable to compete with these developers on allocated sites or sites within settlement boundaries where land values are high, and Should be flexibility within policy wording to ensure that if adequate progress not made within suitable timeframe, a site can be developed as market and affordable housing <p>Respondents who indicated “no” to support gave reasons including no housing at all. Those who did not indicate any preferences included comments summarised below:</p> <ul style="list-style-type: none"> Housing needs right services and provisions Local need / connection should be identified Not in rural areas Should be of an appropriate size for the existing settlement to maintain a balance Small local developments
<p>Provision of Pitches for Gypsies, Travellers, and Travelling Show People: The Options</p>		
<p>Q19. What parts of the District should be considered for this type of development? Should sites be included as part of any future allocations for housing? Are you aware of any suitable sites in Breckland?</p>	109	<p>Many respondents indicated that no parts of the District should be considered for this type of development. Comments from those who did make suggestions are summarised below:</p> <ul style="list-style-type: none"> Existing sites and developments Market towns Rural and towns Near towns to reduce need for travel Areas near facilities

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Elements & Question No.	No. of responses received	Summary of Representations
<p>What size sites do you consider to be the most appropriate?</p>		<ul style="list-style-type: none"> • Away from residential areas • Degenerated urban areas, brownfield sites • Sites with infrastructure • Any part of District and where these groups wish. Avoid clustering to avoid ghettoization • Interstitial sites of road systems, by-passes etc • Where employment opportunities • They should be consulted • There should be policy supported by demonstrable housing need in a particular area • All parts of the District • Wymondham, Attleborough, Great Ellingham, Rocklands, Banham, Thetford • Not Mundford • Swaffham • Major towns for showpeople • Where needed • Why are Bargees and Boat Dwellers not included as part of the definition of the traveller community? <p>Many respondents (33) indicated that no sites should be included as part of any future allocations for housing, where 21 respondents did indicate that sites should be included and that there was support for sites in proximity to amenities, services, and sustainable transport links.</p> <p>Few respondents indicated potential suitable sites which included:</p> <ul style="list-style-type: none"> • Thetford • Splashes at Swaffham • Existing sites • Ongoing development south of Dereham • Potential on several of the proposals for Swaffham and Attleborough • Swanton Morley Barracks <p>Many respondents indicated that future sites should be small in size, ranging from 3 to 10 pitches, and in clusters. Other respondents indicated medium to larger sites ranging from 20 to 150 pitches as an appropriate size. Comments are summarised below:</p>

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Elements & Question No.	No. of responses received	Summary of Representations
		<ul style="list-style-type: none"> • Right size for existing services, or that will be provided to support the new allocation • Small on major roads / edges of towns • Small clusters to avoid building areas that socially exclude • Small infills in villages and towns • Depending on facilities and access • Developments should not increase the settlement population / geographical size maybe by 10%
Internal and External Space Standards: The Options		
<p>Q20. Which criteria do you think is the most important when considering development? Please rank (1) for most important and (5) for least important</p> <p>1.The provision of sufficient affordable housing to meet Breckland’s housing needs</p> <p>2.The provision of sufficient retirement housing to meet Breckland’s housing needs</p> <p>3.Raising standards of design in the District</p> <p>4.Meeting the challenges of climate change</p> <p>5.Protecting and Enhancing the Environment including green space, biodiversity, river and air quality.</p>	167	<p>A significant number (89) of respondents indicated that 5. Protecting and Enhancing the Environment including green space, biodiversity, river and air quality was the most important criteria, followed by 1. (27) The provision of sufficient affordable housing to meet Breckland’s housing needs.</p> <p>51 respondents indicated that 3. Raising standards of design in the District was least important criteria, followed by 2. The provision of sufficient retirement housing to meet Breckland’s housing needs (35 respondents).</p> <p>Many respondents who did not indicate a preference of importance had expressed that all the criteria were important.</p> <p>Other comments included are summarised below:</p> <ul style="list-style-type: none"> • Providing retirement housing in sustainable locations should be a priority due to ageing population and should consider well-being of residents, i.e., a green environment • Starter homes are needed for parishes • Having a mix of good quality private and affordable housing will ensure housing needs are met and will sustain communities • Protecting the environment is part of choosing the correct site and enhancing the area with affordable housing where needed • Promoting regenerative agriculture is key to reversing climate change • Poor design is needlessly spoiling the look of many of our villages – new housing has to be lived with as well as lived in

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Elements & Question No.	No. of responses received	Summary of Representations
		<ul style="list-style-type: none"> • There should be a desire to always raise design standards ensuring they address climate change • The Local Plan should reflect national standards as the starting point, supported by local evidence of need and specific requirements • It is not appropriate to put the needs of one group e.g., retirement housing ahead of meeting the needs of another e.g., affordable housing (see para. 62 NPPF) • Ranking is not a robust tool for informing policy • Sustainability should come first • Council should ensure health and social care • The options are piecemeal and should not be laid down as criteria in this way. They are all equal • All of the options should be promoted in balance to achieve sustainable development • Option 5 should include the historic environment • Development should reflect the demographics and need of the District with flexible policies
<p>Q21. Do you think the Plan should include locally evidenced based accessibility standards that require higher standards than those required by Part M4 of the Building Regulations?</p> <p>Do you think the Plan should set minimum standards for outdoor amenity space for new housing? If so, what should these be?</p>	<p>134 Higher accessible standards: (yes:39 no:22 unsure/other:16)</p> <p>Minimum outdoor amenity standards:(yes:97 no:12 unsure/other:5)</p>	<p>Most respondents indicated support for locally evidenced based higher accessibility standards, with some support for policy flexibility. Comments are summarised below</p> <ul style="list-style-type: none"> • Part M4 remains inadequate to meet disabled needs, need wider doorways, ramps not steps, low rise windowsills, wider garden gates, and more dropped kerbs • All development should exceed minimum standard to safeguard energy costs and promote efficiency • Does not need to be for every development due to % of need, but high standards required for retirement housing • Higher standards for new builds only, and not for conversions etc • Should be applied with flexibility depending on viability and achievability <p>Respondents who indicated that they did not support higher accessibility standards, or who offered no preference gave a mix of comments as summarised below</p> <ul style="list-style-type: none"> • Higher building standards would constrain development and inflate house prices, making the Plan less deliverable • Building Regulations is an appropriate mechanism to ensure standards are being met

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Elements & Question No.	No. of responses received	Summary of Representations
		<ul style="list-style-type: none"> • Any new specialist housing projects need to be considered and factored in as these reduce the need for new dwellings to accommodate the total housing need • Should this policy be pursued, a full assessment of impact and delivery needs to be considered e.g., committed sites with planning permission which may erode the impact of such a policy • Robust evidence is required • Should be negotiated site by site • 10 - 15% suitable for disabled e.g., Downstairs bedrooms and ground floor shower rooms • Should be based on local evidence • Should use national standards • Ensuring that older residents have the ability to stay in their homes longer is not an appropriate manner of meeting the housing needs of older people, i.e., on-site support care and companionship that specialist older persons can provide. • Provision of specialist older persons accommodation provides wider community benefits – release of under-occupied family housing, savings to health and social care budgets <p>A significant number of respondents indicated support for minimum standards for outdoor amenity space for new housing with some suggested quantum's ranging from 15 – 25% of a development. Respondents also indicated types of open spaces required. A mix of comments are summarised below</p> <ul style="list-style-type: none"> • Should include children's play areas and places of recreation to promote exercise and good mental health and social inclusion • Should be included on-site • Every 50 houses should have access to green areas • Double the area currently acceptable • Larger sites to meet deficiencies • Should be space around developments on edge of rural towns • Based on any existing nearby spaces • Tree planting, wilded areas for habitats, e.g., meadows, woodland, gym and nature trails, dog parks, ponds and hedgerows, landscaped developments with maintenance, sports pitches • Cycle / footpaths functioning as green corridors within 10 mins

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Elements & Question No.	No. of responses received	Summary of Representations
		<ul style="list-style-type: none"> • Quiet open spaces for retirement homes • Allotments • Flexibility required for range of measures • Would increase quality of life • Garden space for houses commensurate with no. of bedrooms, and communal space for flats • Will improve air quality • Mitigates against rainfall run off issues • If viable • Local people should be consulted for their areas • Consideration should be given to evidence in the Norfolk GIRAMS and subsequent reviews, and Natural England guidance • Dog walking provision should be considered <p>Few respondents who indicated no support or no preference gave comments as summarised below</p> <ul style="list-style-type: none"> • Quality is more important than quantity • Open space needs for older people are much less. Should be exemption for older peoples housing schemes • Flats / maisonettes – other planning issues can restrict incorporation of balconies i.e., overlooking which should be noted in the policy • Would be better addressed in a Supplementary Planning Document • Should be tested through a Viability Assessment, and policy be flexible
The Economy: The Options		
Q22. Should the Council plan for the minimum economic growth needs required to meet the minimum increase in housing need or seek to increase or maximise inward investment and local employment opportunities by	150	<p>61 (41%) respondents indicated that they supported minimum economic growth.</p> <p>Respondents comments where minimum growth was supported are summarised below</p> <ul style="list-style-type: none"> • The council is more likely to attract inward investment if it has a clearly defined aim and objectives throughout the plan period • Economic growth should not come at the cost of greenfield sites, and should only meet the needs of minimum housing growth

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Elements & Question No.	No. of responses received	Summary of Representations
<p>planning for across the plan period?</p>		<ul style="list-style-type: none"> • If The Brecks are prioritised as a National Park/Landscape, some additional economic growth should be planned for, due to increasing needs of tourism • Forward looking businesses will find own solutions <p>37 (25%) respondents directly indicated support for maximum growth, of which comments are summarised below</p> <ul style="list-style-type: none"> • Only via environmentally sustainable industries • Aim for more than minimum as setbacks and chances of hitting target are increased • Should always maximise the local economy without altering “<i>the working character of the countryside</i>” (Issues & Options Report). Economic activity should be focused on the under-performing market towns. • A district wide approach to address imbalances between urban and rural communities • Housing growth in the District is not the dynamic behind economic growth • Increase the range, size and location of employment sites to diversify economic activity • Social and environmental factors need to be considered • The level of new homes should be supported by significant employment growth • Planning for an appropriately higher but sustainable level of economic growth allows more flexibility • Local Plan provides an opportunity for further growth to boost investment – demand for employment space continues to decline (IPMA), i.e., demand outstrips supply • Norfolk is developing as an economic growth area <p>52 (35%) respondents indicated they were unsure or gave no direct preference. Comments are summarised below</p> <ul style="list-style-type: none"> • Economic growth is not the main factor • There should be an Economic Development Strategy prepared that assesses the land and property infrastructure necessary to support agreed housing need, and to deliver new businesses in higher paid, growth sectors • Para.5.7 of consultation Report – of the given scenarios there is concern about there not being enough jobs for the local workforce, resulting in a higher unemployment rate or unsustainable commuting.

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		<ul style="list-style-type: none"> • NPPF para 81 – provides a clear direction, “...policies and decisions should help create the conditions in which businesses can invest...” • Plan ahead, not behind • Council should strive to do both • A full update of the Employment Growth Study should be undertaken to inform employment strategy and allocations
<p>Q23. Do you agree with the current approach of concentrating industrial space in the market towns and Snetterton?</p>	<p>157 (yes:103 no:19 unsure/other:35)</p>	<p>A significant number (66%) of respondents indicated support for concentrating industrial space in the market towns and Snetterton, due to proximity to major link roads and services, support of housing growth and mitigating the need for commuting. A summary of comments are set out below</p> <ul style="list-style-type: none"> • Not all market towns have good transport links • Swaffham is close to A47, ideal for East West traffic but serious traffic issues in the town centre caused by North South traffic • Market towns provide opportunity than other categories • Support needed for flexible “starter units” in villages and smaller towns to provide employment opportunities • Restriction on size of development should apply • Preserves rural areas • Residential areas should be away from industrial areas • Use brownfield sites • Snetterton - yes but only after adjacent towns have infrastructure improved • Snetterton close to A11 and away from residential areas • Snetterton has opportunity for allocation of additional employment land, e.g., Twells Business Park • Should not preclude alternative mixed use locations e.g., Robertsons Barracks • A balanced approach with flexibility to allow existing businesses to grow • Continue to focus growth in locations such as Attleborough to support growth within the SUE • The Council should recognise the opportunity for development on the edge of Brandon

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		<p>12% of respondents indicated that they did not support the proposed approach, with 22% indicating directly they were either unsure or gave comments indicating neither preference. Comments are summarised below</p> <ul style="list-style-type: none"> • Need for green energy on sites • There are several disused MoD sites • Inadequate small roads • Where possible industry should in proximity to rail links to minimise road freight • Develop existing sites further • Snetterton is not a market town, would impact heavily and overwhelm surrounding villages • Snetterton – increased industrialisation does not benefit it's residents, impacts the environment, local consultation is required • Snetterton is one of the highest points in Norfolk – building height must be kept low • Eccles – no as greener community • Dereham is over subscribed • Swaffham should be prioritised • Breckland is strategically well placed for economic growth due to its location on the Cambridge – Norwich Tech corridor with train and key road links • Approach is too fixed, should look at each settlement
<p>Q24. Are there any other locations which should be considered for industrial space? Please state which ones and why?</p>	<p>134 (yes:45 no:33 unsure/other:55)</p>	<p>Most respondents indicated that they were either unsure or wanted to express an opinion to this question. Comments are summarised below</p> <ul style="list-style-type: none"> • Strategy should consider repurposing older industrial / commercial sites (e.g., central Dereham) • No greenfield sites • Not Little Dunham village • Smaller roads unsuitable for HGVs • The existing Plan has identified strategically suitable sites • HEDNA findings should be used to determine the need and location <p>Many respondents either indicated support for the existing approach or offered other locations and types of land for future development, with some indicating that a distribution should be</p>

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Elements & Question No.	No. of responses received	Summary of Representations
		<p>considered across the District. Many respondents also indicated that existing industrial sites should be expanded. Comments are summarised below</p> <ul style="list-style-type: none"> • Adjacent to A47 corridor Easton to Dereham • Adjacent to major trunk roads – south of Norwich, A11 / A47 corridor • Redundant MoD sites • Redundant rural agricultural building sites • Attleborough, Thetford, Watton • Key settlement areas – existing industrial sites • Land close to A11 and Thetford (Land to the west of Bridgham ref. LPR/C4S/DEV/150) and Land at the Paddocks (LPR/C4S/DEV/396) • Shipdham Airfield • Robertsons Barracks • Poor quality farming areas • Avoid BMV land • Old airfield North Pickenham • Lenwade – brownfield • Roudham industrial area – expand • Beeston – industrial areas • Land north of Brandon • Snetterton – expansion needed • Land north of Station Road and West of Fakenham Road (LPR/C4S/DEV/159)
<p>Q25. Considering the trends in working and the rural nature of the district, do you think our policies on types of office space and location should be different?</p>	<p>124 (yes:31 no:20 unsure/other:73)</p>	<p>A significant number of responses directly indicated that they were unsure and cited the changes in ways of working, i.e., hybrid / remote working, and for a possible need for co-working centres all requiring flexible development policies. Comments are summarised below</p> <ul style="list-style-type: none"> • Incubator space should be considered • Policies should consider vacant offices – easier conversions to residential • Farms in rural locations could be considered for small office space • Water resource constraints – we (AW) are unable to supply new non-domestic demands if this jeopardises domestic supplies. Policies will need to require economic growth to be water efficient • Trends are different in different employment sectors and need to be understood before decisions can be taken on the current policy approach

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Elements & Question No.	No. of responses received	Summary of Representations
		Other responses indicated that the Local Plan needed to deliver a wide variety of office and employment spaces in accessible locations to encourage economic activity. Policies were also needed to support growth of existing businesses in all parts of the District.
Q26. Do you have any suggestions on the location and types of office space which should be provided in the district?	73 (yes:36 no:14 unsure/other:22)	<p>Most respondents suggested flexible / co-working spaces and locations which should be considered as well as emphasising the trend of working from home which reduces the need for more office space. Comments are summarised below</p> <ul style="list-style-type: none"> • Dereham High Street / Market Square areas would benefit from a drop-in business centre • New homes should consider office space due to WFH trend • Serviced community office spaces / hubs in towns and out of town locations to avoid traffic congestion • Repurposing of retail/office/residential property • Agricultural buildings • Near main trunk roads • Across the District • Areas close to housing e.g., Thetford, Attleborough and Watton etc. <p>A summary of other comments are summarised below</p> <ul style="list-style-type: none"> • Should be left to private sector • Environment impacts should be considered • No further office space is needed • Improved digital connectivity to support WFH in rural areas • Already suitable strategic sites within existing Local Plan
How to Attract Businesses to Breckland?		
Q27. From the criteria below please rank which ones you think are the most important in attracting high quality employment to the area (1) being most important and (10) least important.	128	A significant number (68 (53%)) of respondents indicated that criteria 1. Improve digital connectivity across the district, was the most important, followed by criteria 2 (17 (13%)) and 3 (19 (15%)) pertaining to improvements to road and rail, and public transport connectivity respectively.

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Elements & Question No.	No. of responses received	Summary of Representations
<p>1.Improve digital connectivity across the district. Breckland has some of the lowest average download speeds 0 to 26mbps compared to Norwich which has 44 to 55+mbps</p> <p>2.Improve road and rail connectivity across the district</p> <p>3.Improve public transport connectivity of rural areas to market towns and between market towns</p> <p>4.Improve active travel connectivity around market towns (cycle/walkways)</p> <p>5.More flexible office space and industrial space in our market towns</p> <p>6.Better access to higher education and vocational training in Breckland to increase skills levels</p> <p>7.More facilities for meeting and socialising in town centres</p> <p>8.Proximity of employment to housing</p> <p>9.More leisure facilities within town centres</p> <p>10.Other please specify</p>		<p>59 (46%) respondents indicated that criteria 9. More leisure facilities within town centres, was the least important, followed by criteria 8 (18 (14%)) and 5 (14 (11%)) pertaining to employment and office space respectively.</p> <p>Few respondents indicated a further criteria to be considered, and that all of the criteria were equally important as well as comments generally in response to this question summarised below</p> <ul style="list-style-type: none"> • Too many criteria • Investment in skills / education is required to stimulate growth • Agricultural education is notably unsupported • Major routes need improving • Completion of Dereham Southern Link Road and new Drayton hall Lane roundabout • Investment in public transport e.g., improve services Norwich to Ely line • Types of businesses, parking costs and transport needs consideration • Incentivising new businesses to come to our market towns is key e.g., reduced rates • ‘Thetford Enterprise Park’ needed • Rail connectivity over road • Improvements to rural digital connectivity required for agricultural businesses • Designate The Brecks as a National Park/Landscape to boost tourism focussed businesses • Different principles will be more important in different locations and in relation to different types of development – a more nuanced approach is required • 1,5 and 8 are extremely important to Snetterton
<p>Q28. Do you have any other comments with regards your answers or further suggestions on how Breckland can attract more businesses to the area?</p>	60	<p>38 (63%) respondents offered suggestions to how more businesses could be attracted to the area as summarised below</p> <ul style="list-style-type: none"> • Designate employment development zones with the start-up grant funding and insurance backed loan schemes • Incentivise new smaller businesses – subsidised sites / office space

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Elements & Question No.	No. of responses received	Summary of Representations
		<ul style="list-style-type: none"> • Provide brownfield sites for conversion to office space for rental with option to purchase • Add more value to food and agricultural industry • Focus on 'greentech', sustainable eco-tourism, agritech and future proofing. • Vertical farming • More regenerative farming • Business hubs in market towns • Dualling of the A47 / other main route improvements • Investment in local skills training / development • Regenerate town centres • Enable land for solar / wind energy • Improve digital infrastructure • Affordable homes across Breckland • Improve public transport • More leisure activities e.g., outdoor sports • Develop / incentivise tourism • Designation of The Brecks to boost tourism • Allow flexible policies for local/artisan businesses • Prioritise Thetford Business Park • Work with business community to support a marketing campaign, highlighting benefits of living and working in Breckland. • Capitalise on opportunities with the Cambridge Norwich Tech Corridor • Build strategic relationships with Department of Business and Trade • Identify opportunities with existing businesses for expansion • Build on development of key sectors, e.g., manufacturing and advanced engineering • Support development of strategic employment sites <p>22 (37%) respondents commented generally to this question as summarised below</p> <ul style="list-style-type: none"> • Investment required in schools / education attainment • Environmental protection required • More businesses not required, too much traffic congestion • Retain high quality agricultural land
<p>The Rural Economy: Agricultural Development</p>		

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Elements & Question No.	No. of responses received	Summary of Representations
and Diversification: The Issues		
<p>A: Continued support for the reuse of rural buildings to encourage new places for work including those unconnected to the farm holdings business</p> <p>B: Extend the policies around farm diversification to include all types of rural businesses regardless of their connection to the original business e.g., farm shops, glamping, employment connected to ecoservice provision e.g., ecologists, small artisan businesses</p> <p>C: Promoting improvements to communications infrastructure, such as better broadband and better public transport connectivity between rural areas and market towns</p> <p>D: Including planning policies for the support and development of key sectors such as tourism</p> <p>E: Support more work/ home space-shared office space.</p> <p>Q29. Which, if any, of the above options do you think the Plan should seek to include?</p>	72	<p>Most respondents indicated that all of the options were important. Option B was the most favourable, followed by options' C,A,D with E being less favourable. Comments are summarised below</p> <ul style="list-style-type: none"> • None • Consult local people • Farmers should diversify • Option B would interest farms with excess outbuildings • Repurpose buildings keeping local heritage • Option D – requires public transport for services / facilities • It is imperative that the agricultural sector is assisted to grow • Farmers should be encouraged to produce and sell locally, creating local employment and reducing food miles • Option D – designation of The Brecks as a National Park/Landscape would encourage investment from tourism related businesses • Consider carbon neutrality / zero environmental impact • Direct policy support for tourism • Robertson Barracks provides opportunity for mixed flexible spaces • All align with the key objectives and priority actions outlined in the Norfolk Rural Economic Strategy (NCC) • Issues of labour in farming communities must be addressed • Local Plan Update should include specific policies to protect and support enhancement of existing tourism as well as allowing new tourism development in appropriate locations • Local Plan should be responsive to changing trends and supportive of economic diversity. • Provision of a new settlement based around 'garden principles' will provide significant economic benefit in a walkable neighbourhood environment
Q30. Should the Council adopt a more flexible approach towards allowing appropriate economic development in the rural areas by allocating sites or	97 (yes:50 no:33 unsure/other:14)	Most respondents (52%) indicated a flexible approach towards economic development, with more favouring positive enabling policies over site allocations. Comments are summarised below

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Elements & Question No.	No. of responses received	Summary of Representations
<p>through positive enabling policies?</p>		<ul style="list-style-type: none"> • Consider each case on its merits, reject those that do not protect/enhance the countryside • Policies must not detract from the appearance and ambiance of the countryside • Policies should ensure that greenfield sites (BMV and environmental designations) are not allocated • Allocations based on assessment • In a controlled manner • Allocation of sites must be agreed with communities • Allocation, but only on edge of existing transport networks • Allocation of employment land should be based upon local need and meet the Council's vision and objectives • Council needs to be more flexible in minimising commercial rates for start-ups and expanding business • Subject to suitability of the road and public transport • A flexible approach, guided by the principles of sustainable / inclusive growth outlined in the Norfolk Rural Economic Strategy (NCC) would be beneficial for the region • Local consultation is required <p>34% of respondents indicated no support for a flexible approach, and 14% were unsure or indicated no preference. Few comments indicated support for protecting the rural environment and food production. Comments are summarised below</p> <ul style="list-style-type: none"> • Depends on development proposals • No allocations • Structured approach required to ensure fairness • Housing development should not be encouraged, will destroy tourism • More pollution • Would encourage inappropriate development • Unnecessary • Brownfield sites should be prioritised
<p>Q31. Are there any alternative options you think should be considered?</p>	<p>41 (yes:16 no:16 unsure.other:9)</p>	<p>50% of respondents suggested alternative options for consideration. Comments are summarised below</p>

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		<ul style="list-style-type: none"> • Commercial development should be conditioned on improving the environment on-site (where viable) or off-site- with a financial contribution payable to the Parish Council for tree planting, hedgerow enhancement etc. • Ensure existing places / areas used appropriately • Leave it to the investors • Consult existing businesses • Support collaboration by encouraging partnerships through supply chains • Drive development of an educated workforce • Assess what existing rural communities need – shops, services, opportunities for new business. Converting outbuildings into small businesses • Develop existing towns • Focus on brownfield sites and within settlement boundaries • No development • Parish Council’s should identify / assess sites • Encourage initiatives e.g., Wendling Beck Environment Project – will encourage high-value employment to locate to nearby market towns. Will attract new innovators • Extend policies around farm diversification to include all types of rural businesses • Spatial Strategy and Local Plan should be responsive to changing trends and supportive of economic diversity <p>39% of respondents indicated “no” to any alternative options, whilst 22% of respondents were unsure or indicated no preference. Comments are summarised below</p> <ul style="list-style-type: none"> • Not for rural areas • The Council’s job should be to create an environment where business (and leisure / quality of life) can flourish
The Retail Hierarchy		
Q32. Do you think that the retail hierarchy and defined town centre boundaries reflect the proposed role and function of each of the towns in Breckland? Do you have any suggestions	113 (yes:51 no:21 unsure/other:41)	<p>Most (45%) of respondents indicated that the retail hierarchy and defined town centre boundaries reflected the proposed role and function of each of the Breckland towns. Comments are summarised below</p> <ul style="list-style-type: none"> • Apply some flexibility • Retail development makes sense in a town, not in a village • Villages need to be defined

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Elements & Question No.	No. of responses received	Summary of Representations
for changes to the hierarchy or boundaries?		<ul style="list-style-type: none"> • Any changes to boundaries must not affect electoral matter • Dereham has greatest potential for growth and as a new Key Settlement <p>19% of respondents indicated that the hierarchy and boundaries did not reflect the role and function of the towns. Comments are summarised below</p> <ul style="list-style-type: none"> • Support local businesses and start-ups • Need reduction of business rates • Assess need and capacity • More investment in towns e.g., leisure activities • Too much out-of-town development and traffic congestion • Dereham and Thetford – too much [development] on the edge • Need clear strategies for future ‘High Streets’ • Town centre roles and functions have been changing. Concept of walkable neighbourhoods gives the opportunity to re-invigorate. Large centres will continue as destinations. Flexibility is central to success of future town centre objectives <p>36% of respondents indicated that they were either unsure or gave no preference. Comments are summarised below</p> <ul style="list-style-type: none"> • Towns, e.g., Dereham need investment • Use brownfield sites • Boundaries are non-existent. They extend further and further out • Unconvinced the Breckland boundaries are correct with respect to River Wensum
Future Challenges for Town Centres		
Q33. Which of the following approaches do you believe would most enhance market town centres? Please rank in importance (1) being most important to (11) least important	130	<p>Most respondents (21 (16%)) favoured option 8. Better transport links to the market towns from the rural hinterlands as the most important, followed by options 7. More comparison retail shops in our market towns (15(12%)), and 2. Increase in restaurants, cafes and meeting spaces for businesses and visitors in market towns (14(11%)).</p> <p>The least important option was 11. More residential dwellings mixed with commercial premises within our town centres (43(33%)), followed by options 10. Restrictions on conversions of retail</p>

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Elements & Question No.	No. of responses received	Summary of Representations
<p>1.Increase in after 6pm venues in our market towns 2.Increase in restaurants, cafes and meeting spaces for businesses and visitors in market towns 3.Less traffic within market towns 4.More quality green space in our market towns 5.More cycling and walking routes within our market towns 6.More convenience shops in our market towns 7.More comparison retail shops in our market towns (comparison goods are products which are usually higher value and purchased infrequently, such as vehicles, household goods or clothing) 8.Better transport links to the market towns from the rural hinterlands 9.A weekly market 10.Restrictions on conversions of retail units into residential dwellings 11.More residential dwellings mixed with commercial premises within our town centres</p>		<p>units into residential dwellings (28(22%)), and 6.More convenience shops in our market towns (10(8%)). Many comments included reference to good public realm / placemaking, as well as all the options being important, as summarised below</p> <ul style="list-style-type: none"> • Public transport and free parking are key to bringing people into market town shops. • Pedestrianisation makes shopping safer and more attractive • Needs to be a limit on eateries / takeaways and charity shops, and at least one bank • Town centre pavements should be wide enough to safely accommodate wheelchairs and mobility scooters • Our towns are scruffy. Stricter policies are required to keep towns safer, vandalism and litter free, street cleaning, quality street furniture, public toilets • A better mix shift towards more residential favouring conversion of retail unit should be seen as positive as well as quality green spaces • All are important • Different approaches will be more important in different locations and in relation to different types of development – a more flexible nuanced approach is required • A thriving nightlife, ‘café culture’ will boost economy • Reduce business rates, or very low rates for first 5 years for start-ups • Maintain the weekly market • Expand Swaffham Market
<p>Assets of Community Value: The Options</p>		

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<p>Q34. Do you think the Council should develop policies towards providing greater protection for the rural community facilities such as public houses and local shops and valued facilities?</p>	<p>116 (yes:103 no:5 unsure/other:8)</p>	<p>A significant number (89%) of respondents indicated support for policies for greater protection of rural facilities to ensure the sustainability of villages, promoting independence, and that policies should be flexible. Comments are summarised below</p> <ul style="list-style-type: none"> • Policies should be flexible to allow facilities to become ‘one-stop shops’ • Only where there is a need • Start-up funding would help • Provide support to Parish Councils who are best place to identify ACV and NDHAs • Provided it does not mean redundant buildings as a consequence • A nuanced, location-by-location, facility by facility, approach has to be provided for <p>11% of respondents indicated “no” support or were unsure or offered other comments. Comments are summarised below</p> <ul style="list-style-type: none"> • Cheaper rents and business rates would help • Unviable businesses should not be forced to continue • They are subject to market forces • Better consultation needed
Health and Wellbeing: The Options		
<p>Q35. Do you think the Building for a Healthy Life approach to design should be incorporated into the Design Guide and the Local Plan’s design policies as a means of evaluating the success of development?</p>	<p>101 (yes:83 no:5 unsure/other:13)</p>	<p>A significant number (82%) of respondents indicated support for the Building for a Healthy Life approach to be incorporated into the Design Guide and local policies. Comments are summarised below</p> <ul style="list-style-type: none"> • Evidence supports this works • Encourages healthy lifestyles • Well-being and climate change need to be kept at the forefront of all plans • Should be adopted in existing market towns first to create a healthy environment • Active travel must be imperative to reduce our environmental impact • Correlated to workforce productivity • The 12 principles are good and should be followed • Helps communities thrive • Would be hard to evaluate

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		<ul style="list-style-type: none"> • Can be used as an evaluation tool to assess the success of a development • Retain as much green space as possible • Should be applied to all development • Developers will know what is expected • Should be tailored to local perspective <p>18% of respondents indicated “no” support or neither preference. Comments are summarised below</p> <ul style="list-style-type: none"> • More investment needed on the design of rural road systems • Cars will still be used • Could make development unviable • Building for carbon neutrality should be the fundamental approach. “Healthy Life” is too broad a definition
<p>Q36. Can you suggest any other ways to evaluate the success of new development?</p>	<p>70</p>	<p>76% of respondents suggested ways of evaluation of success of new developments including surveying / consulting local communities, new residents as well as existing residents, and town and parish councils to measure health and well-being and environmental impacts. Comments are summarised below</p> <ul style="list-style-type: none"> • Natural England’s Green Infrastructure Framework - Principles and Standards for England¹⁴ to assist with monitoring and measuring the quality of green infrastructure. • Online forum for local residents to feedback • Measure demography and professions • “Design out Crime” rules will provide safe, well-lit communities • Measure e.g., ASB, burglary and vandalism rates • Measure shop lease rates • Measure local housing market and commercial market activity • Measure quantity / quality of local transport • Measure accessibility to facilities • Ensuring enough leisure facilities, green spaces, and medical facilities and shops locally met by developers • Consider Home Quality mark, Social Value methodology and Building with Nature • Approval of the local community must come first • Roads should be priority

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<p>Q37. Besides local preferences, the local character, climate change and health and wellbeing, is there anything else that should be considered in Breckland's Design Policies?</p>	83	<p>76% of respondents offered a mix of suggestions to be considered in Breckland's Design Policies. The topics of impacts on existing infrastructure and protection and enhancement of the local environment featured most. Comments are summarised below</p> <ul style="list-style-type: none"> • Too much control • More signage • Broadband access • Wildlife, biodiversity, noise and light pollution • Consideration to historic environment • Access to high quality green and blue infrastructure (spaces), and incorporated SuDS • Scale of development • Detailed policies, e.g., overlooking, overshadowing, aspects standards, impacts on neighbouring properties, parking, electric car charging, water runoff as a resource • Food production • Economic opportunity • Consult local people • Building materials – quality, sustainability, off-site modular etc, and only where viable • Carbon neutrality, zero environmental impact • Quality of river water • Infill developments over linear developments in villages • Consultation with Town/Parish Councils and Neighbourhood Plan Groups • Traffic and congestion • Age groups and ethnicity
<p>Preserving and Enhancing our Heritage Assets: The Options</p>		
<p>Q38. Do you think there are non-designated sites in your locality which require protection through local policy? Please state which.</p>	85	<p>74% of respondents considered that there were non-designated sites in their locality that required protection with most being specific sites and others more general types of sites/locations. Comments are summarised below</p> <p>Specific sites:</p> <ul style="list-style-type: none"> • Mattishall Village – The Old Mill, Mill Road, The Church Rooms, Dereham Road, Sports & Social Club/Memorial Hall and grounds • Quebec Wood, grounds of Quebec Hall, including detached golf course, Dereham

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		<ul style="list-style-type: none"> • Scarning Water Meadows, Fen, Recreation Ground, area around Rushmeadow /Podmore (wildlife species, deer, toads and bats), The Neatherd, Heathers and Bradley Moor • Scarning Free School – historic value • Billingford Village / St Peters, and surrounding arable areas • Bintree Woods and surrounding area • Eccles – water meadows (wildlife), military buildings near Eccles Hall School in the woods • Eccles – railway sidings - wildlife • North Elmham – woods, fishing area close to village (wildlife) • Swanton Morley WW2 airfield (should be preserved as a monument) • Watton Neighbourhood Plan areas (WTN 10) • Swaffham – section of London Street which extends from the Conservation Area to junction with Watton Road; Station Street (Bears Lane to town centre); Lynn Street; Mangate Street; Ash Close; White Cross Road (especially the Crescent); the Campingland; the Antinghams; The Manor House and fields; all old remnants of the railway, including bridge abutments; parts of Watton Road including Gordon Close • Podmore Lane fields • Garvestone American Memorial, Reymerston Church <p>General Sites/Locations:</p> <ul style="list-style-type: none"> • Thetford Forest and The Brecks • Snetterton North End and South End (areas with different habitats / flora / wildlife) • Wensum Valley including wetlands, river and tributaries, flood plains (SSSI, but protection through local policy needed) • All areas where concern for Nutrient Neutrality • Chalk Streams • Green fields / spaces • All village communities • Farmland • Rural communities on edge of Dereham • All woodlands and hedges • All marshlands / scrub

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Elements & Question No.	No. of responses received	Summary of Representations
		<ul style="list-style-type: none"> • Areas with historical value • Heritage assets • Snetterton – A11 north side designated by DEFRA as a risk area for Great Crested Newt • Rivers, flood plains and water meadows • Gressenhall – surrounding agricultural land • Churches, ancient buildings
<p>Q39. Do you think the council should introduce special controls that prevent the demolition of non-designated, locally important heritage assets?</p>	<p>128 (yes:107 no:6 unsure/other:15)</p>	<p>A significant number (84%) of respondents indicated that there should be special controls to prevent demolition of locally important heritage assets. Few comments were submitted as summarised below</p> <ul style="list-style-type: none"> • Sites should be listed within a schedule of non-designated heritage assets • Use local knowledge within Town/Parish Councils and NPs • Landscapes should be included • Include WW2 Nissen Huts • In relation to the Watton NP <p>Respondents' comments who did not support special controls or who indicated no preference, or unsure are summarised below</p> <ul style="list-style-type: none"> • Not necessary/appropriate for the Local Plan to prepare new approaches or special controls • Better funding for already designated assets would be more appropriate • Designate them rather than special controls
<p>Q40. Do you think the Plan should refresh and update local policy further in line with the NPPF including a strategic policy for the conservation and enhancement of the built and historic environment including resourcing and updating the historic environment evidence base including conservation area management plans and</p>	<p>91 (yes:80 no:4 unsure/other:7)</p>	<p>A significant number (88%) of respondents indicated support for a strategic policy for the conservation and enhancement of the built and historic environment. Comments are summarised below</p> <ul style="list-style-type: none"> • Should be flexible to support local discretion and facts based choices • Will ensure visual enhancement of villages, and policies developed to ensure buildings are maintained and used • Needs to consider boundaries and development impacts on settings of Listed Buildings and Conservation Areas • Community engagement required to protect assets and their reasoning • Needs to take account of carbon neutrality and telecommunication requirements

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Elements & Question No.	No. of responses received	Summary of Representations
appraisals and identified assets of local historic importance?		<ul style="list-style-type: none"> • The grey area of bringing buildings into line with climate change needs clarifying • Each village’s unique history could be identified • Should be in line with NPPF <p>Very few respondents indicated no support, neither preference, or unsure. Comments are summarised below</p> <ul style="list-style-type: none"> • Already sufficient protection
Protection of Habitats and Species: The Options		
Q41. Considering the sensitivities of The Brecks and particularly the smaller other protected sites in Breckland, do you think policies should go further to support these protected sites?	133 (yes:116 no:13 unsure/other:4)	<p>A significant number (87%) of respondents indicated support for enhanced policies to further protect protected sites. Comments are summarised below</p> <ul style="list-style-type: none"> • Checks / monitoring of development needs to be in place to enforce planning conditions • Don’t build on green sites • Huge losses in biodiversity • There should not be any development on or near them • Impacts of climate change means greater consideration of planning proposals • Such sites contribute to the local community • Protected sites need to be maintained • Do not have a ‘10% small sites’ development policy • Wensum needs protecting from sewage and pesticides etc. • For tourism – e.g., The Brecks offer recreation • Such areas are important for science and education • Prevent further loss of ancient hedgerows • SPAs and AONB etc should be protected, and Stone Curlew and Buffer zone should be protected • Judgement should be undertaken by professional assessment of ecological impact. • Green corridors should be maintained / enhanced and introduced where possible through existing and planned development • Wild buffers and hedgerows should be maintained around development • Planning policy must clearly reference the protection of locally designated non statutory wildlife sites which act as important stepping stones in nature recovery • More local consultation is key

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Elements & Question No.	No. of responses received	Summary of Representations
		<ul style="list-style-type: none"> • A specific ‘criteria-based’ policy to the River Wensum and flood plains/tributaries should be devised to determine a geographical distance (catchment) e.g. 1 km, wherein any strategic / major residential or commercial development is to be restricted and subject to a sequential test (alternative locations / sites) and environmental impact assessment based on parameters to be agreed with Breckland DC and Natural England, such as assessing alternative locations first and if no realistic alternatives are available, then assessing water quality / nutrient impacts and requiring developers to demonstrate ‘nutrient neutrality’ if the sequential test is passed, that adequate infrastructure is in place and that there is no risk of negative impacts on the River Wensum flood plain in order for sites to proceed. • Protected areas/buffer zones should not be reallocated to allow development. Landscape features such as avenues of trees should not be felled to allow development as it would change the character of the landscape. More TPOs. • Wayland Wood should be included in the list of sites. This has many rare species of wildflower. It is managed by the Norfolk Wildlife Trust but would benefit from additional protection in the Local Plan. • Protection should be derived from a local evidence base pertaining to the Brecks and other protected sites in the District. <p>Natural England suggest revising the following:</p> <ul style="list-style-type: none"> • Review policy EN3 03, “A new building that will be completely masked from the SPA by existing built development.” Evidence from Clarke et al. (2013) suggests stone curlew are sensitive to urban edge effects, residential development and recreational disturbance, all of which may negatively impact nest density up to a distance of 1.5km. This evidence has shown that stone curlews respond to potential disturbance events including road traffic, walkers and dog walkers from long distances. Nesting stone curlew are also likely to actively avoid buildings, with nesting birds believed to be particularly sensitive to changes in the landscape and built environment. The precise mechanisms for disturbance from individual developments are not understood. For example, it is not a straightforward line-of-sight issue, as reduced nest density occurs beyond woodland that screens any visual development effects. Therefore Natural England’s advice is this policy should be removed. • Ensure that the policy reflects Natural England small-scale development guidance.

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Elements & Question No.	No. of responses received	Summary of Representations
		<ul style="list-style-type: none"> • Natural England observes the same 1500m buffer zone for areas of the Breckland SPA designated for stone curlew as outlined in Clarke et al. (2013) and reviewed and updated in Liley (2016). However, Natural England does not observe the additional buffers referenced as ‘blue secondary buffer’ and ‘orange square cells’ in the policy (ref specific policy and plan). • It is Natural England's view that stone curlew records that underpin these buffers are not Stone curlew are a protected species under the Wildlife and Countryside Act 1981. While a development outside the 1.5km buffer zone may not be considered to have a likely significant effect on Breckland SPA, this does not preclude the need for offsetting should stone curlew be found within 1.5km of the proposed development site. • The Local Plan could consider impacts of indirect effects on protected sites e.g., increased nutrients loads from water and air which can favour more competitive plant species, leading to long term declines in diversity of heathland and grassland sites. Reflection on where development may contribute cumulatively, or where targeting of green infrastructure and off-site biodiversity net gain could act as buffers may offer an indirect means for the plan to help protect these sites. <p>Respondents comments who indicated that no further support was required, or who indicated no preference or who were unsure are summarised below</p> <ul style="list-style-type: none"> • Remit of Natural England and Norfolk Wildlife Trust • Current policies are sufficient, a balance has to be made between protecting such sites but also to not stifle development • The Local Plan needs to accord with the Environment Act 2021 for conservation and enhancement of biodiversity.
Q42. Do you have any suggestions in how the Council can protect these areas even further?	86 (yes:70 no:12 unsure/other:4)	<p>See also above suggestions in Q41.</p> <p>A significant number of respondents gave suggestions for further protection, reiterating / supporting further the suggestions given in Q41 above. Comments are summarised below</p> <ul style="list-style-type: none"> • Prior to planning condition discharge, satisfactory photographic evidence must be provided by developers that all ecological conditions have been met • Encourage educational field trips to these sites • Adopt policies for protecting hedgerows and verges

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Elements & Question No.	No. of responses received	Summary of Representations
		<ul style="list-style-type: none"> • Limit new housing and agricultural activity – pig rearing and fishing units • Review each site in the area • Sites should be graded as ‘Never to be built on’ • No development should be allowed on these sites or surrounding areas • Consult local residents on a regular basis • Give local communities greater weight in enforcement of policy and identification of sites • Work with expert bodies, landowners and enforcement • Promote as places to visit working with other bodies e.g., RSPB • Better joint working with Town/Parish Councils and CPRE, Wildlife Trust and NE • Designate environmentally sensitive areas as SSSIs and promote active travel as features in these areas • Designate The Brecks as an AONB / National Park or National Landscape, would help to attract tourism / business • Identify smaller areas of natural beauty and smaller areas of historic importance with restrictions similar to those in ‘national parks’ • Introduce Bylaws to control development and access- in certain areas • More use of TPOs • Enforced carbon neutrality, zero environmental impact, and insurances to protect local communities from environmental issues e.g., sewage, flood, river pollution or loss of wildlife • Extend the zones • Build a plan for maintenance of specific sites • Designation of public land to join up already designated and special sites to create habitat corridors • Have specific criteria-based policy • Development sites could include areas of natural habitat, open space, and for informal recreation to provide alternative areas for residents and visitors • Address impacts of air pollution – see Environment Act 2021 • Address water use, pollution and Nutrient Neutrality • Address climate change <p>Few respondents indicated that no further protection was needed or were unsure or commented generally. Comments are summarised below</p> <ul style="list-style-type: none"> • Too bureaucratic

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Elements & Question No.	No. of responses received	Summary of Representations
		<ul style="list-style-type: none"> • Already protected by environmental laws and regulations
Biodiversity: The Options		
<p>Q43. Do you consider that a higher biodiversity percentage than the statutory minimum of 10% should be delivered by new development in the district? If so what % and give reasons for your answer.</p>	<p>129 (yes:76 no:35 unsure/other:18)</p>	<p>59% of respondents indicated that a higher percentage of biodiversity should be delivered. A range of percentages were called for, from 15% to 100%. A 20% BNG figure was the most popular percentage called for (12 respondents), followed by</p> <ul style="list-style-type: none"> 25% (5 respondents) 30% (5 respondents) 15% (4 respondents) 50% (3 respondents) 40% (2 respondents) 75% (1 respondent) 100% (1 respondent) <p>Not all respondents calling for a higher figure indicated a specific percentage. Comments are summarised below</p> <ul style="list-style-type: none"> • Needs monitoring / enforcement • Qualitative rather than quantitative targets – insist on ‘Building with Nature’ standards • Breckland should be an example to others in setting new standards. It would be reasonable to demand 20% gain on-site only, or via mitigation or compensation • Biodiversity should also include the surrounding area • Types of biodiversity matter • Needs to be evidenced based • There is not a one size fits all approach • Research commissioned by Kent County Council has also demonstrated that a 20% BNG figure would not have a significant effect on development viability. Viability-Assessment-of-Biodiversity-Net-Gain-in-Kent-June-2022.pdf (kentnature.org.uk) • 20% is appropriate, based on examples of the successful inclusion of this policy in adopted Local Plans, is likely to be deliverable without any significant impacts on viability. Note that 20% BNG isn’t double 10%, as the 10% is in reality the provision of 110% of the original BNG value of the site pre-development. • Benefits of a 20% requirement go beyond biodiversity, as will provide a range of ecosystem services of benefit to the district, including climate change adaptation and

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Elements & Question No.	No. of responses received	Summary of Representations
		<p>mitigation measures such as carbon sequestration, managing water flow and reducing urban heat island effects, as well as providing additional green space which can deliver health and wellbeing benefits.</p> <ul style="list-style-type: none"> • Examples of other Local Planning Authorities which already require 20% BNG include Lichfield District Council and Swindon Borough Council, whilst Buckinghamshire and Milton Keynes are promoting 20% BNG within their strategic growth corridor. <p>Respondents' comments who indicated "no" to a higher percentage or who indicated neither preference, or were unsure are summarised below</p> <ul style="list-style-type: none"> • Statutory minimum should be enforced but a higher ambition should be encouraged • Local policy should remain consistent with National policy • Above 10% does not meet the tests set out in para.57 of the NPPF and in particular a greater than 10% requirement is not necessary to make a development acceptable in planning terms. A 10% requirement should also be maintained in order to ensure that the requirement is 'fairly and reasonably related in scale and kind to the development' (para 57, NPPF). • Should be for the developer to decide- whether to go beyond 10% - it is impossible to know what the cost of delivering net gain is until the base level of biodiversity on a site is known and what is required to achieve 10%. • The Local Plan must ensure that sites remain deliverable throughout the plan period. • The Council should undertake an assessment of the impact of such a policy requirement, on the viability of development and the additional land needed for biodiversity. Para. 34 of the NPPF requires development plans to set out the contributions expected from development, including contributions for green infrastructure, but importantly requires any contributions contained in policy to not undermine the deliverability of the plan. • It is virtually impossible to provide a 10% BNG on-site for smaller sites, leading to potentially costly off-site financial contributions. An increase to the statutory 10% figure would put small developers at an increased risk of having their developments made unviable. • There is no evidence to justify a higher percentage, such an approach is likely to threaten viability of development and curtail the delivery of housing. Aspirations to exceed the statutory requirement would be better addressed within a Supplementary Planning Document

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Elements & Question No.	No. of responses received	Summary of Representations
		<ul style="list-style-type: none"> • Greater clarity required on how the 10% net gain is delivered • 10% is a figure that won't increase property prices • Developments that provide more than 10% should be allowed to trade biodiversity credits • Our goal should be to minimise the effect of development on biodiversity, not 'deliver' it • Depends on individual sites – size and types of development • Requires flexibility
Green Infrastructure: The Options		
<p>Q44. Should the Local Plan designate any green infrastructure proposals within your local area? If so please indicate where they should be?</p>	<p>88 (yes:58 no:6 unsure/other:24)</p>	<p>It should be noted that analysis of the responses to this question highlighted that the term “green infrastructure” was possibly misinterpreted as ‘green energy’. Responses are summarised further below</p> <p>66% of respondents indicated “yes” to designation of green infrastructure proposals, some of which offered suggestions of which are detailed below along with a summary of comments</p> <ul style="list-style-type: none"> • Mattishall NP Steering Group have previously submitted 9 sites for LGS designation • Should be distributed to enhance wildlife corridors • Should be in SSSI areas and by chalk rivers • Dereham • Dereham Southern Linear Country Park area of semi-natural space being delivered by Glavenhill and proposed to be extended • Park areas with ponds/water • Play areas away from traffic • Tree/wooded areas with seating and facilities e.g., café • Track bed of Mid Norfolk Railway, and of the tracked north of land owned by the MNR towards Fakenham, as a footpath, cycleway and/or green corridor • Disused railway network around Swaffham, would provide a connection from Swaffham Heath and Narborough to Sporle and to Watton, with capabilities of connecting to existing footpath network • Land adjacent to the Camping land in Swaffham bordering Norwich Road • All allotments • Major footpaths that border the town (Swaffham) e.g., Shouldham Lane as green corridors • Hammonds Playing Field near the water tower, Swaffham

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Elements & Question No.	No. of responses received	Summary of Representations
		<ul style="list-style-type: none"> • There should be green spaces in all new developments over a certain size, i.e. 50 homes • Scarning – consider creating leisure space with walking trails and café etc • West Hall Drive green space • Whole of Southend, Snetterton • Areas around and including Bawdeswell Heath and other NNR for wildlife corridors • Bintree Woods • Banham • Water Meadows, Neatherd Moor, Rush Meadows, Playing fields • Common land and village greens • Rivers, chalk streams, aquifers, ancient hedgerows, and trees where possible • WW2 Airfields • Environmentally sensitive land types – river valleys, ancient grasslands etc • See Watton Neighbourhood Plan Policy WTN 1 • More access to open spaces and a right to roam in more places, especially river and wild swimming areas • Dedicated cycle routes between villages and nearest school up to 6 miles away. See route 51 in Cambridgeshire • The World Horse Welfare Trust at Snetterton (green land) • All expansion of the urban area should incorporate green corridors to link green areas • Wendling Beck Environment project should be extended upstream (centred in Gressenhall) • Opportunities can be taken to link new GI networks into already existing green spaces in towns or existing historic spaces such as churchyards to improve the setting of historic buildings or historic townscape. Maintenance of GI networks and spaces should also be considered so that they continue to serve as high quality places which remain beneficial in the long term. • Promoted development at land adjacent to Roudham/Harling Road Industrial Area will include open space and green infrastructure and will add to the local green infrastructure network • Promoted development by Alfred Charles Homes, on land at Fen road in Scarning adjacent to Dereham would include areas of natural habitat and open space and recreation areas contributing towards green infrastructure in the local area • American Memorial site, Garvestone • Remembrance space, Reymerston

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Elements & Question No.	No. of responses received	Summary of Representations
		<p>Respondents' (34%) comments who indicated “no” or neither preference, or who were unsure or misinterpreted “green infrastructure” are summarised below</p> <ul style="list-style-type: none"> • Existing green areas should not be developed • A more sustainable source of water and more use of solar energy • Local wind turbines, on greenfield no longer being used for farming • Use principles of the ‘green belt’ to ensure villages and locations keep their individuality • All proposals should be carbon neutral with zero environmental impact • Housing development should contribute more to water treatment and waste water, in an environmentally sensitive manor. Rainwater harvesting should be incorporated into design • The Green Infrastructure Map can be used to identify inequalities in access to greenspace and plan for new GI. The GI standards can be applied locally in policies and design codes.
Water Quality: The Options		
<p>Q45. Do you think that the Local Plan should introduce specific policies including ones around agricultural development to help address issues over water quality of our rivers? Please explain what these should be.</p>	<p>150 (yes:122 no:12 unsure/other:17)</p>	<p>A significant (81%) number of respondents indicated local policies should be introduced to address issues over water quality addressing agricultural practices and development. Comments are summarised below</p> <ul style="list-style-type: none"> • Stricter controls to protect from agricultural pollutants • Protection of water quality and marine life etc in ponds, pits and lakes. • Farmers with riparian rights over watercourses must be compelled to maintain and remove any growth that impedes the watercourse natural flow. • Consideration to proposals for Change of Use as farmers diversify. Resilience of water supply/treatment must be carefully assessed when considering any development. • No developments on agricultural land • No development should be allowed unless the appropriate infrastructure is already in place to deal with water issues including a restriction on agricultural usage. • No large developments / industrial scale poultry farming and the like should be allowed near our rivers. • Control over intensive farming infrastructure for chickens/cows. Encourage construction of tailing dams to reduce slurry runoff to rivers. Encourage facilities for processing farm waste for re-use. • New development should be connected to sewage works.

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Elements & Question No.	No. of responses received	Summary of Representations
		<ul style="list-style-type: none"> • Arrangements for surface water run-off and piping away surface water to avoid local pollution should be embodied in a 'polluter pays' principle for all new development. The fundamental issue with watercourses is agricultural run-off and pollution from surface water and permitted discharges from sewage facilities. Development should be accompanied by requirements for on-site treatment and mitigation. If not practicable the treatment should be specified and required elsewhere to neutralise any discharges. • Carbon neutrality and zero environmental impact would cover such requirements. • Farmers should be encouraged to use organic and sustainable farming methods. • New installations should be allowed with consideration of water treatment e.g., reed bed • Specific 'criteria-based' policy referable to the River Wensum, flood plains and tributaries should be devised to determine a geographical distance (catchment) e.g. 1 km, wherein any strategic / major residential or commercial development is to be restricted and subject to a sequential test (alternative locations / sites) and environmental impact assessment based on parameters to be agreed with Breckland DC and Natural England, such as assessing alternative locations first and if no realistic alternatives are available, then assessing water quality / nutrient impacts and requiring developers to demonstrate 'nutrient neutrality' if the sequential test is passed, that adequate infrastructure is in place and that there is no risk of negative impacts on the River Wensum flood plain in order for sites to proceed. • Watton Brook is a rare chalk stream. It gets filled with silt because of run-off from fields and the Environment Agency's policy is not to dredge chalk streams. We ask that planning policy recognises this rare stream and that any outflow from businesses has very secure back-up systems so that untreated water does not enter the stream. • Environment Agency - We note you have included in 8.11 that "<i>A ministerial statement in July this year has proposed via the future Levelling Up Bill that a statutory duty is placed on Water Companies to ensure that relevant Wastewater Treatment works are upgraded to filter out all nutrient pollutants from development to the highest technical achievement, which should alleviate some of the nutrient pressures on these protected water ways.</i>" It is not passable to filter out all nutrient and so this will need to be edited. The words '<i>out all</i>' should be cut out and the phrase, <i>highest technical achievement</i> should be amended to <i>highest technical limit</i> to make this statement accurate. • Environment Agency - SUDS are also useful for recharging aquifers and reducing pressure on sewage treatment infrastructure.

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		<ul style="list-style-type: none"> • The plan should be developed to leave scope for anticipated improvements to water efficiency of building fittings such as toilets and showers, as identified in the recently published DEFRA's plan for water. • Environment Agency (East Anglia) - Policies to ensure the light sandy soils are not washed into the rivers by inappropriate farming practices. • Policies to help reduce flood risk to developments downstream by using natural flood risk management by identifying land use adjacent to watercourses for such schemes rather than farming right up to the river, and reconnecting the flood plain so nutrient and silt rich flood water drops its load onto natural flood plains • Natural England - specific policies that help to address water quality issues, promote sustainable drainage systems (SuDS) and water sensitive design as part of a wider green infrastructure approach. <p>19% of respondents indicated “no”, due to there being national regulation in place, or gave no preference or were unsure. Comments are summarised below</p> <ul style="list-style-type: none"> • Over development has put pressure on water supply. More brown water systems are needed to protect fresh water/chalk streams • Environment Agency / DEFRA responsibility • The Local Plan should be sufficient flexible to be able to support or capitalise on opportunities to improve water quality or neutrality, through infrastructure delivery. • Agriculture is a small part of the issue, i.e., continued discharge from public sewers should be stopped • Consult Upper Wensum Farmers Group • Agriculture is not development • Enough policy protection in place following the need for proposals to demonstrate nutrient neutrality in areas that fall within the catchment of the River Wensum and Broads SAC <p>River water quality issues arising from modern agricultural practices are subject to regulation from the Reduction and Prevention of Agricultural Diffuse Pollution (England) Regulations 2018, and the related "Farming rules for water". Links to both of these can be found here: https://www.legislation.gov.uk/uksi/2018/151/made https://www.gov.uk/government/publications/applying-the-farming-rules-for-water/applying-the-farming-rules-for-water</p>

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Elements & Question No.	No. of responses received	Summary of Representations
		any new policy is deemed to be required, this should reference existing regulations, including the "Farming rules for water".
<p>Q46. Do you think the Local Plan should introduce further policies around water usage? Please explain what these should be.</p>	<p>127 (yes:72 no:23 unsure/other:32)</p>	<p>57 % of respondents indicated that further policies around water usage should be introduced, with many suggestion for rainwater harvesting and mitigation against run-off. comments are summarised below</p> <ul style="list-style-type: none"> • Ensure less wastage • Water usage should have zero environmental impact with fines for non-compliance • Consider construction of local lakes / water storage to be used for recreation / supply • More awareness of household water usage in UK compared to Europe • River pollution – action needs to be taken • Appropriate infrastructure on developments • Restrictions on agricultural usage • Disincentives to using farming irrigation, and encouragement of sustainable farming • Run-off from fields should be monitored more closely • All homes should be on water meters • Flood plain areas are required • Prohibit large housing settlements at or near upper parts of sensitive water catchments • New buildings should be designed to use brown water for garden / sanitary purposes. Treated fresh water should be designed to be used in the kitchen and bathroom only. Excess rainwater should not be allowed to enter the sewer system – to prevent storm loading • All developments to incorporate rainwater harvesting for non-potable use in dwellings and SuDs biased towards worst case for climate change • Mitigation measures are not enough to protect the Wensum. The council must not allow any development or change of land use unless it can prove that there will be no pollution of rivers or aquifers. • The Council should only be looking for the minimum required development, in order to conserve a scarce resource and ensure our communities are sustainable in the long term. • Only where evidence • Water treatment investment in rural areas should be funded by housing developers via S106 Agreements and match funded by water companies • A Water Cycle Study is important

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Elements & Question No.	No. of responses received	Summary of Representations
		<ul style="list-style-type: none"> • To support water supply and conservation strategies, development should consider if a cost-effective rainwater harvesting, source control SuDS can be implemented. This would be applicable for both greenfield and brownfield sites. • Anglian Water - Breckland should endorse ambitious water efficiency standards beyond the current optional technical standard of 110 l/h/d set out in Part G of Building Regulations. We need to have more robust policies on water use to ensure we have sufficient water to meet future ensuring environmental sustainability. <p>ould support a more ambitious approach similar to that proposed by the emerging Greater Cambridge Local Plan which has proposed 80 l/p/d in recognition of future water supply issues as a result of abstraction reductions to protect the environment. The policy tests would need to be robust to require monitoring of the proposed efficiency standard and remediation where the level of usage is exceeded. Policies should also require integrated water management solutions including rainwater/storm water harvesting and greywater recycling for non-potable uses – such schemes should be mandatory in larger developments that can provide economies of scale to achieve robust water efficiency standards. Anglian Water would also encourage the policy on water usage to include measures to ensure water efficiencies can be achieved through non-household development, which often have greater opportunities for incorporating water recycling and reuse to minimise potable water demands – depending on scale. Non-household development that requires significant water use for processing/operations should provide a water impact assessment to set out the measures they will utilise to meet their requirement and will need to liaise with Anglian Water at an early stage in their pre-application preparation. Please see our response to Q25 regarding non-domestic water supply to new non-household developments.</p> <p>Paragraph 8.11 could also refer to Anglian Water’s draft Water Resource Management Plan (WRMP24) which covers the period 2025-2050. This provides specific details on how we aim to address the challenges of future water supply including specific water resource zones across the region.</p> <p>EA - Local Plan policies should be aiming for the higher optional standard of 110 litres per person per day. However, the LPA should consider if the evidence justifies requiring a higher standard of water efficiency and set the expectation that a full range of options should be explored such as water offsetting, rainwater harvesting and greywater systems.</p>

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		<p>For non-residential we recommend policies require development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption. Older buildings are often the least efficient in resource use, as a result, we recommend that a policy is developed to require the retrofitting of existing buildings where opportunities arise through refurbishments and changes of use. There are several BREEAM Technical Standards documents to support retrofitting for commercial and residential buildings. 43% of respondents indicated either "no" to further policies or "unsure" or gave comments indicating neither "no" or "yes". Comments are summarised below</p> <ul style="list-style-type: none"> • Homeowners are incentivised to economise via water meters. Farmers pay Water Authority for extraction licenses. The system self regulates. • It is not a planning matter • Keep to current standards • Should be dealt with nationally • Education is the most effective way to limit water usage • In respect of agricultural activities, no further policies are required. Where further policies are deemed to be required, these should refer to existing regulations including those from the Environment Act 2021 which are linked to abstraction reform. • Building Regulations already set water efficiency requirements, and it is considered unnecessary to reiterate these within the Local Plan, or to require higher levels of efficiency than the Building Regulations. Any aspirations to exceed the statutory requirement would be better addressed within a Supplementary Planning Document. • NE - The Plan should comply with the Government policies and targets around water quality and efficiencies included in the Environment Act 2021, the Environmental Improvement Plan 2023 and Defra's Plan for Water. The Breckland area, which falls within an area of known water constraint, has a high number of water dependent protected sites and priority habitats that are vulnerable to reduced water supply and quality. Natural England would advise that the Plan includes policies to manage available resources, such as water efficiency or water reuse measures. • The LPA should satisfy itself via its HRA that the policies in their plan will not cause, add to an existing or make it more difficult to remove the risk of an adverse effect on integrity to supply growth. The Planning Authorities can choose to evidence this in several ways but one way may be to ask the water company to explain how it will supply growth and if any of the abstractions with which it is supplying growth impact designated sites (and

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		therefore impact nature recovery objectives in the Government's 25 Year Environment Plan).
Flooding: The Options		
Q47. Do you agree with the proposed approach set out in paragraph 8.15 above? If not please explain what your preferred approach would be?	112 (yes:59 no:17 unsure/other:36)	<p>53% of respondents indicated that they agreed with the proposed approach. Strong support was indicated for mitigation measures e.g., SuDS. Comments are summarised below</p> <ul style="list-style-type: none"> • In line with National Policy. Flood Risk does not preclude development subject to the application of the sequential test and exception test. • Where identified flood risk the developer should be conditioned to construct beam and block ground floor construction to mitigate any future flooding. • Sustainable drainage is hard to achieve and maintain. It must be well designed and maintained into the future. • Majority of development should be directed to areas of lowest flood risk, or appropriate flood alleviation measures should be provided. Requirements for sustainable drainage systems in new developments. • HE - Policies should acknowledge risks to traditional buildings from flooding, especially the need for such buildings to be able to dry out slowly and that care must be taken not to introduce inappropriate retrofitted measures which would prevent effective drying and shorten the life of the building. • Refer to Historic England's guidance note on 'Flooding and Historic Buildings': https://historicengland.org.uk/images-books/publications/flooding-and-historic-buildings-2ednrev/heag017-flooding-and-historic-buildings/ • HE - Policies on SuDS should advise that they need to be designed so that they do not impact on archaeology. Impacts can be caused by draining waterlogged archaeology or introducing surplus water and pollution from surface runoff into archaeological sediments via soakaways. Consideration should be given to the most appropriate course of action to protect buried waterlogged archaeology through the design of SuDS. • Embodied energy in buildings • Live Work Units and working from home: District Heat & Power • Essential to account for climate change, even for small developments. No residential accommodation in flood risk areas, only essential infrastructure where absolutely necessary. • Promote active travel

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Elements & Question No.	No. of responses received	Summary of Representations
		<ul style="list-style-type: none"> • Wensum needs protection • Areas of flood risk should be off limits and allowed to revert to nature. • Building in high flood risk areas should also consider existing dwellings and land e.g., the new builds may be more protected by extra measures, but will the existing dwellings and land be more likely to flood because of the extra measures put in place? • There should be no exception. If there is a flood risk, do not build houses. Climate change is here. • Follows National Policy • Water meadows should be left to perform their natural function. • Clean drains on a regular basis • AW - agrees with the approach to require SuDS in all new development – this provides multi-functional benefits for biodiversity and amenity as part of a wider green infrastructure-led approach to design. • AW - It is the Government's intention to implement Schedule Three of The Flood and Water Management Act 2010 to make SuDS mandatory in all new developments in England in 2024. We welcome the intention to include a SuDS requirement in policy to ensure SuDS are incorporated in new developments, until the Schedule is formally implemented, and the necessary measures are in place. • AW - We would endorse the approach to locate new development in areas of low flood risk –helps to ensure the new water and sewerage infrastructure and the embodied carbon within these assets is not compromised over its operational lifespan, or implications for charges to our customers in providing replacement infrastructure. • NE - supportive of the requirement of SuDS in new development. Further advice on nutrient neutrality for European sites has been provided in response to question 42. <p>47% of respondents indicated “no” or were unsure or gave neither preference. Comments are summarised below</p> <ul style="list-style-type: none"> • NCC - include: Development with areas of downstream flood risk and/or flood history should, wherever practicable, have a positive impact on the risk of surface water flooding. This would be applicable for both greenfield and brownfield sites. • We shouldn't be building houses in flood zones - there are no cases where "there isn't any other option" - the other option is not to build a house that is likely to flood.

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		<ul style="list-style-type: none"> • There should never be development if any significant flood risk exists. There must always be alternative locations. • The cumulative impact of developments should be carefully assessed early in the plan making process and flood risk assessments and consultee comments adhered to. Non major developments should not slip through the process. You need to take a holistic approach. There are a number of locations that are now vulnerable to extreme weather events and the council needs to review their policy position on CIL and seek govt funding to protect vulnerable communities. • Homes should not be built in areas at risk of flooding. The homes themselves might be protected, but flooded roads and surrounding areas can still make life unsettling/dangerous for residents. • Excessive building should not take place in areas that experience flooding. • Flood plains required. • Sustainable sites for residential development in flood risk zones can play an important role in the delivery of housing and should not be demoted if it can be demonstrated that appropriate flood risk alleviation measures can resolve potential flooding issues. Planning applications for residential development in flood risk zones should be determined on an examination of the suite of supporting technical documents, material planning considerations, and the merits of the proposals. • See Watton Neighbourhood Plan Policy WTN 1 • Consider local concerns • If any development has to take place in an area at risk of flooding because there is no alternative location, we will ensurethat is does not take place at that site (rather than ensure mitigation). <ul style="list-style-type: none"> • Phraseology is woolly and easily sidestepped. Should change to <i>“In line with government guidance, we propose to direct ALL development to areas of ZERO flood risk. Alternative locations should be identified for any proposed development on flood risk areas or those which could promote flood risk in local areas. Where such proposals on existing areas may have an impact, suitable alleviation measures and insurances will be taken out to provide local residents with suitable cover for potential issues experienced for a period of no less than 5 years subsequent to the completion of the development. We also propose to require the provision of sustainable drainage and sewerage systems in new developments.”</i>

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		<ul style="list-style-type: none"> • Greater consideration needed re flash flooding as greater rainfall expected over the coming years. • Agricultural land along rivers should be allowed / encouraged to flood in preference to urban areas and rural settlements being inundated. Farmers should be compensated to ensure they suffer no loss and they are willing partners. • Needs to include individual and small developments in at-risk areas in accordance with the new SFRA map. • NE - Natural England expects the Plan to consider the strategic impacts on water quality and resources as outlined in paragraph 174 of the NPPF. We would also expect the plan to address flood risk management in line with the paragraphs 159-169 of the NPPF. • NE - The Plan should be based on an up to date evidence base on the water environment and as such the relevant River Basin Management Plans should inform the development proposed in the Plan. LPAs must in exercising their functions, have regard to these plans.
<p>Tackling Climate Change: The Options</p>		
<p>Q48. Would you be supportive of any of the above proposals within Breckland’s development and design policies? Please state which ones and reasons why.</p>	<p>128 (yes:97 no:10 unsure/other:21)</p>	<p>A significant number (76%) of respondents indicated support for the proposals with development and design policies with many indicating that all of the policies were supported to mitigate climate change, as well as emphasising the more important ones. Comments are summarised below</p> <ul style="list-style-type: none"> • It is important that the sustainability policies do not restrict the delivery of housing across the District and therefore to meet the requirements of the NPPF, these policies must be supported by a robust evidence base and viability assessment that demonstrates policies and targets are deliverable. • Passivhaus standards • Solar panels • Clean energy on all new builds. More electric car charging points. Wind turbines to supply some power to industrial areas as in Eye, Suffolk. There should be ongoing subsidies and grants to assist existing homeowners to upgrade and adopt as many of the options as possible. • District heat and power may be unattainable with the possible exception of Snetterton. • solar heating, cycle ways, green spaces, local shops

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		<ul style="list-style-type: none"> • Photo voltaic cells in appropriate locations, electric car charging points, grey water recycling, cycle ways, green spaces, allotments. • Grey water • Greywater - incentivise home owners. district power - lots of solar going onto homes easily but the real need is cheaper energy. Better broadband for home working, electric car charging - very limited facility in Breckland, light pollution - darkness is a unique property of breckland compared to many other districts. • Green infrastructure • Reducing light pollution • Using regulatory powers to influence change including, planning, waste, recycling, and environmental protection. • Breckland's biggest contribution to CO2 emissions is car use. Housing and economic development must be within or next to existing settlement where walking, cycling or appropriate public transport are all available. • Construction standards should include under the maximisation of sustainable energy policies to require the fitting of solar panels to new south-facing domestic and commercial roof spaces. • Other priority areas should be those to tackle light pollution and to reuse greywater. • Provided it is demonstrated they are needed. And is viable. • Don't go far enough. Strict zero tolerance for climate change issues should be enforced. • Tree planting • Tree planting in urban areas is encouraged - Natural England refers you to the urban tree manual from Forest Research, which provides advice on ensuring the right tree in the right place in urban areas. Policy should ensure that all planting is done in accordance with British Standard BS 8545:2014 to ensure the trees can reach their full potential and deliver a wide range of benefits. <p>24% of respondents indicated no support or were unsure or expressed an opinion. Many supported the need for flexibility to overcome development viability issues. Comments are summarised below</p> <ul style="list-style-type: none"> • This is premature given the Government's Green Day proposals. Any changes to the design policies should reflect the Government's direction of travel. • BNG is enough

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		<ul style="list-style-type: none"> • Not Any. As this will come at a cost to individual households who can ill afford it, I.e., Tax on wood burners, Oil heating, clean air charges. • No stealth taxes in this rural region. Improve public transport. Use the rail structure to improve connectivity and get people out of their cars. • Not allow building development that will unnecessarily increase road use • Not supportive of any of your climate change proposals. I do not recognise our current environment as a 'climate emergency'. The scientific evidence on which these measures are being taking is hotly disputed and the true amount of human-caused global warming is not known. The measurements cited in paragraph 9.3 could be explained by natural long-term climate variation, caused by changes in the sun's irradiance. We cannot implement harmful changes to our way of life without knowing how much of an effect it will produce? • I do not agree with 15 minute towns. Also have you concluded other experts' opinions that we are actually damaging the climate. Electric cars are a con. We can't sustain the battery manufacturing for long. • Climate change is much too broad a concept to commit to being supportive of, just stick to present issues that you know need something done about them, like river pollution, maximising biodiversity, sustainable farming etc. It's doing things that we know are a problem now, rather than speculating on a largely unknown future scenario. • District councils should simply follow government policies on this subject. There is no point duplicating. • Building Regulations requirements only. Any further policies which go beyond these threaten the viability of developments. • An embodied carbon policy must not be so inflexible that it deems sites unviable and it is consistent with NPPF/PPG and justified by the Council. The viability of specialist older persons' housing is more finely balanced than 'general needs' housing and we are strongly of the view that these housing typologies should be robustly assessed in the forthcoming Local Plan Viability Assessment. The Council also need to verify that embodied carbon figures are available to developers from suppliers through an Environmental Product Declaration as in our experience this is not yet readily available from the majority of suppliers. • Any requirement should be 'stepped' in line with Government targets and the proposed changes to the building regulations. This is more desirable as there is considerable momentum from Government in preparing enhanced sustainability standards as it is

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		<p>clear the energy efficiency requirements for domestic and non-domestic buildings will increase sharply in the coming years. Aligning the Council's requirement for carbon neutral development with those of Government would therefore be pragmatic and more achievable.</p> <ul style="list-style-type: none"> • Only build where the services are and reduce commuting miles for everyone. • You cannot reduce private car travel in rural areas and cycling and walking is not an option for many. Low Traffic Neighbourhoods (LTNs) do not work for everybody.
<p>Q49. Are there any other climate change policy proposals we should consider?</p>	<p>68 (yes:59 no:6 unsure/other:3)</p>	<p>A significant (87%) number of responses to this question indicated support for consideration of other policy proposals with strong support for policies requiring new housing development proposals to incorporate green renewable energy e.g., solar panels and heat pumps as well as active travel connections and provision of green infrastructure as well as rainwater harvesting. Comments are summarised below</p> <ul style="list-style-type: none"> • Tree planting – carbon capture. Could be conditioned as part of a permission. • Promoting green space • Protection of green environment including water courses – monitoring / enforcement • Enforcing a biodiversity net gain % in excess of the minimum requirement • Encouraging installation of green energy generation capabilities via support for planning proposals that include this – solar, wind, heat pumps • Policies and design guides should be introduced to ensure the provision of solar panels on all new south-facing domestic and commercial roof-spaces. • All proposals should be carbon neutral with zero environmental impact • Consider environmental impacts / long-term carbon footprint for new housing development (25 houses or 5,000) • Housing growth needs to be restricted and kept within truly sustainable locations • Subsidies for farmers to install solar panels in fallow and unproductive arable fields. Norfolk is one of the lowest powered counties within the UK • Organic farming would also help with co2 emissions and create more biodiverse environment. supporting farmers in this would be great. • Mandatory EV points for new builds • Grants to help listed properties become more eco as retrofitting is often prohibitively expensive • Introduction of Food waste collection. Garden waste collection should be free.

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		<ul style="list-style-type: none"> • Building Regulations – re 31% less carbon emissions is too ambitious as electricity grid is currently unable to support further demand e.g., heating systems, EV home charging. If PV with battery storage is envisaged to be the principle means of generating household power, then household roof design must be conditioned to accept the additional wind and snow loading of the number of individual PV panels. The house roof must ideally be aligned in an East - West orientation to make the optimum use of solar energy. This will affect the developers plot designs and may well effect the overall density of the development. • Min EPC A standard • Don't build where people will be reliant on cars • Developing agricultural land for housing should be resisted -climate change will have a devastating impact on the ability to grow our own food. • Introduce a tourist tax on privately rented holiday lets to offset increased energy and water usage. • Public transport improvements. Cycle, buses, rail • See guidance from CPRE, FoE and others • Consider agriculture/livestock – e.g., developments e.g. a biomass plant need to be considered in the context of reducing greenhouse gas emissions but this needs to be done in a better informed more holistic manner, e.g., biomass feedstock cultivation is having a negative impact on soil health in this area which impacts carbon capture/release. • All future development to be net zero. Look at other LA adopted policies • A sustainable approach should secure a balance between the benefits that such development delivers and the environmental costs it incurs. The policy should seek to limit and mitigate any such cost to the historic environment • Put affordable housing in the right areas <p>NE - We suggest 5 specific actions to include in the Plan:</p> <p>1.Set an ambitious climate-specific policy with targets for reducing greenhouse gas emissions. Plans should include a clear commitment to achieving the national statutory target of net zero emissions by 2050, with policies to secure significant reductions in greenhouse gas emissions over the Plan period;</p>

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		<p>2. Identify, protect and plan to restore all areas of peatland. Wherever possible this should include management of the catchment areas that support the peatland. We would advise extending this approach to shallow peaty areas in addition to deep peats.</p> <p>3. Identify opportunities to increase tree and woodland cover consistent with the UK target. Wherever possible, this should provide multi-functional benefits. Planting on peatlands and other valuable open habitats must be avoided.</p> <p>4. Identify areas where nature-based solutions can provide benefits to people whilst reducing climate change vulnerability in the natural environment.</p> <p>5. Identify habitats and protected sites that are particularly vulnerable to the impacts of climate change and consider how the planning system can work to reduce these vulnerabilities.</p> <p>We advise that these actions are integrated into a strategic approach alongside green infrastructure, health and wellbeing, biodiversity net gain, natural flood management, air and water quality to deliver multifunctional benefits to people and wildlife. The Plan should make clear that development will be consistent with these policies, to ensure sustainable development is properly achieved across the Plan period. Meaningful targets should be set that can be appropriately monitored over the Plan period to demonstrate the effectiveness of the Plan/Policy in addressing climate change and to ensure appropriate remedial action can be taken as necessary.</p> <p>NWT - Given the scale of the climate crisis and its intrinsic links to biodiversity impacts, we believe that there is a strong case for high standards of energy efficiency and renewable energy provision in all new development. We refer to the joint guidance by the TCPA and RTPI which gives good examples of proactive policy best practice in this are nationally https://www.rtpi.org.uk/media/9379/tcpa-rtpi-climate-guide_oct-2021_final.pdf</p> <p>We also recommend that the Council investigates the possibility of including a net zero target for new housing in the district, following the example of Reading Borough Council, which requires in their 2019 Local Plan all new residential developments of over 10 dwellings to be built to net zero standards.</p> <p>13% of respondents indicated no support for further policy proposals or were unsure or expressed an opinion. Comments are summarised below</p> <ul style="list-style-type: none"> • You can't control the weather • End the climate emergency

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		<ul style="list-style-type: none"> Stick to present issues like river pollution, maximising biodiversity, sustainable farming etc. It's doing things that we know are a problem now, rather than speculating on a largely unknown future scenario. Only build where the services are and reduce commuting miles for everyone
<p>A Safe and Convenient Transport Network: The Options</p>		
<p>Q50. Which of the following options do you consider to be the most important for a sustainable transport strategy? Please rank 1 for most important and 8 for least important.</p> <p>1. Development should seek to minimise the need to travel i.e., be located to facilities and services</p> <p>2. More electric charging points including all new development to provide facilities for electric vehicle charging</p> <p>3. Promotion of shared community 'pool' vehicle schemes on some developments</p> <p>4. Improved digital connectivity</p> <p>5. Improved, realistic and safe cycle and walking routes within market towns and from rural villages to market towns within a reasonable distance</p> <p>6. Promote "uber-style" bus services for rural areas similar</p>	<p>155</p>	<p>Most important:</p> <p>Most (39%) respondents favoured option 1. Development should seek to minimise the need to travel i.e., be located to facilities and services as the most important, followed by option 4. Improved digital connectivity (21%), and then option 5. (13%) Improved, realistic and safe cycle and walking routes within market towns and from rural villages to market towns within a reasonable distance.</p> <p>Least important:</p> <p>Option 7. Enhance the role of market towns, increasing their retail/service function to support the rural hinterland, was the least important (25%), followed by option 3. (20%) Promotion of shared community 'pool' vehicle schemes on some developments, and then by option 6. (19%) Promote "uber-style" bus services for rural areas similar to those seen in Warwickshire and Wales BwCaBus, and then option.</p> <p>Many respondents indicated that all of the options were equally important.</p> <p>Other options / comments are summarised below</p> <ul style="list-style-type: none"> Build a railway from Kings Lynn to Great Yarmouth linking up Breckland market towns Use off-shore energy locally Enhanced public transport Sustainable travel e.g., active travel and trains Leave rural areas alone No 20 min city proposals

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<p>to those seen in Warwickshire and Wales BwCaBus 7.Enhance the role of market towns, increasing their retail/service function to support the rural hinterland. 8.Other options</p>		<ul style="list-style-type: none"> • Introduce Three Phase electricity to allow people with 'spare' land to harness solar power to feed back into the grid • Reduce speed limits to encourage active travel on country roads • Dereham – deliver major active travel routes and open spaces networks via development • The options should all be a combined set of expectations • Development in market towns provides opportunity for sustainable development • Improvements should be part of a wider sustainable transport strategy • National policy indicates a range of measures which should be included within any sustainable transport strategy • Network Rail – introduce policies to make communities safer by targeting closure of level crossings, as well as seek costs for these from development to mitigate impacts
<p>Q51. Do you have any other suggestions to provide more sustainable transport options in Breckland?</p>	<p>65 (yes:48 no:10 unsure/other:7)</p>	<p>Most respondents to this question offered suggestions to improve or provide sustainable transport solutions to mitigate the use of the car. Many of the responses indicated solutions that fall under the County authority, British Rail or private provider. Comments are summarised below</p> <ul style="list-style-type: none"> • Safe walking and cycling routes throughout Mattishall enabling access to the village centre • New development close to towns enabling walking / cycling • Encourage new development in existing towns to eliminate commuting, with easy access to facilities • Cycle ways / lanes between towns and villages • Increase bus routes to rural villages and electric buses • Regulated public transport service • Reopen mid-Norfolk heritage railway to proper rail traffic • Mid-Norfolk Railway – use as a cycle way • All refuse vehicles to be electric • Re-opening of Dereham rail links • Implement Cycling / walking infrastructure plan • Subsidised Public Transport services • Promotion of existing services • National policy (NPPF Section 9) provides for sustainable transport. • Proximity of proposed development to railway stations and public transport needs to be considered

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		<ul style="list-style-type: none"> inclusion of mobility hubs at the heart of new developments to integrate various transport modes (ebikes/car sharing clubs/escoters/bus stops) should be encouraged A new settlement offers opportunities for new employment to be offered to existing residents away from the established settlements and through effective masterplanning to future residents of any new settlement, thus reducing the need to travel within the district. Development contributions from any new settlement additionally offer the opportunity for a step change in public transport provision, through either building on existing public transport provision or through the provision of new transport services directly associated with the development
<p>Local Cycling and Walking Infrastructure Plans: The Options</p>		
<p>Q52. Do you have any options for walking and cycling routes in your locality?</p>	<p>82</p>	<p>It is clear from an analyses of the responses that question 52 was open to more than one interpretation, i.e., ambiguous in its meaning. A mix of responses suggested that this question was asking for a) what existing walking and cycling routes do you have in your locality? And b) what suggestions do you have for walking and cycling routes in your locality?</p> <p>28% of respondents directly indicated “no” to this question which has been interpreted to mean that they did not have any existing walking and cycling routes in their locality.</p> <p>The remaining respondents who did comment on either what existing walking / cycling options they had or were suggesting options to enhance or implement walking / cycling options. Comments are summarised below</p> <ul style="list-style-type: none"> Mattishall Village has a good network of footpaths within the 30 MPH zones. The issues arise outside the 30 MPH zones. Pedestrians, dog walkers, families with children in pushchairs and vehicles traveling >60 MPH are not compatible, a serious accident is inevitable without safe footpaths. Prohibit development where footpaths do not exist. No pavements Only for leisure Cycle routes in and out of Dereham and all market towns Make cycle lanes round Dereham better Extensive plans to improve the walking and cycling networks around Dereham linked to the delivery of planned new housing and employment growth between the A47 and

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		<p>Shipdham Road in Dereham in line with the attached proposed Sustainable Urban Extension to Dereham South and South-west Sectors Story Board that accompanies this representation.</p> <ul style="list-style-type: none"> • Off road foot/cycle path from North Elmham to Dereham via Beetley & Gressenhall. Off road foot/cycle path from North Elmham to Bawdeswell to access bus services to Norwich • Between Bawdeswell and Bawdeswell Heath. • North Elmham to Dereham railway track could be turned into a cycle path • Protect footpaths, don't let them become access to developments in the countryside • Roads only • More public use of and right to use the track bed of the Mid Norfolk Railway and of the tracked north of land owned by the MNR towards Fakenham, as a footpath and cycleway would be welcomed • Disused railway lines • Cycle route along the old railway from Loch Neaton, Watton to Swaffham • Along Holt Rd, Cycle Route • It feels like safe walking areas will greatly reduce with the increase of homes and people • Build cycle ways similar to the ones from Wymondham to Norwich • Lynford lakes • Needed to Swaffham and Litcham • There are many existing FPs in Swaffham which lack connectivity. Some can be remedied by providing sections on the inside of roadway hedges if a way could be found for landowners to agree • Swaffham - the main desire route for walking and cycling is the south/north route through the town i.e. the A1065 Brandon Road/ London Street/ Market Place/ Station Street/ Castle Acre Road. At present this route is dominated by vehicular traffic, deterring in particular cycling even for short journeys. <p>New developments around Swaffham must provide an alternative access from those developments towards the north and south, which could also be used for through traffic. That would alleviate the issue of traffic through the town, allow Brandon Road through to Castle Acre Road to be redesigned for safe walking and cycling. All cycling and pedestrian routes from new developments must be 'joined up' to the town centre in particular.</p>

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		<p>Swaffham, a south/north relief road is essential to achieve our aims of improving the town centre ambience and to enable the main Active Travel route to be achieved. This infrastructure should be baked into all new residential development in Swaffham requiring developer contributions including land. All new residential development should be mainly served by this road.</p> <p>Planning of this route soon in this new Local Plan period is urgent. The overall costing should be done to enable CILs to be applied. I therefore would want to see this to be included in the IDP.</p> <ul style="list-style-type: none"> • A cycling plan was put forward by local people in Swaffham. Swaffham would benefit from introducing the 20 mile speed limit and this would open the way to a properly designed local cycling and walking network and to become an active transport town. A network of quiet rural roads could be identified and publicised – the newly unveiled Rebellion way is a good example of a cycle way utilising largely existing infrastructure. • Fengate Drove in Brandon should be widened, and legible pedestrian and cycle routes provided to accommodate and encourage increased movement between the north-west part of Brandon and the existing public transport infrastructure and town centre • Attleborough to Eccles Road station to Aurora School to Kenninghall • Cycle routes are disjointed, and tend toward leisure activities (Marriotts Way, Peddars Way etc) rather than a means of commuting. A good example is the route into Norwich from Dereham • To feel safe there would need to be better Street lighting • Roads are narrow and traffic makes some routes dangerous. The only way to look at cycle routes is to separate cars from bicycles • In Quidenham traffic has eroded the footpaths along the main road and so walking is now unsafe, particularly as the road is busy and the traffic is fast. I would also like to see the speed limit reduced from 40mph to 30mph or 20mph to make walking and cycling safer • The Robertson Barracks site does have existing walking and cycling connections to nearby Swanton Morley. As part of any future development, an opportunity to enhance local connections including walking and cycling routes can be explored. • Incentivise and promote private landowner schemes to connect up and make circular existing footpaths • Yaxham - although we do not want Yaxham/Clint Green to merge with Dereham, a well maintained footpath and cycle route from Dereham to these villages would be option. We

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		<p>would not want this to be a catalyst for more development in these villages. It is greener and more enjoyable to walk/cycle to town.</p> <ul style="list-style-type: none"> • New active travel routes should not be at the expense of the motorist e.g. Low Traffic Neighbourhoods • Welch’s Group is promoting land adjacent to Roudham/Harling Road Industrial Area for development. It is suggested that the promoted development could support the delivery of improvements to the walking and cycling routes and connections in the vicinity of the Industrial Area. There is an existing footway connection between the Industrial Area and the services and facilities within Harling. There is a case for better walking and cycling connections from the Industrial Area to Harling Road railway station, and for more conveniently located bus stops on the B1111 to serve the Industrial Area. • Muller Property Group has promoted land west of West Acre Road in Swaffham to the Call for Sites process for the emerging BLPFR for a mixed use development, comprising residential and employment uses – Ref. LPR/C4S/DEV/137. The site is located on the edge of Swaffham, adjacent to the Eco-Tech Employment Area, within close proximity of supermarkets, and within walking and cycling distance of all of the services and facilities in the town centre. A Vision Document has been prepared for the promoted development and has been submitted as an update to the Call for Sites submission. The Illustrative Masterplan included within the updated Vision Document shows pedestrian and cycle connections from the promoted development into the neighbouring employment area and to supermarkets. • Garvestone, Reymerston & Thuxton Parish Council - Remembrance walk (although pedestrian only) • Alfred Charles Homes is promoting land at Fen Road in Scarning adjacent to Dereham for residential development. The site is within 450m of existing bus stops on Stone Road and Hillcrest Avenue. A preliminary access arrangement has been designed for the promoted development, which includes a new footway connection on the southern side of Fen Road to connect the site to the existing footway network within Dereham. It is considered that a new footway on the southern side of Fen Road in the vicinity of the site, to be delivered in conjunction with the proposed development by Alfred Charles Homes, would provide improved facilities for pedestrians to access Scarning Fen; there are currently pedestrian entrances to Scarning Fen from Fen Road and Stone Road but no footway exists at those entrances. • Walking and cycling routes to and from employment and housing should form the basis of a sustainable location for new development

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		<ul style="list-style-type: none"> The Shadwell Estate is a private estate alongside Thetford Town with river frontage. The inclusion of estate land for development within the growth strategy to 2046 offers the opportunity to open up new walking and cycling routes to the east of the town providing greater connectivity, movement options and access to the wider countryside.
Power: The Options		
<p>Q53. Do you think the current policies are working to encourage more renewable energy development in Breckland? If no, what other options should the Plan consider?</p>	<p>135 (yes:14 no:53 unsure/other:68)</p>	<p>Overall responses to this question indicated that more needed to be done locally or nationally to enable more implementation of renewable energy. There was much emphasis for support for solar power energy and for heat pumps in new developments. Half of respondents (50%) to this question indicated that they were unsure, or gave no preference, or commented generally. Comments are summarised below</p> <ul style="list-style-type: none"> Localised wind turbines and solar arrays where possible. If a community has a certain number of residents, then it should be positively pushed towards the installation of a technology to help reduce its carbon footprint accordingly. These schemes should help reduce the residents energy bills Evidence required Affordable EV charging points in Dereham Community-owned power generation More wind farms Anglian Water would welcome a criteria-based policy for renewable energy development where it supports the zero carbon targets of essential infrastructure providers and enables energy security and greater resilience for our operations. Whilst the installation of some renewable energy development such as solar, on our operational land is permitted development, we would welcome positive policies for renewable energy where this provides further opportunities for securing net zero ambitions within or close to our operational sites. The Council should actively seek to improve the power infrastructure for the District and this shall include improving distribution and capacity of the existing network in key growth locations as well as renewable energy development and as other forms of power generation such as AD plants to support local power requirements. NWT are aware of the national legal requirement to reach net zero by 2050. Given the impacts of a rapidly changing climate on Norfolk's wildlife, would urge the Council to adopt sufficient policy measures to ensure that this target is reached as soon as possible. We would welcome additional policy support for renewable energy provision

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		<p>targets on all new development, where practicable, given the efficiencies of inclusion in the original build versus retrofitting.</p> <p>39% of respondents indicated that they did not think the current policies were working to encourage more renewable energy. Comments are summarised below</p> <ul style="list-style-type: none"> • All new build developments should incorporate air/ground source heat pumps and PV with battery storage for heating and lighting. Glazing should exceed that required under the current Building Control Regulations. Grey water systems and porous driveways should be the norm. • Grants / support for solar and heat pumps • Promote guidance for reducing carbon footprints • EV charging points • More spatial planning for renewable energy – identifying suitable areas • Solar parks on low grade sites • Snetterton power station has a massive expanse of roof space that can be used to install solar panels but they aren't allowed • Design guides and other means should be sought and found to ensure that solar panels become compulsory for new south-facing roof spaces, both on domestic and commercial properties • Relaxation of rules for small scale domestic wind generation (1-3kw) to a permitted development level similar to that existing for solar. This will help bridge the gap between solar in the sunny seasons and winter when the energy is needed for heating. Promote individual investment into wind farm facilities in return for reduced/offset energy rates • Greater emphasis on major solar schemes and creating additional grid capacity and private wire connections to new planned and existing employment uses is required • Pollution • Increased encouragement and explicit support for all forms of renewable energy schemes should be included including direct reference to how such schemes will be assessed when planning applications are submitted, and how the need for renewable energy will be balanced with other factors <p>Only 10% of respondents indicated that they thought the policies were working. Comments are summarised below</p>

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		<ul style="list-style-type: none"> • Does not go far enough • Policies should include consideration of the impact on the historic environment for all commercial renewable energy technologies, including wind power (onshore and offshore), solar photovoltaics (PVs), hydropower, biomass and Energy from Waste facilities (EfW). • Renewable energy policies should include reference to heritage assets and their settings (in conjunction with Local Plan heritage policies) and should seek to ensure that any harm to the significance of a heritage asset is satisfactorily addressed in the planning balance. • The policy, or its supporting text, should not use arbitrary distance measurements for assessments from heritage assets to locations proposed for large-scale renewables. Instead the policy should ensure that settings are fully assessed, on a case by case-basis.
<p>Q54. Are you aware of any suitable sites for the development of renewable energy, including solar and wind farms, within Breckland?</p>	<p>86 (yes:39 no:35 unsure/other:11)</p>	<p>Most respondents (45%) offered suggestions which they considered suitable for renewable energy development. Some offered locations and some offered where e.g., solar panels could be installed (mainly house roof tops). Solar panels featured heavily in responses to this question. Comments are summarised below</p> <ul style="list-style-type: none"> • Industrial areas – roof solar panels connected to the grid and small/large turbines also in commercial areas • Solar and windfarms to existing brownfield sites and introducing tax incentives for businesses/farms to include solar and windfarms on their premises • Solar panels on tops of bus shelters / bike racks, public car parks • Micro projects – all roofs • Bintree • Shipdham - Letton Road • Shipdham Airfield • Snetterton • Snetterton – land at Twells Business Park • Swaffham • West and North of Swaffham – large areas of arable land could be used for wind farms • Necton • Large sites under the Call for Sites • Every proposed housing development - solar panels and/or wind turbines

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		<ul style="list-style-type: none"> • South facing fields for solar panels • Infertile land • Redundant WW2 Airfields • A11 and A47 routes • Robinson Barracks, Swanton Morley • AW - Whilst the installation of some renewable energy development such as solar, on our operational land is permitted development, we would welcome positive policies for renewable energy where this provides further opportunities for securing net zero ambitions within or close to our operational sites. • A new settlement provides an opportunity to deliver a step change in traditional power sources on a large scale, through the delivery of a bespoke and entirely renewable energy strategy, including provision of community micro-grids <p>40% of respondents indicated that they did not know of any locations but if which some did express an opinion, and 13% of respondents expressed an opinion only. Comments are summarised below</p> <ul style="list-style-type: none"> • The issue for any energy development is the lack of grid capacity. This is what is restricting renewable energy development and indeed commercial roof top solar. The LPA needs to engage with National Grid and UKPn to understand the issues. • Concentrate on reducing use and increasing home renewable energy which will remove the need for more cabling and reliance on energy firms • Fields of solar panels should be hidden from sight
Open Space, Sport and Recreation: The Options		
Q55. What are your views on the current provision and future need of open space within the parish you live?	95	<p>A mix of responses was received to this question with responders stating that there was adequate provision, and responders stating there was not adequate provision and gave suggestions as to what was required in their localities. There was concern for existing and future maintenance of open spaces, and that all housing development schemes should provide areas of new open spaces. Comments are summarised below.</p> <ul style="list-style-type: none"> • MPC takes a view that green open space is essential for parishioners' wellbeing. Mattishall currently has a village green, Mattishall Sports and Social Club grounds, laid to football cricket and bowls within season. The village has an area laid out to allotments.

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		<p>This year MPC will take possession of an area of land to the western edge of the village that will become a community wood with walkways and seating. In addition, a second area of allotments and an orchard will also come into community use</p> <ul style="list-style-type: none"> • Mattishall - There is a demonstrable need for areas of Green Open Space to be formally designated in our area. These have been proposed through the Call for sites (Green Open Spaces) process and within our draft revised Neighbourhood Plan • More open space, less houses • Inadequate. Too much of Norfolk’s rural environment is inaccessible • More public footpaths in our parish would be desirable • Open spaces need protecting • Green or brown space should not be used for further housing in the countryside not within walking distance of towns where there are no shops or doctors nearby either • We have a plethora of green space being in a rural village, as long as we don’t get large scale developments nearby • We need a playground and open access area for children. • More walking routes particularly that also allow dog access is also important • Need to maintain this as much as possible to help promote wellbeing • Good Provision at present but reasonable provision puts an enormous burden on parish maintenance, ever since Breckland stopped maintaining open spaces the acquisition of additional open-space is a double edged sword for most parishes • Scarning - sufficient and would be for any moderate expansion of the village • Scarning - Open space is limited to the water meadows and Scarning Playing Field. All these areas need to be better maintained. Additional green areas are needed as the current areas are not sufficient to meet the needs of the residents • Scarning - as the proposed site in the field between Dereham Road and Rushmeadow Road in Scarning is already home to a large number of wildlife species and is not a desirable location for housing opposite a sewage works, I suggest this site be put forward for green open space • Brisley - is very good. There is a beautiful community parkland which is well serviced • Mundford - would like to see more designated walking and cycle paths • Foxley – none in Foxley • Bylaugh Parish – no facilities, no common land, allotments or PRoW • North Elmham – desire for open spaces in the countryside

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		<ul style="list-style-type: none"> • Watton - Inadequate. Watton Town Council feels there is a lack of public open space in Watton. Watton Neighbourhood Plan Policy WTN 7 • Worthing and Hoe Parish - currently very few open space options. No public footpaths in Worthing. Local landowners have withdrawn access to permissive paths • Worthing – insufficient for future needs • Swaffham - insufficient open space generally, badly positioned so that it is under used. The Highfield estate on Lynn Road is woefully short of any open space to the extent that residents use carpark areas for recreation. The Swaffham Parkrun has to use the school playing field with 3 laps to make a 5k distance because there isn't an alternative. if the Town continues to grow, a sufficiently large sport and recreation area needs to be preserved • Swaffham - could do with a larger area for sports. This could be planned with new development on the outskirts of the town and might provide a buffer from a relief road/housing access road and the houses. • Dereham - there is a chronic need for play space, sports pitches and semi-natural public recreational spaces in the area around Dereham. Emphasis should be given in the new Local Plan to the delivery of the new Dereham South Linear Park proposed to be delivered as a benefit linked to new housing and employment growth between Shipdham Road and the A47 at Dereham. The proposal being promoted by Glavenhill is shown on the attached Sustainable Urban Extension to Dereham South and South-West Sectors Story Board forming part of this representation • Quidenham and Eccles - are probably too small to warrant open space, unless development happens. There are already pleasant walks • Yaxham - we strongly believe that open spaces should be protected in our parish in order to keep the rural characteristics of a village. • During recent consultations with residents at a drop in session as part of the Yaxham Neighbourhood plan review, some possible sites were suggested by residents and further consideration is being given to possibly include them as recommended sites within any potential update to our current Neighbourhood Plan • Hockham - We have masses of open space in our community, we just need to protect what we have. That not only includes the forest but the farming community too. • Our existing recreation ground is sufficient for the surrounding village area, providing tennis courts, a bowling green, outdoor gym and playground. As well as open space and

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		<p>a football pitch. - Too much new development would lead to inadequate facilities for the local population especially if the potential 700+ houses were to be built.</p> <ul style="list-style-type: none"> • The parish I live in is very much at risk of not having any open spaces left, at the rate new housing developments seem to be being approved • The current open space needs to be used more everywhere before we add more space • Open spaces are a must but need maintenance and better control, which requires resource and investment (park keepers). Grass Football pitches for youth teams/clubs are like hens' teeth with multiple teams/age groups sharing the same limited space. 3G pitches are located at the Dereham high schools and are great but expensive to hire and again very limited when it comes to availability • We need a playground and open access area for children. More walking routes particularly that also allow dog access is also important • Open space is absolutely vital and must be built into all new developments • There are many villages which lack playing fields • There could be more public access to tracks and field edges in order to create more choice of walking routes • Weight should be given to developments which provide access to new areas of publicly accessible open space where there is currently a deficit in the locality • NE - The Plan should identify, designate and have policies to protect and enhance areas of Local Green Space that are of particular importance to local communities
Q56. Please provide details including any proposed sites within your parish?	42	<p>The majority of respondents did provide details of sites that they considered suitable for open space with some parish councils stating they had submitted potential LGS sites under the Call for Sites. There were also some responses from agents/developers who had also given details of sites submitted under the Call for Sites where open spaces could be created as part of the development proposal. Comments are summarised below</p> <ul style="list-style-type: none"> • Mattishall currently has a village green, Mattishall Sports and Social Club grounds, laid to football cricket and bowls within season. The village has an area laid out to allotments. This year MPC will take possession of an area of land to the western edge of the village that will become a community wood with walkways and seating. In addition, a second area of allotments and an orchard will also come into community use. Proposed sites - 1. Dereham Road/ Howes Lane 2. Community Woodland 3. Off Back Lane 4. Rayners Way 5. Thynnes Lane 6. School Playing Fields 7. South of Norwich Road 8. North of Norwich Road 9. Site to South and west of Ivy Barn, Rayners Way.

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		<ul style="list-style-type: none"> • Shipdam - The Old School field in Shipdham should not be used for more housing. It would be better used to establish a 'village centre' allowing for cafe/retail/seating/play area along with a village hall. The Bullock Park area could become a sport/social area to encourage health and fitness within the community • Shipdham - playing field on Shipdham Lane and the water meadows • Scarning Fen water meadows SSSI near STW • Scarning – Podmore, development access to the site suggested along an unmade footpath. No mains drainage or mains water to the site. Owner does not own or control the footpath that is the suggested access for the said site. Site is very close to a river that has previously been close to flooding • Scarning – 2 parks with good facilities, and walks available • Scarning- proposed site in the field between Dereham Road and Rushmeadow road in Scarning is already home to a large number of wildlife species and is not a desirable location for housing opposite a sewage works, I suggest this site be put forward for green open space • Little Dunham – Playing Field add Amenity Area • Watton – see Watton Neighbourhood Plan Policy WTN 7 • Swaffham - land around the Ecotech site should be considered for future leisure/ amenity use for outdoor activities/ pitches as part of a new leisure/ sport provision for Swaffham This would allow for expansion of the site • Eccles - Circular route from Eccles Road station to include the Mere, Eccles Church, across railway footpath crossing, chestnut woods, disused railway siding, Village Hall etc. • Dereham - See attached masterplan on the attached Sustainable Urban Extension to Dereham South and South-West Sectors Story Board forming part of this representation • Yaxham - during recent consultations with residents as part of the Yaxham Neighbourhood plan review, some possible sites were and further consideration is being given to possibly include them as recommended sites within any potential update to our current Neighbourhood Plan • Hockham - Thetford Forest has been here a long time and the farm even longer, way before most of the houses were built. If these are protected in the first place then there will be no issues • If landowners want to sell land, the council could buy it and create community woodland/ orchards etc.

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		<ul style="list-style-type: none"> • Allocation of green space within a development itself may not be the best way to approach this. We need more consultation with developers to agree a more imaginative approach • Country Park • Shadwell - the opportunity to create a new garden community on the Shadwell Estate land promoted through the Call for Sites provides an excellent opportunity to create open space for new and existing residents of Thetford. The typology can range from natural to semi natural areas, specific play space to be provided as an integral part of new development.
<p>Q57. Do you think the current policies for open space provision are working? If not please explain your answer.</p>	<p>111 (yes:21 no:37 unsure/other:53)</p>	<p>Most respondents (48%) indicated directly that they were unsure or expressed an opinion, with many indicating that more green open spaces were needed, particularly large open spaces. Comments are summarised below</p> <ul style="list-style-type: none"> • We need to protect our wild life, to keep natural balance • They might be having some effect, but not enough • 2.5 hectares (5 acres) for 1,000 people is a truly inadequate target. Maybe ok in a semi-urban district, but In a rural area it should be 10 times that • Large open spaces are needed rather than many small patches of green space as seen on new development sites. Small spaces have limited use and are not ideal for planting trees! Although small areas can have a purpose, including unpaved areas supporting surface water drainage and giving a good visual appearance if planted well and maintained, they can also become unkempt. Green space areas should be planned to help create wildlife corridors as well as cycle/walk ways • Need playing fields • Current policy asks for a contribution from developments of 11 or more units but allows developers to avoid a contribution by piecemeal development. Given that BDC does not administer CIL and Open Space is fundamental to healthy living. I would prefer a lower threshold and a policy adjustment to deal with avoidance. I would be happy to see larger spaces rather than small parcels <p>33% of respondents indicated that the policies were not working with many comments indicating that more open spaces were needed and that policy needed to reflect this. Comments are summarised below</p>

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		<ul style="list-style-type: none"> • Given all the clay below Swaffham I'm surprised that nobody has proposed a reservoir to mitigate the increased likelihood of dry summers and provide a lido for waterworks. • We need more green / community space • A more innovative approach should be adopted by delivering a variety of open spaces with different approaches within the same area e.g. children's play in close proximity to community gardens and green wilder areas. Active transport routes should lead to open space provision • All the newer developments do not have enough green space; gardens are far too small • Lack of delivery. New policies should be put in place in the emerging Local Plan to link and cross-fund semi-natural recreational and sports spaces to new planned housing and employment growth. Priority should be given to development proposals that deliver new major open spaces. • Maintenance and security is poor. Facilities often abused • Green space is unprotected and access to it is poor • Not robust enough or adhered to • The Open Space Assessment underpinning the current Local Plan is significantly out of date (2015) and a fresh assessment is required to determine the most appropriate approach to provision of Open Space in the new Local Plan • Current Open Space policy fails to recognise the contribution that informal green space can make to the quality of a development, and to quality of life, and instead focusses solely on formal sports provision and Childrens' play. This is considered to be an outdated approach that needs to be revised. A greater degree of flexibility is required to enable developments to respond to specific local needs, and greater emphasis should be given to the quality of open spaces rather than just quantity. Greater clarity is needed on how off-site contributions will be calculated; this should be contained within a Supplementary Planning Document • Policy ENV04 in the current local plan restricts the loss of designated open space, it being only permitted if it can demonstrate that there is an excess of open space, or if recreational facilities can be improved by the proposed development or alternative better open space is being provided. We know of examples in Watton where this policy of restricting loss of designated open space has not been applied. We have little such space in Watton and need all we can get. We also are concerned that BDC decides where open space will be and that not necessarily in the town/village where the development is built

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		<ul style="list-style-type: none"> • Just because somewhere is rural does not mean you can ignore access to open spaces particularly when it is within the gift of landowners to include it in development plans, there is just no incentive for them to do so <p>19% of respondents indicated directly that the policies were working. Comments are summarised below</p> <ul style="list-style-type: none"> • As long as the protection provision adequately protects the green spaces from development • Good Provision at present but reasonable provision puts an enormous burden on parish maintenance, ever since Breckland stopped maintaining open spaces the acquisition of additional open-space is a double edged sword for most parishes • There is a need for more spaces to be designated. Green Open Space designation is essential in order to provide much needed policy protection to these important sites
<p>Q58. With reference to the key infrastructure areas below, do you have any further views on the infrastructure needs for your locality? Please explain what and why?</p> <ul style="list-style-type: none"> •Health and medical facilities •Education •Community Facilities •Town and Local Centre improvements •Green space including Open space •Power •Water •Digital connectivity 	<p>54</p>	<p>From analyses of respondents comments to this question, lack of infrastructure generally in both urban and rural areas featured significantly with access to medical and dentist facilities being commonly expressed.</p> <ul style="list-style-type: none"> • Mattishall - there is a proposal to relocate Mattishall Surgery and Pharmacy to a new location outside of the village boundary. Issues would need to be addressed prior to any permission: Transport from the village centre for the elderly to the new location and return. Acceptable conversion of the existing premises. Viability, funding, design and parking within the new facility. • Access to health / medical facilities • Poor digital connectivity • Terrible public transport • Access to schools (full capacity) • Holt Road – poor condition • Dereham – poor health / medical / dentist access, poor high street retail offer, limited green spaces, poor river condition, poor digital connectivity • Dereham - Glavenhill proposes to fund improvements to and/or directly delivery health, education, community and walking and cycle network improvements through the company’s Dereham South and South-West Sustainable Urban Extension proposals • Mundford – inadequate infrastructure (schools, health facilities, dentist)

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		<ul style="list-style-type: none"> • Bintree / County Schools – health facilities, schools, community facilities, green space, digital connectivity. • Town / Local Centre improvements needed – revitalising (retail, hospitality and cultural offer) • Yaxham - drainage • Watton – all infrastructure needs improvement • Landowners at Watton/Carbrooke (Land north and south of Norwich Road (east of Watton)) have commissioned assessments of the utilities capacity to serve land they are promoting through the Local Plan. The initial investigation works undertaken as part of this report has not identified any reason why the sites should not be developed. The Utilities Assessments will be submitted to the Authority to support their promoted sites at Watton/Carbrooke • Gressenhall – health facilities • Beeston / Bittering – medical facilities, community facilities, digital connectivity, electric grid connection poor (regular power cuts), poor water pressure, sewage improvements needed • Emergency services and telecommunications services aren't mentioned. Both of these are poor in the local environment. With reference to the PEEL survey of 2021/2 , responding to the public score of 'adequate' is hardly successful. I suspect independent measurement of the above infrastructure areas should be baselined to determine when policies are introduced that improve or not the associated scoring • Scarning – community venue required • Swaffham - would benefit from a good sixth form centre. It would attract and keep badly needed families to balance the town's demographics. The Town Centre needs to be improved as an environment for pedestrians but this needs to happen in conjunction with improving the road network . Currently there is very little choice for through traffic but to go through the town centre. Whitecross road and Whitsands Rd. and Watton Rd junction with London Rd are have issues. A north/south relief road to the A1065 which would also be a housing access road for all new residential development needed • Attleborough/ Kenninghall and Harling – medical facilities • Swanton Morely - the DIO recognise that there are a number of local infrastructure needs in neighbouring Swanton Morley and surrounding villages. The DIO will explore opportunities to improve the offering in this location, as part of a strategic masterplan for the Robertson Barracks site

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		<ul style="list-style-type: none"> • NHS Norfolk & waveney Integrated Care System / East of England Ambulance Service - Increased policy & Infrastructure Delivery Plan (IDP) recognition for developer funded 'ambulance facilities' is required EEASt consider that the first bullet point (and subsequent references in the local plan) should include reference to 'ambulance facilities' e.g. "health, medical and ambulance facilities" • Transport / parking at community facilities • New health facilities for future large developments • Cycle / pathways (inclusive) for active transport • Green corridors to ensure natural capital • HE - Heritage assets and cultural attractions may be considered as infrastructure. Historic England encourages charging authorities to consider identifying ways in which CIL, and S106 agreements can be used to implement Local Plan policy and proposals relating to the conservation of the historic environment, heritage assets and their setting. This will help to satisfy national planning policy. It is now established that heritage is an important component of growth, a source of employment and a community resource. The Council should consider whether any heritage – related projects within the district would be appropriate for CIL funding. the infrastructure lists contained in future Infrastructure Funding Statements include reference to 'improvements to historic assets related to social, economic or environmental infrastructure' as a type of infrastructure project which the authority intends may be wholly, or partially, funded by CIL. Development specific planning obligations and S106 agreements will continue to offer opportunities for funding improvements to heritage assets and the mitigation of adverse impacts on the historic environment. These may include, but are not limited to, archaeological investigations, access and interpretation, and the repair and reuse of buildings or other heritage assets. You may wish to clarify this matter in your schedule. • NCC - Strategic Planning: • The County Council's Planning Obligations Standards, setting out the infrastructure and services it would expect to be provided as part of any new housing development, are published on the County Council's website https://www.norfolk.gov.uk/rubbish-recycling-and-planning/planning-applications/planning-obligations • The County Council would expect that the infrastructure and service requirements set out in them to continue to be reflected in the Local Plan review.

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		<ul style="list-style-type: none"> The County Council recognises that there are proposals at a national level to replace the existing planning obligations and Community Infrastructure Levy (CIL) legislation/regulations with a new Infrastructure Levy. The County Council would want to continue to work closely with the District Council on the satisfactory provision of infrastructure and services needed on new development sites to ensure that they are both sustainable and deliverable. There are uncertainties as to how an Infrastructure Levy would operate in practice and what the implications would be for County Councils in terms of access to such funds. However, without any appropriate developer funding mechanism in place (in the Local Plan) to fund any necessary infrastructure provision, such as for schools and transport, it would be difficult for the County Council to support any new allocations. New developments can deliver significant positive benefits to both existing and new communities.
<p>Q59. Do you have any views or suggestions for how the planning, phasing and delivery of infrastructure can be improved?</p>	<p>70 (yes:56 no:7 unsure/other:7)</p>	<p>A significant number (80%) of respondents indicated views or suggestions to this question. 20% of respondents indicated “no” to views or suggestions or were “unsure” or expressed an opinion. The theme of ‘infrastructure first’ or ‘front loaded’ was prevalent throughout all responses with comments indicating that all infrastructure needs to be assessed prior to giving planning permission on new developments, and if there were deficits development proposals should not be permitted. Comments are summarised below</p> <ul style="list-style-type: none"> Permissions for new build housing must not be carried out in isolation. If the infrastructure is not capable of taking the additional load from the potential development, then the development should be refused Infrastructure needs to be built IN CONJUNCTION or BEFORE a development goes ahead so as to not impact the existing area too greatly Implement consultation with local residents / partnership working Reducing developments will ease strain on our overwhelmed infrastructure, not designed for a growing population, particularly rural communities Build smaller housing estates, not larger ones with green areas S106 Agreements should be drafted before planning permission has been agreed with the developer and clear time lines in place to ensure compliance. Breckland Council should review its position on Community Infrastructure Levy in line with other Norfolk districts. CIL contributions to Neighbourhood Plan areas will help deliver much needed infrastructure

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		<ul style="list-style-type: none"> • Delivery of infrastructure can be improved through public funding to front load infrastructure delivery to be paid back via CIL/pooled s106 contributions • Don't take large amounts of money from developers before looking at infrastructure • Emphasis on infrastructure is over-stated. Central Norfolk has prime agricultural land and culture, resources that we need to protect and develop to ensure we can provide food for the country and reduce our reliability on foreign imports. Once covered in concrete, bricks and asphalt this finite resource, and our resilience as a country, will be lost forever. <p>The first 7 strategic objectives in the Local Plan all cover housing; the economy, the environment and the community all follow. The priority for the community and the place is not housing, (with the exception of affordable housing). The economy, the environment and the community are more important. The idea that housing can be the driver for the economy is a false premise.</p> <ul style="list-style-type: none"> • The council need to set out their plan in advance of what is required. The consideration of how to get there needs to follow. At the moment the process is too reactive. A developer makes an offer so there is an opportunity to get some infrastructure as a kick-back. This is too reactive. • Baselineing and determination of suitable Key Performance Indicators and Service Level Agreements for the various infrastructure areas with transparent publication of same on an annual or semi-annual basis • Make sure development takes place to a tightly controlled overall plan, and not piecemeal and incrementally which we have experienced in Swaffham. This is to ensure that the developers all contribute proportionately to the funding of the required infrastructure • Development needs to be spread out • Allocate and prioritise planned housing and employment sites that deliver large semi-natural recreational spaces and other local infrastructure improvements and be prepared to use CPO powers to unlock clear opportunities • NHS Norfolk & Waveney Integrated Care System - The broad budget for developer funded ambulance facilities should be reflected in the Breckland Council IDP. Breckland Council should facilitate early developer pre-application engagement with EEAST & its health & blue light partners, which is required to determine a suitable funding basis for the social infrastructure (health/ ambulance facilities) required to mitigate the impacts on service provision arising from each major housing site. The requirement for developer funded health and ambulance facilities should be amplified within a local plan

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		<p>infrastructure policy, & through associated supplementary planning & development management documentation.</p> <ul style="list-style-type: none"> • Localised community plans need putting in place at a parish level so development in villages can be properly planned in phases and facilities such as roads, paths, electricity and sewage can be upgraded and funded in-tandem • Any strategic and/or major housing / commercial development should be directed to locations where sufficient infrastructure already exists and can be further enhanced at an economic cost to underpin the viability and deliverability of the local plan and related site delivery. Infrastructure should be phased with advance provision made where feasible • AW - development should be phased appropriately to align with any required new or upgraded water and water recycling infrastructure provision. Development can be proposed in advance of capacity being made available within existing infrastructure. It is even more important that we have the early discussions so we can make sure the right infrastructure is in place at the right time. We want to ensure our assets enable the delivery of sustainable and resilient growth, whilst minimising capital carbon. Appropriate phasing of development means that Anglian Water is able to deliver the necessary infrastructure on time to serve the development and enable further growth. Essential infrastructure such as water and water recycling infrastructure, is critical to facilitating and enabling growth. We would welcome policy support for essential infrastructure provision to ensure that growth can be delivered in a timely manner. • It is essential that all infrastructure providers are properly engaged in the process of preparing a new Local Plan, such that there is the capacity to provide the necessary infrastructure when needed. Failure to engage at the plan-making stage can result in significant delays to the delivery of new development, changes to the content of development proposals, or an inability to deliver on specific policy objectives • NE - Green Infrastructure policy should consider the requirement for planning applications to clearly set out long term management and monitoring of greenspace
Any Other Issues or Options?		
Q60. Do you have any additional views or suggestions with regards the Local Plan and the issues it should address?	109 (yes:76 no:4 unsure/other:27)	<p>A significant number (70%) of responses offered views and suggestions regarding the Local Plan with many identifying issues it should address. Comments are summarised below</p> <ul style="list-style-type: none"> • Development control – planning conditions require robust enforcement policies e.g., inclusion of Stop Notices

Breckland New Local Plan – Issues & Options Feedback Report 2024

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		<ul style="list-style-type: none"> • It should focus more on proactively monitoring for success rather than the apparent “hope for the best” and “assume the best of people” policies that it currently has. Focusing on cause and effect of policies to the impact on key performance indicator outcomes would be significantly more sensible than the guesswork approach and reading through the responses to unnecessarily lengthy and complex questionnaires • Guidance for long term responsibility for open space and communal area maintenance • Reconsider how listed building rules are applied. There are too many examples of buildings being allowed to decay because the listed building rules are too restrictive or expensive to comply with • Regular Local Plan consultation / communication with residents and Town / Parish Councils throughout • Feedback publication on consultation responses • Development should be directed to market towns • More consideration for impact of development in rural areas – character, separation, design and materials • Environmental protection from development impacts • Consideration / consultation for a National Park / Landscape designation to benefit the environment, residents health and to boost tourism • Protection / promotion of food production • Inclusion of renewable energy in development • New infrastructure as part of growth • Consider capacity of existing infrastructure with regard to new development • No new settlements • Small developments only to impact local shock • Improvements to digital connectivity • Local Plan should be resident focused • NHS Norfolk & Waveney - see EEAST’s separate evidence base & representations - submitted as part of the overarching NHS Norfolk & Waveney ICB submission • Consider applying Community Infrastructure levy – identify current and future infrastructure needs / funding to plan sustainable development accordingly • HE - include a glossary. This should include appropriate Historic Environment terminology including Historic Environment, Heritage Assets, Listed building, Conservation Area, Scheduled Monument, Registered Park and Garden, Designated Heritage Assets, Non- designated Heritage Assets, Local List, Heritage at Risk etc.

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		<ul style="list-style-type: none"> • The Plan should include appropriate monitoring indicators • NCC Natural Environment Team – Section 8 of the consultation document – (8.2) reference should be made to locally designated wildlife sites (i.e. County Wildlife Sites and County Geodiversity Sites) as these form an important element of the nature recovery network and should receive protection via the planning system. (8.4) reference should be made to the Environment Act rather than the Environment Bill. • In addition, the reference to “local recovery strategies” should be revised to local nature recovery strategies”. • Historic Environment Team - would like to reissue previous advice (25th May 2022, our ref: CNF47722_11): We ask that buried remains are considered too, and a statement is included along the lines of: ‘The Norfolk County Council Historic Environment Strategy and Advice Team will continue to monitor new planning applications and offer advice both to Breckland County Council and to potential developers about the historic environment impact of proposed developments in order to ensure that suitable measures are in place if needed, either secured by planning condition, or done pre-application to mitigate any negative effects of such developments on the historic environment, especially any buried remains. • At present, the Local Plan does not contain any specific policies relating to the regeneration of existing residential areas, and this should be rectified in the new Local Plan. Paragraph 120(d) of the NPPF states that planning policies should, “promote and support the development of underutilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure)”. Policy TH37 of the Thetford Area Action Plan sets out a framework for consideration of regeneration proposals within the urban area of Thetford, including infill and redevelopment of existing housing stock as well as redevelopment of redundant parking courts, and it is considered that this approach should be broadened and made applicable across the whole District. • The Issues and Options document does not make any reference to the provision of any crematorium or burial space within the District. There is a need for such facilities in the District • The Updated Local Plan provides Breckland with the opportunity to embrace employment growth along the A11 Tech Corridor and crucially place new housing alongside. The Eccles Road Growth Strategy (May 2023) can play an important role in meeting the district’s Strategic Vision and Objectives.

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Elements & Question No.	No. of responses received	Summary of Representations
		<ul style="list-style-type: none"> • NE - The Plan should contain policies to protect Best and Most Versatile (BMV) agricultural land (Grades 1, 2, 3a). The Plan should recognise that development has an irreversible adverse impact on the finite national stock of BMV land. • Any development proposed on BMV land should be informed by a detailed soil survey. The Plan should have a policy for the protection of and sustainable management of soils on development sites. This should set out mitigation measures to minimise soil disturbance and retain as many ecosystem services as possible through careful soil management during the construction process and appropriate soil re-use. The Plan should recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils. The impact of all types of development on soils should be considered. • Healthy soils are not only important for agriculture, but soils with high environmental value (e.g. wetland carbon stores such as peatland and low nutrient soils) are also important to ecological connectivity. Development should be supported by soils surveys and management plans - see Defra's Code of Practice for the sustainable use of soils on construction sites. • Many of the responses expressed the view that whilst the Issues and Options questionnaire was very comprehensive it was too long, i.e., too many questions of which few questions appeared to have errors (ranking questions where options were repeated – noted in the officer's analyses), and that the Issues and Options Consultation Report was too complex and difficult to understand with use of technical terminology and phrases. Some comments suggested that to be able to answer the questions, a requirement was needed to read supporting technical documents which were also too long and complex.

Appendix 2: Summary of Statutory Consultee responses Element by Element

Element	Summary of Statutory Consultee Comments
<p>Vision and Objectives</p>	<p>Defence Infrastructure Organisation - We would welcome an alteration to the Vision statement, to place a greater emphasis on the importance of making appropriate use of brownfield land, as encouraged by National Planning Policy. This should be at the heart of the Strategic Vision and is currently missing. Strategic Objectives 1 – 4; we suggest that these objectives should be modified as they do not appropriately reflect the Strategic Vision to balance development between urban and rural areas. Objectives should highlight the potential opportunities which can be unlocked as a result of highway infrastructure improvements on the A11 and A47. Strategic Objective 10 should include reference to the brownfield first approach and highlight the need to ensure local employment serves the needs of the community.</p> <p>A Rich Environment: These objectives should be more robust in respect of requirements such as nutrient neutrality and BNG which are fundamental to planning and development in the District.</p> <p>NHS Norfolk & Waveney Integrated Care System - a vision for the future of Breckland, would be to see expanding, sustainable, and accessible healthcare services in line with proposed housing and population growth, rather than unsustainable development adding further constraint.</p> <p>East of England Ambulance Service Trust (EEAST) - emphasis should be placed on ensuring developer funding is made available for investment in physical and social infrastructure provision (incorporating the services provided by the NHS Norfolk & Waveney ICB & partner organisations including EEAST) to support planned housing & population growth. The objectives should be expanded within the “thriving communities” section, to reinforce the importance of ensuring that necessary developer funding is made available for investment in physical and social infrastructure provision (as above) to support planned housing & population growth and achieve sustainable new housing communities.</p> <p>Historic England - the word ‘enhance’ should also added into the vision in relation to the historic environment, to more closely reflect the NPPF.</p>

Element	Summary of Statutory Consultee Comments
	<p>Objective 13 in relation to the historic environment is still relevant.</p> <p>Norfolk County Council – Strategic Planning: The Strategic Vision remains relevant in terms of delivering sustainable development but could be updated to reflect more recent Government policy objectives to achieve net zero by 2050. Strategic Transport: There may be the need for Paragraph 2 of the vision section to be reviewed once a spatial distribution for growth has been established.</p> <p>There needs to be reference in the Strategic Vision to the Government’s Net Zero target on emissions and how that links to sustainable development in Breckland.</p> <p>Strategic Planning: The Objectives in the existing Local Plan still remain relevant and should be carried forward. There should be reference to decarbonisation and the Government’s commitment to net zero by 2050, which could be picked-up under the Climate Change bullet (bullet 4 – page 13). Strategic Transport: specifically include reducing carbon emissions.</p> <p>National Highways - National Highway’s remain supportive of the objectives and the vision of the Local Plan.</p> <p>Network Rail - objectives are relevant and should be actively supported.</p> <p>This siding should be encouraged by allocating this site as a protected freight site and expansion of freight operations should be supported in planning policy.</p> <p>Mattishall PC – Should include reference to Public Transport. Needs greater clarity and relevance. Should draw together the already agreed vision for Breckland encompassed in the latest Breckland Corporate Plan. Alongside "thriving" reference should be made to "a greener future"; "role model for sustainability"; "happy, healthy, fulfilling lives". Ambiguity currently exists in the use of “urban” and “rural”. It should be made clear that village settlements (including those with services) are considered rural. There should be an explicit approach of prioritising previously developed (brownfield) land and protecting greenfield rural land. “An improved housing land supply from rural areas” is not supported.</p> <p>Objectives – largely still relevant, but “Development in the Right Place” needs reference to a Brownfield first approach giving greater protection to greenfield locations. Emphasis should be given in the "Rich Environment" section to contributing / enhancing the natural and local environment. Meeting the Housing Need: should acknowledge the change in emphasis set out in the (proposed) changes to the NPPF. i.e., "build enough of the right homes in the right places with the right infrastructure, ensuring the environment is protected and giving local people a greater say." Brownfield first- and acknowledging that it is acceptable</p>

Element	Summary of Statutory Consultee Comments
	<p>not to meet the housing allocation target if sufficient, appropriately located brownfield sites are not available.</p> <p>Little Dunham PC – Agree with the vision and objectives.</p> <p>Billingsford PC - Agree with the vision. No more new towns.</p> <p>Dereham TC - the overall vision was not sufficiently ambitious with regards to sustainability and a zero-carbon future. Sustainability should be strong a theme running through the document. If important characteristics are to be retained, there needs to be an assessment of what these are. The Climate Emergency must be better reflected in the Vision. The Vision should be more positive towards biodiversity and helping nature adapt to climate change. Objectives - are not as relevant as they could be, the urgency regarding the climate crisis has increased significantly since the priorities were originally set.</p> <p>Bintree PC - the vision is broadly positive. It does not mention the need for Breckland to improve its cultural, recreational and tourism appeal; key factors in making the district economically sustainable, and desirable place to live. Current objectives are sensible.</p> <p>Yaxham PC - much is said about new development and new employment but no mention of new infrastructure.</p> <p>Watton TC - “to improve the health and well-being of our communities...and supporting locally accessible, high quality care”. This objective needs to be met. Reference to “decisions made at community level” should be stressed and implemented. Neighbourhood Plans and local level of Councils should be consulted and responses followed. Consultation should be followed by negotiation if applicable. Perception can be that notice is not taken of the consultation responses. Watton Neighbourhood Plan seeks to support the provision and maintenance of social health and wellbeing services and infrastructure.</p> <p>Gressenhall PC – Agree with strategic vision and objectives.</p> <p>Beeston and Bittering PC - Agree with strategic vision and objectives.</p> <p>Hoe & Worthing Parish Meeting - this vision does not take into account or protect individual small villages who could easily lose their identity.</p> <p>Hockham PC – Agree with Vision. Do not agree with Objectives. It needs to be noted that there are no services available in the rural villages and on climate change, we cannot start building in rural villages</p>

Element	Summary of Statutory Consultee Comments
	<p>where people have to travel. Therefore increasing everybody’s carbon footprint by travelling miles for schools, doctors, shops and work.</p> <p>Garvestone, Reymerston & Thuxton PC – Support the Vision. Ensure that current relevant businesses today are given every opportunity to diversify and prosper in future generations. Stimulate local employment and Growth. Is there enough adaptability in the Plan to encourage and support local businesses and farming to compete with foreign imports? No self-sufficiency related targets in the Plan.</p> <p>Snetterton PC – Support the Vision and objectives. If Snetterton expands exponentially as it is at present, especially on the north of the A11, this will continue to increase traffic through the village, create more light, noise and air pollution and will encroach on the green spaces currently enjoyed by many villagers. Please continue to develop on the racetrack side of the A11, especially on the brown field sites.</p>
<p>Housing: The Issues and Options</p>	<p>Defence Infrastructure Organisation – support Standard Methodology as a starting point. Agree with the Settlement Hierarchy, Local Service Centre Classification and criteria.</p> <p>Development should utilise brownfield land, be in sustainable locations and encourage a mix of uses, transport options and focus on achievable and deliverable land, which can be well planned, to deliver within the plan period and beyond. The spatial principles identified are all important and should be included in the new Local Plan. Development should be concentrated within the market towns. Recent infrastructure investments results in new opportunities to open up development in the north-east of the District.</p> <p>Proposals to create well-planned growth through a new community at Robertson Barracks, following the closure of the site in 2029 could deliver additional growth and significant and sustainable benefits to the local community through enhanced linkages to Dereham and nearby Swanton Morley.</p> <p>The DIO support the principle of well planned growth in rural areas across the District, particularly where there are strong links to existing town centres.</p> <p>The DIO do not believe that a disparate approach to new development, particularly for rural settlements, will result in good growth, improved investment and high quality sustainable place making.</p> <p>The DIO supports the principles of the 15 minute neighbourhood.</p> <p>The DIO supports the use of defined settlement boundaries in the Local Plan. A new Local Plan provides an opportunity to define new settlement boundaries, particularly if new communities are proposed as part of the development strategy.</p> <p>Support for a mix of housing typologies to meet identified need. This should include first homes, specialist housing, homes for an ageing population and custom and self-build housing.</p>

Element	Summary of Statutory Consultee Comments
	<p>The Local Plan should reflect national standards as the starting point, supported by local evidence of need and specific requirements.</p> <p>NHS Norfolk & Waveney Integrated Care System - Thought should be given to the location of new developments when looking at the accessibility to healthcare services, current constraints on the nearest healthcare facilities and local transport available.</p> <p>Wider healthcare facilities/partners across all services need to be considered when deciding on development locations, especially allowing for acute services to be placed in the community to allow easier and equitable access for everyone and for EEAST to be able to adequately respond to calls in a timely manner.</p> <p>Mitigation for healthcare services needs to be considered with a large amount of planned growth and that it is the intention of NHS England and the Norfolk and Waveney ICS to promote Primary Healthcare Hubs with co-ordinated mixed professionals to provide a more accessible and comprehensive health care service to local residents. This will require developer contributions.</p> <p>When identifying villages and rural areas suitable for housing developments the local planning authority should consider capacity in, and location of, nearby health and care services. This should include access to all aspects of primary care as well as community and secondary care services. Very careful consideration needs to be given before building more housing in areas which lack the capacity to provide adequate health services to them.</p> <p>The ICS estate function would be focussed on the principles that take in to account location, accessibility/travel to existing services/facilities, sustainability, and contribution to local infrastructure (health care facilities).</p> <p>With relation to a potential garden village, this would be dependent on various factors including the location, access to developer contributions for a potential new health care hub or substantial extension to existing infrastructure as the ICS would not have the budget for this scale of build.</p> <p>Developments for older people should not all focus on one or two areas as the pressure of their additional service needs are all put on a small number of providers. There needs to be consideration to good transport links and travel distances as well, as these residents have a greater need for all health services. Allocating specific sites for older people’s accommodation would help with planning for the additional demand likely to arise from such developments.</p>

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	<p>East of England Ambulance Service Trust (EEAST) - there will be an increased requirement for ambulance facilities necessitated by the planned housing and population growth within Breckland Council over the new plan period 2021 - 2046.c</p> <p>The increased housing and population growth will significantly impact on its operational capacity, efficiency and resources requiring appropriate mitigation through developer funding for ambulance facilities. Principal growth ought to be directed towards the higher order centres in the District, where EEAST and its 'health & blue light partners' are able to more effectively resource the service impacts arising. Development should be concentrated on the main transport routes (A47, A11 or others). This approach would enable service demands to be accessed & resourced more efficiently. Building for a Healthy Life approach to design should be incorporated into the Design Guide and the Local Plan's design policies as a means of evaluating the success of development.</p> <p>Historic England – spatial principles; principle 3 relating to the character of the existing settlement pattern is most important of the principles listed.</p> <p>Market towns offer a sustainable option for growth due to concentration of facilities and options for public transport etc. Many market towns have important heritage. New development will need to give careful consideration to settlement character and identity and seek to conserve and enhance the historic environment through appropriate development that minimises harm to the historic environment through careful siting and appropriate design. There may be some market towns that are more or less suited to absorbing additional growth, in part dependent upon their historic character and settlement morphology. Where growth occurs, care will be needed to protect and enhance the character, heritage and identity of these market towns.</p> <p>Any proposed growth of villages should give consideration to settlement character and identity. New settlements can offer a sustainable form of development and, if of sufficient scale, can offer opportunities to provide the appropriate level of supporting strategic infrastructure and employment. it is important that these are carefully located and planned with respect to all three strands of sustainable development. It is expected that strategic new settlement policies make reference to the historic environment and the need for its conservation or enhancement. Consideration should also be given to the landscape character/context and how any new development would relate to it.</p> <p>The key to the development of large strategic sites, be they new settlements or urban extensions, is early Heritage Impact Assessment prior to allocation and before the site is included in a Local Plan, to determine</p>

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	<p>suitability of site per se and, if so, which parts of site developable and to recommend appropriate mitigation. We would also emphasise the importance of clear policy wording and ideally a concept diagram to show key principles for the new settlement including heritage mitigation.</p> <p>There would be benefits to siting development along public transport corridors, both existing and proposed. Consideration will need to be given to impacts on the historic environment.</p> <p>Settlement boundaries / criteria based policies - If a criteria-based policy is followed we would recommend the addition of an additional criteria to read</p> <ul style="list-style-type: none"> • ‘Conserve and enhance the historic environment including heritage asset’. <p>Development criteria – Q20; While all of these criteria are important, we recommend that criterion 5, in relation to the Environment, is broadened to specifically include the historic environment.</p> <p>Norfolk County Council – Strategic Planning: The Local Plan should follow National Policy guidelines and the Standard Methodology. The addition of a 15% buffer bringing the total new allocations requirement figure to 8,126 (2021 – 2046), would need to be evidenced i.e. demonstrate there is a need for a 15% buffer compared to say a lower figure of 5%.</p> <p>The existing settlement hierarchy is still considered fit for purpose. The District Council will need to ensure that the criteria for Local Service Centre remains valid for those existing settlements in this category; and determine whether there are any new settlements which may now qualify.</p> <p>Changes to settlements need to be thoroughly evidenced.</p> <p>Local Service Centres - broadly agree with the criteria /methodology for classifying LSCs. The criteria could be tightened up / made more sustainable by quantifying the minimum level of service needed to qualify for LSC.</p> <p>Any new policy could also allow for a new LSC to be considered for inclusion post adoption of the Local Plan having regard to, for example, any new service provision in a particular settlement, such as the introduction of a new bus service; or the opening of a new village convenience shop. Given the plan length up to 2046 a more flexible approach as to whether a settlement qualifies as a LSC should be considered. Probably useful to qualify what type of school is needed, which generally will be a primary sector school.</p> <p>Strategic Transport: The Highway Authority would wish for development to be allocated at sustainable locations where genuine opportunity exists to access active and sustainable travel, encouraging modal shift away from private motor vehicles. This would include availability of suitable walking, cycling and</p>

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	<p>wheeling routes to catchment schools. Other local facilities and employment should as a minimum be accessible by a regular public transport service with an appropriate frequency.</p> <p>Strategic Planning: All criteria [Local Service Centres] need to be met particularly given the need for decarbonisation and deliver net zero by 2050.</p> <p>The idea of villages sharing services to qualify as LSC is generally not welcomed as this would ultimately require transport between villages especially if this involved a single school serving many villages, with children expected to walk or cycle along narrow country lanes without pavements. This could also put pressure on service providers such as the County Council needing to provide additional school transport between villages due to housing growth in what would otherwise not have been a sustainable location.</p> <p>Spatial principles - there needs to be a focus on criteria which minimises the need to travel, whether that is to existing/planned employment opportunities; or to local services such as GP surgeries, schools and shops.</p> <p>The existing settlement hierarchy should be taken forward in relation to Key Settlements and Market Towns as these are considered the most sustainable location for housing and employment growth.</p> <p>Children’s Services: It will be important to ensure local services are provided for in areas that may not be identified as a market town. For education needs, Children’s Services have to assess the school’s capacity to serve the community and to determine if there is potential for expanding the school on its current site or exploring alternative options for creating new educational settings, should the need arise.</p> <p>Sustainable travel for school children across communities should form part of the policy ensuring all schools can be accessed using sustainable means and there are safe routes to access.</p> <p>Dispersing housing within rural areas/villages – Strategic Planning: In broad terms this is not considered a sustainable option; and would also place greater pressure on service providers such as the County Council in delivering its key services such as schools; libraries and transport. Children’s Services: Consideration would need to be given to ensure there are local services that can accommodate any proposed growth, or provisions are made to meet the development demand. School sites will need to be assessed to ensure capacity exists or sites can be expanded or provided for on additional land whilst also considering any increased need to travel.</p> <p>New Settlement Garden Town/Village – Strategic Planning: The level of net new additional housing in the period 2021-2046 of around 8,000 dwellings it felt to be insufficient to justify the need for a purpose-built new settlement.</p>

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	<p>The Existing settlement hierarchy should be taken forward.</p> <p>Strategic Transport: development should be concentrated on the main transport routes (A47, A11 or others), so long as the development does not impact on the strategic function of A11 and A47.</p> <p>Strategic Planning: In principle the retention of settlement boundaries provides a useful control over future housing and employment development; and thereby enabling the LPA to deliver its sustainable aims and objectives through limiting development within existing defined settlement limits.</p> <p>Housing types - support the provision of affordable housing. Any such housing should accord with the settlement hierarchy in the Plan in order to ensure sustainable development/communities. Such housing should have good access to local services; and not be reliant on the private car.</p> <p>Environment Agency (East Anglia) - increases in new housing is likely to lead to more residential properties being located near existing or future intensive farming units. This could lead to conflict with neighbours and an increase in complaints.</p> <p>Natural England – Development Principles; Natural England considers principle 5 (Locate development to minimise its impact on protected or locally important landscapes, heritage and biodiversity) to be of high importance.</p> <p>The direct and indirect impacts of proposed development on designated sites should be considered, including impacts on water quality and the impacts on air quality from increased traffic, intensive agriculture or industrial developments.</p> <p>Criteria-based policies to guide development should include application of the mitigation hierarchy and how the direct, indirect and cumulative impacts of development on designated sites will be addressed.</p> <p>Outdoor amenity space - welcome minimum standards for outdoor amenity space for new housing.</p> <p>Consideration should be given to the evidence presented in the Norfolk GIRAMS (and any subsequent reviews), which was produced by Norfolk’s Local Planning Authorities (LPAs) in response to the potential for population growth in Norfolk to have an adverse effect on designated European sites through recreational disturbance. It would also be pertinent to raise the importance of making provision for dog walking as part of new housing development.</p> <p>Network Rail – Development Q20; Option 4 is most important – this requires the support of operational infrastructure to enable alternatives, i.e., rail, compared to more polluting modes of transport for both people and goods.</p>

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	<p>Mattishall PC – Stay with current methodology 672 pa until HEDNA published. ‘Villages with Boundaries’, Mattishall does not have 7% infill capacity. ‘Local Service Centres’, classification should be downgraded where services are cut. Additional definition is needed e.g., public transport- what is “normal hours”? what is a “shop” (does this include garden centres for example)? Criteria remains relevant but rigid, needs to be flexible for changing circumstances. Helpful to have a clear understanding of settlement hierarchy. Do not support that some villages could be considered together around key services they share.</p> <p>‘Development Locations’ should be concentrated in market towns – e.g., Dereham due to A47 corridor to attract investment / employment and to add to the existing infrastructure.</p> <p>Most villages are at or near housing capacity. Should be limited to needed growth within defined settlement boundaries to protect the countryside.</p> <p>‘New settlement Garden Town/Village’- possibly but would require large investment and a 15 min neighbourhood. Focussing new development within the existing market towns would largely deliver the 15 minute neighbourhood concept and avoid unnecessary further development on greenfield sites.</p> <p>Retain settlement / village boundaries to avoid developer disputes. They provide a clearly understood policy position for decision makers. Supplementary policies are required to address density and protection of green spaces within the settlement boundaries.</p> <p>Support policies for all the types of housing including affordable homes, starter homes for local residents and sheltered housing for 60 plus. Do not support self-builds unless high quality modern true self-builds that enhance the environment. Support locally evidenced based higher accessibility standards (Part M4) and access to open green spaces (play and recreation areas).</p> <p>Provision of pitches for Gypsies, Travellers, and Travelling show People - should be considered for rural and towns. Policy to be supported by demonstrable housing need in a particular area.</p> <p>This Local Plan review should be mindful of the proposed changes to the NPPF.</p> <p>Accessibility Standards – do not support for the Plan to include locally evidenced based higher accessibility standards than that of Part M4.</p> <p>North Elmham PC - no need to go above the minimum required figure, given the need for truly sustainable development which addresses the issues of Climate Change. Growth beyond the minimum level would be incompatible with these aims. As Breckland is home to one of the largest lowland forests in England and ancient heathland in the Brecks, with various levels of protection, there are special reasons why a case could and should be made for lower housing growth figures, particularly given the potential emergence of</p>

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	<p>using 'exceptional circumstances' to justify an alternative method when calculating local housing need. Support for current settlement hierarchy categories to be carried forward. Do not support the methodology for classifying Local Service Centres. It is not clear how 'some employment' is quantified. To be transparent it would be helpful to quantify this e.g., number of jobs as a fraction of the settlement's population. Add a doctor's surgery, it is unrealistic to expect many residents, particularly the elderly, to be able to have all their needs met within the Local Service Centre. It is important that safe walking access to services is present. It would be a concern if a group of villages with services between them, but not accessible to all of them, would be counted as a larger settlement for the purposes of meeting the requirement of having key services. Support for development to be concentrated within the market towns as have a better range of services and employment and should be the focus for further planned growth. They are more accessible due to better transport links. This should be improved further through better provision of bus routes to and from the market towns to settlements further down the settlement hierarchy. Limited housing should be allowed within rural villages (not areas), but only if assessed to be meeting need for affordable social housing, to enable more local people to stay in villages where their families live. No. There is no need for a new settlement if other growth options are followed, such as organic growth of existing market towns with policies in place to ensure vacant brownfield sites are developed. We question what we feel are higher than necessary housing target numbers for the District. Given the overriding need for sustainable development which also addresses Climate Change, housing numbers should be kept to the minimum required by central government, rather than pursuing growth beyond that. The urban extensions of Thetford and Attleborough can be considered as new settlements in terms of their size. 15 min neighbourhood - good planning should ensure that shops, services, employment, schools, medical facilities and other infrastructure is provided within a 15-minute walk of all housing as part of a development. It would be sensible to trial a 15-minute neighbourhood in one of the large sites already in the Local Plan, such as the urban extensions for Thetford or Attleborough. Support development to be concentrated on the main transport routes (A47, A11 or others). Would ensure development would be in a more sustainable location. Development should also be within existing market towns, and on brownfield sites first. New larger estates must be provided with all the necessary services, infrastructure and employment, to avoid them being dormitory/commuter estates which are too car-dependent.</p>

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	<p>It is important that settlement boundaries remain: they have provided some certainty as to where development can go and have prevented speculative applications which would lead to unplanned spread of development into the countryside. Criteria-based policy would lead to loopholes exploited by developers/landowners.</p> <p>One consequence of removing settlement boundaries would be a decrease in sites being put forward as rural exception sites for affordable housing. If landowners realise that market housing can be built adjacent to current settlement boundaries, they are likely to apply for that rather than keep land for affordable developments. Settlement boundaries should remain the same.</p> <p>The only real need [in locality] appears to be for truly affordable homes, along with dwellings which would enable downsizing, or into adapted housing.</p> <p>Unclear about Build to Rent, without controls this could lead to second homes rather than houses for rent for those living and working locally. There is need for housing for the elderly, allowing for downsizing and/or for adapted living. Affordable housing is needed – rural exception sites are not providing a sufficient supply. Local Authority built and owned housing appear to be the best solution to meeting this need.</p> <p>Longham PC - Some development is needed to sustain villages. However, any development should be of an appropriate size and need. We do not think any new settlements should be developed unless there is the existing infrastructures and services to support it.</p> <p>Villages should not have settlement boundaries as restricts development. The District Council should consider any comments/objections made by the Parish Council as has the local knowledge to determine if a development is in an appropriate location in the context of the village. Even where the village fails to satisfy the local service centre criteria?</p> <p>We would support all of the types of housing on the condition that a local need and/or connection can be identified.</p> <p>Little Dunham PC - affordable housing should be given a higher priority. Agree that settlement categories should be carried forward. We are happy with our category. We would like to add access to health and related services. Five criteria - Without these basic facilities it is not a service centre. Do not support grouping villages around key services as not be in accordance with the green agenda.</p> <p>Development Principles: Options – all important but brownfield development most important. Agree development should be concentrated in market towns. Do not support that more housing should be</p>

Element	Summary of Statutory Consultee Comments
	<p>dispersed between rural areas/villages. They do not have the facilities, infrastructure and services required. Agree there should be a new settlement Garden Town/Village.</p> <p>Should development be concentrated on main transport routes - not exclusively but within reason. There are villages that suffer from being split by the A47, e.g., Fransham. However, this might work for villages already adjacent to, but not split by the A47, e.g., Necton.</p> <p>Settlement Boundaries – support both boundaries and criteria-based policy. Settlement boundaries can be useful on larger settlements but we don't want one.</p> <p>Right Types of Homes – a greater mix of properties required but only achieved with improved transport and better facilities. Support for Build to Rent and affordable housing entry-level / rural exception sites.</p> <p>Gypsie, Travellers and Travelling Show People Pitches - no demand for such sites in this village.</p> <p>Meeting the challenges of climate change and provision of sufficient retirement housing is most important.</p> <p>Happy with Building Regs and we have adequate amenity sites in the village. However, it is not really possible to describe minimum standards for outdoor amenity space as depends on individual sites. Quality is more important than quantity.</p> <p>Whissonsett PC - There is no need for a new settlement if other growth options are followed, such as organic growth of existing market towns with policies in place to ensure vacant brownfield sites are developed. We question higher than necessary housing target numbers for the District. Given the overriding need for sustainable development which also addresses Climate Change, housing numbers should be kept to the minimum required by central government, rather than pursuing growth beyond that. Urban extensions of Thetford and Attleborough can be considered as new settlements, in terms of their size.</p> <p>We need more affordable housing in Whissonsett, rather than the larger houses which have been built in recent years but there should be a limit of the number of new houses permitted.</p> <p>Billingford PC – do not support planning for full objectively assessed housing needs based upon the most up to date Standard Methodology. More evidence is needed nationally about Housing requirements. We do not wish to see any new development in Billingford as there is insufficient local infrastructure. Over the last 40 years development in Billingford has taken the form of improvement of local residences and utilisation of redundant buildings which suits the area and which also is in line with National Planning Policy.</p> <p>Agree with methodology for classifying Local Service Centres. Criteria are adequate.</p>

Element	Summary of Statutory Consultee Comments
	<p>Local Plan should continue to define settlement boundaries. There has to be overall control by the local authority and no allowance for developers to decide. Settlement boundary in Billingford should be retained.</p> <p>Dereham TC – Settlement Hierarchy: The most sustainable pattern of development would be to place all development in the towns with all services required on a daily basis within reasonable walking distance. The least sustainable form of development would be to place all development in rural areas where people need to travel further for work and services and where services cost more to deliver. Patterns of development which continue to make people heavily reliant on energy will create future challenges rather than easing the transition to a zero carbon future.</p> <p>All development should be focused in the urban areas as this provides the most sustainable form of development, provided this growth is planned correctly.</p> <p>If Breckland Council are considering patterns of development which are not focused on the urban areas, then there really needs to be some measure to compare energy usage for different forms of development, so that an informed decision can be made on the alternative options.</p> <p>‘Access to public transport with a frequency of service’. It is all dependant on the frequency. A bus once a year at Christmas has a frequency, but it doesn’t improve accessibility to services. Rather than say access to public transport this should say ‘access to a public transport hub’.</p> <p>Villages considered together around shared key services - would this be more environmentally sustainable than locating services within the Market Towns?</p> <p>15 minute Neighbourhood - While Dereham Town Council recognises and is supportive of the outcomes which a 15 minute neighbourhood is trying to achieve, it feels the concept may not directly transpose into the rural district. While the 15 minute neighbourhood template may work very well in an urban setting with an extensive and sophisticated public transport system, supported by a comprehensive cycling network, it is felt that something different is needed in Breckland to deliver similar outcomes.</p> <p>Development Principles: Options - most important are 2, 4 and 12.</p> <p>Thursford PC – Object to new settlement Garden Town/Village within Breckland due to environmental impacts. The villages near to the proposed site would cease to exist as they would be absorbed into this development. Would impact a wide area due to immense infrastructure required, along with decades of construction and associated traffic. Housing should be developed close to existing employment, transport and facilities.</p>

Element	Summary of Statutory Consultee Comments
	<p>Bintree PC- We question the figure of 672 as well as the upwards-only implication. It is not reasonable that the (clear and important) need for more affordable housing should be used to justify even more overall housing. The council can insist developers have higher percentages of affordable housing than the minimum, and then ensure that the agreed target is met. The council can also continue to roll out its Exception Site programme.</p> <p>The ‘identified infrastructure’ requirement needs identifying before using housing to help provide it. It is dangerous to suggest housing should be a key lever for providing more economic growth. Housing in the right areas can provide accommodation for working people in the right places and bolster small communities. Small scale housing also provides employment for local tradesmen. Large-scale housing gives no long-term economic benefit to the district.</p> <p>Support settlement categories as defined in the hierarchy above to be carried forward into the Local Plan Update.</p> <p>All villages/parishes should be given boundaries.</p> <p>Support methodology for classifying Local Service Centres. All criteria are important.</p> <p>Agree that some villages could be considered together around key services they share.</p> <p>Development Options – most important is “Focus development in locations where there is greatest accessibility to employment, local services and facilities”. Affordable housing is where speed is required. Breckland should not be defined by ‘spatial principles. As Michael Gove affirmed in October 2022: “If we are to deliver the new homes this country needs, new development must have the support of local communities.”</p> <p>All five of our market towns need revitalising economically, culturally and socially. The challenge is not to swamp towns with new housing estates but without appropriate facilities and infrastructure.</p> <p>Some rural settlements do benefit from small scale development. This will happen organically as developers offer up schemes. Note the current words from the local plan – “.....whilst giving recognition to the need for small scale and appropriate development in rural areas to support rural communities and services”. This should not be changed.</p> <p>Do not support a new settlement Garden Town/Village developed within Breckland. With developments underway near the main industrial base on the A11, it is difficult to see any location in Breckland that can satisfy the employment/transport criteria of a large, sustainable new settlement that could be called a Garden Town or Village, let alone have community support. Concreting over a natural environment can</p>

Element	Summary of Statutory Consultee Comments
	<p>never be 'green-washed' by a simple label (such as 'Garden Village'). If one is truly concerned about climate change, then housing growth does need to be restricted and kept within truly sustainable locations. We need homes for local people. Building on a large scale in the country will simply bring in a greater proportion of second home-owners and retired people.</p> <p>Development be concentrated on the main transport routes (A47, A11 or others), also the mainline train stations.</p> <p>Bintree locality - affordable homes.</p> <p>Affordable housing has to be done on a scale appropriate to the existing settlement. In addition to the development already ongoing to the south of Dereham, there is potential on several of the proposals for Swaffham and Attleborough in the Call for Sites. Affordable housing needs to be near both good public transport and employment opportunity.</p> <p>Developments on the edge of rural towns should be given space around them.</p> <p>Haveringland Parish Meeting - new settlement Garden Town/Village developed within Breckland is unnecessary and inappropriate nature and scale for this rural area, and would bring with it pressures on infrastructure, disruption to local roads, dilution of identity and community in the villages affected and loss of agricultural land and negative impact on nature. A preferable approach is to bolster the existing market towns and villages in the District so as to help bolster their local services and infrastructure, with minor adaptations and additions to this as necessary.</p> <p>Yaxham PC - Existing planning permissions should be utilised first rather than promoting yet more development.</p> <p>Settlement categories as defined in the hierarchy above should be carried forward into the Local Plan Update.</p> <p>Agree with the methodology for classifying Local Service Centres.</p> <p>Agree that all 5 criteria need to be met to be classified as a Local Service Centre. To include adequate surface water and foul drainage on any new development.</p> <p>Do not support that some villages could be considered together around key services they share.</p> <p>Spatial principles - agree with the ranking.</p> <p>Agree development should be concentrated within the market towns. The rural landscape in the villages should be protected and not urbanized any further.</p> <p>Do not support a new settlement Garden Town/Village developed within Breckland.</p>

Element	Summary of Statutory Consultee Comments
	<p>Development should be concentrated on the main transport routes (A47, A11 or others). Homes required in locality - homes suitable for old people and starter homes for local people. Whatever site may be offered for development, there has to be the appropriate infrastructure to make it sustainable.</p> <p>The Plan should include locally evidenced based accessibility standards that require higher standards than those required by Part M4 of the Building Regulations.</p> <p>Watton TC – settlement categories; 4.22 of the Report is of interest in that “plan-led strategy” is referred to - Watton has perhaps not been subject to “well-planned growth” and there has not been “a comprehensive understanding of the needs of, or support from, the communities”. Negotiation is as important as consultation. Reference to “15 minute-neighbourhoods” is of interest.</p> <p>Spatial principles - he first six [are important] 5,6,2,4,9,10. If 5 is most important much of the location for new development would follow in areas of existing infrastructure and the potential for easy and sustainable transport links is also likely to be present already.</p> <p>Development should be concentrated within the market towns. More sustainable.</p> <p>Do not support that more housing should be dispersed within rural areas/villages. Poor infrastructure and road networks. Not sustainable to create large development within unserved locations. Small scale development only to keep rural areas alive.</p> <p>Development should be concentrated on the main transport routes (A47, A11 or others). Greater likelihood that public transport could be more regular due to increased use as a result of concentration of residents, aiding sustainability for the development, transport providers and the environment. Need to keep the impact of vehicular traffic away from the most rural of areas.</p> <p>Homes required in locality - mix of dwellings in accordance with the needs (Watton Neighbourhood Plan Policy WTN 5).</p> <p>Development criteria (Q20) – option 5 most important and should help to address 4. There should be a desire to raise standards of design and housing needs should be met but within the set criteria arising from 5,4 and 3.</p> <p>Accessibility Standards - See Watton Neighbourhood Plan Policy WTN4.</p> <p>Gressenhall PC – Agree Local Plan should plan for Breckland’s full objectively assessed housing needs (672 per annum).</p>

Element	Summary of Statutory Consultee Comments
	<p>Agree the settlement categories as defined in the hierarchy above should be carried forward into the Local Plan Update.</p> <p>Agree with methodology for classifying Local Service Centres. All 5 criteria need to be met.</p> <p>Object to the principle of a new garden town/village because the housing numbers allocated to Breckland can be reasonably accommodated within existing settlements with emphasis on the key settlements, market towns, local service centres and where appropriate, the villages with boundaries.</p> <p>Agree development be concentrated on the main transport routes (A47, A11 or others).</p> <p>Agree Local Plan should continue to define settlement boundaries and be applied to the villages set out in paragraph 4,9 of the Report.</p> <p>Homes required in locality - well designed, in keeping with rural Norfolk. Different sizes.</p> <p>Development – (Q20) all criteria are important.</p> <p>Accessibility standards – no to higher standards. Plan should set minimum standards for outdoor amenity space for new housing.</p> <p>Saham Toney PC - The Saham Toney Neighbourhood Plan (STNP) (made November 2021) allocates 70 dwellings on 9 selected sites, this is more than twice the minimum target set in the current Local Plan Policy ‘HOU 04’ which calls for 33 dwellings. With a surplus of some 30 plus dwellings on acceptable sites we cannot see the need for additional ones unless the current allocation for the Parish is more than doubled by this Review. The village has poor services and narrow lanes without footpaths. Facilities in the neighbouring town of Watton, the main service provider for this village have not improved apart from the addition of a second Super Market despite the building of approximately 1 thousand new houses in this area.</p> <p>Sparham PC - no new, large development sites should be approved because of the lack of infrastructure and the loss of valuable agricultural land.</p> <p>Quidenham PC - Development - all sites listed under Quidenham Parish relate exclusively to sites within the village of Eccles. Under the current local Plan, we are not classed as a sustainable development. We have no shops and are about to lose our Pub. Though we have a Railway Station, few trains stop. We have no bus service. Any additional development would mean extra Car journeys to work/school/shops/health services etc. This clearly goes against Breckland’s own vision for the future. Any additional development would add an intolerable additional strain on our already overstretched services, particularly – Health Services – Schools – Utilities - Road infrastructure.</p>

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	<p>Eccles is in a unique location as the village is adjacent to Snetterton Heath to the North and West but then overlooks open farmland to the South and East. This has created a very fine balance between Industrial and Rural. Any excess development would destroy the Rural nature of our village, which would be contrary to Breckland’s own vision for these settlements.</p> <p>Developing sites in Eccles as it is close to the employment area of Snetterton Heath is a poorly thought-out strategy. Hardly anyone in Eccles is employed within Snetterton Heath. Workers are much more mobile and go where the work is.</p> <p>We are on the verge of commencing a development of 24 houses on Station Road. This represents a substantial increase in our housing stock. We therefore see no call for any additional large-scale development.</p> <p>WE HAVE NO MAINS SEWERS and none are planned. Local treatment plants would risk damaging the fragile Eco system around the village.</p> <p>Our residents would prefer that the settlement boundary remain but that we are allowed to grow organically, with small scale development where appropriate.</p> <p>Beeston and Bittering PC - Local Plan Update should be based on national demand. The number is too low as house building never catches up to the need.</p> <p>Settlement categories as defined in the hierarchy above should be carried forward into the Local Plan Update.</p> <p>Agree with the methodology for classifying Local Service Centres.</p> <p>LSC qualifying criteria - We would add:</p> <ul style="list-style-type: none"> - Government infrastructure such as broadband. - Shared public amenities such as dog walking areas. - Road safety. <p>We would amend;- Public transport, as too simplistic. A one-off service to a small town is different to a wide range of travel options.</p> <p>Villages could be considered together where two villages are well connected. Litcham and Beeston.</p> <p>Development should be concentrated within the market towns as there is existing infrastructure to support the growth.</p> <p>More housing should be dispersed within rural areas/villages, although the right infrastructure should be in place and more housing should be affordable and ideally sympathetic to the local area.</p>

Element	Summary of Statutory Consultee Comments
	<p>Development should be concentrated on the main transport routes (A47, A11 or others).</p> <p>Locality - Affordable housing required to help younger people buy houses in their local area & bungalows (housing for older people).</p> <p>Support the allocation of site or policies that would allow for the development of the types of housing in Q18.</p> <p>Development criteria – Q20; Our priority list would be: 1, 2, 5, 3, 4</p> <p>Brisley PC – do not support a new settlement Garden Town/Village developed within Breckland. restrict the building of new developments to the housing target set by Government. There is no evidence of need for a new settlement. If a need was identified then brownfield growth in existing towns, such as Thetford and Attleborough, should be utilised. Growth in a rural area such as Breckland should be restricted.</p> <p>Hoe & Worthing Parish Meeting – do not support that settlement categories as defined in the hierarchy should be carried forward into the Local Plan Update.</p> <p>Remove - SETTLEMENTS EITHER SIDE AND OPPOSITE WORTHING BRIDGE, WORTHING ROAD, NR20. ALSO, TOP END OF SWANTON MORLEY ROAD, NR20 5HS THESE AREAS WOULD ENCLOSE THE PARISH OF WORTHING, CAUSE CONGESTION, AND NO FACILITIES CATERED FOR. I.E. BUS ROUTES, GP, SHOP ETC.</p> <p>Settlement criteria - Add public transport, provision of community facility, employment, shop and school.</p> <p>Do not support that some villages could be considered together around key services they share.</p> <p>Spatial principles - 3 & 5 most important.</p> <p>Development should be concentrated within the market towns. EASY CONNECTABILITY.</p> <p>Do not support that more housing should be dispersed within rural areas/villages. RISK LOSING INDIVIDUAL IDENTIFY OF VILLAGES AND THEIR HISTORIC / HERITAGE VALUE.</p> <p>Do not support new settlement or 15 minute neighbourhood concept.</p> <p>Development should be concentrated on the main transport routes (A47, A11 or others) and A149.</p> <p>Support the allocation of site or policies that would allow for specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for service families, the elderly or students).</p> <p>Gypsy, Traveller, and Travelling Show People pitches – none should be considered.</p> <p>Space standards – Q20; 4, 5, 3,2,1 are most important criteria.</p>

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	<p>Gunthorpe with Bale Parish Council - Object (proposal to build 5000 homes near North Elmham). Impacts on environment and villages.</p> <p>Hockham PC - do not feel that numbers should be achieved purely to hit government figures. Where housing is needed build houses, but not in inappropriate places to fill the quota.</p> <p>Agree the settlement categories as defined in the hierarchy should be carried forward into the local plan update.</p> <p>Agree with methodology with for classifying local service centres.</p> <p>Criteria - add a doctor's surgery to the list. If villages with boundaries don't have transport to the nearest doctors, then surely, we cannot expand until the services are put in place. Agree that they don't just need to meet the five criteria but they must exceed the five qualifying criteria. E.g. is the school full, is the doctors at capacity, how often does the public transport offer a service.</p> <p>Do not support that some villages could be considered together around key services they share. They could in the future if the services were improved.</p> <p>Development should be concentrated within the market towns. Do not agree that more housing should be dispersed within rural areas/villages. The surrounding villages DO NOT have the infrastructure in place. The schools are full and the doctors are way over capacity. We need to improve the services BEFORE we increase the houses.</p> <p>Do not support a new settlement Garden Town/Village.</p> <p>Development should be concentrated on the main transport routes (A47, A11 or others).</p> <p>The Local Plan should continue to define settlement boundaries and still be applied to villages set out in Para. 4.9 of the Report.</p> <p>Support allocation of housing that provides specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for service families, the elderly or students).</p> <p>Gypsy, Travellers and Travelling Show People – none should be considered.</p> <p>The Plan should include locally evidenced based accessibility standards that require higher standards than those required by Part M4 of the Building Regulations.</p> <p>The Plan should set minimum standards for outdoor amenity space for new housing.</p> <p>Local people, (i.e. the parish council) should have the largest say in what's good for their area. As they live there and really should know best. As each site is different from any other.</p>

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	<p>Shropham PC – Development; As the A11 corridor around Snetterton increasingly becomes industrialised it is important that adjacent villages such as Shropham preserve their open green spaces, views and tranquillity. Over recent years Shropham has supported housing progress with the development of a substantial number of dwellings. Infrastructure - the village has only a good butcher’s shop, no general stores, no school and no pub, though the village hall has a bar. The village has more than fulfilled its fair share of development.</p> <p>Garvestone, Reymerston & Thuxton PC – [housing] Sufficient at present. Availability of housing stock for private and public sector rental/sale needs to be increased.</p> <p>A rural community such as ours needs to prioritise firstly on affordable housing followed by Economic growth.</p> <p>Strategic Infrastructure needs to be separate with a working plan in place before any major development considered.</p> <p>Local Service Centre - the methodology is constantly changing, the Pandemic possibly being the biggest arbiter for local service change for many years. Community builds for the future need to be carefully monitored with a clear adaptability for change.</p> <p>Qualifying Criteria – add Doctors Surgeries, walk-in centres. Access to play and educational areas.</p> <p>All 5 criteria need to be met to be classified as a Local Service Centre. Concept of local villages combining to provide joint services is a strong step forward – e.g., Garvestone, Reymerston, And Thuxton.</p> <p>Development should be concentrated within the market towns. Infrastructure such as mains drainage, gas, digital connectivity etc need to be able to expand from traditional market hubs to rural developments.</p> <p>More housing should be dispersed within rural areas/villages, providing it doesn’t destroy the character, and community experience of the existing population. Any development has to be supported by a suitable infrastructure.</p> <p>Do not support a new settlement Garden Town/Village developed within Breckland.</p> <p>Development should not be concentrated on the main transport routes (A47, A11 or others) as restrictive.</p> <p>The Local Plan should not continue to define settlement boundaries - the needs should drive the policies not artificial boundaries.</p> <p>Types of housing in locality - affordable housing must be an element.</p> <p>Support the allocation of site and policies that would allow for the development of the following types of housing where a local need or connection could be identified.</p>

Element	Summary of Statutory Consultee Comments
	<p>Development – Q20; criteria 1, 2, 5, 4, 3 most important.</p> <p>Snetterton PC – Breckland need to press the developers to build the houses they already have planning permission for before providing more green field sites. Developers must also be made to fulfil their low cost and/or social housing obligations.</p> <p>Development should be restricted to areas where infrastructure can cope.</p> <p>Do not support more housing dispersed within rural areas/villages. For the reasons above plus there is no other means of commuting to work other than to take to the car. This is not sustainable either in the short or long term as infrastructure in villages does not support it.</p> <p>Any large new settlement needs to provide employment and not just focus on housing.</p>
<p>The Economy: The Issues and Options</p>	<p>Defence Infrastructure Organisation - support an approach which seeks to maximise inward investment and local employment opportunities across the District, to address the imbalance between opportunities for urban and rural communities.</p> <p>Industrial and other commercial uses should be situated in accessible locations including the market towns; however this should not preclude alternative mixed-use locations. Robertson Barracks site presents an opportunity for the inclusion of employment space.</p> <p>Policies in respect of office space should provide flexibility to encourage a range of employment opportunities which are accessible for those across the District.</p> <p>Support the principle of diversification to enhance the rural economy.</p> <p>Policies should be flexible to encourage growth and diversification across the District. Allocation of employment land should be based upon local need and the ability of the site to meet the Council’s vision and objectives.</p> <p>Norfolk County Council – Economic Development: This Plan should seek to increase or maximise inward investment and local employment opportunities by planning for across the plan period, whilst considering social and environmental factors.</p> <p>The Local Plan seeks to achieve each of the economic, social and environmental dimensions of sustainable development and net gains across all three.</p> <p>Strategic Planning: Agree with current approach to concentrating employment generating development in the above market towns and Snetterton. Economic Development: The current Local Plan seeks to deliver 64 Hectares of employment land over the plan period. This is concentrated on sites in Dereham, Swaffham, Attleborough, Snetterton and Thetford. This increase in employment provides a balanced</p>

Element	Summary of Statutory Consultee Comments
	<p>approach across the District over the plan period. The Breckland Local Plan has identified strategically suitable locations for office space within the district. To attract inward investment, Breckland Council should work with the business community to support a marketing campaign to highlight the benefits of living and working in Breckland. Breckland Council should also capitalise on the opportunities associated with the Cambridge Norwich Tech Corridor. Support development of strategic employment sites. Build strategic relationship with the Department of Business and Trade. Identify opportunities with existing businesses to facilitate expansion plans. Build on development of key sectors, such as manufacturing and advanced engineering.</p> <p>Breckland District Council's proposed planning policies align with the key objectives and priority actions outlined in the Norfolk Rural Economic Strategy. The allocation of sites for new economic opportunities and the creation of positive enabling policies could contribute to key objectives of the Norfolk Rural Economic Strategy and support sustainable, inclusive, and resilient growth in rural Norfolk. A more flexible approach towards rural economic development, guided by the principles of sustainable and inclusive growth outlined in the Norfolk Rural Economic Strategy, would likely be beneficial for the region.</p> <p>Natural England – Enhancing market town centres Q33; Natural England considers approach 4. More quality green space in our market towns to be of high importance for town centres. Green space can benefit communities by providing space for exercise leading to improvement in mental and physical wellbeing, reducing flood risk, improving air quality and providing space for communities to gather and connect.</p> <p>Network Rail – Industrial space should be supported where it is suitable, including utilising existing infrastructure such as railway sidings.</p> <p>Mattishall PC - Short term planning rarely works; the Council is more likely to attract inward investment if it has a clearly defined aim and objectives for growth and employment throughout the plan period and beyond. Some of the market towns have good transport links e.g., along A47 corridor but not all. Snetterton benefits from the nearby A11 trunk road.</p> <p>Drop-in business centres are the way forward. The flexible workspace model (small, serviced, monthly license) should be considered within the market towns.</p> <p>Breckland should designate business and employment development zones with the startup grant funding and insurance backed loan schemes. Rural areas - the Council would need to maintain an open-minded approach treating each case on its merits but rejecting those that do not protect and enhance the</p>

Element	Summary of Statutory Consultee Comments
	<p>countryside and deliver a positive benefit. Alternative options - new commercial development should be conditioned on improving the environment. If not on-site, a financial contribution should be made to the Parish Council. Support the retail hierarchy and town centre boundaries. Public transport and parking are key to bringing people into the market towns. Pedestrianisation makes the area more inviting. The Market towns and sites adjacent to the Strategic Route Network offer the greatest sustainability. There should be an Economic Development Strategy prepared that assesses the land and property infrastructure necessary to support the agreed housing need, and to deliver new businesses in higher paid, growth sectors.</p> <p>The Plan needs to acknowledge a growth in home working. Appropriate DM policies need to be included to acknowledge this.</p> <p>Rural economic development – positive policies are required.</p> <p>Retail hierarchy and defined town centre boundaries reflect the proposed role and function of each of the towns in Breckland.</p> <p>Little Dunham PC – agree the Council should seek to increase / maximise inward investment/local employment opportunities. Agree with concentrating industrial space in market towns and Snetterton. Transport and links are key. Types of office space and location needs to be more flexible given current trends. Consideration should be given to co-working, starter offices, live/work space and incubator space. Attracting high quality employment – all criteria are important.</p> <p>Rural Economy – all of the options are important. There should be public transport for services and facilities listed at option d. Agree to a flexible approach allowing appropriate economic development in rural areas. The council needs to be more flexible e.g., in minimising commercial rates for start-up and expanding business.</p> <p>Retail Hierarchy and Town Centre Boundaries - we are happy with the current position. Option 11. More residential dwelling mixed with commercial premises in town centres is the most important option. There has been a change in retailing habits which needs to be appreciated. The other items are helpful but will not make any drastic changes.</p> <p>Dereham TC - The Town Council is not fixed on rigidly retaining retail within the Town Centre, it is happy to see alternative commercial use, but would like to see policies that strongly resist the loss of retail/commercial space to residential.</p>

Element	Summary of Statutory Consultee Comments
	<p>The Town Council feels that the existing bus infrastructure in the Town Centre has reached capacity. Any further growth in the Town and hinterland is likely to bring additional pressures to the level of bus movements in the Town Centre.</p> <p>The Issues and Options needs to identify the planning challenges associated with increased bus use and the need for additional infrastructure in Dereham town centre.</p> <p>The Document feels as though the market towns are not considered a priority for employment growth. The Local plan should focus on growing employment opportunities in the market towns unless it can be shown that developing employment sites in rural areas minimizes the number and length of journeys needed for employment. Small scale farm diversification may be beneficial and appropriate, but a large number of business units in rural locations across the District is likely to increase the number and length of journeys needed for employment and make the transition to a zero-carbon economy more challenging.</p> <p>The Issues and Options report has not sufficiently identified the key economic challenges and opportunities facing Dereham and has not taken account of the impact and opportunities the improvements to the A47 will have.</p> <p>The Economy: The Options - The local Plan should aim for more economic growth, and to reduce the need to travel to work, Breckland already has a low level of jobs as a proportion of the working age population. Agree with the current approach of concentrating industrial space in the market towns and Snetterton, but Dereham has a poor supply of employment land.</p> <p>Consider Dereham for industrial space.</p> <p>Employment should be directed to the market towns where more than 50% of the population live, this will then reduce the need to travel and increase active travel.</p> <p>Attracting business – most important; options 8,5,1and 4.</p> <p>The Council should not adopt a more flexible approach. Employment should be focused in areas close enough to the market towns to enable active travel.</p> <p>Enhancing market town centres – most important; options 10, there has been a gradual conversion of retail unites to residential if the trend continues the Town Centre will eventually cease to have a purpose and loose much of its vitality; and 5, the Town Council is happy to see the town centres evolve away from retail provided that there are policies in place to ensure they retain their prominence as an economic centre and do not become residential areas.</p>

Element	Summary of Statutory Consultee Comments
	<p>Bintree PC - the council should always be looking to maximise the local economy, without altering “the working character of the countryside”. The council needs to work towards generating economic activity in our under-performing market towns, to create jobs for the generation currently in education. Housing growth is not the dynamic behind economic growth. Large scale housing will bring little economic benefit to Breckland.</p> <p>Any brownfield site is worthy of consideration. But access to the A11 or A47 is vital; communities will not tolerate any increase in lorry traffic through the other roads in the district.</p> <p>Incentivising new businesses to come into our market towns is key.</p> <p>Breckland needs to develop its tourist potential. We need to incentivise tourism/hospitality providers. Instead of looking to change the district we should be looking to highlight its attractions.</p> <p>The Plan should seek to include all of the options [para.5.21] to promote Breckland’s rural economy.</p> <p>Rural area - the key responsibility of the council is not to change the essential character of the local environment. The council should be “allocating sites” – but only on the edge of existing transport networks. For small scale economic development (farm diversification) there is no allocation required, this happens organically.</p> <p>Positive enabling policies – this sounds like another way of saying “getting round regulations” – which would be unwise.</p> <p>Agree that the retail hierarchy and defined town centre boundaries reflect the proposed role and function of each of the towns in Breckland.</p> <p>Enhancing market town centres – all of the approaches [Q33] are important.</p> <p>Yaxham PC – agree to Minimum economic growth. Infrastructure and services likely to be more sustainable in the market towns and along the A11.</p> <p>Consider Shipdham Airfield for industrial space.</p> <p>Rural areas - if the economic development is suitable for a rural area and has local support.</p> <p>Watton TC – Attracting high quality employment (Q27); all of the options are all important. Need to be able to balance travel needs but trend towards home working will hopefully grow, increasing local sustainability and well-being. local facilities will hopefully be increased and improved.</p> <p>Enhancing market town centres - What do people want?</p> <p>Gressenhall PC – Agree with the current approach of concentrating industrial space in the market towns and Snetterton. Near A47 and A11.</p>

Element	Summary of Statutory Consultee Comments
	<p>Q27 – All criteria equally important. Support rural business and farm diversification where appropriate. Beeston and Bittering PC – Economic growth needs - plan above the minimum. Do not agree with concentrating industrial space in the market towns and Snetterton. Q27 – we think 1, 3 and 8 are the most important in attracting high quality employment to the area. Support a more flexible approach towards allowing appropriate economic development in the rural areas by allocating sites or through positive enabling policies. The Council should develop policies towards providing greater protection for the rural community facilities. Hoe & Worthing Parish Meeting – minimum economic growth. Attracting business to Breckland – Q27; 1,7, 9, are most important criteria. Rural economy – Q29; Agricultural Development should be included. Enhancing market towns – Q33; 8,1,2,3,9, most important. Hockham PC - doubt the need for housing matches the economic growth. Agree with the current approach of concentrating industrial space in the market towns and Snetterton. Why start building in rural areas when the transport, power, infrastructure and work force are already available. We have to allow studies/offices to be built at home and planning will have to allow this as the norm or even put it as a requirement for a new build. Why would we want to create more employment facilities when the ones in existence are failing or struggling. Fix what we have. Q29 - The Plan should seek to include Option A: Continued support for the reuse of rural buildings to encourage new places for work including those unconnected to the farm holdings business. Q30 – Allowing a flexible economic approach is fine, however, quite often the locals and parish council are asked their opinion, which then gets ignored. Let the people that live and are affected most directly have the larger say in what happens in their community. The retail hierarchy and defined town centre boundaries reflect the proposed role and function of each of the towns in Breckland. Attleborough is expanding at a greater rate than the services that are available. Garvestone, Reymerston & Thuxton PC - Optimise inward investment and local employment opportunities. The Plan should seek to include agricultural development and diversification. Issue of labour in our farming communities must be addressed.</p>

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Element	Summary of Statutory Consultee Comments
	<p>Support for flexible approach towards allowing appropriate economic development in the rural areas by allocating sites or through positive enabling policies.</p> <p>Retail hierarchy – does not reflect proposed role and function of the towns. Clear strategies needed for future ‘High Streets’.</p> <p>Success of new development – evaluate via community engagement.</p> <p>Snetterton PC – Do not support current approach of concentrating industrial space in the market towns and Snetterton. Snetterton has more and more industrial development within it, which benefits Breckland through business rate receipts and the residents with employment. The increased industrialisation does not directly benefit the vast majority of the village residents. Further development for increased industrial and/or transport hub activity offers little or nothing except for more traffic, increased noise, pollution and a significant decrease in wildlife. Permission has already been granted to a development to the northwest of the General Employment Area (3PL/2021/0989/F) which is outside the Snetterton Employment Allocation 1 as drawn in the Breckland Local Plan 2019. Any suggested changes to the Local Plan Review with regard to economic or housing development should be discussed and consultation take place with the Parish Council prior to publishing any revised scheme.</p> <p>Areas closest to the majority of housing, i.e. the towns such as Thetford, Attleborough Watton etc should have more industrial areas added, not just new housing developments so people can work close to their homes rather than having to travel by car to work.</p> <p>Q27 - extremely important in attracting high quality employment to the area are criteria 1, 5 and 8.</p>
<p>Assets of Community Value: The Issues and Options</p>	<p>Mattishall PC – protection is required for rural community facilities as once these vital facilities are closed others are unlikely to take up the challenge and the facility is lost forever. Support to be provided to Parish Councils who are best placed to identify ACV and NDHAs.</p> <p>Longham PC - The District Council should do more to help retain the existing facilities in villages. There is little or no public transport.</p> <p>Little Dunham PC – agree for policies towards greater protection and management for rural community facilities.</p> <p>Dereham TC - Why are rural facilities valued more than facilities in the towns? If there are going to be policies, these should look at all valued facilities not only those in rural areas.</p> <p>Bintree PC - careful, organic growth of rural communities will ensure those facilities can survive.</p>

Element	Summary of Statutory Consultee Comments
	<p>Yaxham PC – rural community facilities; there should be positive encouragement for small independent pubs and shops rather than high rents and encouragement of charity shops by discounts.</p> <p>Gressenhall PC – the Council should develop policies towards providing greater protection for the rural community facilities such as public houses and local shops and valued facilities.</p> <p>Beeston and Bittering PC - The Council should develop policies towards providing greater protection for the rural community facilities.</p> <p>Hoe & Worthing Parish Meeting – Include churches when developing policies towards providing greater protection for rural community facilities.</p> <p>Hockham PC - better consultation would be the most successful way of determining the protection of public houses and shops. Those that are worth saving need the support to make them work.</p> <p>Garvestone, Reymerston & Thuxton PC - Greater protection required for the rural community facilities.</p>
<p>The Built Environment: The Issues and Options</p>	<p>Norfolk Police – All future planning applications should work towards designing out crime by applying the principles of ‘Secured by Design’.</p> <p>National Gas – Utilities Design Guidance; National Gas Transmission advocates the high standards of design and sustainable development forms promoted through national planning policy and a creative approach to new development around underground gas transmission pipelines and other assets.</p> <p>Defence Infrastructure Organisation - support the use of Local Design Guides and national policy /guidance such as Building for a Healthy Life. Reference should be made to the protection and enhancement of the natural and built environment.</p> <p>Non-designated heritage assets - do not believe it is necessary or appropriate for the Local Plan to prepare new approaches or special controls [preventing demolition]. There are detailed national policies already in place.</p> <p>The Local Plan should be in line with NPPF strategic policy in respect of the built and historic environment.</p> <p>NHS Norfolk & Waveney Integrated Care System - the local plan should consider embedding net zero carbon building standards to assess and evaluate the design, construction and operation of a development against a range of targets based upon performance benchmarks such as Health & Wellbeing, transport, energy and water.</p> <p>Increased policy & Infrastructure Delivery Plan (IDP) recognition for developer funded ‘health care facilities is required to support and secure S106 contributions. Infrastructure development plans are currently being produced; these will help to form the basis for which healthcare infrastructure needs are identified. The</p>

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	<p>infrastructure development plans from the ICS should be recognised by the LPA and form part of the finalised local plan.</p> <p>Historic England – Health and wellbeing; We welcome the preparation of the Breckland Design Guide. The Local Plan will need to give consideration to the historic environment within the design policies of the local plan which should seek to draw on opportunities offered by the historic environment and reflect local character and distinctiveness.</p> <p>Non-designated heritage assets - we would encourage the Council to make provision for the identification and protection of non-designated heritage assets through the Local Plan. We would recommend that as a minimum a local authority has established criteria for identifying non-designated heritage assets, and ideally has a local list of assets linked to planning policies in their Local Plan. A good example is Peterborough:</p> <p>http://www2.peterborough.gov.uk/environment/listed_buildings/locally_listed_buildings.aspx</p> <p>Conservation and enhancement - we recommend that the policy is refreshed and updated in line with the NPPF. The current policy for designated heritage assets in the Local Plan doesn't really explain the tests that will be applied for example in the case of substantial and less than substantial harm, nor does it differentiate between different grades of assets. We set out [within the submission document] some of our recommendations in relation to Policies for the historic environment.</p> <p>The evidence base should also be updated. We set out [within the submission document] our recommendations in relation to a sound and robust evidence base.</p> <p>Norfolk County Council – Public Health: Building for a Healthy Life allows communities to set their own expectations of new development by providing a series of considerations that will focus their thoughts, discussions and efforts on the things that matter most when creating good places to live. Its overarching message is categorised into three themes:</p> <ul style="list-style-type: none"> • Integrated Neighbourhoods, • Distinctive Places, and • Streets for All. <p>Building for a Health Life should be used as a 'golden strand' running through the early stages of the development and planning process to ensure health and wellbeing are at the forefront of their design and could subsequently be used as an evaluation tool to assess the success of a development.</p>

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	<p>Natural England - Natural England supports the inclusion of the “Building for a Healthy Life” approach to design as the standard tool which should be incorporated into the Design Guide and the Plan’s design policies as a means of evaluating the success of development in delivering health and wellbeing. Natural England advises using Natural England’s Green Infrastructure Framework – Principles and Standards for England¹⁴ to assist with monitoring and measuring the quality of green infrastructure. Natural England would like to highlight the importance of incorporating the promotion of biodiversity in Breckland’s design policies.</p> <p>Network Rail – Contributions from any development that may affect the volume and / or nature of usage of a level crossing must be consulted with us. We would then seek mitigations to be provided at the entire cost of the developer(s). This should include level crossings which are in proximity to Breckland, district area but may not be within the boundary. Details of level crossings in the district and nearby are available on request.</p> <p>Mattishall PC – support Building for a Healthy Life approach to design. Good design and better integration with the existing local area are crucial elements of good (healthy) design.</p> <p>Success of new developments evaluation - survey residents and questionnaires sent to Town/Parish Councils- asking basic questions on how successful new development has been in their areas- e.g., impact on local services, infrastructure, open spaces. More detailed criteria on required on overlooking, overshadowing and acceptable aspect standards.</p> <p>Design policies - define village/towns characteristics, what makes it special then apply policies to protect, preserve and enhance.</p> <p>Non-designated heritage assets - Mattishall Village sites: The Old Mill on Mill Road, The Church Rooms, Dereham Road, Sports and Social Club/Memorial Hall and grounds. Such assets and land curtilage should be protected under BDC LP policy. Each site should be listed within a schedule of non-designated heritage assets. Support refreshing and updating local policy further.</p> <p>Support introduction of special controls that prevent the demolition of non-designated, locally important heritage assets. Use the local knowledge within Town/Parish Councils and NPs.</p> <p>Support refreshing / updating local policy. In many cases Conservation Areas were designated in the 1970s. A new appraisal is needed to consider boundaries and the impact new development may have on the settings of LBs and Conservation Areas.</p>

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	<p>Little Dunham PC – agree the Building for a Healthy Life approach to design should be incorporated into the Design Guide and LP policies, and should also encourage sustainable development by prioritising development that e.g., meets Passivhaus standards, EPC 'A' etc. Home Quality Mark, Social Value methodology, Building with Nature should be used to evaluate success of development. The following should also be considered: quality environment, waterways and biodiversity.</p> <p>Heritage Assets – agree to introducing special controls- to prevent demolition of non-designated, locally important heritage assets. Perhaps the definition of listing could be revised. Agree for Local Policy to be updated in line with the NPPF and for a strategic policy.</p> <p>Dereham TC - Walking, cycling and public transport need to be split out because they are very different; it might be worth also including e-bikes. Cycling 3 miles on good cycle lanes is not a hardship for many people and is probably as quick as driving a car. But walking 3 miles is quite a walk. Public transport is beneficial for access to services (depending on frequency) but there is no direct health benefit as there is with active travel.</p> <p>Bintree PC - Building for a Healthy Life approach to design should be applied to all developments. The scale of development must be appropriate to the immediate area.</p> <p>Heritage Assets - locally, Billingford Church (Grade 1 listed building) is in a desperate state. Agree the council should introduce special controls that prevent the demolition of non-designated, locally important heritage assets.</p> <p>The Plan should refresh and update local policy further in line with the NPPF including a strategic policy for the conservation and enhancement of the built and historic environment including resourcing and updating the historic environment evidence base including conservation area management plans and appraisals and identified assets of local historic importance.</p> <p>Yaxham PC – agree that the Building for a Healthy Life approach to design should be incorporated into the Design Guide and the Local Plan’s design policies as a means of evaluating the success of development.</p> <p>Watton TC - Health and Wellbeing; see Watton Neighbourhood Plan Policy WTN3.</p> <p>Heritage Assets – non-designated sites in locality; Church Walk, Watton – and other local green spaces as identified in the Watton Neighbourhood Plan Policy WTN 8 and WTN 10.</p> <p>Agree that the Plan should refresh and update local policy further in line with the NPPF including a strategic policy for the conservation and enhancement of the built and historic environment including</p>

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	<p>resourcing and updating the historic environment evidence base including conservation area management plans and appraisals and identified assets of local historic importance.</p> <p>Beeston and Bickering PC - The Building for a Healthy Life approach to design should be incorporated into the Design Guide and the Local Plan’s design policies as a means of evaluating the success of development, also Environmental impact & the varied demographic of residents. Broadband access should be considered in Design Policies. Support special controls that prevent the demolition of non-designated, locally important heritage assets.</p> <p>Hoe & Worthing Parish Meeting – support that Building for a Healthy Life approach to design should be incorporated into the Design Guide and the Local Plan’s design policies as a means of evaluating the success of development. Health and Wellbeing – consider age groups & ethnicity. Non-designated heritage assets – support special controls that prevent the demolition of non-designated, locally important heritage assets.</p> <p>Hockham PC - Evaluating the success of new development; ask the people. Health and Wellbeing - Why build houses in the rural villages where there is no public transport and you would have to drive to work. Surely you have to build where the work is. The NHS/doctors and schools must be consulted on planning decisions. Non-designated heritage assets – agree the council should introduce special controls that prevent the demolition of non-designated, locally important heritage assets. Agree the Plan should refresh and update local policy further in line with the NPPF including a strategic policy for the conservation and enhancement of the built and historic environment including resourcing and updating the historic environment evidence base including conservation area management plans and appraisals and identified assets of local historic importance.</p> <p>Garvestone, Reymerston & Thuxton PC – design policies should include Education and Biodiversity. Non-designated heritage assets - Garvestone American Memorial Remembrance space and Reymerston Church require protection through policy. Support special controls that prevent the demolition of non-designated, locally important heritage assets. Support refreshing and updating local policy further in line with the NPPF including a strategic policy for the conservation and enhancement of the built and historic environment including resourcing and updating the</p>

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	<p>historic environment evidence base including conservation area management plans and appraisals and identified assets of local historic importance.</p> <p>Snetterton PC – Breckland’s Design Policies should consider the extract from the Integrated Assessment of the Breckland Local Plan Partial Review Scoping Report dated June 2022:</p> <p>7. Integrated Assessment Framework – IA Objectives :</p> <p>2.Promote equality of opportunity, improve health and wellbeing, and reduce levels of deprivation and disparity.</p> <p>4.Improve the quality, range and accessibility of essential services, facilities, green infrastructure and open space.</p> <p>7.To conserve and protect land and soils, minimise the loss of agricultural land, whilst reducing land contamination.</p> <p>And,</p> <p>an environmental objective – to protect and enhance our natural, built and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.</p>
<p>The Natural Environment</p>	<p>Defence Infrastructure Organisation – Biodiversity; local policy should remain consistent with National policy at 10%.</p> <p>Flooding - support the principle that the majority of development should be directed to areas of lowest flood risk, or appropriate flood alleviation measures should be provided. Support requirements for sustainable drainage systems in new developments.</p> <p>Historic England - Green Infrastructure should not only be considered in terms of the natural environment, health and recreation but also the role it can play in conserving and enhancing the historic environment. It may be helpful to make reference in the text to the role GI can have to play in enhancing and conserving the historic environment. It can be used to improve the condition and setting of heritage assets and to improve access to them. The historic environment can help contribute to the quality, character and distinctiveness of green spaces by helping to create a sense of place and a tangible link with local history.</p> <p>Flooding - We broadly support the approach set out in paragraph 8.15. of the Report. Policies should acknowledge the risks to traditional buildings from flooding, especially the need for such buildings to be able to dry out slowly and that care must be taken not to introduce inappropriate retrofitted measures which would prevent effective drying and shorten the life of the building.</p>

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	<p>Refer to Historic England’s guidance note on ‘Flooding and Historic Buildings’ https://historicengland.org.uk/images-books/publications/flooding-andhistoric-buildings-2ednrev/heaq017-flooding-and-historic-buildings/</p> <p>Policies on Sustainable Urban Drainage Systems (SuDS) should advise that they need to be designed so that they do not impact on archaeology.</p> <p>Norfolk County Council – Natural Environment: It is advised that planning policy clearly references the protection of locally designated non statutory wildlife sites which can act as important stepping stones within a nature recovery network.</p> <p>The setting of an above 10% BNG requirement is strongly encouraged. It is recommended that 20% is set as a minimum requirement.</p> <p>Broadland Agricultural Water Abstractors Group: In respect of agricultural development, the local plan should not include specific (new) policies to address water quality issues in rivers. River water quality issues arising from these activities are subject to regulation from the Reduction and Prevention of Agricultural Diffuse Pollution (England) Regulations 2018, and the related "Farming rules for water". Where any new policy is deemed to be required, this should reference existing regulations, including the "Farming rules for water".</p> <p>Water Usage - LLFA: To support water supply and conservation strategies, development should consider if a cost-effective rainwater harvesting, source control SuDS can be implemented. This would be applicable for both greenfield and brownfield sites. Broadland Agricultural Water Abstractors Group: In respect of agricultural activities, no further policies are required. The abstraction and use of water in food and farming businesses in Norfolk is controlled by the Environment Agency, working in collaboration with Natural England.</p> <p>Flooding - LLFA: Re approach in Para.8.15 - No. To include: Development with areas of downstream flood risk and/or flood history should, wherever practicable, have a positive impact on the risk of surface water flooding. This would be applicable for both greenfield and brownfield sites.</p> <p>Environment Agency (East Anglia) - Air quality emissions from intensive farming can impact on designated habitat sites. We are currently reviewing our permitting approach for pig and poultry farming in relation to ammonia emissions and are looking to make it even more protective by tightening the emission limits, especially in areas such as Breckland where there are many ‘in-combination’ effects from existing farms. This could result in making it harder for new sites to obtain a permit without the use of enhanced</p>

Element	Summary of Statutory Consultee Comments
	<p>abatement measures to reduce/minimise emissions. Planned inclusion of beef and dairy industry into the permitting regime could result in less ‘head-room’ for emissions in this area making the intensification of livestock farming challenging.</p> <p>We recommend that the supporting text recommends the facilitation of early engagement and collaborative working between the Environment Agency, Local Planning Authority and the applicant on planning applications from livestock developments, with applications for planning and environmental permits for rearing (where applicable). We recommend that the plan states that ideally planning and permitting applications should be twinned-tracked so that potential issues around amenity and ammonia emissions can be identified and addressed as early as possible.</p> <p>Water Resources - water bodies in the Breckland area, including chalk streams, are being adversely affected by the abstraction of groundwater which is essential to supply existing homes, business, and agriculture. It is important Local Planning Authorities (LPAs) work together and with the water companies to assess the risk of growth plans and identify effective mitigation strategies. Where a Local Plan is not supported by an appropriate evidence base, such as a Water Cycle Study, it is likely we will find the plan unsound. LPAs have a duty to have regard to River Basin Management Plans. We recommend local plan policies support the strategic actions set out in Anglian Water’s draft WRMP24 and note the draft plan’s significant reliance on demand management measures to maintain secure supplies and prevent deterioration.</p> <p>Water efficiency measures - we highly endorse the use of water efficiency measures especially in new developments.</p> <p>Water usage - Local Plan policies should be aiming for the higher optional standard of 110 litres per person per day.</p> <p>Water quality; Policy Recommendation – foul water capacity. We recommend a policy is included in the local plan that ensures that development/site allocations are phased to ensure they are in line with planned upgrades to Water Recycling Centres. We recommend the policy states that no occupation of the development will take place before capacity is available at the relevant foul water treatment works.</p> <p>Also include policies to ensure the light sandy soils are not washed into the rivers by inappropriate farming practices. Include policies to help reduce flood risk to developments downstream by using natural flood risk management by identifying land use adjacent to watercourses for such schemes rather than farming right</p>

Element	Summary of Statutory Consultee Comments
	<p>up to the river, and reconnecting the flood plain so nutrient and silt rich flood water drops its load onto natural flood plains.</p> <p>Nutrient Neutrality - we agree that the Local Plan should introduce specific policies including ones around agricultural development to help address issues over water quality of our rivers.</p> <p>Sewered areas; Policy Recommendation - we recommend that allocations and major housing allocations are steered towards existing sewered areas.</p> <p>Flood Risk - The aim of the Sequential Test is to direct <u>all</u> new development to areas of lowest flood risk, taking into account all sources of flood risk and the impacts of climate change. Paragraph 8.14 refers to the Local Plan providing an opportunity to reduce surface water flooding but there is no mention of opportunities to reduce fluvial flooding, which is also an important consideration in some locations such as Thetford, Mundford, Ickburgh and Dereham. The Flooding section of the report does not adequately consider the opportunities provided by new development to reduce the causes and impacts of flooding, as set out in paragraphs 62 to 66 of the Planning Practice Guidance (PPG) on flood risk and coastal change. This could include the use of sustainable drainage systems to reduce existing runoff rates, the removal of culverts and the creation of flood storage areas. The Flooding section does not mention that any land required for current or future flood management will be safeguarded from development.</p> <p>A specific policy on flood risk should be included in the Local Plan. This should make it clear that a sequential approach will need to be taken to the location of new development, with vulnerable development located in areas at lowest risk of flooding wherever possible, taking into account all sources of flood risk and the impacts of climate change.</p> <p>Groundwater and Contaminated Land - The plan should include policies to seek to identify contaminated sites and allocate development as an opportunity to provide improvements by remediating the site and preventing ongoing contamination. The plan should identify the appropriate guidance to be followed when working on contaminated sites and make reference that this guidance is regularly updated.</p> <p>Cemeteries - Policy recommendation; The plan should include a policy identifying the need for future cemetery development and include:</p> <ul style="list-style-type: none"> • Depth to groundwater • Other water features/private supply • The Plan should conform with the requirements of Policy L3 of The Environment Agency’s approach to groundwater protection.

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	<p>SuDs - Policy Recommendation; We recommend that the Local Plan includes a Sustainable Drainage Policy that makes reference that SuDS may not be appropriate in every situation.</p> <p>Natural England - Natural England would expect the Plan to protect and enhance protected sites in line with paragraphs 179-182 of the National Planning Policy Framework15 (NPPF).</p> <p>Stone Curlews - We advise that most of the current policy is in line with Natural England’s current advice on stone curlew but would suggest revising the following:</p> <ul style="list-style-type: none"> • Remove policy, “A new building that will be completely masked from the SPA by existing built development.” Evidence from Clarke et al. (2013) suggests stone curlew are sensitive to urban edge effects, residential development and recreational disturbance, all of which may negatively impact nest density up to a distance of 1.5km. This evidence has shown that stone curlews respond to potential disturbance events including road traffic, walkers and dog walkers from long distances. Nesting stone curlew are also likely to actively avoid buildings, with nesting birds believed to be particularly sensitive to changes in the landscape and built environment. The precise mechanisms for disturbance from individual developments are not understood. For example, it is not a straightforward line-of-sight issue, as reduced nest density occurs beyond woodland that screens any visual development effects. Therefore Natural England’s advice is this policy should be removed. • Protection of Habitats and Species - it is considered that larger residential developments, or some smaller residential developments that are in very close proximity of designated sites, are not able to mitigate the adverse impacts on European designated sites with the GIRAMS payment alone. Natural England recommends that these developments include the provision of well-designed open space / GI that is proportionate to its scale to minimise any predicted increase in recreational pressure to designated sites, by containing recreation within and around the development site boundary. Natural England would welcome inclusion of the GIRAMS in a plan policy aimed at mitigating recreational disturbance from the growth identified in the Plan. • Air Pollution - Natural England would expect the plan to address the impacts of air quality on the natural environment. The Plan should address traffic impacts associated with new development as well as the impacts from industrial developments, and intensive agriculture developments such as pig and poultry units and associated waste management, particularly where this impacts on

Element	Summary of Statutory Consultee Comments
	<p>international sites and SSSIs. The environmental assessment of the plan (SA and HRA) should also consider any detrimental impacts on the natural environment and suggest appropriate avoidance or mitigation measures where applicable.</p> <ul style="list-style-type: none"> • Water Use, Pollution and Nutrient Neutrality - the Plan should contain policies which protect habitats from water quality related impacts and where appropriate, seek enhancement. Priority for enhancements should be focussed on European sites, SSSIs and local sites which contribute to a wider ecological network. • Natural England strongly recommends that Breckland Council develops a nutrient management strategy to offset the delivery of increased nutrients from local plan development and to achieve nutrient neutrality. We recommend that the Plan includes a policy to support such a strategy. • Green Infrastructure - The Plan should consider the role of GI strategically throughout the plan area as well as links to adjoining areas and should consider it as a tool in the delivery of LNRS, reflecting local priorities. The Plan should set out a clear vision for delivering GI, including identification of deficiencies in provision and opportunities for new and enhanced GI. Plans can be supported by a GI strategy, GI policy should support and align with other natural environment policies, such as those on sustainable drainage systems, biodiversity, access, active travel and open space protection and enhancement. • Flooding - Plans should positively contribute to reducing flood risk by working with natural processes and where possible use GI policies and the provision of SuDS to achieve this. Natural England would therefore be supportive of the requirement of SuDS in new development. <p>Mattishall PC – support policies to go further to protect The Brecks and smaller protected sites. Better joint working with Town/Parish Councils and agencies such as CPRE, Wildlife Trust and NE. Prior to planning conditions discharge builders/developers/home owners should provide satisfactory photographic evidence to the Planning Officer/Environmental Officer that all of the ecological conditions have been met. Biodiversity - 20% is needed. Greater clarity required on how the 10% net gain is delivered. Green infrastructure proposals - Local Green Spaces should be designated and be protected by planning policies. MNPSG have previously submitted 9 sites, December 2022 to BDC. The SG is in the process of collating ecological study data that will be submitted to BDC in order to strengthen our case.</p>

Element	Summary of Statutory Consultee Comments
	<p>Quality of rivers - Stricter controls required over pollution to our rivers. Greater enforcement of riparian responsibilities to maintain ditches/culverts etc. Farmers should be prosecuted for pollutant run-off from their fields especially when there are eco-friendly alternatives available. Farmers with riparian rights over watercourses must be compelled to maintain and remove any growth that impedes the watercourse natural flow. Flooding – support the proposed approach in para.8.15 but any area that has an identified flood risk the developer should be conditioned to mitigate flooding.</p> <p>Water usage - do not support further policies.</p> <p>North Elmham PC - More public use of the track bed of the Mid Norfolk Railway and of the tracked north of land owned by the MNR towards Fakenham, as a footpath, cycleway and/or green corridor would be welcomed [in locality].</p> <p>Longham PC - Breckland is not doing enough to support these important sites.</p> <p>Little Dunham PC – agree policies should go further to protect The Brecks and other protected sites. Make the Brecks an AONB.</p> <p>Biodiversity – agree that a higher percentage should be delivered, and maybe put qualitative rather than quantitative targets. Insist on comprehensive guidance standards such as 'Building with Nature'. Numeric targets are too one dimensional.</p> <p>Green Infrastructure - we always need more woods and hedgerows, create meaningful habitats rather than fragments to create wildlife corridors.</p> <p>Water Quality – agree to introduction of specific policies to address issues, but with more monitoring and enforcement by the Environment Agency. Enforcing the rules, we have would be a start, rather than by creating more regulation that still isn't enforced. Extraction of water for intensive farming should be limited.</p> <p>Flooding – agree with proposed approach set out in para 8.15.</p> <p>Dereham TC - If enhancing biodiversity it is important that there are detailed green infrastructure plans for each location which will see growth and should be included in the Local Plan rather than being left to the chance of a settlement producing a neighbourhood plan. Identifying local green corridors to be protected and enhanced along with areas where new green corridors would be beneficial.</p> <p>The council should be considering a high biodiversity net gain. But this should really be linked to connecting habitats using local green infrastructure plans, rather than buying credits off-site. If there is a public health benefit from connecting with nature, then high quality nature should be created where people can connect to it and it is related to the development.</p>

Element	Summary of Statutory Consultee Comments
	<p>The Local Plan should designate green infrastructure proposals. Needs detailed consideration and a more comprehensive response than can be given here.</p> <p>Bintree PC - The Wensum is an SSSI but needs protection through local policy. The council should be looking to protect where there is a genuine concern about nutrient neutrality, rather than simply looking to find ways round the problem in order to be able to continue with development. Mitigation strategies cannot be the answer.</p> <p>The council's duty is to protect all land, not just protected sites.</p> <p>Biodiversity - it would be reasonable to demand 20% gain and – more importantly – not allow that 20% to be 'bought' via paying for mitigation (planting trees elsewhere).</p> <p>Yaxham PC – agree that the Local Plan should introduce specific policies including ones around agricultural development to help address issues over water quality of our rivers.</p> <p>Watton TC - policies should go further to support protected sites.</p> <p>Local Plan designation of green infrastructure proposals - See Watton Neighbourhood Plan Policy WTN 7.</p> <p>Flooding: The Options - See Watton Neighbourhood Plan Policy WTN 1.</p> <p>Gressenhall PC - policies should not go further to support protected sites.</p> <p>Biodiversity – do not support higher percentage than 10%.</p> <p>No green infrastructure proposals should be designated in locality.</p> <p>Policies including ones around agricultural development to help address issues over water quality of our rivers should be dealt with nationally.</p> <p>Water quality should be dealt with nationally.</p> <p>Flooding: The Options - agree with the proposed approach set out in paragraph 8.15 of the Report.</p> <p>Beeston and Bickering PC - Flooding; we would rather you considered local concerns.</p> <p>Hoe & Worthing Parish Meeting – support that the Local Plan should introduce specific policies including ones around agricultural development to help address issues over water quality of our rivers. Support for further policies around water usage - PREVENT / REDUCE BURST WATER MAINS.</p> <p>Hockham PC – agree that policies should go further to support protected sites. More consultation at a local level is the key.</p> <p>The Local Plan should designate green infrastructure proposals within rural areas, they need protecting.</p> <p>Water - water quality must be preserved. The Natural England issues need resolving.</p>

Element	Summary of Statutory Consultee Comments
	<p>Flooding - there is no reason to build where there is a flood risk. The idea that there is no alternative location is absurd, if no alternative location, then don't build.</p> <p>Garvestone, Reymerston & Thuxton PC – support for policies to go further to support protected sites. Education and regular inspection can protect further.</p> <p>Support a higher biodiversity percentage than the statutory minimum of 10% to be delivered - progressive increase to achieve 50% (or above) during the life of the plan.</p> <p>Support Green Infrastructure designation for American Memorial site, Garvestone and Remembrance Space, Reymerston.</p> <p>Water quality – support specific policies for agricultural development to help address issues over water quality of our rivers in line with National policies.</p> <p>Water usage - investigate availability of local bore holes (such as Park lane Reymerston).</p> <p>Flooding - agree with the proposed approach set out in paragraph 8.15.</p> <p>Snetterton PC – Polices should go further to support protected sites. Villages such as Snetterton are in the Brecks.</p> <p>Fields that have been put forward for development in the Call for Sites in Snetterton are home or feeding grounds to many species of birds which are regularly spotted and wildlife. Why not make a wildlife sanctuary as opposed to an industrial development or at least restrict the development to the brown field sites and areas that already have permission and/or are included in the current plan.</p> <p>A higher biodiversity percentage than the statutory minimum of 10% should be delivered by new development in the district.</p> <p>The Local Plan should designate green infrastructure proposals within our local area - in areas that are known to be important habitats for declining.</p>
<p>Tackling Climate Change</p>	<p>Defence Infrastructure Organisation – DIO are supportive of the Council's aspirations to tackle climate change and the themes in the sustainability strategy.</p> <p>Historic England – Development and design policies; Historic England recognises the urgent need for positive action in response to the global climate crisis and is committed to achieving net zero carbon emissions. The proposals (Q48) are considered to be compatible, as looking after and learning from the historic environment contributes positively to overall global sustainability and can help us adapt to and mitigate for climate change.</p> <p>Historic England broadly supports many of the proposals suggested in the consultation paper.</p>

Element	Summary of Statutory Consultee Comments
	<p>Norfolk County Council – Strategic Planning: Supportive of the principles set out in paragraph 9.11 on tackling climate change.</p> <p>Environment Agency (East Anglia) - The plan should include Net Zero policies to align with national Net Zero Targets and NPPF mitigation policies. Climate change policies should go further. The Local Plan should refer to important sites within the plan area and ensure that the plan will not negatively impact designated sites. It should include the provision of Blue/Green infrastructure to ensure that habitats are linked. The plan should particularly ensure that site allocations offer the potential to provide Green/Blue infrastructure that can deliver biodiversity benefits.</p> <p>Natural England - The Plan should contain policies to mitigate and adapt to climate change impacts on the natural environment. Policies should set out and incorporate appropriate nature-based solutions for climate mitigation and adaptation such as woodland or wetland creation or peatland restoration.</p> <p>Biodiversity Net Gain - Consider a more ambitious percentage BNG target than the minimum of 10%. Any target should be achievable and evidence based.</p> <p>The Plan should describe and identify the priorities for habitat creation or enhancement in different parts of the plan area in line with paragraph 179 of the NPPF.</p> <p>We suggest five specific actions to include in the Plan:</p> <ol style="list-style-type: none"> 1. Set an ambitious climate-specific policy with targets for reducing greenhouse gas emissions. Plans should include a clear commitment to achieving the national statutory target of net zero emissions by 2050, with policies to secure significant reductions in greenhouse gas emissions over the Plan period; 2. Identify, protect and plan to restore all areas of peatland. Wherever possible this should include management of the catchment areas that support the peatland. We would advise extending this approach to shallow peaty areas in addition to deep peats. 3. Identify opportunities to increase tree and woodland cover consistent with the UK target. Wherever possible, this should provide multi-functional benefits. Planting on peatlands and other valuable open habitats must be avoided. 4. Identify areas where nature-based solutions can provide benefits to people whilst reducing climate change vulnerability in the natural environment. 5. Identify habitats and protected sites that are particularly vulnerable to the impacts of climate change and consider how the planning system can work to reduce these vulnerabilities.

Element	Summary of Statutory Consultee Comments
	<p>Mattishall PC- support the proposals within Breckland’s development and design policies. District heat and power may be unattainable with the possible exception of Snetterton. Tree planting is viable regarding carbon capture. Could be conditioned as part of a permission.</p> <p>Support proposals to tackle climate change - enhance policies for new build residential; photo voltaic cells in appropriate locations, electric car charging points, grey water recycling, cycle ways, green spaces, allotments. With regard to new homes being required to produce 31% less carbon emissions via electrical heating systems the Power Networks grid is currently not able to support such demand.</p> <p>Little Dunham PC – go further with standards. Min EPC A. Don’t build where people will be reliant on cars. More cycling infrastructure. Protect and maintain watercourses and increase enforcement.</p> <p>Dereham TC - Construction Standards should be adopted to ensure all new developments are net Zero by 2025 to ensure the target of net-zero by 2035 is not compromised.</p> <p>Electric charging points should be on all new properties at a point where people will be parking their cars. “Promote Cycling and Walking on new developments to reduce car use” – the Council doesn’t feel this is terribly ambitious.</p> <p>“On new developments” - the Council feels this needs to be more ambitious and specific.</p> <p>The Local Plan needs to be more specific and more aspirational in making active travel a genuine choice for local journeys. The Local Plan will then better reflect Norfolk County Council’s guidance for developers. The Council is supportive of the proposals detailed (pg 51), subject to comments above.</p> <p>Bintree PC – para. 9.11 proposed policies. All are very sensible. Housing and economic development must be within or next to existing settlement where walking, cycling or appropriate public transport are all available.</p> <p>Yaxham PC – new development should be required to put in accessible EV chargers and solar panels.</p> <p>Hockham PC – Development and Design policies; Why build where there is no jobs, no public transport and no services. If everyone is being asked to reduce their carbon footprint then you can only build where the services are and reduce commuting miles for everyone. Affordable housing [must go] in the right areas.</p> <p>Garvestone, Reymerston & Thuxton PC – support all proposals within Breckland’s development and design policies.</p> <p>Snetterton PC –move away from policies that force people to drive to work.</p>

Element	Summary of Statutory Consultee Comments
<p>A Safe and Convenient Transport Network: The Issues and Options</p>	<p>Defence Infrastructure Organisation - the DIO recognise that a sustainable transport strategy which provide safe and convenient access is critical to the delivery of new development across the District. The DIO support the provision of enhanced public transport, walking and cycling and electric charging points. The Robertson Barracks site has existing walking and cycling connections to nearby Swanton Morley.</p> <p>NHS Norfolk & Waveney Integrated Care System - transport links will need to be improved to and from any new developments and healthcare facilities to ensure patients without transport can easily access required healthcare services.</p> <p>Network Rail – Q50; options considered to be the most important for a sustainable transport strategy - Increased use of rail and freight capabilities in this area, to enable development to be more sustainable and address the challenges we continue to face when Breckland Council declared a climate emergency – Declared on 19th September 2019. Introduce Policy(ies) to make communities safer by targeting the closure of level crossings, as well as seek costs for these from developments to mitigate the impacts they introduce to level crossings and the local populations.</p> <p>Mattishall PC - Establish safe walking and cycling routes. Mattishall Village has a good network of footpaths within the 30 MPH zones. The issues arise outside the 30 MPH zones where traffic is limited to 60 MPH. Pedestrians, dog walkers, families with children in pushchairs and vehicles traveling >60 MPH are not compatible. Prohibit development where footpaths do not exist. District Council to lobby the CC and Government for the reintroduction of Regulated public transport service, (as in other County/CA areas).</p> <p>North Elmham PC - More public use of and right to use the track bed of the Mid Norfolk Railway and of the tracked north of land owned by the MNR towards Fakenham, as a footpath and cycleway would be welcomed [in locality].</p> <p>Longham PC - All the options [in the Document] have merit but we would particularly support option 6 [Promote “uber-style” bus services for rural areas which could work well in smaller, more isolated villages, such as Longham.</p> <p>Little Dunham PC – Option 6: Promote “uber-style” bus services for rural areas, and Option 7: Enhance the role of market towns, increasing their retail/service function to support the rural hinterland, are the most important.</p> <p>Cycling and Walking Routes in Locality- definitely needed to Swaffham and also Litcham.</p> <p>Dereham TC - Congestion in Dereham and possibly other Market Towns:</p>

Element	Summary of Statutory Consultee Comments
	<p>Current Local Plan - a transport study was carried out for Tavern Lane and surrounding junctions and identified a number of improvements needed in order to accommodate the growth in traffic. Once the Local Plan was approved, Norfolk County Council stated that the major interventions identified in the Transport Study were undeliverable.</p> <p>If a transport study was needed for the current Local Plan, but the interventions were deemed undeliverable, the Council felt that, if a transport study was a requirement for the current Local Plan, then a revised transport study would be required for this Local Plan, to identify highway improvements which are actually deliverable.</p> <p>Traffic congestion is often raised as a concern for residents, most roads are hostile to cyclists. In addition, measures taken to improve traffic flow often reduce the attractiveness of a route for walkers.</p> <p>Congestion in Dereham has not improved and it is imperative that congestion in Dereham be included as a planning challenge to be considered in detail in the Local Plan review in order for it to meet the requirements of paragraph 104 of the NPPF.</p> <p>Sustainable transport strategy – most important option 1, but should be where most day to day services can be accessed using active travel and where the distance to other services is reduced to the absolute minimum; 5, Safe walking and cycling routes from rural areas to market towns should only be considered once the cycling and walking network in the market towns is comprehensive and complete. There is no point being able to safely cycle from, say, Yaxham to Dereham; only to find you are unable to cycle in the Town because the network is so hostile to cyclists. It makes no sense to create routes out of the towns until there is a completed cycle network within the towns. Realistically very few people are going to walk into Dereham from the surrounding rural area; and 7 .</p> <p>Bintree PC – Q50 sustainable transport strategy options. All are important. The transport strategy needs to address the existing transport situation first if we are to make any real improvement and get our priorities right.</p> <p>Mid-Norfolk Railway has been much talked about in the past. It is not even mentioned in the Norfolk Transport Plan, 2021-2036. The best solution here would be a cycle path. The North Elmham to Dereham railway track could be turned into a cycle path.</p> <p>Yaxham PC - Safe and Convenient Transport Network: The Options – agree with ranking.</p> <p>Watton TC - A Safe and Convenient Transport Network: The Options - No. 1 first with others having almost equal importance.</p>

Element	Summary of Statutory Consultee Comments
	<p>Walking and cycling routes in locality - Cycle route along the old railway from Loch Neaton, Watton to Swaffham.</p> <p>Gressenhall PC – Q50; options are all equally important.</p> <p>Sustainable transport options - Cycling/walking infrastructure plans.</p> <p>Beeston and Bickering PC – Q50; 4 and 5 most important.</p> <p>Hoe & Worthing Parish Meeting – Q50; 4, 1, most important.</p> <p>Hockham PC – Q50; most important option is 1. Development should seek to minimise the need to travel i.e., be located to facilities and services. All the other options are unachievable.</p> <p>Garvestone, Reymerston & Thuxton PC – options for walking / cycling routes in locality - Remembrance walk (although pedestrian only).</p>
<p>Providing Infrastructure which supports development, local communities, and businesses</p>	<p>Defence Infrastructure Organisation - support the Council's approach to include policies for more renewable energy. The Robertson Barracks site has the potential to accommodate renewable energy infrastructure within the boundary.</p> <p>Mattishall PC – Power: Current policies are not working to encourage more renewable energy development in Breckland. Local Plan should insist all new build developments incorporate heat pumps and PV with battery storage. Glazing should exceed Building Control Regulations, in addition grey water systems and porous driveways should be the norm.</p> <p>Little Dunham PC – Power: renewable energy should be enhanced.</p> <p>Suitable sites - redundant WW2 Airfields</p> <p>Dereham TC - The Local Plan should be more positive with regards to large scale renewable energy generation.</p> <p>Dereham TC - in 2003 Breckland Council produced a study identifying locations which would be suitable for different types of wind turbine. Something similar could be produced to cover wind and solar.</p> <p>Yaxham PC – Current policies are not working. There is not enough renewable energy. e.g., Solar panels on roofs of new developments.</p> <p>Shipdham Airfield is a suitable site for renewable energy.</p> <p>Drainage to be included as key infrastructure.</p> <p>Beeston and Bickering PC – current policies are not working. The parish favours solar over wind as it's less disruptive.</p>

Element	Summary of Statutory Consultee Comments
	<p>Hoe & Worthing Parish Meeting – ROBERTSONS BARRACKS, SWANTON MORLEY is a suitable site for renewable energy development.</p> <p>Garvestone, Reymerston & Thuxton PC – In terms of wind energy, we support the Norfolk Parishes Movement to secure an Integrated Offshore Transmission Network.</p>
<p>Open Space, Sport and Recreation: The Issues and Options</p>	<p>Defence Infrastructure Organisation - The DIO recognise that there are a number of local infrastructure needs in neighbouring Swanton Morley and surrounding villages.</p> <p>East of England Ambulance Service Trust (EEAST) – “Key infrastructure areas” should include reference to ‘ambulance facilities’ e.g. “health, medical and ambulance facilities”.</p> <p>The broad budget for developer funded ambulance facilities should be reflected in the Breckland Council IDP. The requirement for developer funded health and ambulance facilities should be amplified within a local plan infrastructure policy, & through associated supplementary planning & development management documentation.</p> <p>Historic England - Heritage assets and cultural attractions may be considered as infrastructure. Historic England therefore encourages charging authorities to consider identifying the ways in which CIL, and S106 agreements can be used to implement Local Plan policy and proposals relating to the conservation of the historic environment, heritage assets and their setting.</p> <p>Norfolk County Council - Strategic Planning: The County Council’s Planning Obligations Standards, setting out the infrastructure and services it would expect to be provided as part of any new housing development, are published on the County Council’s website https://www.norfolk.gov.uk/rubbish-recycling-and-planning/planning-applications/planning-obligations .The Standards are updated annually and the County Council would expect that the infrastructure and service requirements set out in them to continue to be reflected in the Local Plan review.</p> <p>Natural England - The Plan’s evidence base should include a robust and up-to-date assessment of open space requirements and opportunities, with policies and proposals to remedy deficiencies in greenspace provision, including through land allocation. The Plan should identify, designate and have policies to protect and enhance areas of Local Green Space that are of particular importance to local communities. Green Infrastructure policy should consider the requirement for planning applications to clearly set out long term management and monitoring of greenspace.</p> <p>Sport England - Sport England would like to work with the Breckland policy team to deliver robust policies around the protection of sports facilities and the provision of new facilities.</p>

Element	Summary of Statutory Consultee Comments
	<p>Mattishall PC - There is a demonstrable need for areas of Green Open Space to be formally designated in our area. Green open space is essential for wellbeing. Mattishall has a village green, Sports and Social Club grounds, laid to football cricket and bowls within season. The village has an area laid out to allotments. This year MPC will take possession of an area of land to the western edge of the village that will become a community wood. In addition, a second area of allotments and an orchard will also come into community use. Current policies - protection provision must adequately protect green spaces from development.</p> <p>Green Open Space sites have been proposed as part of the Call for sites process. These are: Mattishall 1. Dereham Road/ Howes Lane 2. Community Woodland 3. Off Back Lane 4. Rayners Way 5. Thynnes Lane 6. School Playing Fields 7. South of Norwich Road 8. North of Norwich Road 9. Site to South and west of Ivy Barn, Rayners Way.</p> <p>Infrastructure needs - there is a proposal to relocate Mattishall Surgery and Pharmacy to a new location outside of the village boundary. Several issues would need to be addressed prior to any permission: Transport from the village centre for the elderly to the new location and return. Acceptable conversion of the existing premises. Viability, funding, design and parking within the new facility. Permissions for new build housing must not be carried out in isolation. BDC should actively consult with statutory providers. If the infrastructure is not capable of taking the additional load from the potential development, then the development should be refused.</p> <p>Section 106 agreements should be drafted before planning permission has been granted/ agreed with the developer and clear time lines in place to ensure compliance. Breckland Council should review its position on Community Infrastructure Levy in line with other Norfolk districts. CIL contributions to Neighbourhood Plan areas will help deliver much needed infrastructure.</p> <p>Little Dunham PC – We have adequate open spaces, Playing Field and Amenity Area. Agree that current policies are working. We have underutilised open spaces and our digital connectivity is fine.</p> <p>Dereham TC - Breckland Council’s open spaces assessment 2015 identified a deficit in Outdoor Playing Space in all parishes. This study identified a 34ha deficit in Dereham. A more detailed open space assessment carried out by Dereham Town Council identified a deficit in Outdoor Playing Space of 21ha. What is clear (and evidenced) however is, since Breckland started carrying out open space assessment, the deficit has been increasing this clearly shows that the policy is not working.</p>

Element	Summary of Statutory Consultee Comments
	<p>The policies currently do not deliver the required amount of Outdoor Playing Space specified in the policy. The policy routinely allows developers to negate the provision of areas for sport. This situation is not helped because Officers only ever talk about the requirement to provide Open Space rather than the requirement to provide Outdoor Playing Space, which is a specific type of Open Space. This leads to confusion with the developers over what they need to provide.</p> <p>The current policy only protects ‘designated’ open space. The policy should be revised to say that ‘all public open space and amenity land will be protected. This will then conform with the NPPF paragraph 99. Key Infrastructure Requirements –</p> <ol style="list-style-type: none"> 1.Ensure the delivery of a coherent cycle network. 2.Ensure delivery of Outdoor Playing Space on the development site rather than off-site contributions. 3.Vehicle charging points on every property at locations where vehicles would normally be parked. 4.Ensuring new developments have sufficient electricity supply 5.Congestion in Dereham is still a major planning challenge and needs to be considered at the early stages of the review of the Local Plan. 6.Doctors’ surgery in Toftwood. 7.Measures to improve bus movements in the Town Centre, to accommodate the anticipated increase in bus movements. 8.Options should be explored to introduce a Park and Ride facility in Dereham to utilise the frequent bus service to Norwich from Dereham. This would enable residents from the surrounding villages to make greater use of public transport. <p>Bintree PC – Our local parishes have adequate open space. Policies - 2.5 hectares (5 acres) for 1,000 people is a truly inadequate target. Maybe ok in a semi-urban district, but In a rural area it should be 10 times that.</p> <p>Infrastructure needs for our locality – Health and medical facilities Bintree needs a village hall Town and Local Centre - the focus should be on revitalising the town centres, rather than infrastructure. The concentration should be on improving the quality of what is available, including retail, hospitality and cultural offerings. Digital connectivity.</p>

Element	Summary of Statutory Consultee Comments
	<p>Emphasis on infrastructure is over-stated. Central Norfolk has prime agricultural land and culture, resources that we need to protect and develop to ensure we can provide food for the country and reduce our reliability on foreign imports.</p> <p>Watton TC - Watton Town Council feels there is a lack of public open space in Watton. Watton Neighbourhood Plan Policy WTN 7.</p> <p>Large open spaces are needed. Small spaces have limited use and are not ideal for planting trees! Although small areas can have a purpose, including unpaved areas supporting surface water drainage and a good visual appearance if planted well and maintained. Green space areas should be planned to help create wildlife corridors as well as cycle/walk ways.</p> <p>Watton is in need of improvement/enhancement of all infrastructure. Better local partnership working [required].</p> <p>Gressenhall PC – adequate current of open space within parish. Current policies a working for Gressenhall.</p> <p>Health and medical facilities lacking.</p> <p>Beeston and Bickering PC – poor provision in our Parish. Current policies not working. The options in the parish are limited and are not requested within all large applications.</p> <p>Increase health provision and medical facilities including dentists.</p> <p>Community facilities – lack of shop as current one is closing.</p> <p>Digital connectivity – needs improvement for rural areas. Power needs – our area has lots of power cuts.</p> <p>Water – there is a lack of pressure in lots of Beeston. Improved sewage systems are also required.</p> <p>Deliver the infrastructure first.</p> <p>Hoe & Worthing Parish Meeting – our future need is to retain open space.</p> <p>Hockham PC - We have masses of open space in our community, we just need to protect what we have. That includes the forest and the farming community.</p> <p>Policies for open space provision – they are working in our Parish.</p> <p>Infrastructure needs - always ask, “can the services cope with more people if development occurs?”</p> <p>Planning can ask the doctors and the schools to be consultees on any planning. If they can’t cope with more numbers then don’t build.</p> <p>Garvestone, Reymerston & Thuxton PC – Current Provision in Parish; currently sufficient. Agree open space policies are working.</p>

Element	Summary of Statutory Consultee Comments
	Key Infrastructure – digital connectivity and power stability needed.
Any other Issues or Options?	<p>Defence Infrastructure Organisation - The DIO welcome the opportunity to engage with Breckland Council, the Town Council, Parish Council, elected members, local community and other key stakeholders to discuss the future of the Robertson Barracks site. The Council should identify the Robertson Barracks site as a Key Strategic Allocation as part of the future local plan, which can deliver beneficial sustainable development on a large brownfield site, in line with the NPPF.</p> <p>Historic England - The Plan should include a glossary. This should include appropriate Historic Environment terminology including Historic Environment, Heritage Assets, Listed building, Conservation Area, Scheduled Monument, Registered Park and Garden, Designated Heritage Assets, Non- designated Heritage Assets, Local List, Heritage at Risk etc.</p> <p>The Plan should include appropriate monitoring indicators.</p> <p>Norfolk County Council - Natural Environment: re section 8 of the Report – 8.2 It is advised that reference is also made to locally designated wildlife sites (i.e. County Wildlife Sites and County Geodiversity Sites) as these form an important element of the nature recovery network and should receive protection via the planning system. 8.4 It is advised that reference is made to the Environment Act rather than the Environment Bill. In addition, the reference to “local recovery strategies” should be revised to local nature recovery strategies”.</p> <p>Historic Environment: We ask that buried remains are considered too, and a statement is included along the lines of: ‘The Norfolk County Council Historic Environment Strategy and Advice Team will continue to monitor new planning applications and offer advice both to Breckland County Council and to potential developers about the historic environment impact of proposed developments in order to ensure that suitable measures are in place if needed, either secured by planning condition, or done pre-application to mitigate any negative effects of such developments on the historic environment, especially any buried remains.’</p> <p>Natural England - The Plan should contain policies to protect Best and Most Versatile (BMV) agricultural land (Grades 1, 2, 3a). Policies should avoid the loss of BMV land. The Plan should recognise that development has an irreversible adverse impact on the finite national stock of BMV land.</p> <p>Network Rail – Network Rail and rail industry partners welcome the opportunity to consider multi-party transport investment opportunities.</p>

Element	Summary of Statutory Consultee Comments
	<p>Mattishall PC - Planning conditions are pointless unless the Council has a viable Enforcement organisation underwritten by policy and should be actively encouraged to enforce ALL conditions. Please ensure a continued effective dialogue with Town/Parish Councils throughout the review.</p> <p>North Elmham PC - concerned by the lack of consultation planned for later, for the sites for housing submitted during the call for sites process. The first opportunity we will have to comment on the suitability of these sites is at the consultation later in 2023, which will be after the sites have been assessed with the preferred sites having been selected without any specific public consultation. It is very disappointing that the views of Parish/Town Councils, members of the public and others will not have been used to help inform Breckland's decisions in choosing initial preferred sites. We would like there to be another round of public consultation on which sites for housing should be preferred, be reasonable alternatives or are unreasonable. This would ensure that all have then been given the best opportunity to express what the Local Plan should contain. Without this, we feel the Plan may be judged to be unsound. We are concerned by the poor quality of this consultation; it is not user-friendly. There are various errors and confusions within it which when added together raise serious concerns. This version (quite rightly we think) has Part A for respondents' details, with names and organisations to be published. However, the version on Commonplace does not, with responses being anonymous. Question 10 has two statements duplicated which will make any responses to this question unreliable. Question 16 has the incorrect report reference.</p> <p>Longham PC - planning applications - we often feel our comments are ignored by Breckland. We have the local knowledge and can raise any concerns to ensure that the correct development is delivered in our village. Our views should carry more weight.</p> <p>Whissonsett PC - Planning decisions should be enforced, sensitive development which should be in keeping with existing, no backyard or over-development of sites, and Breckland to take account of Parish Council views.</p> <p>Billingford PC - Comment on question 13. There are many other ways of fulfilling housing need instead of building a new town or village, including developing existing brownfield sites and using housing numbers relevant to our district and not exceeding national target figures. The large additions to the major towns in Breckland are already equivalent to any new settlement and better placed in terms of local infrastructure roads and communications.</p>

Element	Summary of Statutory Consultee Comments
	<p>The site at Billingford parish in the issues and options documentation is entirely unsuitable because of lack of transport and infrastructure and jobs to avoid the need for commuting, in actual fact it would mean a loss of jobs because the site is already a working farm and egg production unit, risk of pollution, drainage problems and run off interfering with the Wensum SSSI, loss of good agricultural land which contributes to UK food production, interference with important aquifers and water sources.</p> <p>Interference with landscapes and wildlife, factors contributing to climate change.</p> <p>Dereham TC – Has the Issues and Options Report identified all those planning challenges and opportunities which the Local Plan should be addressing?</p> <p>Bintree PC - This kind of questionnaire does not reach most of the population. Most people are not prepared to go through a 60 question form. It is biased towards professional developers.</p> <p>Yaxham PC - Parish Councils know their area and there should be more consultation with them as well as with developers. Enforcement / building control should be far more robust.</p> <p>Beeston and Bickering PC - All rural developments should be assessed against the character of the area with adequate separation, design and materials.</p> <p>Hockham PC - Infrastructure must be provided first.</p> <p>Snetterton PC - Roads through the village of Snetterton are a single-track road with no pavements with blind corners. The roads are used daily by pedestrians, including children and older village residents. They are also used frequently by cyclists and joggers, daily in fair weather. Traffic is increasing monthly as the Snetterton Business parks grow. If the industrialisation continues this is going to get worse.</p>

Appendix 3. Summary and Analysis of Representations by Question

Summary and analyses of Focussed Issues & Options Representations by Question (January 2024 to February 2024)

Elements & Question No.	No. of Responses Received	Summary of Representations
Sustaining Rural Communities		
<p>Q1. Do you agree with the methodology for deciding which parishes should be Local Service Centres? Y/N Please explain your answer to deciding Local Service Centres.</p>	<p>197 (yes:95 no:97, unsure/other:5)</p>	<p>There was an event split as to whether respondents supported (48%) or didn't support (49%) the methodology for deciding which parishes should be classed as Local Service Centres, key findings show a confusion as to how criteria have been selected ahead of the development strategy being produced, need for flexibility and how locations for the criteria and need for in depth infrastructure assessment. Further comments summarised below:</p> <ul style="list-style-type: none"> • Some respondents expressed confusion about the criteria for a village to be considered a Local Service Centre. Pointing out inconsistencies that some village needing to meet 5 services while only 3 in another. • There were concerns about the lack of infrastructure and services, and the impact on sewage and water distribution. Respondents felt that these factors were not being adequately considered when designating a village as a Local Service Centre. • Some respondents felt that there should be a minimum amount of services available for a village to become a LCS. They also suggested that transport should always be one of the three services. • Some respondents felt that a village should not have to fit every criteria to be considered a Local Service Centre. They suggested that a village with everything apart from a shop may still be suitable for development, and the additional houses and residents could then help to support and justify a shop. • Further key point raised included the need for development to meet the needs of present and future residents, concerns about whether the current infrastructure levels can sustain more people, and the importance of local employment opportunities.

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Elements & Question No.	No. of Responses Received	Summary of Representations
		<ul style="list-style-type: none"> • Essential to identify Local Service Centres and allocate a level of growth to them that is commensurate with their position in the settlement hierarchy. • Is simply designating a settlement as a LSC, and then directing the majority of growth to these settlements, is the most sustainable strategy for delivering housing for a very rural District. • Development strategy needs to be in place first to ensure that any criteria that sites are being assessed against meets the objectives of the defined Strategy. • Phase 1 assessment very much aligns with settlement hierarch within current adopted Local Plan and as development strategy not laid out how can any sites be ruled out at this stage? Should a different approach be taken there would be different criteria points to assess sites against.
Towns, villages and countryside		
<p>Q2. Should Breckland continue with a settlement boundary approach or develop a robust criteria-based policy? Please explain your answer regarding the settlement policies.</p>	<p>180 (continue with settlement boundaries:125 Develop criteria based policy:46 unsure/other:9)</p>	<p>The majority of respondents want to continue with settlement boundaries in the new Local Plan with a range of concerns focussed on a lack of detail as to what a criteria based approach would mean in practice, greater subjectivity when assessing planning applications and concerns about disruption to the environment. Reasons for supporting settlement boundaries summarised below:</p> <ul style="list-style-type: none"> • Maintaining settlement boundaries minimizes the risk of habitat fragmentation and allowing species to thrive in their natural environment without the disruptions caused by development. • Being inside the settlement boundary provides a degree of certainty as to whether the principle of development would be supported. • Brings clarity to a range of Local Plan policies. A settlement boundary clearly sets out a distinction between a settlement and its surrounding countryside where development is not acceptable unless in specific circumstances. • Provide a robust way to prevent unnecessary encroachment into the landscape, or into strategic or local "gaps". • Not continuing settlement boundaries with result in greater ambiguity and opportunity for interpretation and challenge. <p>Responses did highlight the potential benefits of developing a criteria based approach:</p>

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Elements & Question No.	No. of Responses Received	Summary of Representations
		<ul style="list-style-type: none"> • Can help accommodate specialized housing needs, including older persons' homes, care facilities, and self and custom builds (SCBs). These specialized housing needs may not fit neatly within the confines of traditional settlement boundaries. • Criteria can be developed that directs development to more sustainable locations. • Relieve pressure for development but not taking a one size fits all approach • In order for the emerging Local Plan to be resilient to change across the whole plan period, the implementation of a criteria based policy would enable this. <p>But did note the following concerns:</p> <ul style="list-style-type: none"> • There's a lack of detail on what a criteria-based system would look like in practice. • Criteria hasn't been shared and respondents would want opportunity to comment on these • Noted that criteria-based systems can be subject to interpretation and could potentially be open to loopholes.
Potential Development Sites		
<p>Q3. Do you agree with this new criteria for assessing sites? Y/N Tell us more (explain your answer or comment in more detail on aspects of the proposed criteria)</p>	<p>178 (yes:84 no:85 neither yes, no or unsure:9)</p>	<p>There was an event split as to whether respondents supported (47%) or didn't support (47%) the criteria or checklist for assessing sites considering a number of aspects which results in the Council proposing potential suitability against these considerations using a traffic light system (red = likely not suitable, amber = might be suitable and green = likely suitable).</p> <p>Some respondents supported the proposed RAG rating as an initial assessment but further detail would be required, key concerns included how the criteria have been chosen ahead of development strategy being published and how improvements/mitigation will be factored into the assessment. Reasons summarised below:</p> <ul style="list-style-type: none"> • Sites should be ranked on potential and not existing qualities. • How can site criteria have been developed when development strategy has not been published?

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Elements & Question No.	No. of Responses Received	Summary of Representations
		<ul style="list-style-type: none"> • A site may have been marked red for an issue but this doesn't consider where significant infrastructure improvements can be delivered. The Council needs to be certain when marking an issue as red that there is no mitigation or intervention available. • RAG assessment given it's use by multiple Local Planning Authorities is a suitable tool to use. • RAG system is high level and for example when considering transport doesn't differentiate between A and B roads. • Some criteria do not account for how the site could be designed and delivered
<p>Alternative Development Strategy Options</p>		
<p>Q4. Please drag and move the options below to rank in order of preference, the six alternative development scenarios. If you think there are any other development strategies that could be considered, or areas that you think should have more or less development, please share your ideas.</p>	<p>451 (Scenario C Maximising strategic sites came out as the most popular option followed by scenario A Market town focus and in third place is scenario F Maximising strategic site and urban rural split (including Villages with Boundaries).</p>	<p>Most respondents were acceptant towards some form of the proposed growth options and provided further suggestions, while some of the respondents opposed to all growth options. From the responses, scenario C Maximising strategic sites came out as the most popular option followed by scenario A Market town focus and in third place is scenario F Maximising strategic site and urban rural split (including Villages with Boundaries).</p> <p>In addition to the ranking exercise, respondents made the following comments summarised below:</p> <ul style="list-style-type: none"> • North Lopham, Mattishall, Mundford, Beeston, Thompson, Watton, Harling, Carbrook Village lacks necessary infrastructure. • New housing should be considered near existing sites of major employment. • Development should be directed near existing infrastructure. • Development should support and be complimentary to villages. • There should be a clear focus on infrastructure including new/improved road, public transport, schools, health facilities and shops. • More development welcome in villages but keep main focus to market towns. • Keep historical balance between sizes of towns and villages. • Avoid rural/village development. • Market town preference with scaled up infrastructure. • Beeston lacks necessary infrastructure to meet LSC requirements.

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Elements & Question No.	No. of Responses Received	Summary of Representations
		<ul style="list-style-type: none"> • Housing growth should be focused near jobs and infrastructure, reducing the need to travel by car. • Avoid development in areas prone to floods (Yaxham, Saham Toney, Attleborough). • Prevent villages merging. • Distribute growth regardless of settlement hierarchy. • Recognise settlements / villages that are part of a group of settlements centred around a Local Service Centre, creating village clusters. • New Town either side of the A11 near Wretham Heath.

Appendix 4: Statutory Consultee responses and Planning Policy comments

Statutory Consultee	Consultation Response Summary	Planning Policy comments
<p>Anglian Water</p>	<p>Alternative Development Options: Anglian Water’s Reg. 18 Issues & Options response submitted in May 2023, supported a spatial strategy methodology that places a quantitative approach to assessing growth options i.e. utilising available capacity at our Water Recycling Centres to accommodate future growth at locations informed by a Water Cycle Study or Integrated Water Management Study (IWMS). Where there is insufficient infrastructure capacity to support the quantum of growth identified for the Local Plan review, we recommended that a quantum of growth that supports 5,000 population equivalent (i.e. above 2,000 dwellings) such as sustainable urban extensions to higher order settlements, would ensure that investment in new infrastructure provides the greatest carbon efficiencies in relation to embodied/capital carbon in infrastructure. As a result, we particularly supported options that focussed on locations that would maximise the use of existing available infrastructure, or where development would contribute most to infrastructure.</p> <p>The alternative development options that have been developed for this focussed Reg.18 consultation have therefore been considered in terms of capacity or headroom at our Water Recycling Centres (WRCs) within Breckland. The catchment for a WRC can vary in size and may include more than one settlement or indeed flows from another WRC catchment. These have been identified in Table 1, together with known existing allocations and commitments for major development (as identified in the consultation paper).</p> <p>WRC Capacity: For the purposes of plan-making the number of new homes that could be served by an existing WRC is therefore a snapshot in time and will be subject to change due to the number of factors that may influence WRC headroom in the future, including new annual DWF data. The RAG assessment does not provide actual housing numbers</p>	<p>It is noted the requirement for appropriate water infrastructure to support allocations of 2000 dwellings and above.</p> <p>We support Anglia Waters comments and accompanying evidence will be produced to inform the plan as it develops to support any spatial distribution of development and phasing of chosen growth options.</p>

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and should be used as a high-level assessment to help inform the spatial distribution of growth and general alignment with findings of Local Plan evidence documents such as Infrastructure Delivery Plans, Water Cycle Studies (WCS), or Integrated Water Management Studies (IWMS). It will be for the LPA to confirm the position through the WCS/IWMS and in liaison with the Environment Agency. The RAG assessment is only in relation to known existing allocations, commitments, and proposed allocations for dwellings specifically – it does not include an assessment of WRC headroom for new businesses and non-domestic flows.

RAG rating – WRC headroom:

	Headroom available for proposed future growth
	Some headroom available for proposed future growth – may require phasing to allow for future planned investment to come forward.
	No headroom for the proposed level of future growth, and no immediate plans for future investment.

The RAG assessment for the Alternative Development Scenarios A – F can therefore be utilised to further assess the Potential Development Sites for future allocations to be proposed in the Preferred Options Local Plan consultation later this year. We would also advise that a Water Cycle Study/Integrated Water Management Study, should be prepared to support decisions on the spatial distribution of development and future phasing of growth.

Table 1: High Level WRC Capacity Assessment of Growth Scenarios

Water Recycling Centre (WRC) Name	Allocations and major commitments	Scenarios – no. of dwellings proposed in the WRC catchment						Settlements in the WRC catchment	Commentary	Drainage and Wastewater Management Plan (DWMP) Strategy ²
		A	B	C	D	E	F			
ATTLEBOROUGH STW	4,579	0	223	0	87	230	59	Attleborough, Banham, Rocklands	There is a growth scheme planned for Attleborough WRC which is currently planned for delivery in AMP8. Whilst the growth scheme will enable the allocated SUE to come forward, there is unlikely to be capacity for additional growth. However, this will be dependent on the timing and phasing of growth in the SUE. Scenarios A and C are favourable where no further growth is directed to the WRC catchment.	Medium term - increased capacity at WRC - mixed strategies/SuDS. Long term 25% surface water removal
BRADENHAM STW		0	0	0	0	0	0	Bradenham	Some headroom available at the WRC - no growth identified.	No strategies

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Water Recycling Centre (WRC) Name	Allocations and major commitments	Scenarios – no. of dwellings proposed in the WRC catchment						Settlements in the WRC catchment	Commentary	Drainage and Wastewater Management Plan (DWMP) Strategy ³
		A	B	C	D	E	F			
BYLAUGH-NEAR CHURCH STW	33	51	403	6	122	437	147	Bawdeswell, Swanton Morley, Lyng	All growth scenarios are likely to be feasible for settlements in this WRC catchment, whilst the growth in Scenario E is likely to exceed available capacity, particularly when combined with any existing commitments and windfall developments, meaning that the WRC would require investment in later AMPs to facilitate the additional growth to come forward.	Medium term - mixed strategies/SuDS. Long term 25% surface water removal
CARBROOKE-CHURCH END STW		0	0	0	0	352	205	Carbrooke	There is insufficient capacity at the WRC within the current DWF permit to accommodate the levels of growth proposed in Scenarios E and F – although there is some capacity for smaller scale growth. Scenarios E and F would necessitate future investment to accommodate growth in later AMPs. Scenarios A-D are therefore favourable.	Medium term - mixed strategies/SuDS. Long term 50% surface water removal
Water Recycling Centre (WRC) Name	Allocations and major commitments	Scenarios – no. of dwellings proposed in the WRC catchment						Settlements in the WRC catchment	Commentary	Drainage and Wastewater Management Plan (DWMP) Strategy ³
DEREHAM-RUSHMEADOW RD STW	168	2,308	0	1,303	0	316	181	Dereham, Gressenhall, Beetley	There is an Accelerated Infrastructure Delivery scheme for Dereham to deliver infrastructure that will enable technically achievable limits for phosphorous by the end of March 2025. This means that future development draining to this WRC will require fewer nutrient credits to demonstrate they are nutrient neutral, once the infrastructure is operational and the nutrient neutrality calculator is updated ⁴ . The capacity for future growth will be dependent on the location of allocations and whether flows are directed to Dereham WRC or Swanton Morley WRC. We suggest that further evidence will be required (i.e. a Water Cycle Study) to determine the balance of allocations and whether wastewater flows will be directed to Dereham WRC or Swanton Morley WRC. Development east of Dereham is directed to Swanton Morley, which has implications for Scenarios C, D and F which promote 2,000 dwellings at Swanton Morley barracks.	Medium term - mixed strategies/SuDS. Long term 50% surface water removal

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Water Recycling Centre (WRC) Name	Allocations and major commitments	Scenarios – no. of dwellings proposed in the WRC catchment						Settlements in the WRC catchment	Commentary	Drainage and Wastewater Management Plan (DWMP) Strategy ³
		A	B	C	D	E	F			
EAST HARLING STW	100	85	643	0	318	550	252	Harling, Kenninghall, Quidenham, North Lopham	All growth scenarios are likely to be feasible for settlements in this WRC catchment, in terms of capacity of the WRC under its current DWF permit. This includes current commitments/allocations.	Medium term - mixed strategies/SuDS. Long term 50% surface water removal
FOULDEN STW		0	0	0	0	0	0	Foul登	Limited headroom available at the WRC - no growth identified	No strategies
GOODERSTONE STW		0	0	0	0	0	0	Gooderstone	Some headroom for small scale growth at WRC - no growth identified	No strategies
GREAT CRESSINGHAM STW		0	0	0	0	0	0	Great Cressingham	Very limited headroom available at the WRC - no growth identified	No strategies
GREAT ELLINGHAM STW	210	0	0	0	0	0	0	Great Ellingham	Available headroom at WRC beyond existing commitments/allocations - no growth identified	Medium term - no risk identified. Long term - wait and see.
GREAT HOCKHAM LT HOCKAM RD STW	134	0	0	0	0	0	0	Great Hockham	No available headroom at WRC for future growth - no growth identified beyond existing allocations/commitments	No strategies

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Water Recycling Centre (WRC) Name	Allocations and major commitments	Scenarios – no. of dwellings proposed in the WRC catchment						Settlements in the WRC catchment	Commentary	Drainage and Wastewater Management Plan (DWMP) Strategy ³
		A	B	C	D	E	F			
HOCKERING-BY A47 STW		24	155	0	79	110	54	Hockering	This WRC will have measures to reduce nutrients to technically achievable limits (TAL) by 2030. All growth scenarios are likely to be feasible for settlements in this WRC catchment, in terms of capacity of the WRC under its current DWF permit. This does not include any current commitments/allocations.	No strategies
LITCHAM STW		20	114	0	59	82	42	Litcham	All growth scenarios are likely to be feasible for settlements in this WRC catchment, in terms of capacity of the WRC under its current DWF permit. This does not include any current commitments/allocations.	No strategies
MATTISHALL STW	80	64	409	0	246	373	166	Mattishall and Yaxham	This WRC will have measures to reduce nutrients to technically achievable limits (TAL) by 2030. The WRC is likely to have sufficient capacity for growth under scenarios A, D and F when considering existing commitments. Growth scenarios B and E would exceed the available headroom available at the WRC.	Medium term - mixed strategies/SuDS. Long term 50% surface water removal
MUNDFORD STW		93	342	12	197	256	152	Mundford	The WRC has limited headroom under the current DWF permit for growth. Only Scenario C is achievable but is dependent on the level of existing commitments. There is insufficient capacity at the WRC for the growth identified in all other scenarios, without investment in the WRC to increase DWF capacity in later AMPs.	Medium term - mixed strategies/SuDS. Long term 25% surface water removal

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Water Recycling Centre (WRC) Name	Allocations and major commitments	Scenarios – no. of dwellings proposed in the WRC catchment						Settlements in the WRC catchment	Commentary	Drainage and Wastewater Management Plan (DWMP) Strategy ³
		A	B	C	D	E	F			
NARBOROUGH STW	40	28	244	0	118	169	79	Narborough	The WRC has some headroom under the current DWF permit to accommodate growth in scenarios A, D and F, including current commitments/allocations. There is insufficient capacity to accommodate levels of growth proposed in Scenarios B and E without further investment to increase DWF capacity. An investment scheme has been identified in our PR24 Business Plan at Narborough. However, this is subject to final determination by Ofwat (see supporting text on PR24 below).	No risk identified
NECTON STW	10	0	484	0	188	309	96	Necton and Sporle	This WRC will have measures to reduce nutrients to technically achievable limits (TAL) by 2030. All growth scenarios are likely to be feasible for settlements in this WRC catchment, in terms of capacity of the WRC under its current DWF permit. This includes current commitments/allocations.	No strategies
NORTH ELMHAM STW	25	53	285	0	150	205	107	North Elmham	This WRC will have measures to reduce nutrients to technically achievable limits (TAL) by 2030. There is currently very limited headroom available at the WRC, meaning that the growth scenarios A, B, D, E and F cannot be accommodated. Scenario C is therefore preferable.	No risk identified

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Water Recycling Centre (WRC) Name	Allocations and major commitments	Scenarios – no. of dwellings proposed in the WRC catchment						Settlements in the WRC catchment	Commentary	Drainage and Wastewater Management Plan (DWMP) Strategy ³
		A	B	C	D	E	F			
OLD BUCKENHAM STW		60	267	0	146	195	108	Old Buckenham	All growth scenarios are likely to be feasible for settlements in this WRC catchment, in terms of capacity of the WRC under its current DWF permit. This does not include any current commitments/allocations.	Medium term - mixed strategies/SuDS. Long term 25% surface water removal
SHIPDHAM-CARBROOKS RD STW	87	0	307	0	80	172	9	Shipdham	This WRC will have measures to reduce nutrients to technically achievable limits (TAL) by 2030. All growth scenarios are likely to be feasible for settlements in this WRC catchment, in terms of capacity of the WRC under its current DWF permit. This includes current commitments/allocations.	No strategies
SWAFFHAM STW	383	573	0	165	0	0	0	Swaffham	This WRC will have measures to reduce nutrients to technically achievable limits (TAL) by 2030. However, the proposed growth scenarios are likely to be feasible for settlements in this WRC catchment, in terms of capacity of the WRC under its current DWF permit (including current commitments/allocations).	No risk identified

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Water Recycling Centre (WRC) Name	Allocations and major commitments	Scenarios – no. of dwellings proposed in the WRC catchment						Settlements in the WRC catchment	Commentary	Drainage and Wastewater Management Plan (DWMP) Strategy ³
		A	B	C	D	E	F			
SWANTON MORLEY STW		0	0	2,000	2,000	0	2,000	Swanton Morley barracks - also flows from East Dereham	This WRC also accepts flows from East Dereham – therefore, there will need to be a clear indication of the spatial distribution of growth in both locations. Both WRCs will have measures to reduce nutrients to technically achievable limits (TAL) by 2025 for Dereham and 2030 for Swanton Morley, due to nutrient neutrality requirements. This will present future challenges for additional growth beyond existing headroom available at the WRCs under their current DWF permits.	No strategies
THETFORD STW	4,847	0	0	460	460	0	460	Thetford	Available headroom at the WRC to accept wastewater flows from existing residential commitments and allocations and proposed growth in Scenarios C, D and E.	Medium term - network attenuation. Long term - 25% surface water removal
WATTON STW	426	1,075	217	520	78	494	179	Watton, Griston, Caston, Saham Toney, Ashill	Watton WRC currently does not have available headroom. However, a permit application has been submitted to the Environment Agency to increase the DWF permit to enable growth to come forward.	Medium term - mixed strategies/SuDS. Long term 25% surface water removal
WEETING STW	24	0	0	0	0	0	0	Weeting	Available headroom for growth at the WRC - no growth due to other constraints (i.e. Breckland SAC)	No strategies

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Water Recycling Centre (WRC) Name	Allocations and major commitments	Scenarios – no. of dwellings proposed in the WRC catchment						Settlements in the WRC catchment	Commentary	Drainage and Wastewater Management Plan (DWMP) Strategy ³
		A	B	C	D	E	F			
BEESTON-BITT-DYKEWOOD FARM STW		19	117	0	58	80	41	Beeston	There is unlikely to be capacity for further growth at the WRC without further investment. Only Scenario C which proposes no growth at Beeston is feasible.	No strategies
GARBOLDISHAM-BACK LANE GARBOLDISHAM-ELM GROVE GARBOLDISHAM-THE COMMON		15	173	0	81	118	52	Garboldisham (3 descriptive works)	Garboldisham has 3 very small WRCs that have descriptive permits which are appropriate when the population served by the WRC is less than 250, and there is no trade effluent accepted at the works. It is unlikely that significant growth could be accommodated at the WRCs without further significant investment post-2030. Anglian Water would advise that growth is directed to locations where sufficient capacity is available to accommodate growth without the need for further investment in the medium term and the attendant carbon impacts that would incur.	No strategies
SHROPHAM		0	0	0	0	30	5	Shropham	A small WRC with a descriptive permit (see explanation above). As above, only very small-scale growth is likely to be accommodated.	Medium term – no risk identified. Long term - wait and see.
THOMPSON		0	0	0	0	40	20	Thompson	A small WRC with a descriptive permit (see explanation above). It is unlikely that there is capacity at the WRC for the level of growth proposed by Scenarios E and F.	No risk identified

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Water Recycling Centre (WRC) Name	Allocations and major commitments	Scenarios – no. of dwellings proposed in the WRC catchment						Settlements in the WRC catchment	Commentary	Drainage and Wastewater Management Plan (DWMP) Strategy ³
		A	B	C	D	E	F			
WEASENHAM ST PETERS WEASENHAM ALL SAINTS		0	0	0	0	41	21	Weasenham (2 descriptive works)	Weasenham has two small WRCs with descriptive permits (see explanation above). It is possible that small scale growth may be feasible, but dependent on location and how many existing properties are connected to both WRCs.	No strategies
		1995	2590	4966	3894	3207	3851	Total dwellings in green and amber categories	These numbers indicate that Scenario C is likely to deliver the most dwellings with current/planned capacity at our WRCs. The number can be maximised by focussing growth at locations with available headroom at the WRC, including some smaller settlements identified in Scenario D for example. This would provide additional flexibility where there may be uncertainties in terms of the overall quantum of growth that can be delivered where headroom is or is planned to be available – e.g. if growth needs to be balanced between Swanton Morley and Dereham WRCs	

Integrated Assessment Scoping Report (IASR):
 Anglian Water has the following comments on the IASR:
 Water Resources:
 Para. 6.18: Anglian Water suggests that this paragraph also references the nutrient neutrality requirements associated with the River Wensum Special Area of Conservation (SAC). We note that the Habitats Regulations Assessment (HRA) will be undertaken separately, but the findings will be considered in the Integrated Assessment going forward.
 Para. 6.20: Anglian Water as part of our Get River Positive commitment, has pledged to be as transparent as possible with the data we collect about our water recycling network and the improvements that we're making, especially around storm overflows. We have produced an interactive map⁵ which shows where our storm overflows are located, provides data about how often they spilled in 2022, and how we are investing in the region. This map will be updated when 2023 data becomes available. In addition, we have produced a Pollution Incident Reduction Plan which

A section on the nutrient neutrality issues has been included in the Environment Section of the plan for both residential and agricultural development.

 We support the comments around the requirement for water cycle studies and intend to use evidence from these studies to inform the Local Plan.

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	<p>sets out the actions we are taking between 2023 and 2025 to improve our pollutions performance. Para. 6.21: We welcome reference to the source protection zones and the need to safeguard drinking water quality. It may also be worth noting that our revised draft Water Resources Management Plan for 2025-2050</p> <p>IA Objectives Anglian Water agrees with the IA objectives for water – to limit water consumption and ensure sustainable reuse of water to accommodate growth and maintain and enhance water quality. Efficient use of water: Anglian Water is currently working with the Environment Agency, Natural England and Cambridge Water to develop a Joint Protocol for Water Efficiency to support Local Planning Authorities in preparing policies to reduce water consumption through ambitious water efficiency and integrated water management measures. This will be supported by an evidence base to assist LPAs in developing their policy ambitions. We also agree with the questions to assess policies in terms of source protection zones and capacity at our WRCs.</p>	<p>Comments will be noted and considered in next iteration of Integrated Assessment.</p> <p>Support inclusion.</p>
<p>Environment Agency East Anglia</p>	<p>IA Objectives Flood Risk Chapter 4 – Climate change mitigation and adaptation IA objectives (p.74) “Adapt and respond to the implications of a changing climate”. Would the policy minimise inappropriate development in areas prone to flood risk and areas prone to increasing flood risk elsewhere, taking into account the impacts of climate change?” We consider that the above question should be reworded as it implies that there are ‘areas prone to increasing flood risk elsewhere’, which is confusing; it should be made clear that new development has the potential to increase flood risk elsewhere. There should also be a reference to reducing flood risk overall, in line with the requirements of the NPPF. We recommend that the word ‘inappropriate’ is removed</p>	<p>Comments noted and will be taken into consideration in future iterations of the Integrated Assessment.</p>

	<p>as all new development should be avoided in flood risk areas, in line with the sequential approach. We recommend separating the above question into two parts and rewording it as follows: •Would the policy minimise development in areas prone to flood risk from all sources, taking into account the impacts of climate change? •Would the policy ensure that new development will not increase flood risk elsewhere and will seek to reduce flood risk overall, taking into account the impacts of climate change? Water resources Habitats Regulations Assessment (HRA) Page 14 Starting section 1.21: Has/will the local plan consider how the proposed growth will affect Habitats Regulation sites by proxy? For example. Growth leads to increased abstraction by Anglian Water to supply it. What are the Habitat regulation implications regarding this additional abstraction? Similarly for consideration of the wastewater side of growth and development. The developments themselves may have no impact on Habitat Regulation (HR) sites, but it's what's needed to service them that is the important consideration.</p> <p>Natural England (NE) has added some HR wetlands sites onto its list of concerns about the current status. We recommend that you discuss this with NE and also the water company to identify whether there are any at risk sites linked to the abstractions that would service growth in your area and/or any pending investigations that could affect the sustainability of those abstractions. Policy context 6.1: Habitats Regulations and water framework directive appear to be missing from the list of national policy</p>	<p>Matters such as the impact of growth upon water abstraction are understood to be of potential relevance to understanding whether development may lead to potential harm to designated sites. An updated HRA is proposed and will be in place to inform the final draft Local Plan. It is expected this will identify measures to avoid and/or mitigate any potential harm to enable effective growth.</p> <p>Noted, discussions with NE will progress as part of Plan preparation.</p> <p>The list will be reviewed and updated as required.</p>
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	<p>3.18 Water: The Water Framework Directive (WFD) data presented is assumed to relate to the overall ecological classifications for the surface water bodies. However, the individual elements (fish, invertebrates, macrophytes etc) should also be considered as there is a requirement to prevent deterioration at the individual element level, not just the overall status.</p> <p>This assessment also needs to consider the water bodies that are affected by the water supply to this local plan area. The issue is the water where it leaves the environment (abstraction), and this may be from sources outside of your local plan Area as Anglian Water operates its water supply network over a large geographical area.</p> <p>This section doesn't set out any protected areas, for example, wetlands/rivers designated under the Habitats Regulations or SSSI.</p> <p>6.25 This section doesn't appear to address the requirement under the WFD to prevent deterioration in status (even if already failing). How have you assessed that WFD will provide existing safeguards? Water companies have a legal duty to supply planned domestic growth. They can't use WFD as a reason for not supplying growth. It's more likely that the company will need to apply for exemptions under WFD to allow deterioration to happen so that it can continue to abstract or increase abstraction to supply growth.</p> <p>The statement "Without the Local Plan, it is likely that East Anglian will continue to be seriously water stressed." - this highlights the significance of the water issue and why development needs to look closely at the impacts on water demands and the environment.</p> <p>6.27 – 'The Local Plan Review will also provide the opportunity to ensure that development is located and designed to take into account the sensitivity of the water environment '</p>	<p>This advice is noted and reference to both overall and individual elements will be included. Noted</p> <p>This section relates to water and water quality. The Chapter Biodiversity and Geodiversity addresses habitat and species-based biodiversity designations.</p> <p>This statement was made on the basis that the role of the Water Framework Directive is to prevent deterioration and enhance the status of aquatic ecosystems. However, the wording will be reviewed to accurately reflect the potential implications of growth in Breckland and role of the WFD.</p>
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	<p>We advise that you add to this list the timing of growth, i.e. can it be phased to meet the delivery of sustainable water supplies. If it can't, then what are the environmental risks of this?</p> <p>Page 111: “Limit water consumption to the capacity of natural processes and storage systems, ensure the sustainable reuse of water to accommodate growth and maintain and enhance water quality.”</p> <p>We are not clear what this actually means in practice or how it is assessed. In terms of the capacity of the natural system, there is no additional water available from the groundwater aquifers and very limited water available from surface water systems that would only be available at times of high flow. Furthermore, the current level of licensed abstraction from the groundwater aquifers is too high and unsustainable and measures are required to reduce it. Therefore, a condition to limit consumption to these capacities would presumably mean that all development would need to be water neutral or very close to.</p> <p>If you are referring to the capacity of the water company's storage systems, then this needs to be explained more clearly what is meant. Anglian Water does not have access to reservoir storage to supply development in this local plan area, so is reliant on direct abstraction from groundwater aquifers. As already noted, the level of groundwater abstraction is currently deemed unsustainable, and measures are required to prevent deterioration of the existing conditions and further reductions to deliver environmental improvement/sustainable abstraction.</p> <p>These measures will take time to deliver as reliant on new strategic water supply schemes that might not be delivered until the mid to late 2030s. Your plan should consider how growth proposals, particularly the phasing of growth, affect Anglian Water's ability to supply existing and future demands sustainably, or indeed, whether this is even possible before the strategic new supplies are developed. What is the capacity of AWS' supply network to service growth sustainably?</p> <p>If growth is planned beyond the sustainably limits of what Anglian Water can provide, then making this growth as water efficient as possible is one measure to</p>	<p>Noted, reference will be added to managing growth in accordance with delivery of sustainable water supply.</p> <p>This phrase is the IA Objective – it is the goal that the Plan is assessed against when determining the sustainability of potential growth, policies and proposals in the Local Plan.</p> <p>The growth trajectory for Breckland is based at this time upon the minimum Local Housing Need as established through the government's standard method. The growth proposed in this Plan is not new, with forecast delivery continuing broadly in</p>
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	<p>reduce the risks to the environment and should be exhausted. Anglian Water is heavily reliant on demand management measures in the interim to limit the increase in abstraction.</p> <p>What does sustainable reuse of water mean? Are you referring to greywater recycling? Have you considered the legislative challenges to greywater recycling and that water companies are not permitted to supply it to domestic customers?</p> <ul style="list-style-type: none"> •Would the policy help to reduce water consumption and promote more efficient use of water? <p>Difficult to assess as the policy isn't clear how it would be assessed or how you'd actually use it as an enforcement tool to set planning conditions?</p> <p>Would the policy seek to avoid deterioration and where possible improve the water quality of the district's rivers and groundwater resources?</p> <p>Uncertain as the policy isn't clear or explicit what it seeks to do or how that would be measured.</p> <ul style="list-style-type: none"> •Would the policy minimise inappropriate development in Source Protection Zones? <p>In its present format, it's not possible to say whether this policy would restrict inappropriate development in SPZs. The policy is too vague, and I can't see what part of it would allow you to restrict inappropriate development if it came forward.</p> <ul style="list-style-type: none"> •Would the policy ensure there is sufficient wastewater treatment capacity to accommodate the new development? <p>The policy could be read as no development until there is capacity in the wastewater network or getting to wastewater neutrality. Is this what is meant by this?</p>	<p>keeping with current trends and the existing Plan. However, feedback received from Anglian Water and others regarding the ability to sustainably serve this growth will be taken fully into account if they define significant barriers.</p> <p>This means, reuse of water to manage demand arising from growth.</p> <p>The IA sets out objectives, and questions to test policy. These comments are made in response to the IA, which does not set out policy but assess the emerging Plan. The January 2024 Issues and Option consultation also did not set out any proposed policy, focused particularly upon strategic growth options. This will be included in the draft Plan to be published Spring 2024. The observations made</p>
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	<p>P145 relevant SEA topics Policy 10 “Limit water consumption to the capacity of natural processes and storage systems, ensure the sustainable reuse of water to accommodate growth and maintain and enhance water quality. “ The SEA needs to look at the issues in combination with other planned growth. That doesn't appear to have been mentioned in the document thus far. AWS is having to supply neighbouring LPA areas and the work needs to consider any overlap between the company's supply zone for Breckland and neighbouring LPAs. It is the combined level of growth that AWS needs to supply, in addition to its existing customers, that creates the environmental impact. Partly covered in 10.11, but there is a need to consider whether to look outside of its own geography for the full implications of cumulative impact. Chapter 11 Initial Integrated Assessment findings Alternative Development Scenarios 11.2 - largely, from a water supply perspective, the exact location of the development scenarios is not an issue - although it may be an issue for Anglian Water in terms of infrastructure requirements. We do not comment on that aspect. The issue relates to where and when the water leaves the environment to supply the growth, therefore, if this is the same for any of the options, our views will be the same for all of them. 11.39 - even with a high standard of water efficiency, the developments will lead to a net increase in the demand that AWS has to service, so unless you are aiming for water neutral development, increased demand is an issue. What are the environmental effects of this in relation to AWS' abstraction to service the demand increase? Chapter 12 Consultation and next steps 12.3: In particular, the consultees are requested to consider:</p>	<p>here will be considered in informing the draft Plan.</p> <p>Reference to the role of wider growth and cumulative effects of growth will be strengthened in the IA.</p> <p>Integrated Assessments are a high-level analysis of available evidence and the likely effects of development on key sustainability objectives. The Breckland IA will be informed by other key and more detailed evidence in preparation including the Water Cycle Study that will address such issues for Breckland in greater detail.</p>
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	<ul style="list-style-type: none"> •Whether the scope of the Integrated assessment (IA) generally is appropriate as set out. The material in this report hasn't provided a very detailed or accurate summary of the baseline conditions or identified the potential areas of interest for the study. The policy/objective statement is vague and unclear what it will actually deliver or how it can be assessed. •Whether there are any additional plans, policies or programmes that are relevant to the IA and should be included in relation to the relevant topic areas addressed by the Scoping Report. Anglian Water's revised draft water resources management plan 2024, noting that Defra has yet to approve the company's draft for publication and therefore, changes may occur. Anglian river basin management plan - more detail on the elemental classification status of the ecology. Neighbouring LPA local plans and how the combined level of growth impacts Anglian Water's supply network. Habitats Regulations sites of concern from Natural England •Whether the information included in relation to each topic area is robust and comprehensive and provides a suitable baseline for the IA of the Local Plan Full Update. There is very little data presented in this document and the water supply information is too high level to draw any sensible conclusions from. •Whether there are any additional key sustainability issues that should be included. Given the report notes that this is a water stressed area and that the development will lead to an increase in demand, it is surprising that water supply isn't considered a key issue. 	
<p>Thompson Parish Council</p>	<p>Comments on Breckland Local Plan Strategy Options Location and character Thompson is located about 3 miles from Watton, with 3 access roads into the village. These roads, together with the roads within the village are in general little more than the width of an agricultural vehicle or bulk transporter, and in places the roads are</p>	<p>The overarching strategic approach to growth is expected to remain broadly</p>

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	<p>narrower than these vehicles. None of the roads into the village are sufficiently wide to have central white lines.</p> <p>Additionally, Norfolk Highways cuts gullies into the verges to take water from the road surface as there are few road drains. These gullies render the verges unsuitable for cars to use to facilitate passing of oncoming wide vehicles.</p> <p>Thompson has evolved slowly over centuries with overwhelmingly low-density housing in an open dispersed layout in linear form following the roads. The present approved Local Plan has many policies which are designed to reinforce positive and distinctive local character and amenity and to avoid incongruous development, while maintaining a high degree of compatibility with the settlement. The Parish Council trusts that these policies will be carried forward in the revised Local Plan.</p> <p>Sustainability</p> <p>Thompson lacks many of the necessary services on which its residents rely for day-to-day living. It has a primary school but is essentially dependent on nearby Watton, a mid-sized market town, which is approximately three miles to the north, for goods, health care, further education and employment. Apart from a once a week on demand minibus there are no public transport options available in the village to existing or future residents. Surrounding roads are narrow, of a rural nature and unlit without segregated pavements. Present residents of the village have to rely on the use of the private car as their main source of transport, as will those joining it in the future. This is the least sustainable travel option.</p> <p>Employment opportunities in Thompson</p> <p>It has been reported that there are 20 businesses in Thompson, 2 of which employ more than 10 people. This gives an erroneous impression of the nature of the village. The junior school does employ that amount, the pub has a number of part time staff working short hours. Farmland in the parish provides little employment being predominantly arable in nature and highly mechanised, much of the specialist work such as cereal harvesting being carried out by external contractors as needed. The remaining businesses are mainly self-employment in nature. People travel out of the village for employment.</p> <p>Utilities</p>	<p>in keeping with the current Local Plan. The importance of protecting the character and integrity of settlements will continue and additional policy to manage the quality of design will further support such goals for settlements like Thompson.</p> <p>The Council considers the data presented is accurate but recognises that it includes self-employed. The same approach to establishing the presence of businesses and employment is the same for all settlements. As such, as a point of comparison and definition of the scale and role of settlements in Breckland to determine their position in the district's hierarchy the data applied is considered relevant and robust.</p>
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	<p>The proposal to replace this with a criterion-based approach does not represent an improvement, particularly as it appears that the criteria have not as yet been determined and therefore are not available for evaluation.</p> <p>We have seen with concern the evaluations of the sites which have been brought forward for consideration as suitable for future housing development. As an example, one site (reference LPR/CS4/DEV/140) which it is stated could accommodate 60 dwellings is assessed as “the site would be in keeping with scale of settlement” and would be “an extension to a lower tier settlement or part of a new lower tier settlement”. As the houses within the settlement boundary at present number around 120 this represents a 50% increase – one wonders what percentage increase would be considered unacceptable. Together, the 4 sites being taken forward for further review (LPR/CS4/DEV/140, LPR/CS4/DEV/108, LPR/CS4/DEV/170 and LPR/CS4/DEV/171) would potentially contribute 100 houses, an increase of 83%.</p> <p>We do not agree that the settlement boundary approach to determining planning applications should be replaced with one which is criterion based, particularly as the criteria have not as yet been determined.</p> <p>Initial Evaluation of Sites brought forward.</p> <p>Two of the sites brought forward are away from the built area of the parish and do not involve the building of dwellings, the proposed activity on the sites being equestrian in nature.</p> <p>The four sites brought forward which do relate to development which is residential in nature (LPR/CS4/DEV/140, LPR/CS4/DEV/108, LPR/CS4/DEV/170 and LPR/CS4/DEV/171) would, if all are accepted at the next stage of the review process, potentially result in 100 new dwellings the majority of which would be in a high density arrangement. The initial evaluation of these sites appears to have been carried out as a desk exercise with no reference to the characteristics and sustainability of the low-density settlement which they would adjoin.</p> <p>Given the lack of public transport through Thompson as well as lack of employment in the village, and no secondary education, cars will be needed for accessing work, travelling to school, shopping, doctors, leisure activities and the numerous other</p>	<p>Noted – such feedback will assist in further analysis of proposed development sites in Thompson.</p> <p>No new housing allocations are proposed in Thompson in the emerging Draft Local Plan.</p>
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	<p>essentials of modern life. In addition, very few of the pupils who attend the village junior school, or the school staff, live in the village which adds to the number of car journeys required as all of these need cars to get them to and from school over already inadequate roads.</p> <p>Not only would the occupants of any housing built in the future most likely have 2 cars per house, vans delivering online purchased goods would also increase the vehicular traffic into and out of the village. At present there are many large and heavy vehicles on the Thompson roads mainly though not exclusively related to the agricultural activity in the village. Increased housing will add to the numbers due to delivery of fuel oil, emptying septic tanks and PTPs and construction related vehicles during the build phase.</p> <p>The already inadequate potable water infrastructure would be severely adversely impacted by the increase in dwellings. It is also questionable whether the fluctuating electricity supply would similarly be able to manage a significant increase in demand.</p> <p>The village already suffers from poor surface water drainage and the addition of so many buildings and hard landscaping will exacerbate future problems the nature of which have been experienced in the village in recent exceptional weather events and after prolonged periods of rainfall. While the risk of fluvial flooding in the village is low, drainage of surface water is poor due to lack of drains and filling in of ditches over the last 7 or 8 decades.</p> <p>There is no indication that the village infrastructure will be improved and brought up to the level required by a significant increase in housing and population before, during or after the construction. Resolution of existing drainage problems in the village has been refused as it wouldn't be cost effective. Experience of the significant development in Watton has shown that virtually no improvement in infrastructure has resulted. Although the Community Centre promised has been built the additional doctors' surgery has yet to materialise. The latter has an impact on the surrounding villages as well as the increased population of Watton. No housing development beyond single "windfall" developments should be considered in unsustainable villages such as ours until services are in place to provide support.</p>	
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	<p>Options E and F of the potential scenarios to achieve Breckland’s target housing increase are those which, if selected, would impact Thompson. These show a requirement of 40 and 20 houses respectively, both numbers being in excess of what can be accommodated in the village without significant improvement to the infrastructure and services in and around Thompson before development commences.</p> <p>Conclusion</p> <p>Thompson Parish Council does not want the removal of the settlement boundary given the present lack of information about the specifics of an alternative planning approval process.</p> <p>As far as the evaluation of the sites in Thompson parish which have been brought forward as available for development is concerned, there is considerable disquiet about the lack of consideration of the suitability of the sites in relation to the existing Thompson settlement, its infrastructure and the characteristics of the geography of the area.</p> <p>When evaluating the development scenarios, the Parish Council views the best options to be C or D. Having a significant development of 2,000 houses at the Swanton Morley Barracks site would provide opportunities for the developers to fund the infrastructure required and provide Norfolk Highways and Anglian Water with projects which will be cost effective. The size of the Abbey Estate would similarly justify the infrastructure expenditure.</p> <p>Following this is Option A. While the Market Towns have been allocated significant numbers in the earlier Local Plan, they do have facilities to support the growth and present a rationale for the addition of doctor and dentist surgeries, schools, employment opportunities, public transport support and improvements in roads, water supply and management, sewerage and drainage. Option B is less good, placing undue pressure on the Local Service Centres.</p> <p>For Thompson, the Parish Council cannot see any justification in assigning a target housing increase to the village given that it is already considered unsustainable. A binding commitment to put in place all necessary infrastructure improvements must</p>	<p>The draft Plan is proposing a criteria based approach which is part of the consultation and feedback will be used to assess the effectiveness of such an approach.</p> <p>Thompson is not identified as a location for new allocations.</p>
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	<p>be made before any additional housing beyond occasional single “windfall” houses can be approved. For the larger villages with settlement boundaries, it considers that before assigning any additional houses to them the two Strategic Development sites must be approved, which means that of Options E and F Option F is preferable. We have found that there is overwhelming support for the development of the Strategic Sites to be a priority.</p>	
<p>Sport England</p>	<p>COMMENTS ON THE CONSULTATION 1.Sustaining rural community services Do you agree with the methodology for deciding which parishes should be Local Service Centres? No comment 2.Towns, villages and countryside Should Breckland continue with a settlement boundary approach or develop a robust criteria-based policy? No comment. 3.Alternative development strategy options Please drag and move the options below to rank in order of preference, the six alternative development scenarios. No comment. 4.Potential development sites Do you agree with this new criteria for assessing sites? Sport England has no objections to the initial high-level assessment suggested for Phase 1 in the Consultation Paper: Site Assessments - Phase 1 Report. It should be noted that depending on the results of the consultation on Alternative Development Options, more comprehensive site assessments will be conducted on a limited number of sites. These assessments will take into account input from important consultees and stakeholders regarding the limitations, effects, and infrastructure needs of the sites. Spatial analysis will also play a role in informing these assessments.</p>	<p>Noted</p>

	<p>The spatial analysis should cover both indoor and outdoor sports facilities, including playing fields. Paragraph 102 of the NPPF highlights the importance of ‘Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision.’ Sport England insists on being consulted during Phase 2 of potential site allocations that could result in the loss or detriment of an existing playing field. This is because Paragraph 103 of the NPPF specifies that ‘Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.’</p> <p>5. Call for sites & Full list of sites LPR/CS4/DEV/274 Thetford SUE</p> <p>There are currently three football pitches, four tennis courts, a skate park and associated car parking spaces at this location.</p> <p>Sport England would insist that any development plans for this site either retains the existing playing fields or includes measures to mitigate for the potential loss of these sports facilities. As stated at paragraph 103 of the NPPF ‘existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh</p>	<p>Accessibility to and requirements for facilities such as indoor and outdoor sports will be taking into consideration through the plan preparation. A playing pitch strategy is being prepared to inform the Local Plan and the Plan will additionally be supported by an Infrastructure Delivery Plan.</p> <p>This site relates to the Thetford SUE. Whilst submitted for evaluation through the Local Plan Call for Sites the site already benefits from outline planning permission and is being delivered in accordance with an agreed masterplan. Phases of development are already on site. The existing policy included within the 2019 Local Plan and appropriate elements of the Thetford</p>
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	<p>the loss of the current or former use'. Failure to address the loss of these playing pitches and ancillary facilities (car parking) would result in objections from Sport England regarding the site allocation.</p> <p>Furthermore, Sport England would request that the policy for this site explicitly states the need to retain and/or re provide the equivalent or greater number of football pitches, skate park, tennis courts and associated car parking at this site.</p> <p>LPR/CS4/DEV/101 South of Kilverstone Road Planning permission (reference 3PL/2009/0263/CU) was granted in 2009 for the change of use of the site to the use for football matches and training. Allocation of the site for employment purposes would result in the loss of a playing field.</p> <p>If the site allocation were to allow for the loss of the playing field Sport England would expect there to be mitigation proposed for the loss of this sport facility in accordance with paragraph 103 of the NPPF, which states that 'existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.' If the loss of the playing field were not mitigated Sport England would object to the allocation of this site.</p> <p>Sport England would expect the loss resulting from the proposed development be replaced by equivalent or better provision in terms of quantity and quality in a suitable location. Consequently, Sport England would require a site-specific policy pertaining to the site to ensure the appropriate measures to mitigate any potential issues are secured.</p> <p>Planning permission (reference 3PL/2009/0263/CU) was granted in 2009 for the change of use of the site to accommodate football matches and training.</p>	<p>AAP regarding the site will be retained.</p> <p>Noted – this feedback will inform the Phase 2 site analysis.</p>
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	<p>If the site were to be allocated for employment purposes, it would lead to the loss of a playing field. In such a scenario, Sport England would expect measures to be proposed in order to mitigate the loss of the playing fields. Paragraph 103 of the NPPF states that ‘existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.’ If the loss of the playing field is not adequately mitigated, Sport England would object to the allocation of this site. To address this concern, Sport England would expect the loss resulting from the proposed development be replaced by equivalent or better provision in terms of quantity and quality in a suitable location. Consequently, Sport England would require a site-specific policy pertaining to the site to ensure the appropriate measures to mitigate any potential issues are secured.</p> <p>LPR/CS4/DEV/231 Reepham Road The site would be located adjacent to an existing playing field, multi used games area, bowling green and a village hall. Whilst the site would not be located on a playing field, development of the site should not prejudice the use of, all or any part of the playing field. Failure to comply with this may result in objection from Sport England to the allocation of this site.</p> <p>.LPR/CS4/DEV/238 Gooseberry Hill, Swanton Morley The northwest of the site abuts an existing playing field. Whilst the site would not be located on a playing field, development of the site should not prejudice the use of, all or any part of the playing field. Failure to comply with this may result in objection from Sport England to the allocation of this site.</p>	<p>Noted – this feedback regarding submitted sites that have a close relationship to existing playing fields is welcome. This feedback will inform the Phase 2 site analysis and any site-specific policy regarding potential allocated sites.</p>
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	<p>LPR/CS4/DEV/058 Playing Field and Beeston Road The site would be adjacent to an existing playing field to the west. Whilst the site would not be located on a playing field, development of the site should not prejudice the use of, all or any part of the playing field. Failure to comply with this may result in objection from Sport England to the allocation of this site.</p> <p>LPR/CS4/DEV/334 Village Hall Field To the north of the site lies an established playing field and a village hall. Although the site itself would not be situated on the playing field, any development of the site should not prejudice the use of, all or any part of the playing field. Failure to comply with this may result in objection from Sport England to the allocation of this site.</p> <p>LPR/CS4/DEV/351 West Heath Row The site is situated next to a current playing field that is utilised by Hockering Football club. Although the site itself would not be positioned on the playing field, any development on the site should not negatively impact the use of the playing field in any way. Failure to comply with this may result in objection from Sport England to the allocation of this site.</p> <p>LPR/CS4/DEV/185 Land to the East of Whissonsett Road (larger site) & LPR/CS4/DEV/186 Land to the East of Whissonsett Road (smaller site) To the site's west, there are allotments and a playing pitch. Although the site itself would not be situated on a playing field, any development should not hinder the use of any portion of the playing field. Failure to comply with this may result in objection from Sport England to the allocation of this site.</p> <p>LPR/CS4/DEV/214 Land at Vicarage Road A playing field lies to the east of the site. Whilst the site would not be located on a playing field, development of the site should not prejudice the use of, all or any part of a playing field. Failure to comply with this may result in objection from Sport England to this site allocation.</p> <p>LPR/CS4/DEV/167 Land off Powell Close To the west of the site lies open space, a playing pitch and a substation. Whilst the site would not be located on a playing field, development of the site should not</p>	
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	<p>prejudice the use of, all or any part of a playing field. Failure to comply with this may result in objection from Sport England to the allocation of this site.</p> <p>LPR/CS4/DEV/031 Kings Oak To the east of the site is a playing pitch. Whilst the site would not be located on a playing field, development of the site should not prejudice the use of, all or any part of a playing field. Failure to comply with this may result in objection from Sport England to this site allocation.</p> <p>LPR/CS4/DEV/174 Southwest Urban Extension The southeastern part of this site would be in part adjacent to an existing playing field used by Dereham Saints Football Club. Whilst the site would not be located on a playing field, development of the site should not prejudice the use of, all or any part of a playing field. Failure to comply with this may result in objection from Sport England.</p> <p>The southeastern section of this area would partially border an already established playing field utilised by Dereham Saints Football Club. Although the site itself would not be situated on the playing field, any development on the site must not prejudice the usage of the playing field in any way. Non-compliance with this requirement may lead to an objection to the allocation of this site from Sport England.</p> <p>LPR/CS4/DEV/281 Land South of Princes Street A playing field and bowling green lies to the south of the site. Whilst the site would not be located on a playing field, development of the site should not prejudice the use of, all or any part of a playing field otherwise Sport England may raise an objection to it.</p> <p>LPR/CS4/DEV/228 Old Drier Building Hoe Road North Playing pitches are located to the east and south of the site. Whilst the site would not be located on a playing field, development of the site should not prejudice the use of, all or any part of a playing field otherwise Sport England may raise objection to the allocation of this site.</p> <p>LPR/CS4/DEV/299 East Priory Close</p>	
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	<p>To the northwest of the site lies playing pitches. Whilst the site would not be located on a playing field, development of the site should not prejudice the use of, all or any part of a playing field otherwise Sport England may raise an objection to the allocation of the site.</p> <p>LPR/CS4/DEV/110 South of Harling Road, Great Hockham</p> <p>The site is adjacent playing fields to the east. Therefore, whilst the site would not be located on a playing field, development of the site should not prejudice the use of, all or any part of a playing field otherwise Sport England would raise objection to it.</p> <p>The site is situated next to playing fields on the eastern side. Although the site itself is not positioned on a playing field, any development on the site should not prejudice the use of any portion of a playing field. Otherwise, Sport England may raise an objection to the allocation of this site.</p> <p>LPR/CS4/DEV/105 East of Chalk Lane, Narborough</p> <p>To the northwest of the site lies a playing field and a sports centre. Whilst the site would not be located on a playing field, development of the site should not prejudice the use of, all or any part of a playing field otherwise Sport England may raise objection to it.</p> <p>LPR/CS4/DEV/008 Arable Field South of St Andrews</p> <p>Necton Sports and Social Club, consisting of a playing field and sports pavilion, is situated to the south of the site. Although the site itself would not be situated on a playing field, any development should not prejudice the use of the playing field in any way otherwise Sport England may object to the allocation of this site.</p> <p>LPR/CS4/DEV/299 Land East of Priory Close, Sporle</p> <p>The site would be located to the east of an existing playing field and multi used games area. Whilst the site would not be located on a playing field, development of the site should not prejudice the use of, all or any part of a playing field otherwise Sport England would raise objection to it.</p> <p>LPR/CS4/DEV/084 Whissonsett</p> <p>A playing field is situated to the north of the site. Although the site itself would not be positioned on the playing field, any development on the site should not prejudice the</p>	
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	<p>use of the playing field in any way otherwise Sport England may raise an objection to the allocation of this site.</p> <p>LPR/CS4/DEV/156 Poplar Farm, South Green (Phase 2)</p> <p>The southern border of this location connects to Mattishall Playing Field, which includes playing fields, the Sports and Social Club, Bowling Green, and parking facilities. Whilst the site would not be located on a playing field, development of the site should not prejudice the use of, all or any part of a playing field otherwise Sport England may object to it.</p> <p>Closing Comments on Site Allocations</p> <p>Sport England would like to highlight that any allocation that does not clearly indicate the protection or replacement of a sports facility would be contrary to paragraph 103 of the NPPF, and Sport England’s Planning Policy, unless the specific facility is identified as surplus within a robust borough wide sport facility strategy. Sport England, therefore, advise that any site allocations are clear that the sports facilities, including playing fields, are protected or replaced in advance of any development in accordance with the criteria in paragraph 103 of the NPPF.</p> <p>Where off-site replacement provision is required to facilitate the development of a site, the replacement site should be referenced in the policy and if appropriate a related site allocation should be made in the plan to provide certainty that the facility can be replaced in practice.</p> <p>It is advocated that the Council engages with Sport England in advance of the Regulation 19 consultation to help ensure that the impact of the allocations on sports facilities are fully considered and where suitable, mitigated with appropriate sporting facilities as part of the site allocation policy. Sport England would prefer to address any issues in advance of a Regulation 19 consultation to negate the need to object to allocations in this consultation and for the issue to be discussed at the Examination. It should be noted that Sport England may be a statutory consultee if some of these allocations were included in the plan and progressed to a planning application. Addressing any issues and concerns through the Local Plan would offer more certainty that delays and uncertainty in the implementation of the allocations will not arise at the planning application stage.</p>	<p>Noted – the Council do not anticipate allocating any sites that would result in loss of playing pitches or other sports facilities. However, some of the above sites, adjacent to existing playing pitches may be included as proposed allocations.</p> <p>The Plan will incorporate general policy regarding the protection of such facilities and have regard where</p>
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	<p>Please note that if Sport England has missed any sport facility that falls within any land allocation, then this does not mean the facility is surplus to current or future need. As stated in the NPPF, sport facilities should be protected unless they are surplus to current or future needs, replaced or lost to another sport facility the benefits of which outweighs the harm caused by the loss.</p> <p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered through planning obligations or CIL. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has or will have in place.</p> <p>In line with the Government’s NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England’s Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Evidence base Paragraph 102 of the NPPF states that “Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.”</p> <p>In the absence of an existing Playing Pitch Strategy and a Built Facilities Strategy for Breckland, there is a concern that decisions about planning for meeting the current and future sports facility needs of the community will not be based on an up-to-date,</p>	<p>appropriate to any potential impacts that may arise from proposed allocations.</p> <p>The Council’s general approach to developer contributions intends to secure this. The Playing Pitch Strategy will be updated through 2024, whilst specific playing pitch requirements arising from key allocations will be assessed and measures to secure provision included in appropriate policy for those sites.</p> <p>Additional policy regarding Health and Wellbeing is being developed for inclusion in the draft Plan. The specific guidance cited will be reviewed and referenced in this.</p> <p>An updated Playing Pitch Strategy is planned for 2024.</p>
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Breckland New Local Plan – Issues & Options Feedback Report 2024

	<p>and therefore robust, evidence base in accordance with the requirements of paragraph 102 of the NPPF. A clear understanding of current and future community sports facility needs is essential for informing and justifying emerging local plan policies which may cover the protection, enhancement and provision of sports facilities. For example, how would the Council or an applicant be able to clearly demonstrate that a sports facility is no longer required (as required by the NPPF) if there is no up-to-date objective evidence base available to assess the proposal against. Furthermore, how could securing financial contributions from development towards new or enhanced facilities be justified if there is no evidence that a development will generate additional demand that will not be able to be met by existing facilities. Accordingly, Sport England would have to challenge the soundness of emerging local plan policies for sport and recreation if they are not justified by an up to date and robust evidence base.</p> <p>Sport England's experience has shown that where local plans have not been supported by up-to-date and robust assessments of need for sports facilities, Inspectors have requested that this be an issue that requires discussion at the examination of the plans. I would advise that most local planning authorities prepare sports facility strategies (incorporating needs assessments) in advance of plans being considered at examination in order to ensure that their local plans are sound. Furthermore, if the evidence base is not updated and continues to be used for determining planning applications, developers are likely to challenge the evidence base especially in the context of the need to protect existing facilities or provide for sport in new development through planning obligations or CIL. An additional concern is that the absence of an up-to-date evidence base for indoor sports facilities will have implications for planning community infrastructure in the development allocations that may be proposed in the Local Plan.</p> <p>To address these concerns, it is requested that the Council prepares an up-to-date indoor and outdoor sports facility strategies incorporating assessments of needs which will provide the robust evidence to support emerging Local Plan policies. This approach would in principle allow the plan to accord with Government policy in paragraph 103 of the NPPF. Detailed advice on the preparation of sports facility</p>	<p>An updated Built Sports Facilities Strategy is planned for 2024.</p>
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	<p>strategies can be found on Sport England's website https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport?section=assessing_needs_and_playing_pitch_strategy_guidance and further advice can be provided upon request. It is advocated that any new sports facility strategy is discussed with Sport England and other stakeholders before being commissioned. It should be emphasised that Sport England would prefer to provide support to the Council to address this matter during the development of the emerging local plan rather than making formal representations at the Regulation 19 stage.</p>	
<p>Yaxham Parish Council</p>	<p>We have responded to the Commonplace Portal to the A to F scenarios as proposed and order them A, C, B, D, E, F. It is felt that development is best sited where the infrastructure and services are basically in place and must be improved if further housing is permitted.</p> <p>Councillors and Neighbourhood Plan Review Working Group members have worked very collaboratively to give the LPA the response to the consultation with the widest community support. Yaxham has two distinct settlement boundaries and in a public consultation in 2023, residents confirmed their wish to live in a small rural village rather than in a town.</p> <p>To aid Breckland in its forthcoming sites assessment, the village has evolved its own RAG system of assessing the four sites put forward for further development in the village against its own Neighbourhood Plan policies as well as existing Breckland Local Plan policies. Yaxham was given an increase of 18 dwellings in the 2019 Local Plan. The village has more than fulfilled its share of new housing already with a further 54 + dwellings with planning permission waiting for build out.</p> <p>We have also assessed the village against your 5 criteria for villages with boundaries. You will find attached the amendments to your information. Councillors are very concerned to see that the serious issue of surface water and sewer flooding in the village remains completely ignored in your Breckland report on Yaxham in the Topic Paper. Photographic evidence was given in the Yaxham Neighbourhood Plan (2017) evidence base and Yaxham was identified in 2020 as being in the first 16 listed for action on identified flooding issues by the Norfolk Strategic Flooding</p>	<p>The Settlement Hierarchy is based on the strategic role and scale of a settlement within Breckland. This is a function of the services and facilities present in a settlement. Environmental constraints such as flood risk and drainage will inform potential site selection as part of the Plan making process.</p>




Breckland New Local Plan – Issues & Options Feedback Report 2024

	<p>Alliance. The flooding issues continue into 2024 and are reported to Anglian Water and the LLFA via the Norfolk flooding one stop number each time but to no avail.</p>	
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Breckland New Local Plan – Issues & Options Feedback Report 2024

YAXHAM Response from Yaxham Parish Council to inaccurate information on the village in the Topic Paper – A Review of Villages with Boundaries December 2023			
Key Indicator Groups	Key indicators	Quantity	Amendments/additional information NOTE – where information held by Breckland is incorrect please see correct info in BOLD
 Population	2011 Census 772 2021 census 860		Increase of 11%
 Growth indicators	No of houses built between 2011 – 2021 No of granted planning permissions to date	27 54	 Reference: Issues & Options Paper 2023
 Education	Primary School Secondary School	Yes No	School capacity 104 but there are 72 pupils currently Dereham Neatherd
 Health	Primary Healthcare facilities	No	Orchard Surgery Dereham 2 miles from Yaxham Mattishall Surgery 2 miles from Clint Green
 Connectivity	Digital Connectivity Public Transport Cycle and footpath routes	 Yes Yes	Ultrafast broadband, mobile signal on 4 providers Konnect 4 Norwich to Dereham. Hourly Monday to Saturday Within village settlements
	Proximity to nearest market town or key settlement	2.7 miles	4.0 miles to Dereham from Clint Green
 Shopping facilities	Local Shop/Post Office Other shops Mobile Shops	0 0 0	 Mobile library visits once a month, no sale of goods therefore not a shop
 Social Capital	Village hall/community centre Pub Church Website	Yes No Yes Yes	Fitness classes, dance classes, table tennis Pickle & Pie bistro closes at 5 pm & is not a Pub Regular Services www.yaxham.com & www.np4Yaxham.com

Breckland New Local Plan – Issues & Options Feedback Report 2024

	Events		Recreation Field
 Business and employment Information	Employed Population		
	Businesses within the parish	There are 23 registered businesses in Yaxham with Yaxham holiday park employing 23 in two separate businesses and the school employs 20 staff There are also financial services, construction and maintenance	
 Restrains to Development	Water & Utilities	No-known capacity issues – This is completely incorrect	Extensive surface water flooding in Station Road, Whinburgh Road, St Peter's Close, Spring Lane and Well Hill – all reported to the LLFA Sewage overflows due to pumping station lack of capacity at Norwich Road, St Peter's Close and Paper Street. Yaxham Neighbourhood Plan (NP4Yaxham "made" in 2017) has extensive photographs in the Plan's evidence base prepared in 2016.
	Flood Risk	The River Tudd flows to the north of the parish forming the parish boundary parallel to Cutthroat Lane. It incorporates land in flood zones 2, 3a and 3b.	
	Local Road Network	The village is accessed via the B1135 from Dereham	
	Biodiversity	There is a County Wildlife Site located on Dereham road to the north of the property known as Look East. A County Wildlife Site is located to the north of Manor Farm	
	Nutrient Neutrality	Yes River Wensum catchment	
 Village character	Landscape Assessment	Agricultural with historical rural row interrupted but with a modern morphological form of rural row continuous	Conservation Area near St Peter's Church in Yaxham settlement
	Listed Buildings	7	Hollands Hall, Yaxham House, Willow Farm, Boronia Cottage, War Memorial, Table Top Tomb and St Peter's Church – Grade 1 listed.
	Status in Local DP	Village with boundary	
Conclusion	Yaxham has 4 out of the 5 criteria for a village with two settlements – each with a boundary.		
Amendments	Yaxham Parish Council would be very grateful if you would update your records to include the correct information as listed above in bold text. Thank You		

Breckland New Local Plan – Issues & Options Feedback Report 2024

YAXHAM PARISH COUNCIL – CALL TO SITES CONSULTATION COMMENTS			
ELM CLOSE			
APPLICATION REF:	LPR/CS4/DEV/080	DATE:	18/1/24
BRECKLAND LOCAL PLAN POLICIES			
POLICY	RAG	COMMENTS	
HOU1 Development Requirements	AGAINST POLICY	Under the existing Local Plan, Yaxham has already reached its allocation	
HOU2 Level and Location of Growth	AGAINST POLICY	Under the existing Local Plan, Yaxham has already reached its allocation	
HOU3 Dev outside of Boundaries of Local Service Centres	N/A	Yaxham is a 'Village with Boundaries' as defined in HOU4	
HOU4 Village with Boundaries	AGAINST POLICY	As stated on the proposal document, the site is not adjacent to the settlement boundary.	
HOU5 Small villages and hamlets outside of settlement boundaries	N/A	Yaxham is a 'Village with Boundaries' as defined in HOU4	
HOU6 Principle of housing	FURTHER INFORMATION REQUIRED	Further information required	
HOU7 Affordable Housing	FURTHER INFORMATION REQUIRED	Further information required	
HOU8 Provision for Travellers and travelling show people	N/A	Not proposed as Travellers' site	
HOU9 Specialist Housing	N/A	Not proposed for 'Specialist Housing'	
HOU10 Technical design standards for new homes	FURTHER INFORMATION REQUIRED	Further information required	
HOU11 Residential replacement, extension and alteration	N/A	New development	
HOU12 Conversion of buildings in the countryside	N/A	No existing buildings	
HOU13 Rural Workers Dwellings	N/A	Proposals not identified for 'rural workers dwellings'	
HOU14 Affordable Housing Exceptions	FURTHER INFORMATION REQUIRED	The application does not yet state-market led housing, further information required - Not identified as an 'exception site' – expected to meet policy requirements.	

WEIGHT

	IN ACCORDANCE WITH POLICY
	FURTHER INFORMATION REQUIRED
	AGAINST POLICY
	NOT APPLICABLE

GENERAL COMMENTS ON APPLICATION

Sites assessments noted, in so far as they relate to an assessment against current Local Plan policy. At a strategic level it is currently proposed that no additional / new allocations are required in Yaxham. As such, no sites are proposed as preferred allocations in the draft Local Plan.

Breckland New Local Plan – Issues & Options Feedback Report 2024




YAXHAM PARISH COUNCIL – CALL TO SITES CONSULTATION COMMENTS

PAPER STREET

APPLICATION REF:	LPR/CS4/DEV/135	DATE:	18/1/24
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BRECKLAND LOCAL PLAN POLICIES		
POLICY	RAG	COMMENTS
HOU1 Development Requirements	AGAINST POLICY	Under the existing Local Plan, Yaxham has already reached its allocation
HOU2 Level and Location of Growth	AGAINST POLICY	Under the existing Local Plan, Yaxham has already reached its allocation
HOU3 Dev outside of Boundaries of Local Service Centres	N/A	Yaxham is a 'Village with Boundaries' as defined in HOU4
HOU4 Village with Boundaries	AGAINST POLICY	This site is adjacent to the settlement boundary. The application is for 71 dwellings which is beyond the 5% limit set in this policy
HOU5 Small villages and hamlets outside of settlement boundaries	N/A	Yaxham is a 'Village with Boundaries' as defined in HOU4
HOU6 Principle of housing	FURTHER INFORMATION REQUIRED	Further information required
HOU7 Affordable Housing	FURTHER INFORMATION REQUIRED	Further information required
HOU8 Provision for Travellers and travelling show people	N/A	Not proposed as Travellers' site
HOU9 Specialist Housing	N/A	Not proposed for 'Specialist Housing'
HOU10 Technical design standards for new homes	FURTHER INFORMATION REQUIRED	Further information required
HOU11 Residential replacement, extension and alteration	N/A	New development
HOU12 Conversion of buildings in the countryside	N/A	No existing buildings
HOU13 Rural Workers Dwellings	N/A	Proposals not identified for 'rural workers dwellings'
HOU14 Affordable Housing Exceptions	FURTHER INFORMATION REQUIRED	Not identified as an 'exception site' More information required – expected to meet policy requirements.

WEIGHT

	IN ACCORDANCE WITH POLICY
	FURTHER INFORMATION REQUIRED
	AGAINST POLICY
N/A	NOT APPLICABLE

GENERAL COMMENTS ON APPLICATION

Breckland New Local Plan – Issues & Options Feedback Report 2024

YAXHAM PARISH COUNCIL – CALL TO SITES CONSULTATION COMMENTS

NORWICH ROAD

APPLICATION REF:	LPR/CS4/DEV/094	DATE:	16/1/24
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YAXHAM NEIGHBOURHOOD PLAN POLICIES		
POLICY	RAG	COMMENTS
STR1 – Strategic Gaps Policy THE GAPS BETWEEN SETTLEMENTS		The proposed site is on land that separates Yaxham and Clint Green, therefore impacts on this policy
HOU1 – LOCATION OF NEW RESIDENTIAL DEVELOPMENT		The proposed settlement is outside the Settlement boundary,
HOU2 – HOUSING DENSITY		The proposal suggests a density of 22 dwellings per hectare which is in excess of this policy which is 20 dwellings per hectare, reflective of comparative densities within the village
HOU3 – SCALE OF RESIDENTIAL DEVELOPMENT		the proposal is for 90 dwellings which is well above the 10% increase in the size of the settlement of Clint Green
HOU4 – EXISTING LAND USE		This application is on a greenfield site
HOU5 – HOUSING MIX		Further information required
HOU6 - DESIGN		Further information required
HOU7 – AFFORDABLE HOUSING		Further information required
ENV1 - DARK SKIES		Further information required
ENV2 – CONSERVATION AREA & HERITAGE ASSETS		The site is not adjacent to the conservation area
ENV3 – GREEN INFRASTRUCTURE		Further information required
ENV4 – SURFACE WATER MANAGEMENT PLANS		This site has been used for agricultural purposes for a number of years, it has open ditches to some boundaries. Further information required , on the basis this development will require significant infrastructure.
ENV5 – SEWERAGE PROVISION		Further information required. The existing foul water systems in the parish will not accommodate this scale of development. Almost the entire parish is on AWA pumped foul systems the infrastructure for which will need to be reviewed with this scale of development

Breckland New Local Plan – Issues & Options Feedback Report 2024

YAXHAM PARISH COUNCIL – CALL TO SITES CONSULTATION COMMENTS

ELM CLOSE, YAXHAM

APPLICATION REF:	LPR/CS4/DEV/080	DATE:	16/1/24
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YAXHAM NEIGHBOURHOOD PLAN POLICIES		
POLICY	RAG	COMMENTS
STR1 – Strategic Gaps Policy THE GAPS BETWEEN SETTLEMENTS	Green	No impact
HOU1 – LOCATION OF NEW RESIDENTIAL DEVELOPMENT	Red	The proposed settlement is outside the Settlement boundary.
HOU2 – HOUSING DENSITY	Red	The proposal suggests a density of 25 dwellings per hectare which is above the 20 dwellings per hectare stated in this policy
HOU3 – SCALE OF RESIDENTIAL DEVELOPMENT	Yellow	Further information required
HOU4 – EXISTING LAND USE	Red	This application is on a greenfield site and therefore not appropriate under this policy
HOU5 – HOUSING MIX	Yellow	Further information required
HOU6 - DESIGN	Yellow	Further information required
HOU7 – AFFORDABLE HOUSING	Yellow	Further information required
ENV1 - DARK SKIES	Yellow	Further information required
ENV2 – CONSERVATION AREA & HERITAGE ASSETS	Red	This site is adjacent to the conservation area and a heritage statement will be required
ENV3 – GREEN INFRASTRUCTURE	Yellow	Further information required
ENV4 – SURFACE WATER MANAGEMENT PLANS	Red	There are ongoing significant issues with the permissions already granted. Further information required, on the basis this development will require significant infrastructure.
ENV5 – SEWERAGE PROVISION	Red	Further information required, on the basis this development will require significant infrastructure.
TRA1 – TRAFFIC AND SUSTAINABLE TRANSPORT	Yellow	Further information required
TRA2 – PARKING PROVISION	Yellow	Further information required
ECN1 - NEW ECONOMIC DEVELOPMENT	N/A	No commercial development
COM1 – EXISTING PARISH-BASED COMMUNITY SERVICES	N/A	Not a community asset

Breckland New Local Plan – Issues & Options Feedback Report 2024

YAXHAM PARISH COUNCIL – CALL TO SITES CONSULTATION COMMENTS			
NORWICH ROAD			
APPLICATION REF:	LPR/CS4/DEV/094	DATE:	18/1/24
BRECKLAND LOCAL PLAN POLICIES			
POLICY	RAG	COMMENTS	
HOU1 Development Requirements		Under the existing Local Plan, Yaxham has already reached its allocation	
HOU2 Level and Location of Growth		Under the existing Local Plan, Yaxham has already reached its allocation	
HOU3 Dev outside of Boundaries of Local Service Centres	N/A	Yaxham is a 'Village with Boundaries' as defined in HOU4	
HOU4 Village with Boundaries		This site is adjacent to the settlement boundary once it is extended to the boundary of the new Badger Home site. The application is for 90 dwellings which is beyond the 5% limit set in this policy	
HOU5 Small villages and hamlets outside of settlement boundaries	N/A	Yaxham is a 'Village with Boundaries' as defined in HOU4	
HOU6 Principle of housing		Further information required	
HOU7 Affordable Housing		Further information required	
HOU8 Provision for Travellers and travelling show people	N/A	Not proposed as Travellers' site	
HOU9 Specialist Housing	N/A	Not proposed for 'Specialist Housing'	
HOU10 Technical design standards for new homes		Further information required	
HOU11 Residential replacement, extension and alteration	N/A	New development	
HOU12 Conversion of buildings in the countryside	N/A	No existing buildings	
HOU13 Rural Workers Dwellings	N/A	Proposals not identified for 'rural workers dwellings'	
HOU14 Affordable Housing Exceptions		Not identified as an 'exception site' More information required – expected to meet policy requirements.	
WEIGHT			
	IN ACCORDANCE WITH POLICY		
	FURTHER INFORMATION REQUIRED		
	AGAINST POLICY		
N/A	NOT APPLICABLE		
GENERAL COMMENTS ON APPLICATION			

Breckland New Local Plan – Issues & Options Feedback Report 2024

YAXHAM PARISH COUNCIL – CALL TO SITES CONSULTATION COMMENTS

BEECH FARM, NORWICH ROAD

APPLICATION REF:	LPR/CS4/DEV/093	DATE:	16/1/24
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YAXHAM NEIGHBOURHOOD PLAN POLICIES		
POLICY	RAG	COMMENTS
STR1 – Strategic Gaps Policy THE GAPS BETWEEN SETTLEMENTS	Green	No impact
HOU1 – LOCATION OF NEW RESIDENTIAL DEVELOPMENT	Red	The proposed settlement is outside the Settlement boundary,
HOU2 – HOUSING DENSITY	Green	The proposal suggests a density of 18 dwellings per hectare which meets policy requirements
HOU3 – SCALE OF RESIDENTIAL DEVELOPMENT	Yellow	Further information required
HOU4 – EXISTING LAND USE	Red	This application is on a site which is designated as agricultural land. There are derelict agricultural buildings and a disused farmhouse.
HOU5 – HOUSING MIX	Yellow	Further information required
HOU6 - DESIGN	Yellow	Further information required
HOU7 – AFFORDABLE HOUSING	Yellow	Further information required
ENV1 - DARK SKIES	Yellow	Further information required
ENV2 – CONSERVATION AREA & HERITAGE ASSETS	Green	The site is not adjacent to the conservation area
ENV3 – GREEN INFRASTRUCTURE	Yellow	Further information required
ENV4 – SURFACE WATER MANAGEMENT PLANS	Yellow	Further information required, on the basis this development will require significant infrastructure.
ENV5 – SEWERAGE PROVISION	Yellow	Further information required, on the basis this development will require significant infrastructure.
TRA1 – TRAFFIC AND SUSTAINABLE TRANSPORT	Yellow	This site had a previous application for 1 dwelling withdrawn, concerns were raised regarding access to the road and vision splays
TRA2 – PARKING PROVISION	Yellow	Further information required
ECN1 - NEW ECONOMIC DEVELOPMENT	N/A	No commercial development
COM1 – EXISTING PARISH-BASED COMMUNITY SERVICES	N/A	Not a community asset
COM2 – DEVELOPER FUNDING PRIORITIES	Yellow	Further information required

Breckland New Local Plan – Issues & Options Feedback Report 2024

YAXHAM PARISH COUNCIL – CALL TO SITES CONSULTATION COMMENTS

BEECH FARM

APPLICATION REF:	LPR/CS4/DEV/093	DATE:	18/1/24
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BRECKLAND LOCAL PLAN POLICIES			
POLICY	RAG	COMMENTS	
HOU1 Development Requirements	Against Policy	Under the existing Local Plan, Yaxham has already reached its allocation	
HOU2 Level and Location of Growth	Against Policy	Under the existing Local Plan, Yaxham has already reached its allocation	
HOU3 Dev outside of Boundaries of Local Service Centres	N/A	Yaxham is a 'Village with Boundaries' as defined in HOU4	
HOU4 Village with Boundaries	Against Policy	This site is not immediately adjacent to the settlement boundary	
HOU5 Small villages and hamlets outside of settlement boundaries	N/A	Yaxham is a 'Village with Boundaries' as defined in HOU4	
HOU6 Principle of housing	Further Information Required	Further information required	
HOU7 Affordable Housing	Further Information Required	Further information required	
HOU8 Provision for Travellers and travelling show people	N/A	Not proposed as Travellers' site	
HOU9 Specialist Housing	N/A	Not proposed for 'Specialist Housing'	
HOU10 Technical design standards for new homes	Further Information Required	Further information required	
HOU11 Residential replacement, extension and alteration	Against Policy	Beech farm is an existing farm house with outbuildings that are in a state of disrepair. The application does not indicate if these buildings are retained or demolished. Proposal to replace with multiple buildings	
HOU12 Conversion of buildings in the countryside	Against Policy	Not proposed to convert existing buildings	
HOU13 Rural Workers Dwellings	N/A	Proposals not identified for 'rural workers dwellings'	
HOU14 Affordable Housing Exceptions	Further Information Required	Not identified as an 'exception site' More information required – expected to meet policy requirements.	

WEIGHT

	IN ACCORDANCE WITH POLICY
	FURTHER INFORMATION REQUIRED
	AGAINST POLICY
N/A	NOT APPLICABLE

GENERAL COMMENTS ON APPLICATION

Breckland New Local Plan – Issues & Options Feedback Report 2024

YAXHAM PARISH COUNCIL – CALL TO SITES CONSULTATION COMMENTS

YAXHAM, PAPER STREET

APPLICATION REF:	LPR/CS4/DEV/135	DATE:	16/1/24
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YAXHAM NEIGHBOURHOOD PLAN POLICIES		
POLICY	RAG	COMMENTS
STR1 – Strategic Gaps Policy THE GAPS BETWEEN SETTLEMENTS	Green	No impact
HOU1 – LOCATION OF NEW RESIDENTIAL DEVELOPMENT	Red	The proposed development is outside the Settlement boundary, although the access road is within the boundary.
HOU2 – HOUSING DENSITY	Red	The proposal suggests a density of 30 dwellings per hectare which is in excess of this policy which is 20 dwellings per hectare, reflective of comparative densities within the village
HOU3 – SCALE OF RESIDENTIAL DEVELOPMENT	Yellow	Further information required
HOU4 – EXISTING LAND USE	Red	This application is on a greenfield site and therefore fails this policy
HOU5 – HOUSING MIX	Yellow	Further information required
HOU6 - DESIGN	Yellow	Further information required
HOU7 – AFFORDABLE HOUSING	Yellow	Further information required
ENV1 - DARK SKIES	Yellow	Further information required
ENV2 – CONSERVATION AREA & HERITAGE ASSETS	Green	The site is not adjacent to the conservation area
ENV3 – GREEN INFRASTRUCTURE	Yellow	Further information required
ENV4 – SURFACE WATER MANAGEMENT PLANS	Yellow	This site has been used for agricultural purposes for a number of years, it has open ditches to some boundaries, which during winter periods are prone to flooding. (see photograph ref 1)Further information required, on the basis this development will require significant infrastructure.
ENV5 – SEWERAGE PROVISION	Red	Further information required. The existing foul water systems in the parish will not accommodate this scale of development. Almost the entire parish is on AWA pumped foul systems the infrastructure for which will need to be reviewed with this scale of development

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<p>Rocklands Parish Council</p>	<p>1. Sustaining rural community services – and Local Service Centres “Do you agree with the methodology for deciding which parishes should be Local Service Centres?” Answer: NOT ENTIRELY Whilst the five principal criteria are generally applicable, the way in which they have been applied is far too crude. For example, in some cases, schools have been categorised as employing more than 10 persons – but this includes staff who work for only one or two hours per day or week e.g. catering and cleaning staff. Such employees may also be employed part-time by other schools or businesses e.g. where two schools or more are federated and share heads, teachers and support staff. In such a scenario, these persons will be double counted. A more accurate approach would be to measure by Full Time Equivalents (FTE’s). No account is taken of the accessibility of community facilities, shops, post offices. By definition, users will have to travel by some means to access Service Centres. Whilst more customers are essential if these facilities are to thrive and remain viable, where those travelling by car are going to park can be a significant issue. For example, pubs with car parks will have no such issues – whilst shops with no car parking, on a narrow street/lane with no pavements, could very quickly lead to significant obstructions, safety issues, and have detrimental impact on the amenity of neighbours. Somehow, a balanced approach needs to be applied. A concept of ‘catchment area’ also needs to be applied – identifying a critical mass necessary for a Service Centre to be viable, whilst minimising distances travelled.</p> <p>2. Defining Settlements “Should Breckland continue with a settlement boundary approach or develop a robust criteria-based policy?” Answer: Continue with a Settlement Boundary approach Policy requirements on defining rural settlements will, of necessity, vary according to the size and location of any particular settlement – and any protected characteristics. This should not be down to a simple binary choice on policy. The ethos of the Localism Act was always to devolve more decision making to local communities –</p>	<p>The criteria applied are intended to enable comparison between the settlements in Breckland to establish a settlement hierarchy.</p> <p>Detailed issues such as this are recognised. However, such challenges impress the importance of encouraging active travel and appropriately directing development that does occur to locations where accessing a shop or other facility on foot is a reasonable alternative. This is one reason why the existence of a shop and other facilities in a settlement counts towards a higher placement in the settlement hierarchy</p>
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	<p>Finally, in some of the development scenarios proposed, there appears to be the belief that all communities with settlement boundaries – irrespective of local need, location, size, character etc. - should be prepared to expand to accommodate their fair share of the housing quota. This, again, is an inadequate blunt instrument approach to the distribution of housing, with potential to seriously harm some communities.</p> <p>If it is perceived that all communities with settlement boundaries have the capacity to expand, then we will lose the character of those settlements, they will cease to be villages and hamlets, and the entire rural character of Breckland will be gone for ever.</p> <p>We would take the opportunity to point out that the consultation document supporting this section is titled 'Approaches to defining settlements and protecting the countryside from development' – whereas it is elsewhere referred to as 'Approaches to defining settlements and protecting the countryside from inappropriate development' – we suspect that the latter was the intention.</p> <p>'A Review of Villages with Boundaries'</p> <p>We would like to query/correct some of the analyses you have carried out for the parish of Rocklands:</p> <ul style="list-style-type: none"> • On pages 29 and 30, you have published your review of 'The Rocklands'. We don't know where our parish got this title (was the document produced by someone not familiar with Breckland District?), but our name is simply 'Rocklands'. • Against 'Growth Indicators' are some puzzling entries – 'No of planning permissions to date = 1' (?), a dislocated planning permission reference etc. – this needs review and accuracy. <ul style="list-style-type: none"> • Against 'Education' we are shown as having a secondary school (we don't) – but this is recorded as 'Attleborough Academy' – which is over 5 miles away... 	<p>existing population and the availability of services and infrastructure to serve the existing residents and future potential growth. Settlements with a resident population will generate a proportion of the districts overall housing needs. The Plan process must consider firstly the sustainability of an area for growth and secondly the specific impacts of an allocation upon a settlement. The Growth Options published set out the first stage of this process.</p> <p>Noted, this will be corrected.</p> <p>This references one dwelling. The Planning reference included can be searched on the Council's planning applications search function. The same data is provided for all settlements. The nearest secondary school is recorded for all</p>
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	<ul style="list-style-type: none"> • Against 'Cycle and Footpath Routes' we have a '0' – whereas Rocklands parish has 4 registered footpaths, and 5 bridleways. Consulting the NCC 'Definitive Maps' will confirm. • Against 'Churches', 3 are listed – yet St Andrew's Church is a ruin – Grade II Listed. • Against 'Business and Employment Information' Rocklands Primary School is listed as having 10 or more staff. The school is federated with Great Ellingham Primary School, and shares a Head, teachers and support staff. Those such as dinner time staff, cleaners etc. work a few hours a week. <p>It would be helpful and more accurate to record employed persons by FTE (Full Time Equivalent), and this will avoid double-counting persons who work in more than one parish.</p>	<p>settlements in the settlement profiles but noted that this is within Attleborough and not Rocklands.</p> <p>Noted, and further information on listed buildings have been added.</p> <p>Noted, all employment criteria were based on ONS data which was derived from PAYE information for each business in each location. Each PAYE employee was counted towards the employment criteria. A consistent approach is required across all villages.</p> <p>The employment data for settlement analysis is a comparative tool with other settlements in Breckland. Such an adjustment may provide a revised picture of employment but would be unlikely to substantially change the relative assessment of a settlement.</p>
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<ul style="list-style-type: none"> • Against 'Water and Utilities' is recorded 'No known capacity issues'. In fact, the first time sewer recently installed in the St Peter area of the village has a restricted capacity – just for the dwellings that are ready there. As Anglian Water informed us in the public meetings, this is limited – and this sewer joins the existing All Saints sewer which is served by the pumping station with specific design capacity. • Against 'Flood Risk' the inference that there is none is seriously inaccurate. See elsewhere in this document for substantial details. Our engagement with Breckland Planning Officers, the Planning Committee, LLFA, MNFP, NSFA etc. should indicate that we have had serious surface water flooding issues in certain parts of our parish for decades. • Accordingly, Rocklands has 3 of the 5 criteria for a village with boundaries. <p>3. Alternative development strategy options “Please drag and move the options below to rank in order of preference, the six alternative development scenarios. Sort in order of importance.” Answer: C, D, A, B, F, E Firstly, we understand that the overall requirement for housing numbers has come from applying the Government’s ‘Standard Method’ – 661 dwellings per annum from Breckland. We also understand that the ‘Housing and Economic Development Needs Assessment’ (HEDNA) is not yet completed – but will review the numbers from the ‘Standard Method’ when finished. The overall principles that we believe should be applied to the development needs assessment are as follows: <ul style="list-style-type: none"> • Need - additional housing should be located close to where employment opportunities are/will be located. This will reduce the need to use the car, length of </p>	<p>Noted</p> <p>The Topic Paper concludes Rocklands has a shop, primary school, a community facility, bus service and employment. The counter view that Rocklands has 3 of 5 is presumably based on discounting employment. The Council has reviewed its analysis, and it considers that Rocklands meets 5 out 5 of the criteria as it has a school, a shop, a pub, a frequent bus service to Attleborough and employment with the school and Huw building services along with a number of small businesses throughout the village. Communities were able to</p>
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<p>journeys (and therefore reduce environmental impacts), increase use of public transport, cycling, walking.</p> <ul style="list-style-type: none"> • Where motorised travel to work is unavoidable, additional housing should be located close to major traffic routes – avoiding ‘rat runs’ through villages and the countryside. • Maximum use should be made of the opportunities presented by the redevelopment of Swanton Morley Barracks and the Abbey Estate. This would take the pressure off other communities. • Rural settlements with little or no employment opportunities should not be forced to grow into ‘dormitory’ villages for commuters to employment locations. It is widely recognised that sense of community is often diluted/lost in these circumstances. We wonder why Swanton Morley Barracks and the Abbey Estate do not feature in all six options? <p>Again, the approach needs to be more nuanced, rather than relying on rigidly restrictive principles. Communities should be consulted – face to face – in a more detailed manner. At no time during the workshops held so far, have we seen a planning officer. Placing consultants between the stakeholders and the Planning department unfortunately suggests a ‘box-ticking’ exercise.</p> <p>We would like to point out that your supporting documentation variously refers to ‘four’ and ‘six’ development options/scenarios.</p> <p>4. Potential development sites “Do you agree with this new criteria for assessing sites?” Answer: NO</p> <p>As previously stated, flooding (from surface water, rivers etc.) – a very serious issue in a number of areas of our district – is entirely missing from these “. robust criteria.”. There are certainly some proposed sites which almost immediately disqualify themselves from consideration due to such issues.</p> <p>Merely relying on Environment Agency flood maps, and LLFA records is a wholly incomplete process. Much more engagement with the communities affected by flooding, with their local knowledge, is required. In this respect, we now at least have</p>	<p>comment via a questionnaire on the service provision in their villages. The questionnaire was available for response from June to September 2023.</p> <p>The Phase 1 assessment is a high-level initial assessment to review sites alongside the Growth Option consultation. Flood risk maps provide a useful indicator of likely flood risk. However, all proposed allocations will be tested through the Strategic</p>
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	<p>recognition of these issues, and Rocklands – together with the Watton and Saham Flood Action Group – will, as already agreed by Breckland, be engaging with consultants in the review of the Strategic Flood Risk Assessment for development of the new Local Plan.</p> <p>Rocklands’ pro-active approach in organising multi-agency meetings (LLFA, Anglian Water, Breckland Council, NCC Highways etc), and it’s membership of the Mid-Norfolk Flood Partnership, and liaison with the Norfolk Strategic Flooding Alliance, serve to demonstrate how critical it is to include flooding as one of the criteria for assessing sites.</p> <p>Also, there appear to be no weightings given to each of the criteria. Most certainly, some are more significant than others – and general subjective conclusions appear to have been made based on undisclosed considerations.</p> <p>Considering the phase 1 assessments produced for Rocklands parish, and our dialogue already with Andrew D’Arcy and Martin Craddock, we have the following comments to make about each site:</p> <p>LPR/C4S/DEV/062 – Area 1, East of Rectory Road LPR/C4S/DEV/403 – Area 2, West of Rectory Road LPR/C4S/DEV/404 – Area 3, West of Rectory Road</p> <p>These are collectively addressed, as a confused proposal was originally made for the Rectory Road area – only very recently re-structured. Responses to our queries, from Andrew D’Arcy (Principal Planning Policy Officer), has elicited the following, “I understand that we are not going to update the published site assessments until reissuing the site analysis work in the Spring to accompany preferred options,- now that we have secured confirmation of the areas proposed and intention of the landowner.”</p> <p>Notwithstanding the above, we have the following comments:</p> <ul style="list-style-type: none"> • Under current policy, the proposed sites are a considerable distance outside the Settlement Boundary, and in no way adjacent or connected to it. <p>Under the proposed criteria:</p> <ul style="list-style-type: none"> • The sites are entirely Greenfield in nature. 	<p>Flood Risk Assessment and a Sequential Test. A Water Cycle Study is in preparation and will be informed by the distribution of recent development and assess the impacts of planned growth.</p> <p>It would be inappropriate to apply weighting and assume an automated conclusion from the site assessment process. The analysis is designed to ensure the issues and affected sites are identified and understood.</p> <p>Comments noted. Sites 062, 403 and 404 are not proposed as preferred sites at this time.</p>
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	<ul style="list-style-type: none"> • Access to the sites would be via Rectory Road – a narrow tertiary road with few passing places. The nearby junction with Magpie Lane – another narrow tertiary road with few passing places – and the end of The Street is also very restricted in width. We do not consider that access for additional properties will be either safe or practical. • Pedestrian access to the proposed sites would be extremely hazardous – there being no pavements, and via a narrow-inclined road. • The Visual Landscape Impact would be High - particularly with respect to neighbouring properties on both sides of the road. These properties would lose the current visual amenity of unrestricted views of the surrounding rural landscape. As the sites are in an elevated position, development will impact on the rural views currently enjoyed from surrounding properties, roads and footpaths. • We would argue that the proposed sites are only very tenuously Adjacent to the existing built-up area. • The sites would conflict with the scale and size of the settlement and would notably grow it. • The sites are not in proximity to a recognised settlement and could not form part of a new settlement. • Although these sites can be perceived to align with the proposed development scenarios E and F in the consultation, we believe that the other factors above weigh significantly against development. • In summary, we contend that these sites should not be accepted for development. <p>LPR/C4S/DEV/251 – Magna Farm, Magpie Lane</p> <ul style="list-style-type: none"> • Under current policy, the proposed site is a considerable distance outside the Settlement Boundary, and in no way adjacent or connected to it. • The proposed site would represent backfill, and not conform to the generally linear form of the main part of the village. <p>Under the proposed criteria:</p> <ul style="list-style-type: none"> • The site is entirely Greenfield in nature. 	<p>Site 251 not proposed as a preferred site at this time.</p>
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	<ul style="list-style-type: none"> • Access to the site would be via Magpie Lane – a very narrow tertiary road with few passing places. This lane is already subject to numerous traffic conflicts and driver conflicts. We do not consider that access for additional properties will be either safe or practical. • Pedestrian access to the proposed site would be extremely hazardous – there being no pavements, and via a narrow road with few passing places. • There will be some Visual Landscape Impact – particularly with respect to neighbouring properties, and traffic approaching from the West via Bray’s Lane and the B1077. • The site is in no way Connected to the existing built-up area, lying a significant distance away. • The site is not in proximity to a recognised settlement and could not form part of a new settlement. • The site does not align with any of the scenarios in the Development Scenarios consultation. • In summary, we contend that this site should not be accepted for development. <p>LPR/C4S/DEV/064 – South of Bell Road</p> <ul style="list-style-type: none"> • Under current policy, the proposed site is adjacent to the Settlement Boundary. Under the proposed criteria: • The site is entirely Greenfield in nature. • Access to the site would be via either Bell Road or Chapel Street. Bell Road is an extremely narrow tertiary road with no passing places. It is probably the narrowest road in the parish, has high banks in places, blind bends and is used by large agricultural vehicles. Vehicle-vehicle and vehicle pedestrian conflicts are a regular occurrence on this narrow road. <p>Chapel Street is another narrow tertiary road with few passing places, having three blind bends and the same agricultural traffic as Bell Road. We do not consider that access for additional properties will be either safe or practical.</p>	<p>Subject to appropriately addressing site specific issues, Site 064 is identified as a preferred option.</p>
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- Pedestrian access to the proposed site would be hazardous – extremely so from the Bell Road direction – there being no pavements in either Bell Road or Chapel Street. Conflict with large agricultural vehicles would pose a particular risk.
- There would be unavoidable Visual Landscape Impact – particularly with respect to neighbouring properties on both sides of the road, and from the rear aspect of a significant number of properties on Chapel Street, where it bends to the Southeast and South. These properties would lose the current visual amenity of unrestricted views of the surrounding rural landscape.
- The site is adjacent to the existing Built-up Area, and adjacent to and connected to the existing Settlement Boundary.
- Although this site can be perceived to align with the proposed development scenarios E and F in the consultation, we believe that the other factors above weigh significantly against development.
- In summary, we contend that this site should not be accepted for development.

LPR/C4S/DEV/065 – Land at The Street

- Under current policy, the proposed site is adjacent to the Settlement Boundary.
- We have already commented that the proposed assessment criteria take no account of areas prone to flooding. This proposed site is one such area – subject to surface water flooding in periods of heavy rainfall. See the images below – showing surface water flooding from this site, and to the East down The Street:



Under the proposed criteria:

Subject to appropriate addressing site specific issues Site 065 is identified as a preferred option. Details regarding surface water concerns are noted. Any scheme would clearly require appropriate measures to manage drainage and avoid any increase in flood risk elsewhere.

	<ul style="list-style-type: none"> • The site is entirely Greenfield in nature. • The site is at the junction of Rectory Road, Magpie Lane and The Street. Magpie Lane and Rectory Road are very narrow roads with very few passing places. The Street narrows at this point. Wherever egress from this site is located, visibility to the right – down Magpie Lane – is exceptionally poor, as the road bends away to the right and has significant hedges and trees. We do not consider that access for additional properties will be either safe or practical. • Pedestrian access to the proposed site would be hazardous – due to narrow roads with no pavements. Access to local services on foot would be fraught with hazards. • There would be unavoidable Visual Landscape Impact – particularly with respect to neighbouring properties, and from the rear aspect of properties on The Street. These properties would lose the current visual amenity of unrestricted views of the surrounding rural landscape. • The site is adjacent to the existing Built-up Area, and adjacent to and connected to the existing Settlement Boundary. • Although this site can be perceived to align with the proposed development scenarios E and F in the consultation, we believe that the other factors above weigh significantly against development. • In summary, we contend that this site should not be accepted for development. <p>LPR/C4S/DEV/365 – North of Chapel Street</p> <ul style="list-style-type: none"> • Firstly, we believe that this site location has been mis-named. Chapel Street finishes opposite 'Corner Cottage' – where Bell Road starts. Reference to the Electoral Register will confirm. • Under current policy, the proposed site is neither connected to nor adjacent to the Settlement Boundary. See 3PL/2023/0702/F for the Case Officer's reasons for refusal, "The site fall outside the defined settlement of Rocklands classified as a Village with a Boundary and is not immediately adjacent to the settlement boundary." Under the proposed criteria: • The site is entirely Greenfield in nature. 	<p>Site 365 is not identified as a preferred option at this time.</p>
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	<ul style="list-style-type: none"> • Access to the site would be via either Bell Road or Chapel Street. Bell Road is an extremely narrow tertiary road with no passing places. It is probably the narrowest road in the parish, has high banks in places, blind bends and is used by large agricultural vehicles. Vehicle-vehicle and vehicle/ pedestrian conflicts are a regular occurrence on this narrow road. <p>Chapel Street is another narrow tertiary road with few passing places, having three blind bends and the same agricultural traffic as Bell Road. We do not consider that access for additional properties will be either safe or practical.</p> <ul style="list-style-type: none"> • Pedestrian access to the proposed site would be hazardous – extremely so from the Bell Road direction – there being no pavements in either Bell Road or Chapel Street. Conflict with large agricultural vehicles would pose a particular risk. • There would be unavoidable Visual Landscape Impact – particularly with respect to neighbouring and nearby properties on both sides of the road. These properties would lose the current visual amenity of unrestricted views of the surrounding rural landscape. <p>See 3PL/2023/0702/F for the Case Officer’s reasons for refusal, “The proposed development represents visual intrusion and erosion of the open countryside. The proposed design and appearance in terms of scale, height and massing of the dwelling, is out of character with the local context and street scene. It would result in unacceptable urbanisation of the area that would harm the character and appearance of the area including the open countryside. The proposed development is contrary to Policies COM01, GEN05, ENV05 & GEN02 of the Breckland Local Plan (adopted 2019), as well as having due regard to National Planning Policy Framework (2023).”</p> <p>The above related to a single property on this site – a number of properties could only have greater negative impact. Further, the Northeast corner of the proposed site would abut the Methodist Church graveyard – which is in regular use by the bereaved and their families. Adjacent dwellings would serve to disturb the peace and quiet, and the open countryside views valued by the users.</p>	
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	<ul style="list-style-type: none"> • The proposed site is neither connected to, nor adjacent to, either the Built-up Area or the Settlement Boundary. • As stated in the Case Officer’s comments above, the proposed site would be unlikely to be in keeping with the scale and size of the settlement at this point. • Although this site can be perceived to align with the proposed development scenarios E and F in the consultation, we believe that the other factors above weigh significantly against development. • In summary, we contend that this site should not be accepted for development. 	
Yaxham Neighbourhood Plan Working Group	[Same submission as Yaxham Parish Council]	Noted see response to Yaxham Parish Council
RSPB	When considering Alternative Development Strategy Options, we would recommend taking into account which settlements are located within the Natural Character Area of the Brecks. Due to the special wildlife found in the Brecks any development is likely to be subject to additional environmental assessment and surveys (or Habitats Regulation Assessment if it occurs within the SPA buffer zones) and may be restricted. It may therefore be prudent to concentrate new housing development away from this area where possible to protect the biodiversity of the Brecks and reduce resource burden and risk for developers.	Noted – the Local Plan will be informed by HRA and places protection of the Brecks SPA and identified buffers for Stone Curlew as a critical factor for the overall strategy and identification of sites.
M.O.D	The largest Ministry of Defence land holding within Breckland is the Stanford training area and ranges. The military training area of Stanford forms part of the distinctive Breckland landscape region and has been in use since 1942 when a battle training area was required during the second world war. There is a continuing need for military training and operations on the Stanford training estate and at other defence sites within Breckland. Please note that the site of Robertson Barracks, an MOD disposal site, is the subject of separate representations to this consultation.	Comment noted – the Council will consider inclusion of such a policy.

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	<p>The 'Towns Villages and Countryside' consultation document looks at the approach to defining settlement boundaries and asks the following question: - In principle do you consider the Council should continue to identify Settlement Boundaries in its Local Plan or develop a robust criteria-based policy instead? The MOD is supportive of the settlement boundary approach and believe that this should continue. However, to support the ongoing military training and operations within the district, it is considered that the inclusion of a specific policy in the Local Plan to recognise these requirements would be beneficial and accord with national planning policy. Paragraph 101 of the National Planning Policy Framework (December 2023) states that planning policies and decisions should promote public safety and take into account wider security and defence requirements including by 'b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.' Suggested Policy Wording 1. Proposals associated with defence and military operations will be supported in principle at existing sites within Breckland where they would enhance or sustain operational capabilities. 2. Non-military or non-defence related development within or in the areas around a defence or military site will not be supported where it would adversely affect military operations or capability, unless it can be demonstrated that there is no longer a defence or military need for the site.</p>	
<p>NHS Property Services</p>	<p>NHS Property Services NHS Property Services (NHSPS) manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable and modern healthcare environments. We partner with local NHS Integrated Care Boards (ICBs) and wider NHS organisations to help them plan and manage their estates to unlock greater value and ensure every patient can get the care they need in the right place and space for them. NHSPS is part of the NHS and is wholly owned by the Department of Health and Social Care (DHSC) – all surplus</p>	<p>Breckland's Planning Obligations policy includes establishing appropriate contributions towards healthcare facilities required to support new growth and development.</p>

	<p>funds are reinvested directly into the NHS to tackle the biggest estates challenges including space utilisation, quality, and access, with the core objective to enable excellent patient care.</p> <p>General Comments on Health Infrastructure to Support Housing Growth The delivery of new and improved healthcare infrastructure is significantly resource intensive. The NHS as a whole is facing significant constraints in terms of the funding needed to deliver healthcare services, and population growth from new housing development adds further pressure to the system. New development should make a proportionate contribution to funding the healthcare needs arising from new development. Health provision is an integral component of sustainable development – access to essential healthcare services promotes good health outcomes and supports the overall social and economic wellbeing of an area.</p> <p>Residential developments often have very significant impacts in terms of the need for additional primary healthcare provision for future residents. Given health infrastructure’s strategic importance to supporting housing growth and sustainable development, it should be considered at the forefront of priorities for infrastructure delivery. The ability to continually review the healthcare estate, optimise land use, and deliver health services from modern facilities is crucial. The health estate must be supported to develop, modernise, or be protected in line with integrated NHS strategies. Planning policies should enable the delivery of essential healthcare infrastructure and be prepared in consultation with the NHS to ensure they help deliver estate transformation.</p> <p>Detailed Comments on Emerging Local Plan At this early stage of the consultation process, our comments are focused on highlighting NHSPS priority areas important to embedding the needs of the health services into the Local Plan in a way that supports sustainable growth.</p> <p>Infrastructure Delivery and Developer Contributions As set out above, given health infrastructure’s strategic importance to supporting housing growth and sustainable development, it should be at the forefront of priorities for infrastructure delivery. Health infrastructure should be clearly identified in the Local Plan as essential infrastructure, with an expectation that development</p>	<p>Local Plan policy, specific requirements for major development sites and the evidence to be collated through preparation of an Infrastructure Delivery Plan.</p>
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	<p>proposals will make provision to meet the cost of healthcare infrastructure made necessary by the development. In areas of significant housing growth, appropriate funding must be consistently leveraged through developer contributions for health and care services to mitigate the direct impact of growing demand from new housing. Additionally, the significant cumulative impact of smaller housing growth and the need for mitigation must also be considered by the Plan.</p> <p>We also emphasize the importance of effective implementation mechanisms so that healthcare infrastructure is delivered alongside new development, especially for primary healthcare services as these are the most directly impacted by population growth associated with new development. The NHS, Council and other partners must work together to forecast the health infrastructure and related delivery costs required to support the projected growth across the Local Plan area. NHSPS recommend that the Local Plan have a specific section in the document that sets out the process to determine the appropriate form of developer contributions to health infrastructure. This would ensure that the assessment of existing healthcare infrastructure is robust, and that mitigation options secured align with NHS requirements.</p> <p>The Local Plan should emphasize that the NHS and its partners will need to work with the Council in the formulation of appropriate mitigation measures. NHSPS recommends that the Council engage with the relevant Integrated Care Board (ICB) to add further detail within the Local Plan and supporting evidence base (Infrastructure Delivery Plan) regarding the process for determining the appropriate form of contribution towards the provision of healthcare infrastructure where this is justified. As a starting point, we suggest the following process:</p> <ul style="list-style-type: none"> •Assess the level and type of demand generated by the proposal. •Work with the ICB to understand the capacity of existing healthcare infrastructure and the likely impact of the proposals on healthcare infrastructure capacity in the locality. •Identify appropriate options to increase capacity to accommodate the additional service requirements and the associated capital costs of delivery. •Identify the appropriate form of developer contributions. 	<p>Noted. This joint working will be a priority as the infrastructure necessary to support proposed development is evidence through the IDP. Reference to working with the ICB included within the draft Plan.</p>
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	<p>Healthcare providers should have flexibility in determining the most appropriate means of meeting the relevant healthcare needs arising from a new development. Where new development creates a demand for health services that cannot be supported by incremental extension or internal modification of existing facilities, this means the provision of new purpose-built healthcare infrastructure will be required to provide sustainable health services. Options should enable financial contributions, new-on-site healthcare infrastructure, free land/ infrastructure /property, or a combination of these.</p> <p>Healthy Developments</p> <p>There is a well-established connection between planning and health, and the planning system has an important role in creating healthy communities. The planning system is critical not only to the provision of improved health services and infrastructure by enabling health providers to meet changing healthcare needs, but also to addressing the wider determinants of health. Identifying and addressing the health requirements of existing and new development is a critical way of ensuring the delivery of healthy, safe, and inclusive communities.</p> <p>On this basis, we would welcome the inclusion of a comprehensive policy on health and wellbeing in the Local Plan and encourage the Council to engage with the NHS on this matter ahead of the Regulation 19 document being prepared. Specific policy requirements to promote healthy developments should include:</p> <ul style="list-style-type: none"> •Proposals should consider local health outcomes, and where appropriate to the local context and/or size of the scheme include a Health Impact Assessment. •Design of schemes should encourage active travel, including through providing safe and attractive walking and cycling routes, and ensuring developments are connected by these routes to local services, employment, leisure, and existing walking and cycling routes. •Provide access to healthy foods, including through access to shops and food growing opportunities (allotments and/or providing sufficient garden space). •Design schemes in a way that encourages social interaction, including through providing front gardens, and informal meeting spaces including street benches and neighbourhood squares and green spaces. 	<p>Noted, the draft Plan incorporates such a policy for further discussion and refinement. Elements of a wide range of policies including this relating to design, housing standards and accessibility all include an interrelationship to health and wellbeing.</p>
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	<ul style="list-style-type: none"> •Design schemes to be resilient and adaptable to climate change, including through SUDs, rainwater collection, and efficient design. •Consider the impacts of pollution and microclimates, and design schemes to reduce any potential negative outcomes. •Ensure development embraces and respects the context and heritage of the surrounding area. •Provide the necessary mix of housing types and affordable housing, reflecting local needs. •Provide sufficient and high quality green and blue spaces within developments. <p>Affordable Homes for NHS Staff</p> <p>In undertaking further work on local housing needs, we suggest the Council consider the need for affordable housing for NHS staff and those employed by other health and care providers in the local authority area. The sustainability of the NHS is largely dependent on the recruitment and retention of its workforce. Most NHS staff need to be anchored at a specific workplace or within a specific geography to carry out their role. When staff cannot afford to rent or purchase suitable accommodation within reasonable proximity to their workplace, this has an impact on the ability of the NHS to recruit and retain staff.</p> <p>Housing affordability and availability can play a significant role in determining people’s choices about where they work, and even the career paths they choose to follow. As the population grows in areas of new housing development, additional health services are required, meaning the NHS must grow its workforce to adequately serve population growth. Ensuring that NHS staff have access to suitable housing at an affordable price within reasonable commuting distance of the communities they serve is an important factor in supporting the delivery of high-quality local healthcare services. We recommend that the Council:</p> <ul style="list-style-type: none"> •Engage with local NHS partners such as the local Integrated Care Board (ICB), NHS Trusts and other relevant Integrated Care System (ICS) partners. •Ensure that the local need for affordable housing for NHS staff is factored into housing needs assessments, and any other relevant evidence base studies that inform the local plan (for example employment or other economic policies). 	<p>Policies for affordable housing make reference to ensuring appropriate provision for homes to meet a range of defined needs. Where there are requirements for NHS staff specifically, and this is established to exist through a local needs assessment, housing policy would be supportive of appropriate development.</p>
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	<p>•Consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers.</p> <p>Achieving Net Zero NHSPS fully support policies that promote carbon neutral development, and the securing of financial contributions where on-site carbon mitigation requirements cannot be met. In considering the implementation of policies related to net zero, we would highlight that NHS property could benefit from carbon offset funds. This would support the NHS to reach the goal of becoming the world’s first net zero healthcare provider.</p>	<p>At this time Breckland has no specific evidence indicating a particular need or proposal requiring provision of affordable homes for NHS staff. However, where such needs are identified they would be taken into account in the Local Plan.</p>
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Water Management Alliance	<u>Proposed sites which may impact NRIDB:</u>			Comments welcomes and will be given regard through our site analysis process. At this time none of the identified sites are proposed as preferred allocations in the draft Plan.
	Parish and Site Reference	Comments (Regulation)	Flood Risk*	
	Billingham			
	LPR/CS4/DEV/159	Major development partially within NRIDB's IDD. Proposed site is adjacent to Board maintained watercourses MN 28 – Billingham (Drain ID's: DRN105G0102 & DRN105G0101), located to the south of the site. Consent would be required from the Board for any works within 9 metres of this watercourse, as well as any alterations or discharges to this watercourse/any riparian watercourse within the Board's IDD.	Known flood risk concerns. Best practice for the disposal of surface water should be followed, as per the SuDS hierarchy and Non-Statutory technical standards for sustainable drainage systems.	
	Gressenhall			
LPR/C4S/DEV/078	Minor development within NRIDB's IDD. Proposed site is adjacent to Board maintained watercourse MN 32 - Gressenhall Dunfer Hall (Drain ID: DRN103G0101), located to the south of the site. Consent would be required from the Board for any works within 9 metres of the watercourse, as well as any alterations or discharge to the watercourse/any riparian watercourse within the Board's IDD.	Known flood risk concerns. Surface water run-off will need to be well managed to ensure this is not further increased, as per paragraph 167 of the National Planning Policy Framework. The Board strongly recommend that at the detailed design stage, where practicable, SuDS are utilised on the development, in line with the Non-Statutory technical standards for sustainable drainage systems.		
Hockering				
LPRC4SDEV400	Major development partially within NRIDB's IDD. Consent would be required from the Board for alterations or discharges to any riparian watercourse within the Board's IDD.	Known flood risk concerns. Proposed dualling of the A47 and associated infrastructure will impact nearby watercourses within the NRIDB's district. Therefore, surface water run-off will need to be well managed to ensure this is not further increased, as per paragraph 167 of the National Planning Policy Framework. The Board strongly recommend that at the detailed design stage, where practicable, SuDS are utilised on the development, in line with the Non-Statutory technical standards for sustainable drainage systems.		

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Page 3		Water Management Alliance
LPR/CS4/DEV/351	Major Development within the watershed catchment of NRIDB, adjacent to an ordinary watercourse.	<p>Whilst outside the Board's IDD, the watercourse adjacent to the proposed site is known to have capacity issues. Any additional rate or volume introduced to this watercourse could increase flood risk.</p> <p>The Board strongly recommends that (at the detailed design stage in the planning process) a surface water discharge proposal in line with the drainage hierarchy is submitted. Our recommendation is to ensure that surface water run-off will be well managed to ensure this is not further increased, as per paragraph 167 of the National Planning Policy Framework.</p>
North Elmham		
LPR/C4S/DEV/283 LPR/C4S/DEV/285	<p>Major development within the Board's IDD. The nearest Board maintained watercourse (MN 35 - E. Bilney/Beetley, DRN101G0101) lies south, outside the development boundary for site LPR/C4S/DEV/283.</p> <p>Whilst unlikely due to the site's location, consent would be required for works within 9 metres of this watercourse. In addition, consent from the Board would be required for any proposed discharges/alterations to this watercourse/any ordinary watercourses within the IDD.</p>	<p>Known flood risk concerns. The Board has concerns with the downstream network's capacity of site LPR/C4S/DEV/283.</p> <p>Therefore, surface water run-off will need to be well managed to ensure this is not further increased, as per paragraph 167 of the National Planning Policy Framework.</p>
LPR/C4S/DEV/120	<p>Minor development within the Board's IDD. The nearest Board maintained watercourse (MN 39 – Elmham, DRN099G0102) lies north, outside the development boundary.</p> <p>Whilst unlikely, should any alterations/discharges to the watercourse be proposed during the detailed stage of the planning process, consent from the Board would be required. In addition, consent would be required for works within 9 metres of this watercourse. Consent would also be required for any proposed discharges/alterations to any riparian watercourses within the IDD.</p>	<p>The Board strongly recommend that at the detailed design stage, where practicable, SuDS are utilised on the development, in line with the Non-Statutory technical standards for sustainable drainage systems.</p>
LPR/C4S/DEV/215	Major development partially within NRIDB's IDD. Consent would be required from the Board for alterations or discharges to any riparian watercourse within the Board's IDD.	
Scarning		
LPR/C4S/DEV/068 (Site A)	Site A of the proposed sites at the former nurseries' location is within	Best practice for the disposal of surface water should be

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	<p>NRIDB's IDD. Consent would be required from the Board for any alterations or discharge to any riparian watercourse (excluding Main Rivers) within the Board's IDD.</p> <p>Whilst outside the Board's IDD, if at the detailed design stage Site B intended to discharge into a watercourse within the IDD, consent would be required.</p>	<p>followed, as per the SuDS hierarchy and Non-Statutory technical standards for sustainable drainage systems.</p>
Wendling		
LPR/C4S/DEV/383	<p>Major development within NRIDB's IDD. Consent would be required from the Board for alterations or discharges to any riparian watercourse within the Board's IDD.</p>	<p>Known flood risk concerns. Best practice for the disposal of surface water should be followed, as per the SuDS hierarchy and Non-Statutory technical standards for sustainable drainage systems.</p>
<p>*Flood risk information publicly available here: https://check-long-term-flood-risk.service.gov.uk/map</p>		
<p>Parishes within the watershed catchments of either WLYLIDB or NRIDB:</p>		
Parish Name	IDB	Comments
Banham, Bradenham, Carbrooke, Kenninghall, Necton, Saham Toney, Sparham, Sporle, Swaffham, Whissonsett	Parishes partially within or within the watershed catchment of NRIDB	No submitted sites in these parishes are within the Board's wider watershed catchment, however, if any additional sites within the IDD's watershed come forward during the local plan process, we request that any surface water discharge is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).
South Lopham	Parish within the watershed catchment of WLYLIDB	Major developments in these parishes are within/partially within the Board's watershed catchment. Whilst outside the Board's IDD, we request that any proposed surface water discharges within the watershed catchment of the Board's IDD is facilitated in line with the Non-statutory technical standards for sustainable drainage systems (SuDS).
Bawdeswell, Beeston, Beetley, Bintree, Brisley, Colkirk, Dereham, Foxley, Fransham, Garvestone, Great Dunham, Hockering, Hoe, Litcham, Little Dunham, Longham, Mattishall, Mileham, Narborough, North Elmham, North Tuddenham, Scaming, Shipdham, Swanton Morley, Weasenham	Parishes within the watershed catchment of NRIDB	Any proposed sites which may be in the Board's wider watershed catchment, but adjacent to the Board's IDD may be subject to the Board's

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	<p>Page 5</p> <table border="1" data-bbox="439 236 1189 355"> <tr> <td data-bbox="439 236 692 355"></td> <td data-bbox="692 236 922 355"></td> <td data-bbox="922 236 1189 355"> <p>Water Management Alliance Byelaws (i.e. the discharge of surface water to a watercourse within the IDD would require consent from the Board under Byelaw 3).</p> </td> </tr> </table>			<p>Water Management Alliance Byelaws (i.e. the discharge of surface water to a watercourse within the IDD would require consent from the Board under Byelaw 3).</p>	
		<p>Water Management Alliance Byelaws (i.e. the discharge of surface water to a watercourse within the IDD would require consent from the Board under Byelaw 3).</p>			
<p>Natural England</p>	<p>Natural England provides the following comments: Sustaining rural community services and which parishes have been identified as Local Service Centres.</p> <p>a) Do you agree with the methodology for deciding which parishes should be Local Service Centres?</p> <p>Natural England acknowledges that currently, Local Service Centres are set with a level of development of 10% of the estimated number of households, and villages with boundaries at a level of 7% (paragraphs 4.10 and 4.11, Breckland Local Plan Full Update: Issues and Options Report for Consultation)¹.</p> <p>As set out in paragraph 185 (b) of the National Planning Policy Framework (NPPF)², “To protect and enhance biodiversity and geodiversity, plans should promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.” Natural England welcomes the consideration given to the impacts on designated sites when deciding which parishes should be defined Local Service Centres. This has been demonstrated in the decision to not include Weeting as a Local Service Centre. This is because it is within the 1.5km zone around Breckland Special Protection Area (SPA), where there is potential for new built development to negatively impact on stone curlew, an interest feature of the site.</p> <p>¹ Breckland Local Plan Full Update: Issues and Options Report for Consultation (Breckland Council, March 2023). Available at: https://www.breckland.gov.uk/media/20470/Issues-and-Options-Consultation-Paper/pdf/Breckland_District_Local_Plan_Issues_and_Options_March_2023.pdf?m=1683113139857</p>				

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	<p>2 National Planning Policy Framework (Department for Levelling Up, Housing & Communities, December 2023). Available at: https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf</p> <p>2) Further measures to protect Breckland’s countryside and different ways to think about defining settlements – towns and villages –across the district. Should Breckland continue with a settlement boundary approach or develop a robust criteria-based policy? Natural England’s existing guidance on assessing impacts of residential development on stone curlew in Breckland SPA, uses the settlement boundaries found in the current Breckland Local Plan (referenced in policies GEN 03, HOU 03, HOU 04 and HOU 05)3. Should an alternative criteria-based policy be adopted, your Authority’s criteria to guide development and allocate land should take forward relevant policies of the NPPF, which support the natural environment, such as to:</p> <ul style="list-style-type: none"> •conserve and enhance the natural environment, including landscapes and green infrastructure (GI) (section 15, NPPF) •make as much use as possible of previously developed or ‘brownfield’ land (paragraphs 123 and 124, NPPF) •allocate land with the least environmental or amenity value (paragraph 181, NPPF). <p>3) Alternative development strategy options to help decide the best way to accommodate future growth in Breckland. a) Proposed development strategy options:</p> <ul style="list-style-type: none"> •Market town focus •Urban/rural split •Maximise strategic sites •Maximise strategic sites and urban/rural split •Urban/rural split (including villages with boundaries •Maximise strategic site and urban rural split (including villages with boundaries) 	<p>Comments and advice noted. The draft Plan is proposing a criteria based approach which is part of the consultation and feedback will be used to assess the effectiveness of such an approach.</p>
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	<p>If you think there are any other development strategies that could be considered, or areas that you think should have more or less development, please share your ideas.</p> <p>Please refer to Natural England’s comments on relevant policies of the NPPF provided in response to issue 2 (detailed above), which also apply to setting the spatial strategy.</p> <p>4) Potential development sites and a new proposed criteria on deciding which sites shared during the Call for Sites might be suitable.</p> <p>a) Do you agree with this new criteria for assessing sites?</p> <p>Although Natural England does not required consultation on call for sites, we offer the following advice to consider for the new criteria.</p> <p>The strategy for allocating land for development should:</p> <ul style="list-style-type: none"> •avoid protected sites and apply the biodiversity mitigation hierarchy (NPPF, paragraph 185a) •give great weight to conserving and enhancing designated landscapes (NPPF, paragraph 182). •avoid the loss of best and most versatile agricultural land (NPPF, paragraph 180b). <p>Selecting sites and setting design principles for their delivery should conserve and enhance the</p> <p>3 Breckland Local Plan (Breckland Council, September 2023). Available at: https://www.breckland.gov.uk/media/16659/Adopted-Breckland-Local-Plan/pdf/Appendix_4_-_Breckland_District_Council_Local_Plan.pdf?m=1704795365193</p> <p>natural environment. An appropriate evidence base should be used to support the selection of sites and inform the policies for their delivery. This should include:</p> <ul style="list-style-type: none"> •Landscape and Visual Impact Assessments, Landscape Sensitivity Assessments and Landscape Character Assessments. •Soil surveys and mapping (Agricultural Land Classification available on Magic maps) •Ecological surveys, green infrastructure and biodiversity opportunity mapping. 	<p>Recommendations regarding the Natural England GI Framework and its role in supporting allocations and the integration of GI into policy and development are welcomed.</p>
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	<p>Plans should set requirements, opportunities and detailed design guidance for site allocations to conserve and enhance the natural environment. This should include measures secured through policy covering:</p> <ul style="list-style-type: none"> •Biodiversity Net Gain⁴ (BNG): BNG is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Your Authority should set policies to support BNG. Allocations should be supported by a baseline assessment of biodiversity value using the Statutory Biodiversity Metric⁵. •Green Infrastructure (GI) strategy: Natural England has produced the ‘Green Infrastructure Framework Principles and Standards for England’ as part of the Government’s 25 Year Environment Plan to deliver more and better-quality GI to enhance towns and cities, and create attractive, healthy and investable places. The GI Framework helps local planning authorities meet requirements in the National Planning Policy Framework to consider GI in local plans and in new developments and can be utilised when updating local plans and formulating policy. Allocations should set out measures to protect, enhance and improved connectivity of GI within and beyond allocation sites. Consideration should also be given to setting appropriate GI standards for allocation sites. Please reference to Natural England’s Green Infrastructure Framework⁶ for further guidance. •Landscape features: Allocation policy should incorporate and enhance existing landscape features within the development. This could include hedgerows, walls, ancient and veteran trees, woodland and wildlife corridors. •Agricultural land and soils: Allocations should be based on a detailed soils survey and have policies that secure a soil management plan. •Access: Policies for allocations should incorporate and enhance public access to the natural environment. This includes Public Rights of Way that run through or adjacent to allocated sites, as well as linking from the site to the wider route network. 	
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	<p>Breckland Special Protection Area (SPA):</p> <p>Listed below are sites that appear to be within 400m of Breckland Forest SSSI, a component part of Breckland SPA designated for woodlark and nightjar. Within this distance, there is potential for disturbance to these species through recreation, light spill and construction impacts. Natural England supports your existing plan policy that development within this zone will not normally be permitted. It is therefore advised that an appropriate assessment should be undertaken to assess the potential impacts to these features and determine whether any mitigation is required to ensure there would be no adverse effect on the integrity of Breckland SPA.</p> <p>Site references: 246 360 151 152 361 109 172 243</p> <p>It is a little unclear how RAG has been applied to the column labelled Breckland SPA as it is noted that some sites have been highlighted as red, but they are over 1.5km from the site. Is there another reason for the red rating?</p> <p>For proposals within the 1.5km constraint zone around the Breckland SPA, where likely significant effects on stone curlew that are a feature of the SPA cannot be ruled out, an appropriate assessment will need to be carried out. Again, the appropriate assessment will need to demonstrate there would not be an adverse effect on the integrity of Breckland SPA.</p>	
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	<p>Air Quality - River Wensum Special Area of Conservation (SAC), Norfolk Valley Fens SAC, Waveney & Little Ouse Valley Fens SAC, Breckland SAC.</p> <p>Another impact that should be taken into consideration is air quality. With regards to air quality screening, if there is a European designated site less than 200m from a main access road for a development, it could have a likely significant effect on the designated site and should be assessed in an appropriate assessment. Please refer to Natural England’s approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations - NEA001 for further guidance.</p> <p>Nutrient Neutrality - River Wensum SAC and/or Broads SAC and Broadland Ramsar</p> <p>The list provided has identified that a few of the proposed allocations are in the nutrient neutrality catchment. The HRA will need to show that there will be no adverse effect from nutrient impacts on European designated sites (the River Wensum SAC and/or Broads SAC and Broadland Ramsar). We would advise that a plan-level nutrient budget is provided, and it should be demonstrated that options are available to offset this burden. Things to consider would be the sub-catchments in which the allocations fall and identifying the treatment works for each allocation, as this will have implications on where mitigation will need to be provided. It would also be beneficial to consider the time phasing of the developments, to take account of the impacts of the Levelling Up and Regeneration Act (LURA) and the required updates to eligible wastewater treatment works (WwTWs) to operate at technically achievable limits (TAL) by 2030.</p> <p>For sites of larger allocations, such as Robertson Barracks at Swanton Morley, it would be useful to demonstrate what bespoke mitigation options would be available.</p>	
<p>Historic England</p>	<p>Integrated Assessment Scoping</p>	<p>Comments noted and will be taken into consideration</p>

	<p>The historic environment should be considered as part of the sustainability appraisal process. We recommend that these comments should be read alongside our Advice Note 8. https://historicengland.org.uk/images-books/publications/sustainabilityappraisal-and-strategic-environmental-assessment-advice-note-8/</p> <p>Our response addresses each of the questions raised on page 180 of the Scoping Document. These questions are set out as bullet points below.</p> <p>We also provide responses to other parts of the scoping document.</p> <p>Chapter 8 Historic Environment Historic Environment Policy Context.</p> <ul style="list-style-type: none"> • WHETHER THERE ARE ANY ADDITIONAL PLANS, POLICIES OR PROGRAMMES THAT ARE RELEVANT TO THE IA AND SHOULD BE INCLUDED IN RELATION TO THE RELEVANT TOPIC AREAS ADDRESSED BY THE SCOPING REPORT. <p>We welcome the inclusion of many of these Plans and Programmes in the Review. We particularly welcome the inclusion of several Historic England Advice Notes. In addition, we recommend the inclusion and consideration of the following:</p> <p>International/European</p> <ul style="list-style-type: none"> • European Landscape Convention • The European Convention on the Protection of Archaeological Heritage – This is the Valetta Treaty – please add full title on p118 <p>National</p> <ul style="list-style-type: none"> • National Planning Practice Guidance • Managing Significance • The Setting of Heritage Assets • GPA1 • HEAN3 <p>Local</p> <ul style="list-style-type: none"> • Local Plans (Breckland and adjoining authorities as well as Norfolk Minerals and Waste Plans) • Norfolk Local Transport Plan 	<p>for further iterations of the IA.</p> <p>Additionally, BDC are aware of the importance of undertaking additional assessment work to understand in further detail the potential impact of proposals upon heritage assets and intend to prepare a Heritage Impact Assessment to support later iterations of the Plan.</p>
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	<ul style="list-style-type: none"> • Historic Environment Record • Heritage/Conservation Strategies • Other Strategies (e.g. cultural or tourism) • Conservation Area Character Appraisals and Management Plans • Listed building Heritage Partnership Agreements Baseline • WHETHER THE INFORMATION INCLUDED IN RELATION TO EACH TOPIC AREA IS ROBUST AND COMPREHENSIVE AND PROVIDES A SUITABLE BASELINE FOR THE IA OF THE LOCAL PLAN FULL UPDATE. <p>We welcome the identification of designated heritage assets (Listed Buildings, Scheduled Monuments, Registered Parks and Gardens) within the area. The number of Conservation Areas should also be identified (at present the text only identifies Conservation Areas at Risk). Mapping these assets provides a greater indication of their distribution and highlights sensitive areas. We therefore welcome the map on page 122.</p> <p>However, we would stress that assessing the potential impact of development on the significance of heritage assets requires more than a simple mapping of the location of those assets and identification of those assets on or in proximity to potential sites. Our Historic England Advice Note 3 sets out a sequential approach to assessing the impact on significance.</p> <p>We also would expect non-designated heritage assets to be identified. These include, but are not confined to, locally listed buildings. At the moment, these are not identified.</p> <p>In addition to the above, we would expect reference to currently unknown heritage assets, particularly sites of historic and archaeological interest. The unidentified heritage assets of the area should be acknowledged and outlined in this section.</p> <p>We also suggest that you use the word setting in relation to heritage assets.</p> <p>We welcome the reference to Heritage at Risk at paragraphs 8.8 and 8.9. Please can you double check the reference to the grade I listed church of St Mary at North Tuddenham. It does not appear to be on the 2023 Heritage at Risk register.</p> <p>Identification and mapping of designated and non-designated heritage assets at risk can provide an indication of clusters and themes.</p>	
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	<p>Finally, we recommend that you refer to historic landscapes and townscapes.</p> <p>Evidence</p> <p>Historic England’s Good Practice Advice Note 1 contains advice on other relevant sources of evidence. These include Conservation Area Appraisals and Management Plans, Local Lists, Historic Characterisation assessments and any other in-house and local knowledge. We recommend that these other sources of evidence are considered as part of the SA process.</p> <p>Landscape Character Assessment is the process of identifying and describing variation in the character of the landscape. It seeks to identify and explain the unique combination of elements and features (characteristics) that make landscapes distinctive. This process results in the production of a Landscape Character Assessment.</p> <p>We suggest that you also refer to Historic Landscape Characterisation data in your assessment. We refer you to our website which includes some helpful guidance in this regard and sets out some of the differences between this and Landscape Character Areas.</p> <p>https://historicengland.org.uk/research/methods/characterisation/historic-landscapecharacterisation</p> <p>It is our view that Historic Landscape Characterisation (HLC) provides exactly the sort of landscape-scale information which should assist an SEA; giving perspective on the relative character of the wider area into which alterations to the character of any particular part might be weighed.</p> <p>HLC is an inherently comprehensive and generalising approach, all about providing context to the understanding of the particular and about the management of change everywhere. We consider that the HLC approach is applicable and highly relevant to informing SEA. In fact, all of the commissioned County-level HLCs were designed to inform strategic level planning. (It should also be noted that HLC can be undertaken at any scale, including coarser or finer grained work - HLC is also a principled approach which can be, and is being, undertaken at a range of scales).</p> <p>Finally, and perhaps most importantly, we would expect to see Heritage Impact Assessments (see 5 step methodology on page 5 of Historic England’s Site</p>	
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	<p>Allocations in Local Plans Advice Note) for potential site allocations. See more information on this below.</p> <p>Key Sustainability Issues</p> <ul style="list-style-type: none"> • WHETHER THERE ARE ANY ADDITIONAL KEY SUSTAINABILITY ISSUES THAT SHOULD BE INCLUDED. <p>Issues</p> <p>Para 8.13 identifies two sustainability issues in relation to the historic environment. These are a helpful starting point.</p> <p>Other Key Sustainability Issues for the Historic Environment could include:</p> <ul style="list-style-type: none"> • Conserving and enhancing designated and non-designated heritage assets and the contribution made to their significance by their settings • Heritage assets at risk from neglect, decay, or development pressures. • Areas where there is likely to be further significant loss or erosion of landscape/seascape/townscape character or quality, or where development has had or is likely to have significant impact (direct and or indirect) upon the historic environment and/or people’s enjoyment of it • Traffic congestion, air quality, noise pollution and other problems affecting the historic environment <p>Opportunities</p> <p>Para 8.14 We welcome the opportunities identified at paragraph 8.14. It is considered that the historic environment can make a significant contribution to the success of development and there may be opportunities for the enhancement of the historic environment which comes from sustainable development proposals. It is considered that the IA should highlight these opportunities. Other example opportunities for the historic environment to include within the IA can be found in our guidance notes in the links above.</p> <p>SEA Objectives</p> <p>The objectives and questions identified on page 124 provide a useful starting point for the historic environment.</p> <p>Whilst recognising that the number of objectives needs to be manageable, we recommend the objectives below:</p> <p>Environmental Objectives</p>	
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	<ul style="list-style-type: none"> • Protect, enhance and manage the character and appearance of landscapes/seascapes/townscapes, maintaining and strengthening local distinctiveness and sense of place • Protect, manage and improve local environmental quality • Achieve high quality sustainable design for buildings, spaces and the public realm <p>Social Objectives</p> <ul style="list-style-type: none"> • Improve and broaden access to the local historic environment • Provide better opportunities for people to understand local heritage and participate in cultural and leisure activities <p>Economic Objectives</p> <ul style="list-style-type: none"> • Foster heritage-led regeneration and address heritage at risk • Optimise the use of previously developed land, buildings and existing infrastructure • Promote heritage-led sustainable tourism • Support the sustainable use of historic farmsteads <p>IA Framework</p> <ul style="list-style-type: none"> • WHETHER THE IA FRAMEWORK (INCLUDED IN CHAPTER 10) IS APPROPRIATE AND INCLUDES A SUITABLE RANGE OF OBJECTIVES. <p>With regard to decision making criteria/questions, we welcome the decision-making criteria identified at 8b on page 144.</p> <p>Other criteria/questions that you could consider including are as follows:</p> <p>Environmental: will the policy or proposal</p> <ul style="list-style-type: none"> • Improve the quality and condition of the historic environment? • Respect, maintain and strengthen local character and distinctiveness? • Promote high quality design? • Integrate climate change mitigation and adaptation measures into the historic environment sensitively? • Alter the hydrological conditions of water-dependent heritage assets, including organic remains? <p>Social: will the policy or proposal</p> <ul style="list-style-type: none"> • Increase the social benefit (e.g. education, participation, citizenship, health and well-being) derived from the historic environment? 	
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	<ul style="list-style-type: none"> • Improve the satisfaction of people with their neighbourhoods as places to live? • Engage communities in identifying culturally important features and areas? • Provide for increased understanding and interpretation of the historic environment? • Provide new leisure, recreational, or cultural activities? • Support and widen community uses through shared facilities? <p>Economic: will the policy or proposal</p> <ul style="list-style-type: none"> • Increase the economic benefit derived from the historic environment? • Promote heritage-led regeneration? • Lead to the repair and adaptive re-use of a heritage asset and encourage high quality design? • Make the best use of existing buildings and physical infrastructure? • Promote heritage based sustainable tourism? • Ensure that repair and maintenance is sympathetic to local character? • Help to reduce the number of vacant buildings through adaptive re-use? <p>Assessment Criteria</p> <p>In developing assessment criteria, we would advise against a purely distance based approach. The impact of proposals on the significance of heritage assets should be taken into consideration at an early stage. In terms of projects, this should be based on more than just measuring the proximity of a potential allocation to heritage assets.</p> <p>Impacts on significance are not just based on distance or visual impacts, and assessment requires a careful judgment based on site visits and the available evidence base. This is preferred to the application of a standard proximity test (e.g. is the site within a set distance of a heritage asset) as it avoids misleading results (Our Historic England Advice Note 3 sets out a sequential approach to assessing the impact on significance).</p> <p>We would suggest that you avoid summing the scores indicating how each proposal performs against the criteria to give an aggregate contribution to each relevant SA objective since such an approach may inadvertently mask ‘showstoppers’ by effectively averaging out the scores. There needs to be some mechanism of identifying where an impact is so great that the proposal should not be progressed.</p>	
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	<p>Method for Generation of Alternatives The historic environment should be a factor when considering a method for the generation of alternative proposals.</p> <p>Archaeology Scoping and evaluation of archaeological and landscape impacts needs to be an iterative process where existing sources (HER’s cartographic etc. and research frameworks e.g. https://archaeologydataservice.ac.uk/researchframeworks/eastmidlands/wiki/ are consulted, work is done to explore those questions and new questions asked (including lidar, aerial survey, geophysical survey, field walking, deposit modelling see our new guidance https://historicengland.org.uk/imagesbooks/publications/deposit-modelling-and-archaeology/heag272-deposit-modellingand-archaeology/, trial trenching). These techniques should be used to model risk and build a robust approach to understanding that through any project so the greater heritage and project delivery risks are targeted first so they can inform minimisation and timely mitigation)</p> <p>Other Assessment methodologies Finally, we would add that whilst this assessment process is a vital part of the assessment, more detailed assessment of particular aspects may be necessary going forward for particular sites/schemes. For example, Historic England would expect to see the completion of a Heritage Impact Assessment as part of the evidence base for certain sites/proposals likely to have an impact on the significance of heritage assets (including development within the setting of the heritage assets). The Historic Environment and Site Allocations and Local Plans - Advice Note 3 sets out a methodology for heritage impact assessment for site selection on page 5. We would be happy to provide further advice in this regard if and where this may be necessary as part of the evidence base for transport proposals.</p> <p>2) Initial IA findings</p> <ul style="list-style-type: none"> • Whether the appraisal findings are clear and justified. 	
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	<ul style="list-style-type: none"> • Whether there are any further issues relating to the options appraised that should be reported on in the IA. <p>It would appear that all 10 different development scenarios are anticipated to have significant negative effects on the historic environment (page 158, and paras 11.34 and para 11.48). There is no differentiation given in this assessment.</p> <p>The findings are currently very general and do not differentiate between the options in terms of impacts on the historic environment.</p> <p>Clearly as alternative sites are explored further, we would expect greater analysis informed by heritage impact assessments to help differentiate between different broad options and individual sites in terms of impacts on the historic environment. At the moment there is insufficient analysis of historic environment impacts to make meaningful decisions.</p> <p>On a presentational note, on page 158, the - - do not show through the purple shading. Also, the purple colour is not the same as that shown in the key in Table 10.1 on page 152. The findings as currently presented on page 158 are not clear and should be clarified.</p> <p>Breckland Local Plan Regulation 18 Consultation on Key Areas</p> <p>SUMMARY</p> <p>Whilst our response sets out a number of detailed comments in relation to S106, strategic sites, settlement boundaries and settlement hierarchy, our key message in this response is the need for an appropriate level of heritage impact assessment (HIA) now to inform the selection of sites for inclusion in the Plan in accordance with our Advice Note 3: The Historic Environment and Site Allocations and Local Plans - Advice Note 3</p> <p>1 Alternative Development Strategy Options Viability and Developer Contributions</p> <p>We are pleased to see reference to heritage in Paragraph 2.5 with regard to S106. Historic England therefore encourages charging authorities to consider identifying the ways in which S106 agreements and CIL can be used to implement Local Plan</p>	
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	<p>policy and proposals relating to the conservation of the historic environment, heritage assets and their setting. This will help to satisfy national planning policy (NPPF paragraphs 8, 20 and 196).</p> <p>Large scale strategic options The consultation document references several larger strategic options for growth. The boundaries of these potential sites are not clear from the consultation material, but we have included some initial comments on these broad areas and the likely heritage considerations in respect of each option.</p> <p>a) North Elmham Garden Village There are a number of designated heritage assets nearby including Elmham Registered Park and Garden listed at Grade II and North Elmham Conservation Area. The scheduled monument of the Episcopal chapel and fortified manor house on site of Anglo-Saxon cathedral is within the village. There are also a number of listed buildings including the grade I Church of St Mary, grade I ruined church and manor house, grade II* Shettles and several grade II listed buildings. Any development of a garden village in this area would have the potential to impact upon these designated heritage assets and their settings. We appreciate that the consultation document highlights that there was very significant opposition to this site in the previous Issues and Options consultation.</p> <p>b) Land north of Station Road and East of Fakenham Road, Billingford The grade I listed Church of St Peter lies to the south of the site in Billingford. Beck Hall and Beck Hall Barn, the School Room, Billingford Hall, Ice House, Billingford Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU Lodge (all listed at grade II) and a Roman roadside settlement scheduled monument also lie to the south of the site. To the north of the site in the village of Bintree lies the grade II* church of St Swithin and several grade II listed buildings and structures.</p>	
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	<p>To the west, beyond Bintree woods, lies North Elmham and its wealth of heritage assets including Elmham Registered Park and Garden listed at Grade II and North Elmham Conservation Area. The scheduled monument of the Episcopal chapel and fortified manor house on site of Anglo-Saxon cathedral is within the village. There are also a number of listed buildings including the grade I Church of St Mary, grade I ruined church and manor house, grade II* Shettles and several grade II listed buildings.</p> <p>To the east of the site lies the grade II* listed Church of St Thomas and two grade II listed buildings.</p> <p>Development in this broad area has the potential to impact upon the significance of these designated heritage assets through a change in their setting.</p> <p>We note that paragraph 6.1 states that the Council considers that further consideration of this site would be inappropriate for a number of reasons.</p> <p>c) The Swanton Morley Barracks Robertson Barracks at Swanton Morley includes the grade II listed Control Tower. St Margaret’s church, GII* listed lies to the north of the site. Any redevelopment of the barracks would need to give careful consideration to any impacts on these designated heritage assets and their settings. An HIA is required.</p> <p>d) The Abbey Estate (Thetford) The Abbey Estate in Thetford lies to the north of the scheduled area of Saxon Town and to the east of the scheduled Cluniac Priory as well as a number of grade I listed buildings (Priory remains, Abbey Farm Cottage, Farm Building and Priory Gatehouse). Thetford Conservation Area extends into the eastern part of the estate. Any redevelopment of the Abbey Estate will need to give careful consideration to any impacts upon the conservation area, scheduled monuments and listed buildings and their settings. An HIA is required.</p> <p>Importance of Heritage Impact Assessment (HIA) to inform site selection. We would re-emphasise the importance of heritage impact assessment to inform the site selection process. Please refer to our letters to you dated 9th May 2022 and</p>	
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	<p>17th May 2023 which set out more detailed advice on site assessment, site selection and heritage impact assessment. Further advice in relation to this is set out at Section 3 of this letter.</p> <p>Six Alternative Development Scenarios</p> <p>We do not have a particular preference for any one of the 6 development scenarios put forward in the consultation material, but we strongly recommend that you take account of the historic environment as you evaluate alternative growth options as well as submissions and sites brought forward from elsewhere.</p> <p>To date there would appear to have been little assessment of the historic environment impacts of alternative scenarios. The IA does not differentiate between the options on the basis of historic environment impacts, primarily because there has been insufficient assessment to date of likely impacts.</p> <p>2 Call for Sites and Site Assessment work</p> <p>We do not have the capacity to review each individual Phase 1 site assessment. We are disappointed to see that heritage is not being considered in Phase 1 of your assessment.</p> <p>We note that you are proposing to assess heritage in Phase 2 of your assessment process. The criterion in relation to the historic environment that you are proposing to use at Phase 2 is:</p> <p>6. Does the site contain or is within proximity to a designated and/or non designated heritage asset (built assets / archaeology)?</p> <p>In our advice letters in May 2022 and May 2023 and at our meeting in July 2023 we made it clear that a purely distance based approach is not considered sufficient for the assessment of heritage impacts for local plan sites.</p> <p>We would very much emphasise that a more holistic approach is needed. Heritage Impact Assessments are needed now as part of Phase 2 to help inform the selection of sites, to confirm the suitability of otherwise of sites and to inform appropriate mitigation and enhancement measures as well as policy wording.</p> <p>All potential sites will need to be appraised against potential historic environment impacts. It is imperative to have this robust evidence base in place to ensure the</p>	
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	<p>soundness of the Plan. We recommend that the appraisal approach should avoid merely limiting assessment of impact on a heritage asset to its distance from, or intervisibility with, a potential site.</p> <p>Site allocations which include a heritage asset (for example a site within a Conservation Area) may offer opportunities for enhancement and tackling heritage at risk, while conversely, an allocation at a considerable distance away from a heritage asset may cause harm to its significance, rendering the site unsuitable. Cumulative effects of site options on the historic environment should be considered too.</p> <p>Historic England advocates a wide definition of the historic environment which includes not only those areas and buildings with statutory designated protection but also those which are locally valued and important, as well as the landscape and townscape components of the historic environment.</p> <p>The importance and extent of below ground archaeology is often unknown, although information in the Historic Environment Record (HER) will indicate areas of known-interest, or high potential where further assessment is required before decisions or allocations are made.</p> <p>Conservation and archaeology staff within the relevant councils should be consulted on matters relating to archaeology, landscape/townscape and the historic environment generally.</p> <p>Assessing sites – Heritage Impact Assessment</p> <p>In order to help refine which growth options and site allocations to take forward, we would suggest that a Heritage Impact Assessment is undertaken of each of these sites. We would refer you to our Advice Note 3 ‘The Historic Environment and Site Allocations in Local Plans’.</p> <p>Our advice note 3 on site allocations in local plans sets out a suggested approach to assessing sites and their impact on heritage assets (also known as Heritage Impact Assessment).</p> <p>In essence, it is important that you:</p> <ol style="list-style-type: none"> a) Identify any heritage assets that may be affected by the potential site allocation. b) Understand what contribution the site makes to the significance of the asset 	
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	<p>c) Identify what impact the allocation might have on that significance d) Consider maximising enhancements and avoiding harm e) Determine whether the proposed allocation is appropriate in light of the NPPFs tests of soundness</p> <p>The HIAs should assess the suitability of each area for development and the impact on the historic environment. Should the HIA conclude that development in the area could be acceptable, and the site be allocated, the findings of the HIA should inform the Local Plan policy including development criteria and a strategy diagram which expresses the development criteria in diagrammatic form. HIAs should be proportionate.</p> <p>In assessing sites, it is important to identify those sites which are inappropriate for development and also to assess the potential capacity of the site in the light of any historic environment (and other) factors.</p> <p>3 Approaches to defining settlements and protecting the countryside from development. Historic England welcomes the final sentence of paragraph 1.4 which is a very important caveat in relation to settlement boundaries and the principle of development.</p> <p>There are advantages and disadvantages to both defining settlement limits and a criteria-based policy. With settlement boundaries, whilst there is clarity, a presumption in favour of development within the boundary could lead to adverse impacts on the historic environment and therefore unsustainable development. If a criteria-based policy is followed we would recommend the addition of an additional criteria to read</p> <ul style="list-style-type: none"> • ‘Conserve and enhance the historic environment including heritage assets’. <p>4 A review of Villages with Boundaries</p>	
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	<p>We note the criteria used to determine which villages should have boundaries in paragraph 4.2 However, criterion 4 is unclear. It sets out what the criterion was in 2017 and then makes a number of comments about what has changed since 2017. But it is not clear from the text exactly how this has been assessed in 2023. Please can you make this clearer.</p> <p>Appendix A seems to set out pro-formas for each village. There is a section on village character which references landscape assessment and listed buildings. Have these characteristics been used in any way to determine if a village should have boundaries? And if so, in respect of the historic environment it might also be appropriate to consider other designated heritage assets (namely Conservation Areas, Registered Parks and Gardens and Scheduled Monuments).</p> <p>5 Local Service Centre Topic Paper</p> <p>We welcome the identification of settlements as Local Service Centres, based on qualifying criteria.</p> <p>We also recommend that further consideration is given as to how the historic environment will be considered in devising the spatial strategy and also the selection of sites for allocation in the Local Plan.</p> <p>For example, it may be that a Local Service Centre is considered very sustainable in terms of number of shops, schools, transport and other services etc., but there be circumstances where historic environment considerations mean there are limited opportunities for growth without harming the historic environment.</p> <p>It is unclear to us how you plan to factor that into your decisions in relation to spatial strategy and site selection. We need to see a robust process for how you intend to achieve this.</p> <p>We note, for example, that Weeting meets the criteria for a local service centre but is not considered to be an appropriate location for new development due to the environmental constraints of the Stone Curlew.</p> <p>The same may be true in respect of heritage constraints around some settlements.</p> <p>The historic environment needs to be factored into any consideration of suitability of settlements to absorb growth, much as has been done in relation to the natural</p>	
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	<p>environment and the Stone Curlew. This should be assessed and any such settlements with heritage capacity constraints identified.</p>	
<p>Norfolk County Council S Faulkner</p>	<p>1.2. Strategic Comments Background</p> <p>1.3. The County Council has supported the overarching sustainable principles set out in the existing Local Plan adopted in September 2023. Support has been made to:</p> <ul style="list-style-type: none"> •Policy GEN 01 (Sustainable Development in Breckland) – this policy makes reference, inter alia, to allocating development which seeks to provide access to homes, employment, retail leisure and other facilities; directing jobs and growth to the most sustainable locations; and co-ordinating development with transport provision ensuring good access to existing community facilities, and services etc; •Policy Gen 03 (Settlement Hierarchy) – this policy directs development to key settlements (Attleborough and Thetford); followed by the Market towns of Dereham, Swaffham and Watton. Sitting below the above towns are the local Services Centres (LSCs). <p>1.4. The existing Sustainable objectives as reflected in the above policies and allocations in the Adopted Local Plan should be carried forward in any Local Plan Review. The latest NPPF (December 2023) reaffirms the Government’s commitment to sustainable development and making effective use of land in urban areas (paragraph 11). The NPPF indicates Local Plans should be prepared with objectives contributing to the achievement of sustainable development (para 16).</p> <p>1.5. Local Service Centre Comments Welcome the review of the existing LSCs and agree:</p> <ul style="list-style-type: none"> (a)Take out Weeting given its proximity to the Brecks Special Protection Area. (b)Addition of Mundford given new public transport links. 	

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<p>(c) Addition of Beeston due to community Pub However, the addition of up to 15 villages with boundaries which only meet 3 of the 5 criteria (below) is not considered appropriate as all the criteria as set out in the Adopted Local Plan, paragraph 216, (2023) should be met covering:</p> <ul style="list-style-type: none"> • a primary school, • a village shop, • public transport, • a community facility (such as a village hall, pub, restaurant or cafe) and employment. <p>1.6. Over-arching Strategic Comments Development Strategy Options</p> <p>1.7. The County Council recognises the rural nature of Breckland and challenges it faces in allocating housing and employment growth up to 2046. It is understood from officer-level meeting with the District Council that approximately 4,500 of new housing will be required up to 2046 in addition to existing allocations, commitments and windfall allowances.</p> <p>1.8. It is strongly felt that this level of housing growth (4,500) should be directed having regard to the existing settlement hierarchy (Policy GEN 03); and the sustainable principles set out in Policy GEN 01 of the Adopted Local Plan. It is accepted that no further strategic housing growth is needed in Thetford and Attleborough given the existing levels of allocation as set out in their respective Strategic Urban Extension (SUEs). As such growth should be focussed on the next tier down in the settlement hierarchy in the market towns outlined in Option A of the Local Plan Development Options Report.</p> <p>1.9. Focussing future growth in the Market towns (Option A) would ensure that the existing sustainable principles being met in terms of:</p> <ul style="list-style-type: none"> • linking housing and employment growth; and 	<p>Only settlements that meet all 5 criteria are considered or proposed as Local Service Centres. The consultation on updates to the settlement hierarchy simply confirmed these settlements as Secondary Villages (previously Villages with Boundaries in current Local Plan) – there is no proposal for settlements with 3 or 4 of 5 criteria to be designated as anything other than a Secondary Village.</p>
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	<p>•enabling these market towns to build on their existing infrastructure and services to deliver growth sustainably.</p> <p>1.10. Clearly there will need to be commensurate improvements and expansion of infrastructure and services to support planned growth, particularly in respect of sustainable transport and education provision in order to bring forward the levels of growth anticipated up to 2046. Focussing growth as set out in Option A will allow for a growth to be managed, and services and infrastructure upgraded in a comprehensive and sustainable way, which a more dispersed pattern of growth could not achieve. In addition, this growth option will allow for greater certainty that developer funding can be achieved in respect of the key infrastructure and services.</p> <p>1.11. Criteria for development</p> <p>1.12. The criteria referred for site selection need to include:</p> <ul style="list-style-type: none"> •Proximity to local Schools (Primary and Secondary). •Safe Walking Routes to Schools. •Proximity to local services – shops; health care, banks; post office. •Proximity to employment area. •Proximity to public transport provision. •Proximity to leisure and entertainment facilities. <p>2. Strategic Transport</p> <p>2.1. Do you agree with the methodology for deciding which parishes should be Local Service Centres? Please give the reasoning for your answer. Yes, as it accords with previous reasoning.</p> <p>2.2.</p>	
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	<p>Should Breckland continue with a settlement boundary approach or develop a robust criteria-based policy? Please give the reasoning for your answer.</p> <p>A settlement boundary approach should be continued, as it prevents more dispersed development that leads to more trips on the transport networks and likely to increase the use of the private car as well as making service accessibility less easy by sustainable modes.</p> <p>2.3.</p> <p>Rank the six alternative development scenarios in order of preference. If you think there are any other development strategies that could be considered, or areas that you think should have more or less development, please share your thoughts.</p> <p>Option A is supported with the remaining options raising significant transport / highway concerns, particularly the 2,000 dwellings proposed at Swanton Morley. The proposed level of growth at Swanton Morley (Options C, D and F) raises issues as the scale is not large enough to support secondary education and other significant services, which will lead to increased need to travel. Current links would need to be significantly improved and more evidence is required on issues of scale and connectivity before the site could be assessed for allocation. As such 2,000 houses is not supported in highway and transport terms at Swanton Morley. The chosen distribution will need to be evidenced by an area wide transport assessment that considers the impacts on the strategic connections and the ability to maximise the opportunities to travel by public transport and active travel. Large scale growth in Dereham will need to demonstrate that the local transport impacts can be managed, and deliverable mitigation is available that meets the requirements of the Highway authority. Consideration will need to be given to the current Local Transport Plan, the Bus Service Improvement Plan and other relevant policies and strategies of the County Council.</p> <p>2.4.</p> <p>Do you agree with these new criteria for assessing sites? Explain your answer or comment in more detail on aspects of the proposed criteria.</p>	<p>Noted, it is recognised that proposals for any development at Swanton Morley – Robertson Barracks require appropriate evidence to understand the sustainability of the development and highway impacts. The potential constraints on development are recognised and the site will be defined as one of three alternative strategic options within the draft Local Plan.</p> <p>Noted, proposals for growth at Dereham will be identified as a strategic option with further evidence including a transport assessment to consider highway impacts to be prepared.</p>
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	<p>4.3. Do you agree with the methodology for deciding which parishes should be Local Service Centres? Please give the reasoning for your answer. No concerns ecologically on the methodology. Although, as identified in the document, some ecological constraints will need to be considered “5.3 It is considered that although Weeting meets all the criteria for a Local Service Centre, due to the strict environmental constraints of the Stone Curlew Buffer around the village, it is not considered to be an appropriate location for new development. However, for consistency, it is still to be designated as a Local Service Centre.” It is also important to note that BNG will be in effect from February 12th, 2024, and the delivery of BNG either on or off site may change the nature of deployment.</p> <p>4.4. Should Breckland continue with a settlement boundary approach or develop a robust criteria-based policy? Please give the reasoning for your answer.</p> <p>4.4. Should Breckland continue with a settlement boundary approach or develop a robust criteria-based policy? Please give the reasoning for your answer. With regard to Ecology, either approach will undergo the same checks (SSSI Impact zones, SPA, SAC, and RAMSAR sites, non-statutory sites, and protected species) regardless of the selection policy. It is easier to use the boundary approach to mitigate some of these risks ahead of site selection, for example an area within a protected sites with known protected species present could be outside of the boundary and therefore less likely to be impacted directly though habitat loss act.</p> <p>4.5. Rank the six alternative development scenarios in order of preference. If you think there are any other development strategies that could be considered, or areas that you think should have more or less development, please share your thoughts. At this scale it is not effective to make a ranking of these based on Ecological considerations. As stated above many of these areas (both urban and rural) can be right next to or part of sensitive sites, and many species that are protected live within urban areas (e.g. Bats).</p>	
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	<p>4.6. Do you agree with these new criteria for assessing sites? Explain your answer or comment in more detail on aspects of the proposed criteria. Assessment of sites at this scale can be difficult as there are a number of features and data sets that are important to consider; Great Crested Newts Risk zones, SSSI Impact zones, Statutory and non-statutory sites, and many others. The criteria outlined in the proposals for site selection can have great impact on ecological features of the district but are not defined in accordance with it. This would be site selection to mitigate pressures of statutory sites, site selection to deliver BNG to support (met)populations of species in decline and so on.</p> <p>4.7. Landscape:</p> <p>4.8. Do you agree with the methodology for deciding which parishes should be Local Service Centres? Please give the reasoning for your answer. We would encourage the context of the proposed Local Service Centres is considered when any development is proposed which may encroach into the wider landscape. Whilst a village may be well supported with facilities and be suitable to be classified as a Local Service Centre, the surrounding landscape may not be able to accommodate large scale development without adverse impacts.</p> <p>4.9. Should Breckland continue with a settlement boundary approach or develop a robust criteria-based policy? Please give the reasoning for your answer. Settlement boundaries provide a robust way to prevent unnecessary encroachment into the landscape, or into strategic or local "gaps". However, it is appreciated that they can sometimes generate pressure for development so are not necessarily suitable as a one size fits all approach. Should a criteria-based policy be used, this would need to consider the differing locations of settlements and how sensitive to change the surrounding landscape is. Elements of the policy would need to still ensure that any edge/fringe development is located adjacent to the existing settlement and not causing excessive growth, or growth that will facilitate infill.</p>	
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	<p>4.10. Rank the six alternative development scenarios in order of preference. If you think there are any other development strategies that could be considered, or areas that you think should have more or less development, please share your thoughts. Whilst from a landscape perspective we do not have a clear view on the ranking of the development scenarios, we would refer to the comments made on the two previous questions in ensuring that the wider landscape of Breckland is protected from excessive encroachment and that where development does occur the sensitivity of the landscape is considered, and sites located and designed appropriately as to minimise adverse impacts.</p> <p>4.11. Do you agree with these new criteria for assessing sites? Explain your answer or comment in more detail on aspects of the proposed criteria. We broadly support the traffic light system proposed as an initial high-level assessment for Phase 1 and the inclusion of visual impacts. It would be beneficial to differentiate between visual impacts (where the impact is on specific views and visual amenity), and landscape impacts (where the impact is on the landscape as a resource or place but not necessarily seen). Both will be important to be assessed at this early stage. At the more detailed stages we would expect that the nuance of site-specific contexts to be considered and more robust landscape and visual assessments to be undertaken to ascertain the suitability of the site. Should you have any queries with the above comments please contact the Natural Environment Team NETI@norfolk.gov.uk</p> <p>5. Corporate Property</p> <p>5.1. Rank the six alternative development scenarios in order of preference. If you think there are any other development strategies that could be considered, or areas that you think should have more or less development, please share your thoughts.</p>	
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	<p>NCC land has been promoted and allocated in several locations to support the delivery of identified housing need in the Local Plan process throughout the County. In Breckland, the location of NCC land holdings is mainly rural focussed. In terms of supporting future housing growth required in the district, more rural focussed scenarios (notably E and F) would be most likely to allow NCC land to be used to support the delivery of future housing growth in Breckland.</p> <p>Should you have any queries please contact Andy Scales - andy.scales@nps.co.uk</p> <p>6.</p> <p>Lead Local Flood Authority</p> <p>6.1.</p> <p>Should Breckland continue with a settlement boundary approach or develop a robust criteria-based policy? Please give the reasoning for your answer.</p> <p>The LLFA would support a risk-based approach that considers the appropriate avoidance and management of flood risk from all sources, where the risk is avoided as a priority consideration. Furthermore, any that surface water runoff from the development is managed through the use of sustainable drainage systems.</p> <p>6.2.</p> <p>Rank the six alternative development scenarios in order of preference. If you think there are any other development strategies that could be considered, or areas that you think should have more or less development, please share your thoughts.</p> <p>Site selection should avoid high flood risk areas and areas prone to surface water flooding both directly and indirectly.</p> <p>6.3.</p> <p>Do you agree with these new criteria for assessing sites? Explain your answer or comment in more detail on aspects of the proposed criteria.</p> <p>A clear assessment criterion in relation to flood risk management from all local sources should be included as a local priority. This would not alone support the avoidance of developments being placed in critical areas but would consider the whether the surrounding area is already impacted by flooding. Opportunities to seek additional flood risk management potential should be considered on all sites to seek benefits to the existing community to alleviate the existing flooding associated</p>	
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	<p>problems. There is an opportunity for the LPA to incorporate flood risk betterment in the selection assessment criteria so the future development benefits everyone and enhances sustainable flood risk management opportunities in Norfolk.</p> <p>7. Minerals and Waste Integrated Assessment</p> <p>7.1. Minerals:</p> <p>7.2. To ensure consistency and avoid misinterpretation, please amend paragraph 6.11 to read: “There are six safeguarded mineral extraction sites (and associated consultation areas) within Breckland, identified within the Norfolk Minerals and Waste Local Plan. Sand and gravel mineral resource areas are also safeguarded by the Minerals and Waste Local Plan.”</p> <p>7.3. As above, please also amend paragraph 6.26, bullet point 4, to read: “There are six safeguarded mineral extraction sites (and associated consultation areas) designated within Breckland. The sand and gravel mineral resource in Breckland is also safeguarded.”</p> <p>7.4. Waste:</p> <p>7.5. For clarification, please amend paragraph 6.15 to read: “Sixteen safeguarded waste management sites (and associated consultation areas) within the district are identified in the Norfolk Minerals and Waste Local Plan”.</p> <p>7.6. For consistency, please also include the following wording “There are ten safeguarded water recycling centres (and associated consultation areas) within Breckland, identified within the Norfolk Minerals and Waste Local Plan.” You may wish to insert this in the waste, or water section.</p> <p>7.7.</p>	<p>Comments relevant to the integrated Assessment are noted and suitable amendment made to the Scoping Report and assessment.</p>
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	<p>Should you have any queries with the above comments please contact the Caroline Jeffery – caroline.jeffery@norfolk.gov.uk</p> <p>8. Development Strategy Position Summary 8.1. The County Council supports the sustainable principles of the existing Local Plan (2023) and the settlement hierarchy that directs growth to the most sustainable locations. Strategically, the County Council supports in principle Option A of the development scenarios, which allocates most of the additional housing growth to market towns. There would be strong concerns if the future pattern of growth in Breckland were to significantly depart from the existing settlement hierarchy and major allocations made outside the market towns.</p>	
<p>Norfolk County Council LLFA</p>		<p>Comments noted. BDC are preparing an up to date SFRA to review flood risk and inform site selection.</p>
<p>Link to information</p>	<p>NEW: Sustaining rural community services - Breckland Local Plan</p>	
<p>Q1.</p>	<p>Do you agree with the methodology for deciding which parishes should be Local Service Centres? Please give the reasoning for your answer.</p>	

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		N/A for the LLFA to comment on	
Link to information		NEW: Towns, villages, countryside - Breckland Local Plan	
Q2.		Should Breckland continue with a settlement boundary approach or develop a robust criteria-based policy? Please give the reasoning for your answer.	
		The LLFA would support a risk-based approach that considers the appropriate avoidance and management of flood risk from all sources, where the risk is avoided as a priority consideration. Furthermore, any that surface water runoff from the development is managed through the use of sustainable drainage systems.	
Link to information		NEW: Alternative development strategy options - Breckland Local Plan	
Q3.		Rank the six alternative development scenarios in order of preference. If you think there are any other development strategies that could be considered, or areas that you think should have more or less development, please share your thoughts.	
		Site selection should avoid high flood risk areas and areas prone to surface water flooding both directly and indirectly.	
Link to information		NEW: Potential development sites - Breckland Local Plan	
Q4.		Do you agree with these new criteria for assessing sites? Explain your answer or comment in more detail on aspects of the proposed criteria.	

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		<p>A clear assessment criteria in relation to flood risk management from all local sources should be included as a local priority. This would not alone support the avoidance of developments being placed in critical areas but would consider the whether the surrounding area is already impacted by flooding. Opportunities to seek additional flood risk management potential should be considered on all sites to seek benefits to the existing community to alleviate the existing flooding associated problems. There is an opportunity for the LPA to incorporate flood risk betterment in the selection assessment criteria so the future development benefits everyone and enhances sustainable flood risk management opportunities in Norfolk.</p>	
<p>North Elmham Parish Council</p>	<p>Sustaining rural community services Q. Do you agree with the methodology for deciding which parishes should be Local Service Centres? Yes. Please explain your answer to deciding Local Service Centres</p>	<p>We broadly support the methodology for deciding which settlements should be designated as Local Service Centres, other than to add the requirement of good access (i.e. regular public transport) to a Doctor’s Surgery. We question the methodology for assessing employment within parishes, as it appears there is a certain amount of ‘double-counting’ taking place. For example, if a parish contains a school or a GP surgery, these count as businesses employing probably at least 20 people, while also counting in other categories which determine whether a settlement should be categorised as a Local Service Centre. There should be recognition within the methodology for differentiating between full time and part time employees, as some businesses particularly within the hospitality sector are likely to employ more part time staff which should not have the same weighting as for full time staff when assessing the employment category. Further measures to protect Breckland’s countryside or Towns, villages, countryside.</p>	<p>There is no clear reason why the contribution of a school to both employment and to its role as a facility for the community is problematic. This is a reflection of the role of a school or similar facility within the settlement.</p> <p>It is recognised that analysis of employment could be refined further to consider full and part time employment. However, the general distribution of such employment across the</p>

	<p>Q. Should Breckland continue with a settlement boundary approach or develop a robust criteria-based policy? Continue with a Settlement Boundary approach. Please explain your answer regarding the settlement policies -Any change to a criteria-based approach is likely to lead to increased development in the countryside as settlements expand beyond their current boundaries. Moreover, any such approach will have loopholes in the criteria which would then be exploited by developers to allow development, some of which would be unsuitable and unwelcome, particularly given the system of appeal for applicants of planning applications which are initially refused permission. The relevant policies in the Hambleton and Central Lincolnshire Local Plans are, in our opinion, too subjective and open to interpretation, thus providing the potential for loopholes as outlined. · By abolishing settlement boundaries, it is likely that sites for much-needed affordable housing schemes in rural exception sites are less likely to come forward than at present. This is because once land on the edges of settlements has the potential for other development, land values will increase, and landowners will understandably keep these sites for more profitable market housing. -Settlements are able to expand with the current system of allocated sites, which usually leads to an extension of the settlement boundary. Windfall development may be restricted,</p>	<p>district is expected to be similar and the overall effect of such a change on the overall relative sustainability of settlements and their position in Breckland’s settlement hierarchy is likely to be negligible.</p>
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	<p>but as this is unplanned growth, it is better to keep it to a clearly defined area i.e. within a known settlement boundary.</p> <ul style="list-style-type: none"> · A more important policy development for the Breckland Plan, which would be effective in delivering more much-needed rural affordable housing would be to designate all rural parishes across Breckland as 'rural', for the purposes of Section 157 of the Housing Act 1985. This would then enable the Local Plan to lower the threshold for housing developments whereby affordable housing has to be included. This is currently set at 10 units or higher (or 0.5 hectares or greater), whereas it could be at 5 units or lower as laid out in paragraph 65 of the NPPF. A designation as 'rural' would also help to prevent the selling off of former council homes bought under the Right to Buy scheme, to anyone other than those who have worked/lived in Breckland for at least three years. <p>Alternative development strategy options Order of importance of the six alternative development scenarios Scenario A: market towns focus Scenario C: maximise strategic sites Scenario F: maximise strategic sites and urban/rural split (including villages with boundaries) Scenario D: maximise strategic sites and urban/rural split Scenario E: urban/rural split (including villages with boundaries) Scenario B: urban/rural split</p> <p>If you think there are any other development strategies that could be considered, or areas that you think should have more or less development, please share your ideas.</p> <p>We acknowledge that some small-scale, organic growth is necessary for rural settlements, although the real need is for truly affordable housing which would enable local people to remain in the area rather than for larger, expensive properties.</p>	
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	<p>Of the suggested development strategies, scenario Option A to concentrate development in Market Towns provides the closest fit to these aims. Redevelopment of the Abbey Estate in Thetford would also be desirable to regenerate that area, although we have doubts about the suitability of the Swanton Morley Barracks as a site for massed new housing, given its geographical location, lack of good local roads and employment opportunities, as well as the likely impact on nearby residents and countryside.</p> <p>Potential development sites</p> <p>Q. Do you agree with this new criteria for assessing sites?</p> <p>Yes</p> <p>Tell us more (explain your answer or comment in more detail on aspects of the proposed criteria.</p> <p>We broadly agree with the criteria for the Phase 1 assessment of sites put forward in the Call for Sites. Our suggested amendment is:</p> <p>‘Highway Access – yes – adjacent to a secondary/tertiary road within settlement’ should not be given ‘green’ status, but ‘amber’ instead, as there may be location sustainability issues without main road access which require further investigation.</p>	
<p>Croxton Parish Council</p>	<p>Objection Although listed in the Submitted Sites for Brettenham and Kilverstone dated December 2022 Croxton Village PC strongly object to the proposal at Reference B as the location falls within the Croxton Parish giving the following justifications.</p> <p>1. Breach of A11 and A1075</p> <p>The proposed development would breach the newly established A11 and A1075 demarcation lines that the PC wish to protect in order to preserve the rural village identity. It is feared that should these parish boundary lines be breached more development proposals would be forthcoming in an attempt to ‘tack onto’ the proposed site at Reference B and by stealth change a rural agricultural parish into something quite different. Additionally, this would go against and make void the reasoning adopted by Breckland Council when they originally made their decision to change the Parish boundary.</p> <p>2. Loss of species habitat</p> <p>Arable fields have a diversity of habitats which tend to be undervalued. They contribute a crucial habitat, and network of habitat corridors, protecting and connecting biodiversity.</p>	<p>Comments noted, whilst not explicit it is assumed this response is in reference to site 272 – North of A1075. Site assessment work is ongoing and will have regard to feedback received.</p>

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	<p>Special Protection Area Breckland is a Special Protection Area (Reference E) with an objective to <i>'Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;</i></p> <ul style="list-style-type: none"> - <i>The extent and distribution of the habitats of the qualifying features</i> - <i>The structure and function of the habitats of the qualifying features</i> - <i>The supporting processes on which the habitats of the qualifying features rely</i> - <i>The population of each of the qualifying features, and,</i> - <i>The distribution of the qualifying features within the site.'</i> <p>The following are the qualifying species: A133 <i>Burhinus oedicnemus</i>; Stone-curlew (Breeding) A224 <i>Caprimulgus europaeus</i>; European nightjar (Breeding) A246 <i>Lullula arborea</i>; Woodlark (Breeding)</p> <p>The significance of arable land within the Brecks Arable plants are the fastest declining group of plants in the UK, and the site in question is considered an 'Important Arable Plant Area'. The Breckland Biodiversity Audit has identified over 600 species in the Brecks that require regular ground disturbance, of which 263 of the regions priority invertebrates and plants can be supported by arable habitats such as cultivated margins (References F and G). The Breckland Farmers Landscape Recovery Project includes a focus on creating a network of habitat corridors through arable land, connecting areas of high biodiversity value. Baseline invertebrate monitoring done as part of the project has already found two rare beetles on arable land in the Brecks. These include one Nationally Rare species (RDB3) that can only be found within the Brecks in the UK, and one that has only been recorded four times in the Brecks - including very close to the proposed site. (Reference H).</p> <p>3. Justification by the Developer The proposed site is currently Greenfield, currently allocated to agricultural use and the current users would need to be relocated. More notably the entire justification given in sect 10 of Reference B for this proposal is generic and basically states that the UK needs more logistical space, which may be true but could be equally applied to any area in the UK with access to the A11 or indeed any major road network. It could be argued therefore that there are much better areas suited for this type of development, Snetterton for example which would not breach a newly instigated planning demarcation line with all the additional associated risk.</p>	
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<p>Mattishall Parish Council</p>	<p>As an overarching comment, the Parish Council is concerned that this consultation appears to be based on the assumption that Breckland will deliver a housing land supply based on the government’s standard methodology figures. Revisions to the NPPF now confirm that the standard methodology for calculating housing need as an “advisory starting point”. Local authorities with an up-to-date local plan (e.g. Breckland) will no longer need to continually show a deliverable five-year housing land supply. Additionally, the 5% and 10% buffers have been removed in Breckland’s case. Furthermore, we have not seen any evidence provided through a Housing Needs Assessment, which is crucially important at this stage of plan making.</p> <p>Overall, therefore it is difficult to comment on these questions when an up-to-date assessment of overall housing need across the district has not been evidenced.</p> <div data-bbox="414 639 981 756" style="border: 1px solid black; padding: 5px;"> <p>Question 1: a. Do you agree with the methodology for deciding which parishes should be Local Service Centres? b. Please explain your answer to deciding Local Service Centres</p> </div> <p>Mattishall Parish Council response: a. YES b. The suggested methodology is sound, although it should be acknowledged that in the current economic situation the viability of many of the criteria elements e.g. shops, public transport, pubs, community facilities is not certain and may change over time.</p> <div data-bbox="414 983 981 1125" style="border: 1px solid black; padding: 5px;"> <p>Question 2: Should Breckland a. continue with a settlement boundary approach or b. develop a robust criteria- based policy. Please explain your answer regarding the settlement policies</p> </div> <p>Mattishall Parish Council response: a. YES continue with a settlement boundary approach. On balance the hierarchical designation of Local Service centres and the associated “settlement boundary” policy brings clarity to a range of Local Plan policies. A settlement boundary clearly sets out a distinction between a settlement and its surrounding countryside where development is not acceptable unless in specific</p>	<p>An up to date Housing and Economic Development Needs Assessment is in preparation and will be published alongside publication of a new Local Plan.</p> <p>It should be noted that whilst a starting point, NPPF is clear alternative calculations are only appropriate in exceptional circumstances. The HEDNA will assess the Standard Method and consider whether any alternative approaches may be appropriate, but none are expected at this time. The application of buffers within NPPF relate to the calculation of the Five-Year Land Supply. It will remain incumbent on the Council to identify a robust supply of housing sites to ensure the Local Plan requirement can be achieved.</p> <p>Comments in relation to site assessments are</p>
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	<p>circumstances. The Settlement Boundary approach can also allow for “windfall” exceptions, where for example brownfield sites become available.</p> <div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <p>Question 3:</p> <p>Rank the options (a,b,c,d,e,f) in order of preference:</p> <p>For example:</p> <ul style="list-style-type: none"> • Do you have any comments on the Scenarios set out above? • Are there any parishes included in the Scenarios above that should not have allocations for development? • If so which parishes and why? • Are there any other parishes (other than those included in the above Scenarios) where allocations for development should be considered? • If so which parishes and why? • Should the distribution of development between the towns and / or Local Service Centres be equally distributed irrespective of the size of a particular parish in terms of population? <p>If you think there are any other development strategies that could be considered, or areas that you think should have more or less development, please share your ideas.</p> </div> <p>Mattishall Parish Council response:</p> <p>Ranking: c,a,f,d,e,b</p> <p>Option c is totally consistent with NPPF paragraphs 123-130 in that it promotes effective use of land, maximising the use of previously developed land. Mattishall Parish Council supports the development of brownfield sites before any consideration is given to developing the open countryside, land in use for agriculture, fisheries, horticulture, orchards, plantation, forestry, woodland, mineral extraction or processing of waste, open spaces, sports and recreational facilities, allotments, school playing fields.</p> <p>Consistent with Scenario “C” Mattishall should not be required to allocate additional residential land. The 2019 Local Plan identified Mattishall as a ‘Local Service Centre’. Mattishall is currently required to accommodate a 10% growth in housing to 2036. This equates to an additional 149 dwellings. Mattishall has exceeded this</p>	<p>noted. The Phase 1 assessment will be supplemented with further analysis of the constraints affecting sites. Broadly issues such as the status of a site as greenfield or brownfield site have been included, with Greenfield sites assessed as Red, and Brownfield as Green. Additional considerations such as alignment with existing policy will be noted but would be a matter for judgement if a site is otherwise considered suitable. The Council will look to avoid conflict arising between existing Neighbourhood Plans and the emerging Local Plan. However, if conflict were to arise the most recent policy would take precedence.</p>
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	<p>number. As at March 2022 120 houses have been completed, and a further 85 have planning permission or are under construction. There are existing in-fill sites within the settlement boundary capable of being brought forward. i.e. the total figure is a minimum of 202. This is well in excess of a 10% increase in the reviewed plan period to 2036.</p> <p>Across Breckland consideration should be given to the capacity of the highway network to adequately accommodate whichever growth strategy is adopted. Mattishall Parish Council supports scenarios that see growth concentrated in the existing market towns and at Robertson barracks. This presents the District Council with the opportunity to masterplan growth on these significant sites, thereby effectively planning for necessary social and physical infrastructure provision. This strategy helps retain and support the district’s main asset- that of its rural character and agricultural significance.</p> <div data-bbox="414 673 976 809" style="border: 1px solid black; padding: 5px;"> <p>Question 4:</p> <p>a. Do you agree with this new criteria for assessing sites? Y/N</p> <p>b. Explain your answer or comment in more detail on aspects of the proposed criteria.</p> </div> <p>Mattishall Parish Council response:</p> <p>a. No</p> <p>b. Whilst the proposed criteria are all relevant a number of important additional considerations should also be included. These are:</p> <p>i. Breckland Council must follow a “Brownfield” first approach and therefore resist development proposals on greenfield sites.</p> <p>ii. Consideration of policies within the current Local Plan and relevant Neighbourhood Plan. For example, Mattishall site LPR/C54/DEV/307 is covered by Policy ENV2 protecting important views and vistas.</p> <p>iii. Consideration should be given to whether sites have been proposed in the Local Plan review as Local Green Spaces e.g. Mattishall sites: LPR/C54/DEV/307 and LPR/CS4/DEV307.</p>	
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	<p>iv. These criteria consider each site in isolation. Consideration should be given to the cumulative impact on infrastructure (social and physical) should more than one site come forward.</p> <p>v. Flooding issues must be considered as a key criteria. Sites should be assessed against the Government’s Long Term Flood Risk map. www.gov.uk/check-long-term-flood-risk. There is a serious existing problem with flooding in Mattishall caused by an inadequate foul water sewerage system. Additional development would be unacceptable unless this major infrastructure defect is addressed.</p> <p>vi. The “trees and hedgerows” consideration is cursory. Greater emphasis should be applied to ecological and biodiversity matters, particularly in respect of the need to demonstrate Biodiversity Net Gain.</p> <p>vii. The sites should be assessed against Norfolk C.C Minerals safeguarding policy.</p> <p>viii. A more detailed assessment should be undertaken to assess highways and traffic safety issues- impact on traffic speeds and volume; cumulative impact of additional traffic.</p>	
<p>National Highways</p>	<p>National Highways operates and manages England’s Strategic Road Network (SRN). Within the BDC area this includes the A11 and A47. As operator of the SRN, we support the economy through the provision of a safe and reliable SRN, which allows for the efficient movement of people and goods. Such a network can play a key part in enabling and sustaining economic prosperity and productivity while also helping support environmental and social aims by contributing to wider sustainability objectives and improved accessibility to key economic and social services.</p> <p>Whilst National Highways have no principle to the proposed criteria to assess sites during the Call for Sites review, any sites accessed from the SRN or considered to have an impact on SRN due to cumulative impact or on Road Safety must be reviewed by National Highways.</p>	<p>Comment noted.</p>
<p>Garboldisham Parish Council</p>	<p>The decision to award Garboldisham the status of a Local Service Centre was vehemently refuted, not only by Garboldisham Parish Council, but our District Councillor and several Parishioners during the consultation period for the current Breckland Local Plan. It became quite obvious that Breckland Council were using out of date statistics with regard to Public Transport in the Village.</p>	

<p>This has been confirmed by the assertion of Breckland Bridge in their documentation in the current Call for Sites Document of December 2022, released for public viewing recently. The details that they have produced on the availability of public transport to/from Garboldisham are so out of date, and inaccurate, that they are laughable. For Example: -</p> <p>The Simonds 338 Service between Garboldisham and Bury St Edmunds – there are only three (3) buses to Bury St Edmunds Monday to Friday, the last leaving at 12.55 pm, not the seven (7) asserted by Breckland Bridge, and four (4) returning, the last at 17.30 pm.</p> <p>In addition, this bus only runs because of the subsidy provided by Suffolk County Council, as there is no suitable parking place at Hopton (the next village in Suffolk) and therefore they utilize Garboldisham to turn the bus around. This service is therefore always under threat from Suffolk County Council removing their subsidy. The Suffolk Norse Bus 143 stopped picking up in Garboldisham approximately 5 years ago.</p> <p>And whilst indeed there are designated school buses to Diss High School, and Old Buckenham High School during term time, that is exactly what they are school buses – and are not available for the general public to use.</p> <p>It would be impossible to get a train from East Harling, Thetford or Diss with the current bus provision.</p> <p>Therefore, to assert Garboldisham has sufficient public transport to merit reaching the requirements laid down for Local Service Centres is erroneous.</p> <p>To the best of our knowledge there are no plans for any provider to start up a bus running from Garboldisham to anywhere in Norfolk (e.g. Thetford, Diss, Attleborough, Norwich), and as a consequence all parishioners of Garboldisham must rely on private transport (i.e. Car journeys), which is contra to a requirement in the current draft local plan 2046. (Page 27.1.27) Large developments in a village such as Garboldisham can only increase the use of private transport (car journeys). There is some local employment in the Village, but these have now been reduced to Mervyn Lambert Plant, MLP Road Signs and Robin Tacchi Plants. Any other business is small-scale, and home based. Therefore, parishioners wishing to find</p>	<p>The LSC topic paper sets out that “it is considered that if public transport still available to a higher hierarchical settlement (so for a Local Service Centre the transport should be to a town/city) with at least four services a day at times that enable a reasonable range of activities, such as a shopping trip or attendance at an appointment to be completed, then the criterion has been satisfied.”</p> <p>Figures regarding employment are based on ONS data. It is noted that the precise location and nature of some businesses and may vary, however, such instances are reflected across the district and the figures provide an overall indication of the relative levels of economic activity in settlements. Part of the criteria for employment is for at least 2 businesses to have 10 or</p>
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	<p>work would have to provide their own transport (private car again) to access employment. We believe that Centre Parcs does provide a bus service for workers which stops in the Village, but we know of no other. In addition, access to health care (doctor, dentist, optician etc.) all has to be made by private transport, as none of the above is within walking distance (Doctors are East Harling and Kenninghall, Stanton and Botesdale), and if you require a doctor, it is unlikely that you would want to walk, or even cycle, a round trip of ten (10) miles or more.</p> <p>We also query whether Garboldisham, in fact, has 20 businesses. Reading your documentation one of the businesses says it operates from Garboldisham – Combat Paintball – this is totally incorrect; this business operates from Roudham – it is just that the owner lives in Garboldisham. In addition, since Local Service Centre status was given some 7 or 8 years ago, one of the largest employers, Weld Fab has ceased operation. Therefore we would be obliged if you would update your records for employment accurately. This would mean that even more people may require public transport to get to work (for example in Thetford), which as we have seen is non-existent.</p> <p>Because of having Local Service Centre status, Garboldisham has already accommodated about 40 news houses since the current Local Plan was adopted. The number laid down in the plan would have been less should “Parish with Boundaries” have been awarded initially. Whilst we recognize that new homes are required in Norfolk, this amount does seem excessive for our Parish, and the current Call for Sites has indicated that the developers wish to build more large-scale development if approved.</p> <p>We, as a Parish, therefore request that the status of Local Service Centre is removed from Garboldisham. This is to bring development in line with the current requirements in the proposed new Local Plan, particularly with the requirement for reduction in Private Transport journeys.</p>	<p>more employees. The 2023 assessment does not include Weld Fab and, if the Paintball were excluded, there remain more than 2 businesses that meet this criteria.</p>
<p>Bawdeswell Parish Council</p>	<p>BAWDESWELL PARISH COUNCIL DETAILED COMMENTARY ON THE BRECKLAND LOCAL PLAN UPDATE PAPERS Introduction</p>	

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	<p>The papers sent to parishes on 27th November 2023 noted the Breckland Cabinet decision to put out the papers referenced in Appendix 2 of the approved Local Development Scheme for the Full Update of the Local Plan for a further 8-week local consultation. This paper offers Bawdeswell Parish Council’s approved commentary on those Breckland papers.</p> <p>Commentary on Breckland’s Local Development Plan Options V9 – Alternative Development Strategy Scenarios</p> <p>While accepting that Breckland has a right, and possibly a need, to recognise its four Alternative Development Strategy Scenarios listed, and possibly any mixed options within them, it is clear to Bawdeswell Parish Council that previous local consultations have come out strongly for a scenario whereby the bulk of any additional housing requirement within the new local plan should be firmly within the market towns of the region and centred along the main arterial highways; with any remainder being shared amongst the local service centres and other rural parishes dependent upon relative size, need and sustainability. These factors effectively negate Option B and Option D (the 50 % shared options between market towns and local service centres).</p> <p>Looking in more details at Options A and Option D, the argument basically rests on whether the new plan should take advantage of the brownfield sites at Swanton Morley barracks and/or Abbey Farm Thetford. Bawdeswell Parish Council is not in any position to comment upon the efficacy and benefit of refurbishing the Abbey Farm estate, but the village of Bawdeswell would be directly affected by any plans to develop the brownfield site at Swanton Morley. This village relies heavily on the medical facilities at North Elmham, and its satellite facility at Swanton Morley; in addition to the medical facilities at Reepham. Moreover, the traffic along the roads leading from Bawdeswell to its closest market town (Dereham) would be significantly increased by a development of up to 2,000 additional homes at Swanton Morley. As usual, the debate depends so much on the associated issue of infrastructure improvements necessary to help sustain such a large development.</p> <p>If a major development was to result in a significant upgrade to the medical facilities and infrastructure within Swanton Morley, and if the surrounding roads were</p>	<p>The existing size of a population in a settlement may be relevant to the overall scale of growth appropriate to a settlement but does not necessarily reflect the level of services and potential role of a settlement as a sustainable location for growth.</p> <p>Access to medical facilities such as a GP is clearly important. However, the nature and frequency of use of such facilities is such that the Council does not consider the presence of a GP facility within a settlement is crucial in establishing its sustainability as a location for day-to-day activities.</p> <p>In relation to identification of current LSCs within the adopted Local Plan attention is drawn to the Inspector’s views. It is noted that the Inspector’s</p>
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	<p>upgraded to cope with the expected increase, then the residents of Bawdeswell, along with Swanton Morley and other adjacent parishes might benefit; even though Bawdeswell currently has no public transport to any of its medical facilities. If, however, these vital infrastructure developments are not put in place prior to any major development at Swanton Morley barracks; then Bawdeswell and other close rural parishes will suffer.</p> <p>Regarding statements in the Breckland paper on the continued selection of Bawdeswell as a local service centre, Bawdeswell Parish Council would strongly disagree; primarily because it believes the argument not to include population size and access to medical facilities is flawed. Indeed, para 13.4 of the paper recognises that an argument can be posed to include such factors in the criteria for designation as a LSC and goes on to list possible ‘enhanced’ LSCs where medical facilities exist. The Breckland argument rests on the point that an independent assessor ruled that Breckland’s analysis on LSCs for the existing Local Plan was ‘reasonable’ – a very subjective term! In doing so, however, the independent assessor did actually raise the concern that access to medical facilities had not been covered!</p> <p>In sum and responding directly to the questions posed in the Local Development Plan’s Options paper, Bawdeswell Parish Council opposes options B and D, and strongly recommends Option A, which is in line with the public response to Breckland’s approach so far. Option C could only be acceptable if the major infrastructure improvements required to sustain a 2,000-housing development at Swanton Morley barracks are put in place before any housing development commences. Past experience has shown that promises of infrastructure improvements arising from major housing developments no longer hold water! All that said, it is obvious that some development of the brownfield site at Swanton Morley barracks, which otherwise would demand considerable care and maintenance as a vacant site, is highly desirable, as it would help alleviate the problem of excess housing development elsewhere; as long as it is done sympathetically with the infrastructure needs of Swanton Morley and surrounding parishes being made paramount in the debate.</p>	<p>report to the previous plan stated, “Whilst other factors could have been included such as GP surgeries, I am content that the criteria offer a reasonable basis to consider the suitability of settlements to receive growth.”</p> <p>Detailed comments regarding the assessment of Bawdeswell are noted and will be considered. On balance the points made are welcomed but do not impact the Council’s assessment of Bawdeswell. Reference to health access is noted, but health itself is not a criteria in identifying and LSC.</p> <p>Digital connectivity is a priority across Breckland. This is not a criteria linked to the LSC designation. Public transport services to higher order settlements do not need to be within Breckland district. Accuracy regarding other settlements is noted but</p>
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	<p>Commentary on Breckland’s Local Service Topic Paper 2023 Nov 12 – A Review of Local Service Centre Parishes</p> <p>Bawdeswell Parish Council was fully opposed to the designation of Bawdeswell as a LSC in the previous deliberations on the existing local plan. It felt that its objections, on both the details surrounding Bawdeswell as well as Breckland’s logic of ignoring medical facilities and population size, were largely ignored. Despite Breckland’s claim that an independent assessor vindicated its approach to assessing parishes for LSC status, in fact the assessor (according to Breckland’s own testimony) did question why access to medical facilities had not been included.</p> <p>Since then, the situation regarding sustainability and essential infrastructure requirements within Bawdeswell has only got worse. With the exception of an improved bus service to Norwich and Fakenham, other infrastructure support within the village has deteriorated, rather than being improved by recent housing development. The village pub, an essential centre for social cohesion, has closed. The primary school has suffered from changes to staff and is close to being full. The local employment opportunities are severely limited; and, most important, there is still no public transport to essential medical facilities or local market towns.</p> <p>Moreover, to suggest in the current analysis that Bawdeswell could be asked to accommodate up to 189 additional houses (about a 50% increase on the current housing stock) within a village population of less than a thousand is frankly not realistic!</p> <p>In the detailed assessment of Bawdeswell, the following inaccuracies are in need of amendment:</p> <p>Health: It should be recognised that Bawdeswell residents are also registered with North Elmham medical facilities and also use the satellite medical centre at Swanton Morley. However, none of these facilities (which are well outside the walking criteria stated) can be accessed by public transport!</p> <p>Connectivity – Digital: While the village does, technically, have superfast broadband, the service is intermittent, and the mobile signal strength is weak and intermittent; so limiting the scope of local businesses and working from home.</p>	<p>does not influence the analysis.</p> <p>The range of businesses in and around Bawdeswell is considered appropriate. Minor adjustments – for example removal of Cobb Europe would not alter the assessment of Bawdeswell. Other sources of employment such as employment within the school and lone trader businesses are all indicative of a level of economic activity in the area. On the basis of a set of criteria applied equally to all settlement assessments they are indicative of a scale of activity.</p>
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	<p>Connectivity – Public Transport: While the X29 bus service to/from Norwich and Fakenham has improved, but it should be noted that there is no regular or frequent bus service to local market towns (except for one shopper bus on a Friday) and no public transport access to vital medical facilities.</p> <p>Proximity to Key Settlements: It should be noted that the small market town of Reepham is 4.1 miles from Bawdeswell, but as previously stated no public transport to/from Reepham exists.</p> <p>Local Businesses: The analysis states that there are 22 business concerns within Bawdeswell with employment opportunities. Contrary to this analysis, Cobb Europe is not within the village – it sits between Bawdeswell and Elsing and offers little in the way of local employment opportunities. Similarly, local villagers have little opportunity to be employed by the primary school, which cannot or should not be classed as a ‘business’! Outside of the local garden centre and the shop (now Morrisons – not Martin McColl), the other businesses quoted in the Breckland analysis are, generally speaking, one-person concerns run from home and are not employers of local labour.</p> <p>For all the reasons stated above, Bawdeswell Parish Council firmly believes the Bawdeswell should be removed from the list of suitable LSCs unless vital infrastructure development is incorporated into the village prior to any further housing development, and Breckland re-visits its logic regarding the designation of LSCs.</p> <p>Commentary on Breckland Settlement and Countryside Notes V2 - Approaches to defining settlements and protecting the countryside from inappropriate development</p> <p>In considering the consultation questions posed in the first part of the paper, Bawdeswell Parish Council is firmly of the opinion that settlement boundaries have served the local planning process and local planning authorities well, in that they have helped to define planning expectations and certainly helped to protect the local countryside. It therefore sees no reason to change the current approach, given that it already provides sufficient ‘licence’ for LPAs to stray outside of settlement boundaries for all the right reasons. To abolish this system, perhaps in favour of the</p>	
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	<p>suggested robust criteria-based policy, could open up the system to abuse, given that the strength of ‘robust criteria’ may vary considerably between the views LPAs and unscrupulous developers! The disadvantages of settlement boundaries listed in the paper are largely commercial concerns and not, therefore, primary concerns for a planning authority.</p> <p>Turning to the second issue within the paper – clearly there will be a need to categorise settlements as those needing a settlement boundary and those smaller parishes that, realistically have not need, given the dispersed nature and proximity of protect countryside within such settlements. However, and contrary to the arguments within the paper, there would seem to be no reason for a major review of every settlement boundary within the district; unless, as the paper’s criteria suggests, there is a need to adjust/expand boundaries to cater for the perceived housing development needs of the updated local plan in each settlement.</p> <p>Bawdeswell has benefitted considerably in recent years from having a clearly defined settlement boundary, and a conservation area largely within it; and yet some minor development has occurred outside, but adjacent to, the settlement boundary for sound reason related to affordability and social cohesiveness. The latest major development (42 houses) was also outside of the settlement boundary at the time, but its inclusion within the revised, larger settlement boundary was a logical extension to the geography of the area at the time. Hence, while recognising the value of settlement boundaries for the reasons outlined above, Bawdeswell perhaps epitomises the flexibility offered within the current approach. Bawdeswell Parish Council would therefore wish to maintain its current settlement boundary; albeit accepting that some adjustment might be necessary to accommodate much needed but limited affordable housing and local infrastructure.</p>	
<p>North Tuddenham Parish Council</p>	<p>Summary of Discussions - Public Meeting held on 28th November 2023 In attendance – 30 members of the public – approximately 10% of North Tuddenham electorate.</p>	

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	<p>Also present: District Cllr Bambridge, Parish Councillors: Baxter, Harding and Hall; Clerk to North Tuddenham Parish Council.</p> <p>Cllr Harding chaired the meeting which was noted as organised by the Parish Council and that this was a public meeting, and NOT a Parish Council Meeting.</p> <p>Cllr Harding summarised again the remit Breckland Councils “Call for Sites” initiative to feed into the requirements of the National Planning Policy Framework. Cllr Harding briefed the meeting around the consideration of a potential “Neighbourhood Plan” or other options open to ensure a cohesive and agreed plan for responding to any upcoming future development in the village.</p> <p>Cllr Harding referred to the previous meeting held, and confirmed that those who attended gave a clear message that none of the sites put forward were suitable for North Tuddenham, voting between 70-75% against:</p> <p>Maily due to:</p> <ul style="list-style-type: none"> Location and accessibility due to the nature of our single-track roads, concerns of Health and safety Increased traffic volumes from potential residents, guests and online deliveries. Number of properties <p>2</p> <p>The Parish Council have delivered these comments along with a full summary of the last meeting stressing residents’ views against these sites, to Breckland Council for consideration.</p> <p>Discussions took place around the importance of consolidating ‘Material Considerations’ in any planning process:</p> <ul style="list-style-type: none"> Highway safety standards Traffic volumes (2-3 cars per property) online deliveries, supermarket deliveries, friends and families, parties etc Scale and dominance. Character or appearance Previous planning decisions <p>Factors that might impact upon future development were noted as including:</p> <ul style="list-style-type: none"> A47 upgrade 	<p>Comments regarding site assessments noted. The identification of sites as potential allocations will be made in accordance with the development strategy of the Local Plan. North Tuddenham is not identified in the settlement hierarchy as a location for new housing specific allocations within the Local Plan.</p>
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Transport for elderly residents.
 Transport for younger residents who do not drive.
 Transport for those working in Norwich or Dereham
 Environmental impact

Call for Sites and Local Plan Consultation September 2023	
Potential Development Site	SUMMARY INTERPRETATION This public meeting was organised by the Parish Council on behalf of the residents of North Tuddenham. Please note that the number of attendees included applicants and family members of the aforesaid. All those in the public gallery were given the opportunity to vote. Cllrs in attendance: Harding (Chair of the Public Meeting) Stapleton, Baxter, Hall and Blake; Parish Clerk 49 Members of the public
Bear's Den, Low Road East	Greenfield Mixed use development – total 15 properties although it was noted this could change.
5 Proposed Dwellings	Concerns around the current condition and repair of Low Road and the width of the highway were expressed.
Land Opposite Bear's Den, Low Road East	Loss of productive farmland was a concern.
10 Proposed Dwellings	Residents considered the single road access inadequate for further development with the road measuring around 3.1m in width as opposed to the mandatory 4.8m. The road also has no designated passing places with no provision for any and remains a 60mph zone which is unlikely to be reduced.
(The above are being considered as one development for ease of identification at this point)	Concerns were tendered around sufficiency of access for emergency vehicles. The road is also a dead-end and historic planning applications were noted to have contained Highways conditions whereby the suitability of the road was highlighted for one stand-alone dwelling. There are no footpaths for pedestrians and concerns were expressed around the safety of more vulnerable road users ie walkers, cyclists and horse-riders. Children also regularly use Low Road to walk to catch Pupil Transport. It was also noted that there are no road signs, markings, curbs, streetlighting, poor visibility, overgrown vegetation, houses already

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	<p>built to road edge, use of road by heavy vehicles and farm machinery, and poor visibility due to road splays.</p> <p>Residents noted already tangible increases in vehicular traffic along this road because of more residents working from home, greater demand for deliveries because of home-shopping, and diversions already in-place to facilitate preparatory works for the A47 upgrade, increasing the risk of the road being used as a 'rat run'.</p> <p>Residents noted that Low Road was cut in two by the bypass in 1992. The western end of Low Road East has no exit and if the A47 dualling plans proceed, then there will be no exit at the eastern end either, by 2025. Heavy farm traffic which used to have access to fields from the west pre-1992 now must negotiate the narrow approach along Low Road East.</p> <p>Residents shared concerns around the lack of no speed limit on Fox Lane, Mattishall Lane or Low Road East in particular, whereas there is a 50mph limit on the Old Main Road and 30mph on Mill Road and Low Road West.</p> <p>Residents expressed concern around environmental and ecological impact ie disturbance to natural habit and wildlife, removal of trees. Livestock have been killed by impatient drivers and concerns were voiced around potential for human lives to be lost.</p> <p>'Near misses' to BT poles situated on the embankments have been reported. Damage to these could result in many days lost communication. (Refer to Burgh Lane incident last December.)</p> <p>Residents considered the infrastructure as a whole was inadequate to facilitate this development ie no shop, limited bus service, no health facilities.</p> <p>Concerns around ambiguity of numbers of potential dwellings were also raised and the potential for it to be a 'trojan horse' application.</p> <p>NOTE: 37 ARADIST development - 75.5% of attendees</p>		
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Land West of Elsing Road	<p>Brownfield Mixed housing</p>	<p>Residents expressed concerns over access to this proposed site and the evidence of it being a brownfield site were questioned.</p> <p>Ambiguity around potential numbers of dwellings was highlighted as a concern.</p> <p>Concerns were raised around loss of woodland and subsequent and unavoidable ecological damage.</p> <p>Repetition of comments around road type and condition were made. (See above)</p> <p>Further endorsement of concerns around lack on infrastructure were made.</p>	<p>NOTE: IS AGAINST DEVELOPMENT – 71.40% OF ATTACHEES</p>
1+ Dwellings – number to be determined.	<p>Greenfield Mixed Housing</p>	<p>Discussions took place around the proposal of green space for community use, and biodiversity net-gain. Opinions vacillated between the potential to possibly use this space for allotments to no further requirement for amenity land outside of the officially designated Common in the village.</p> <p>Residents considered that access to the main road was very narrow. With duplicated concerns over the need to possibly reverse out on to Main Road which is a 50mph zone.</p> <p>Concern was expressed regarding development close to the waste recycling/industrial site already occupied by Martyn Green.</p> <p>Options for accessing this potential site were discussed and it was broadly concluded that access from the Main Road was preferable. Access marked "A" was reputedly not an existing access and it was assumed that at some point over the previous 2 years, hedging had been removed to facilitate access for a local recycling business. Access marked "B" was also assumed to be a turning bay.</p>	
Land off Main Road/Low Road West		10+ Dwellings – or as otherwise agreed.	

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	<div style="text-align: center; border: 1px solid black; padding: 2px; width: fit-content; margin: 0 auto;">TUDENHAM</div> <p>Repeated concerns were made around ambiguity of number. Repeated concerns around lack of infrastructure and amenities as above.</p> <p>Some residents considered that there was insufficient information available at this juncture.</p> <p style="background-color: red; color: white; font-weight: bold; padding: 2px;">NOTE: 88 AGAINST development - 71.8% of attendees</p> <p>Matters Arising and other information discussed</p> <p>Cllr Gordon Bambridge confirmed that Breckland District Council has 500 sites to consider during this preliminary process.</p> <p>He confirmed that an additional validation report for future planning would ensure that the NHS was to become a consultee.</p> <p>Cllr Bambridge confirmed that he would represent the village as led by the PC if any application was forthcoming from the process. Context: Breckland District Council MUST identify sites - the local authority is the largest geographically sized Council in the Country and there is an expectation on BDC to provide 688 houses every year going forward.</p> <p>Cllr Bambridge advised the Parish Council of the pertinency of a Neighbourhood plan which whilst an expensive investment, could allow greater control over the landscape of the vicinity and greater statutory control.</p> <p>The initial stage of the Call for Sites process will be reviewed again later this year.</p> <p>Cllr Harding concluded the meeting at 7.40pm and summarised that the feedback and informal vote-casting indicated that there was little appetite for development in the forms tendered by the sites put forward; residents concurred with this assumption. It was concluded that a second Public Meeting be called later in the Autumn to consider any updates and to consult the village around the adoption of a Neighbourhood Plan.</p> <p>PLEASE NOTE In accordance with GDPR, the anonymised responses provided by residents are for research purposes only and will only be shared as part of consultative responses.</p>	
<p>Gooderstone Parish Council</p>	<p>Should Breckland continue with a settlement boundary approach or develop a robust criteria-based policy? Gooderstone Parish Council believes that development should be considered against a defined criteria rather than an outright 'yes or no' based on the boundary line.</p>	<p>Comments noted.</p>

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	<p>Do you agree with the methodology for deciding which parishes should be Local Service Centres?</p> <p>Gooderstone Parish Council agrees with the methodology used for deciding which parishes should be Local Service Centres, with the caveat that once those Local Service Centres are identified using that methodology, they are then subject to density considerations, rigorous infrastructure, water, sewerage and ecological reporting to determine viability.</p> <p>Do you agree with this new criteria for assessing sites?</p> <p>Gooderstone Parish Council finds favour with the criteria laid down for assessing sites, i.e. based on the five existing amenities within a village: Primary School Village Shop Public Transport Community facility and Employment.</p> <p>Alternative Development Strategy Options</p> <p>Gooderstone Parish Council favours the following order of options:</p> <ul style="list-style-type: none">A Market town focusB Urban/Rural splitC Maximise strategic sitesD Split between hubs and outlying villagesE Urban/rural split but taking boundaries fully into accountF Maximise strategic site and urban rural split (including villages with boundaries) <p>Concerning the three potential development sites identified in the Local Plan for Gooderstone, the Parish Council comments as follows: -</p> <p>We have looked individually at these three sites and the surrounding factors.</p> <p>Site 7. National Grid Field No: TF 76013387 – PE33 9BX</p> <p>The access road to this particular site is narrow, falling away and dangerous.</p> <p>The proposed density of development for this site is burdensome on this village with minimal infrastructure.</p> <p>Site 8. National Grid Field No: TF 76026613 – PE33 9DA</p> <p>The street at this point in the village is narrow.</p> <p>Severe flooding occurs in this area, rendering entry and exit to the village almost impossible.</p>	
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	<p>The protected bird species of Stone Curlews are known to nest on the field in question. Site 9. National Grid Field No: TF 7702 – PE33 9DB This is the only site of the three that presents as viable. The road is wider at this point. The site lends itself better to development in the traditional linear form of Norfolk villages, although the density of development for this site too is burdensome on this village with minimal infrastructure.</p>	
<p>Dereham Town Council</p>	<p>Comments on an alternative criteria-based approach. (Breckland’s Local Plan Development Strategy Consultation) Policy GEN 05 -settlement boundaries. Policy GEN 05 states that “Settlement Boundaries Within the defined settlement boundaries and the boundary for Attleborough SUE (as shown on the Policies Map) proposals for new development are acceptable, subject to compliance with relevant Development plan policies. Outside the defined settlement boundaries, development is restricted to recognise the intrinsic character and beauty of the countryside. Development outside the defined settlement boundaries will only be acceptable where it is compliant with all relevant policies set out in the development plan, including but not necessarily restricted to”: The first part of the policy states that development outside the settlement boundary will be restricted. The second paragraph of GEN 05 states that “development outside the defined settlement boundaries will only be acceptable where it is compliant with all relevant policies set out in the development”. This last paragraph has resulted in a development in the garden of Gallymoor Farmhouse adjacent to the Neatherd. The Town Council strongly objected to this application, but because of the last paragraph of GEN05 Breckland officers were unable to refuse the application. Dereham Town Council recommends that GEN 05 be re-worded so that the last paragraph does not cancel the first paragraph, the current wording has led to</p>	<p>Comments noted – the specific wording and approach to policy development will be subject to public consultation on the draft Local Plan. The importance of a comprehensive understanding of the transport impacts of development in Dereham is recognised. Approaches to growth in the town will be informed by specific evidence of highway and sustainable travel impacts. Identification of reference to cycling accessibility is noted and will be considered in reviewing the site assessment approach. However, in generality the site assessments process</p>

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<p>unacceptable forms of development. Whether there is or is not a settlement boundary, planning policies should not lead to unplanned and unacceptable forms of development.</p> <p>Breckland’s Local Plan-Development Strategy Consultation, new development strategy options.</p> <p>Dereham Town Council is of the view that all and every Development strategy will result in additional and unacceptable levels of traffic and congestion in Dereham. The last Local Plan included a Transport Study which identified that certain junctions would be over capacity, with a number of junctions needing major interventions. None of these major interventions have been delivered with some identified as being undeliverable.</p> <p>Dereham Town Council strongly asserts that as part of the Local Plan, there should be comprehensive transport study and strategy, for Dereham, covering all modes of transport including public transport. Such a study is required for the Local Plan to be compliant with the NPPF paragraph 108, which states that “transport issues should be considered from the earliest stages of plan making so that the potential impacts of development on the transport networks can be addressed”.</p> <p>Along with the specific transport concerns it is also very concerned with the ongoing ad-hoc and piecemeal form of development which may continue to be delivered in Dereham. The Town Council has been consistent over the years in being supportive of additional housing provided it is properly planned and balanced to deliver the services, outdoor playing space, infrastructure, employment and does not adversely impact on the already overburdened road network. The Town Council feels that there needs to be more master planning of Development in Dereham which would deliver:</p> <ul style="list-style-type: none"> •Sufficient employment land •Services including schools, dentists, doctors. •Comprehensive transport strategy <p>It does not appear that these matters have yet been fully addressed in the Local Plan so far.</p> <p>Breckland’s Local Plan-Development Strategy Consultation Site Assessment</p>	<p>is designed to separate and distinguish those sites that are most appropriate as locations to be allocated for development. It may follow that further evidence, mitigation and other enhancements remain necessary for sites. In this regard, within Breckland where there is relatively limited dedicated cycle infrastructure – particularly away from main towns – the role of such a criteria is limited and the more important factor for modes of transport such as cycling is overall accessibility and proximity to facilities and services.</p>
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	<p>General Comments The Assessment criteria considers vehicular access and pedestrian access, but it does not consider cycling access from the site to likely destinations. The National Planning Policy Framework (NPPF) states, at:</p> <ul style="list-style-type: none"> •paragraph 108 transport issues should be considered from the earliest stages of plan making; so that opportunities to promote walking, cycling and public transport are identified and pursued. •Paragraph 109 The planning system should actively manage patterns of growth to ensure a genuine choice of transport modes. •Paragraph 110 Planning policies should – provide for attractive well-designed walking and cycling networks. •Paragraph 116 applications for development should give priority first to pedestrian and cycling movements, both within the scheme and to the neighbouring areas. <p>To be compliant with the NPPF, the site assessments need to be reviewed in order to include access for cycling. Individual site comment.</p> <table border="1" data-bbox="432 794 1590 1257"> <thead> <tr> <th>Site</th> <th>Assessment Criteria</th> <th>Comment</th> <th>Alternative assessment</th> </tr> </thead> <tbody> <tr> <td>West of Golf Course</td> <td>Built up area</td> <td>This site doesn't appear to be adjacent to the built up area. Nor is it adjacent to a railway line.</td> <td>Red</td> </tr> <tr> <td rowspan="2">Land at Norwich Road</td> <td>Pedestrian Access</td> <td>Pedestrian Access seems quite good</td> <td>Green</td> </tr> <tr> <td>Settlement Boundary</td> <td>It is inside the settlement boundary</td> <td>Green</td> </tr> <tr> <td rowspan="3">Dereham Hospital, Northgate</td> <td>Highways</td> <td>This seems odd as it is always in the local plan!</td> <td>Amber</td> </tr> <tr> <td>Pedestrian Access</td> <td>Not significant</td> <td>Green</td> </tr> <tr> <td>Trees and hedgerows</td> <td>Scrub rather than trees</td> <td>Amber</td> </tr> <tr> <td>Land at Grange Farm Etling Green</td> <td>Highways Access</td> <td>Depends where the access is coming from off Etling green then red off the highway green</td> <td>Red</td> </tr> </tbody> </table>	Site	Assessment Criteria	Comment	Alternative assessment	West of Golf Course	Built up area	This site doesn't appear to be adjacent to the built up area. Nor is it adjacent to a railway line.	Red	Land at Norwich Road	Pedestrian Access	Pedestrian Access seems quite good	Green	Settlement Boundary	It is inside the settlement boundary	Green	Dereham Hospital, Northgate	Highways	This seems odd as it is always in the local plan!	Amber	Pedestrian Access	Not significant	Green	Trees and hedgerows	Scrub rather than trees	Amber	Land at Grange Farm Etling Green	Highways Access	Depends where the access is coming from off Etling green then red off the highway green	Red	<p>Site specific comments noted and will be considered in review of the assessments.</p>
Site	Assessment Criteria	Comment	Alternative assessment																												
West of Golf Course	Built up area	This site doesn't appear to be adjacent to the built up area. Nor is it adjacent to a railway line.	Red																												
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	Trees and hedgerows	Scrub rather than trees	Amber																												
Land at Grange Farm Etling Green	Highways Access	Depends where the access is coming from off Etling green then red off the highway green	Red																												

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	Built up area	This site doesn't appear to be adjacent to the built up area	Red
	Scale and size	Development would have a serious impact on form and character of existing hamlet of Etling Green	Red
Land North of Swanton Road	Potential coalescence	This would effectively connect the settlement of Dereham with the Hamlet of Northhall Green.	Red
Land at Swanton Road LPRC4SDEV344	This site has no assessment		
Moat Field, Northhall Green	Highways Access	Access via narrow lane	Amber
	Built-up area	Not adjacent to the built up area of Dereham	Red
	Settlement Boundaries	Not adjacent to existing settlement boundary	Red
	Scale and size	Development impact on form and character of existing hamlet of Northhall Green	Red
Fieldfare Etling Green	Highways Access	Not adjacent to a highway	Red
	Pedestrian Access	No pedestrian access to any services	Red
	Built up area	Etling Green is not a built up area, nor is it adjacent to the built up area of Dereham	Red
Meadoway Etling Green	Highways Access	Not adjacent to highways	Red
	Pedestrian Access	No pedestrian access to any services	Red
	Built up area	Etling Green is not a built up area, nor is it adjacent to the built up area of Dereham	Red
Sandy Lane	Built up area	Not adjacent to existing built up area	Red
Quebec Farm	Greenfield/Brownfield	Not sure how this could be described as Brownfield. Definitely Greenfield	Red
	Highways Access	Poor road network	Amber

	<p>Site Assessments Phase 1 Report (November 2023) Comments on the Phase 2 site assessments. At the rear of the Site Assessments Phase 1 Report (November 2023), paragraph 5.2 details the methodology that will be used to assess sites remaining after the phase 1 Assessment. With regards the Phase 2 Assessment. Cycling - Neither the phase 1 nor the phase 2 assessment included an assessment for cycling. The NPPF states; at paragraph 108 transport issues should be considered from the earliest stages of plan making; so that opportunities to promote walking, cycling and public transport are identified and pursued. Paragraph 109 The planning system should actively manage patterns of growth to ensure a genuine choice of transport modes. Paragraph 110 Planning policies should – provide for attractive well-designed walking and cycling networks. Paragraph 116 applications for development should give priority first to pedestrian and cycling movements, both within the scheme to the neighbouring areas. The Assessments are not compliant with the NPPF if proper consideration is not given to cycling at this early stage of the plan making process. The Town Council is not suggesting that everybody should cycle but, it is self-evident, that if people who want to cycle and are able to cycle, it will reduce the number of cars on the road network, minimise congestion. An assessment of how accessible the site is for cycling could be made using information from Government guidance contained within LTN 1/20. The table below is from LTN 1/20 and shows the level of participation in cycling for different traffic volumes/speeds with no interventions (Mixed Traffic) and various levels of intervention. This table also gives an indication as to the types of interventions in particular situations which is likely to make cycling a genuine choice as per NPPF 109.</p>	
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Figure 4.1: Appropriate protection from motor traffic on highways

Speed Limit ¹	Motor Traffic Flow (pcu/24 hour) ²	Protected Space for Cycling			Cycle Lane (mandatory/ advisory)	Mixed Traffic
		Fully Kerbed Cycle Track	Stepped Cycle Track	Light Segregation		
20 mph ³	0	Green	Green	Green	Green	Green
	2000	Green	Green	Green	Green	Green
	4000	Green	Green	Green	Green	Yellow
	6000+	Green	Green	Green	Yellow	Pink
30 mph	0	Green	Green	Green	Yellow	Yellow
	2000	Green	Green	Green	Yellow	Yellow
	4000	Green	Green	Green	Yellow	Pink
	6000+	Green	Green	Green	Pink	Pink
40 mph	Any	Green	Yellow	Yellow	Pink	Pink
50+ mph	Any	Green	Pink	Pink	Pink	Pink

- Provision suitable for most people
- Provision not suitable for all people and will exclude some potential users and/or have safety concerns
- Provision suitable for few people and will exclude most potential users and/or have safety concerns

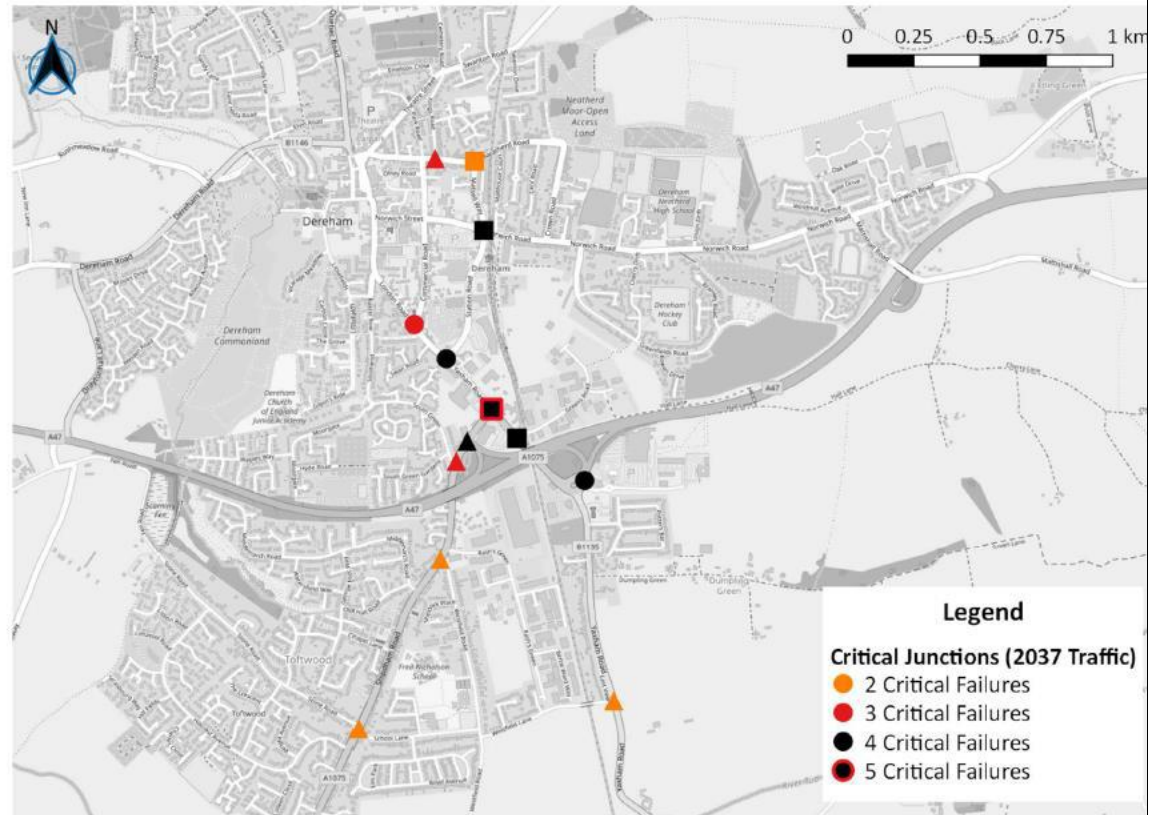
Notes:

1. If the 85th percentile speed is more than 10% above the speed limit the next highest speed limit should be applied
2. The recommended provision assumes that the peak hour motor traffic flow is no more than 10% of the 24 hour flow
3. In rural areas achieving speeds of 20mph may be difficult, and so shared routes with speeds of up to 30mph will be generally acceptable with motor vehicle flows of up to 1,000 pcu per day

Given the volumes of traffic on the main routes in Dereham to make cycling a realistic choice for most people, there would need to be some form of segregation. Clearly some routes will better lend themselves to segregation than others. This is an important consideration and needs to be factored in as part of the site

assessment. The Town Council commissioned an assessment from consultants PJA; this study looked at critical junctions as these are the places where accidents are more likely to occur. The study clearly demonstrated that the road network in Dereham is largely hostile to all but the most confident cyclist. Summary of findings below:

Figure 8: Plan showing junctions with severity of critical cycling safety conditions (2037 Scenario)



	<p>Walking Assessment.</p> <p>At section 5.2 (7)(8)(9)(10) [extract below] there is an assessment criteria to look at walking distances.</p> <p>It is clear what the criteria is trying to do, but</p> <ol style="list-style-type: none">1.the wording isn't very clear,2.it is not clear where the distances states are drawn from3.it doesn't recognise different destinations have different walking distances <p>The purpose of this assessment, it is assumed, is to identify the most sustainable location for development, so that walking to meet most daily needs is a realistic choice for most people.</p> <p>This assessment is really important for Dereham with its issues with congestion. It is self-evident that the more people who can walk to meet their daily needs it gives people a genuine choice (NPPF 109) and it will free up road space for those people who wish to or need to drive.</p> <p>Suggested alternative approach.</p> <p>Firstly, identify key services which would fulfil most people's daily needs and identify how far most people would be prepared to walk to such services. It must also be remembered that the elderly and disabled will not be able to walk as far as able-bodied people. Fareham Borough Council has produced an Accessibility Standard for its Local Plan, this is set out below:</p>	
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Facilities and Associated Accessibility Standard ^f		
Facilities	Accessibility Standard in Metres (m)	Approximate Walking Time (minutes)
GP surgeries	1,200m	15
Bus stops* Peak-time to and from higher order settlement.	400m	5
Train station	1,600m	20
Community and leisure	800m	10
Secondary schools	1,600m	20
Primary schools**	800m	10
Newsagents/convenience store	800m	10
Town/district centres/parades	1,600m	20
Designated employment areas	1,600m	20
Accessible green spaces (unrestricted and not including greenways or incidental spaces) or play space	800m	10

*incorporating 10(vi) from the Site Assessments Phase 1 Report (November 2023)
 **suggested amendment by Dereham Town Council

There may be certain services (Key Services) that are more important than others such that every development must be within walking distance of that service, say primary, secondary schools, bus stop to higher order settlement and accessible green space. Then of the sites that are accessible on foot to the key services the

In development of the Local Plan regard will be given to the Norfolk CC Countywide Local Walking and Cycling Improvement Plan. Advice regarding walking distances is noted. The accessibility standards proposed within the Phase 1 report for future assessments are informed by Norfolk wide assessment standards. They incorporate accessibility to services required to meet daily needs with a RAG rating based on the number of facilities within a given range. It is noted there may be alternative approaches to doing this, but it is not established that there are particular flaws in the mechanism proposed.

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	sites with the greater number of other services, accessible on foot, will be the most sustainable. i Background Paper: Accessibility Study, 2018, Fareham Borough Council	
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