

**Breckland Local Plan Pre-Submission
Publication full representation
schedule**

December 2017

Contents

Comment ID	Consultee	Consultee ID	Method of Submission	Notes	Page Number
1	Mr John Dunford	1118963	Web		1
2	Mr David Cockburn	868883	Web		3
3	Mr David Cockburn	868883	Web		5
4	Mr David Cockburn	868883	Web		7
5	Mr David Cockburn	868883	Web		9
6	Mr Tim Bornett	966641	Web		11
7	Mr Tim Bornett	966641	Web		13
9	Mr Tim Bornett	966641	Web		15
10	Mr Tim Bornett	966641	Web		17
11	Lynn Fletcher	1121366	Email		18
12	Mr Ian Tarry	1121461	Letter		24
13	Garboldisham Parish Council (Mary Anne Feakes)	1122575	Email		28
14	Mr John Dennis	1122865	Letter		32
15	Mrs Lesley Cauillault	1123033	Letter		37
16	Jane Woollestone	1123468	Letter		41
17	Julie Walmsley	1123472	Letter		45
18	Mrs J M Raynsford	498955	Letter		49
19	Swanton Morley Parish Council (Mrs Faye LeBon)	873890	Web		56
20	Swanton Morley Parish Council (Mrs Faye LeBon)	873890	Web		58
21	Carbrooke Parish Council (Mr Nicholas Hartley)	1124026	Web		60
22	Mr George Hayes	974399	Email		62
23	Mr Tim Bornett	966641	Web		66
24	Stow Bedon & Breckles Parish Council (Mr Julian Gibson)	973939	Web		68
25	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		70
26	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		72
27	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		74

28	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		76
30	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		78
31	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		80
32	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		82
33	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		84
34	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		86
35	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		88
36	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		90
37	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		92
38	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		94
39	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		96
40	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		98
41	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		100
42	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		102
43	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		104
44	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		106
46	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		108

47	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		110
48	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		112
49	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		114
50	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		116
51	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		118
52	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		120
53	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		122
54	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		124
55	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		126
56	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		128
57	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		130
58	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		132
59	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		134
60	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		136
62	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		138
63	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		140
64	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		142

65	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		144
66	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		146
67	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		148
68	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		150
69	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		152
70	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		154
71	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		156
72	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		158
73	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		160
74	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		162
75	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		164
76	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		166
77	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		168
78	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		170
79	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		172
80	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		174
81	Attleborough Town Council (Gina Lopes)	975674	Email		176

82	Mrs Val Pitt	1127986	Web		181
83	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		183
84	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		185
85	Saham Toney Parish Council (Mr Christopher Blow)	963733	Web		187
86	Saham Toney Parish Council (Mr Christopher Blow)	963734	Web		189
87	Snetterton Park Limited (Mr James McSwiney)	1128193	Email		191
88	Norfolk County Council (Hannah Grimes)	1128246	Email		202
89	Norfolk County Council (Mr David Robertson)	1128257	Email		207
90	Norfolk County Council (Mr David Robertson)	1128257	Email		212
91	Norfolk County Council (Mr David Robertson)	1128257	Email		217
94	NPS Property Consultants (Mr Richard Smith)	1128366	Email		222
95	NPS Property Consultants (Mr Richard Smith)	1128366	Email		226
96	NPS Property Consultants (Mr Richard Smith)	1128366	Email		230
97	NPS Property Consultants (Mr Richard Smith)	1128366	Email		234
98	NPS Property Consultants (Mr Richard Smith)	1128366	Email		238
99	Norfolk County Council (Mr Stephen Faulkner)	442915	Email		242
100	Mr Les Scott	971309	Web		244
101	Mr Les Scott	971309	Web		246
102	Mr Chris Smith	255168	Email		248
103	Mr Chris Smith	255168	Email		253

104	Mrs Val Pitt	1127986	Email		259
105	Mr Chris Smith	255168	Email		263
106	Rentplus	1128735	Email		267
107	Beetley Parish Council (Leigh)	873983	Web		323
108	Litcham Parish Council (Leigh)	873985	Web		325
109	Cornerstone Planning Ltd (Alan Presslee)	975598	Email		327
110	Jarl Barnes	1129327	Letter		333
111	Debbie Dingor	1129331	Letter		337
113	Andy Carr	1129340	Letter		341
114	Sonia Meacher	1129345	Letter		345
115	Jane Whitehead	1129348	Letter		349
116	Chloe Green	1129352	Letter		353
117	EJW Planning Ltd (Mrs Erica Wettingsteel)	609986	Web		357
118	EJW Planning Ltd (Mrs Erica Wettingsteel)	609986	Web		359
119	EJW Planning Ltd (Mrs Erica Wettingsteel)	609986	Web		361
120	Maeve McBride	1129365	Letter		363
121	EJW Planning Ltd (Mrs Erica Wettingsteel)	609986	Web		367
122	EJW Planning Ltd (Mrs Erica Wettingsteel)	609986	Web		369
123	EJW Planning Ltd (Mrs Erica Wettingsteel)	609986	Web		371
125	EJW Planning Ltd (Mrs Erica Wettingsteel)	609986	Web		373
126	EJW Planning Ltd (Mrs Erica Wettingsteel)	609986	Web		375
127	EJW Planning Ltd (Mrs Erica Wettingsteel)	609986	Web		377
128	K Powles	1129385	Letter		379
129	EJW Planning Ltd (Mrs Erica Wettingsteel)	609986	Web		383
130	EJW Planning Ltd	609986	Web		385

	(Mrs Erica Wettingsteel)			
131	Michelle Hoskins	1129398	Letter	387
132	Keith Francis	1129403	Letter	391
133	Jackie Francis	1129409	Letter	395
134	Mr H Wilcox	1129414	Letter	399
135	A Pendergrest	1129420	Letter	403
136	Mr Hollett	1129423	Letter	407
137	Edwin Atkinson	1129426	Letter	411
138	Mr Trevor Ward	1129430	Letter	415
139	D.M.Ward	1129449	Letter	419
140	Emily Makcrow	1129464	Letter	423
141	John Dawson	1129622	Letter	427
142	Danny Rae	1129623	Letter	431
143	Kevin Green	1129659	Letter	435
144	Beverley Hatherall	1129664	Letter	439
145	Railway Tavern (Paul Sandford)	1129669	Letter	443
146	Shaun Small	1129674	Letter	447
147	Huw David	1129685	Letter	451
148	B Bird	1129687	Letter	455
149	J Bird	1129689	Letter	459
150	Gemma Gilding	1129694	Letter	463
151	Mrs Emma Reeve	1129696	Letter	467
152	Mr Colin Reeve	1129699	Letter	471
153	Naomi DGLISH- Gage	1129702	Letter	475
154	Susan Gilding	1129705	Letter	479
155	Louise DGLISH	1129707	Letter	483
156	Stephen Gilding	1129710	Letter	487
157	Stephen Dean	1129715	Letter	491
158	Teresa Small	1129717	Letter	495
159	Stuart Wing	1129721	Letter	499
160	Kelly Wing	1129725	Letter	503
161	Kirsty-R Hann	1129728	Letter	507
162	Mr R Kingdom	1129734	Letter	511
163	Albert Harris	1129738	Letter	515
164	Education and Skills Funding Agency (Mr Douglas McNab)	1129753	Email	517
165	Orbit Homes Limited	868057	Web	521
166	Orbit Homes Limited	868057	Web	523
167	Orbit Homes Limited	868057	Web	525

168	Orbit Homes Limited	868058	Web		527
169	Orbit Homes Limited	868059	Web		529
170	Orbit Homes Limited	868060	Web		531
171	Orbit Homes Limited	868061	Web		533
172	Orbit Homes Limited	868062	Web		535
173	Orbit Homes Limited	868063	Web		537
174	Orbit Homes Limited	868064	Web		539
175	Orbit Homes Limited	868065	Web		541
176	Education and Skills Funding Agency (Mr Douglas McNab)	1129753	Email		543
178	St Edmundsbury Borough Council (West Suffolk Planning Policy)	1030375	Email		547
179	Natural England (Francesca Shapland)	1129965	Email		551
180	Orbit Homes (2020) Limited (Orbit Homes (2020) Limited)	1129978	Letter	Sent as a combined representation comments 180, 222 and 338-341	555
181	Matthew Pendercrest	1130020	Letter		567
182	Danielle O'Connell	1130028	Letter		569
183	Demi Fossitt	1130035	Letter		573
184	Mrs lesley Manns	1130041	Letter		577
185	Caroline Green	1130046	Letter		579
186	Leslie Alan Thompson	1130049	Letter		583
187	Susan Hollings	1130056	Letter		587
188	Ian Hollings	1130058	Letter		589
189	Craig La Mont	1130065	Letter		591
190	Alison Baker	1130069	Letter		593
191	Richard Biggs	1130073	Letter		595
192	Brian Ottis	1130241	Letter		599
193	Gorden Kay	1130247	Letter		601
194	T Webster	1130248	Letter		603
195	Jemma Shepherd	1130252	Letter		607
196	Tom Brady	1130255	Letter		611
197	Mr M Wilkins	1130260	Letter		614

198	J Moore	1130263	Letter		618
199	Chris Chitty	1130294	Letter		620
200	Kenneth Powles	1130300	Letter		623
201	Derek Brown	1130309	Letter		625
202	Banham Parish Council (Ms Geraldine Sayers Cowper)	1125802	Web		627
203	Banham Parish Council (Ms Geraldine Sayers Cowper)	1125802	Web		629
204	Diane Oglivy	1130319	Letter		631
205	Ian Dent	1130335	Letter		633
206	D Chambers	1130339	Letter		635
207	Jennifer Manns	1130345	Letter		637
208	Luke Carrol	1130350	Letter		640
209	Jamie Beeby	1130357	Letter		642
210	Bethany Hollings	1130359	Letter		645
211	Debbie Dungan	1130367	Letter		647
212	Mr King	1130376	Letter		649
213	Marie Da Silva	1130393	Letter		651
214	Dawn Mastin	1130398	Letter		653
215	Mrs Tina Wilkins	1130400	Letter		655
216	Elaine Wintebone	1130402	Letter		659
217	Michael Meers	1130408	Letter		663
218	Ronald Hart	1130412	Letter		665
219	Rod James Ranger	1130417	Letter		668
220	Morgan Da Silva	1130426	Letter		671
221	Mr Stephen Gibson	1130432	Letter		673
222	Orbit Homes (2020) Limited (Orbit Homes (2020) Limited)	1129978	Letter	Sent as a combined representation comments 180, 222 and 338-341	676
223	Banham Parish Council (Ms Geraldine Sayers Cowper)	1125802	Web		688
224	Banham Parish Council (Ms Geraldine Sayers Cowper)	1125802	Web		690
230	Norfolk County Council (Hannah Grimes)	1128246	Email		692
232	Gillian Wingrove	1130605	Email		697
235	Vincent Potter	1130636	Letter		701

236	Claire Gooch	1130644	Letter		704
237	Mrs J R Howard	1130647	Letter		707
238	Dean Goldspink	1130657	Letter		710
239	Jess Bannerman	1130661	Letter		712
240	Marcus Admes	1130665	Letter		715
241	Danielle Buttes	1130673	Letter		717
242	Morgana Hale	1130677	Letter		720
243	Jan Hawkins	1130681	Letter		723
244	P Doughty	1130683	Letter		726
245	Angela Daley	1130686	Letter		729
246	Annette Barkowski	1130692	Letter		732
247	Blundell	1130696	Letter		735
248	Mrs JJ Tinney	1130704	Letter		738
249	Sarah Godsoe	1130708	Letter		741
250	Mr Pablo Dimoglou	1130821	Web		744
251	Old Buckenham Parish Council (Mrs Hilary Clutten. Clerk to Old Bucken Council)	1130852	Web		746
252	Old Buckenham Parish Council (Mrs Hilary Clutten. Clerk to Old Bucken Council)	1130852	Web		748
253	Old Buckenham Parish Council (Mrs Hilary Clutten. Clerk to Old Bucken Council)	1130852	Web		750
254	Old Buckenham Parish Council (Mrs Hilary Clutten. Clerk to Old Bucken Council)	1130852	Web		752
256	Saham Toney Parish Council (Mr Christopher Blow)	963732	Web		754
257	Mr Geoff Hinchliffe	1130870	Web		756
258	Mr Pablo Dimoglou	1130821	Web		758
259	Mr Pablo Dimoglou	1130821	Web		761
260	Mr Pablo Dimoglou	1130821	Web		763
261	Mr Peter Bush	973437	Web		765
262	Mr Peter Bush	973437	Web		767
263	Mr Peter Bush	973437	Web		769
264	Mark Mendham	976454	Web		771
265	Mark Mendham	976454	Web		773

266	Mr Dick Barwick	1130929	Web		775
267	Mr Dick Barwick	1130929	Web		777
268	Mr Paul Walmsley	1130940	Web		779
269	Mr Chris Manning	969337	Web		782
270	Mr Pablo Dimoglou	1130821	Web		784
271	Mr Pablo Dimoglou	1130821	Web		787
272	M Neave	1131017	Letter		789
273	Mrs Kirsty Heath	972215	Web		792
274	Mr Pablo Dimoglou	1130821	Web		793
275	Mrs Kirsty Heath	972215	Web		795
276	Mrs Kirsty Heath	972215	Web		796
277	Mr Pablo Dimoglou	1130821	Web		798
278	Mrs Kirsty Heath	972215	Web		800
279	Mrs Kirsty Heath	972216	Web		801
280	Mrs Kirsty Heath	972217	Web		803
281	Lisa Boyle	1131040	Letter		804
282	Mrs Kirsty Heath	972217	Web		807
283	Mrs Jen Gaton	1131046	Letter		808
284	Mr Pablo Dimoglou	1130821	Web		811
285	EJW Planning Ltd (Mrs Erica Wettingsteel)	609986	Web		813
286	Mr S Yarham	1131059	Letter		815
287	Mr Pablo Dimoglou	1130821	Web		819
288	Mr Pablo Dimoglou	1130821	Web		821
289	Mr John Pitt	1131065	Letter		823
290	Harling Parish Council (Mrs Kate Filby)	970265	Letter		825
291	R. N. Smith	1131085	Letter		829
292	Mr Paul Hewett	512902	Email		830
293	Yaxham Parish Council (Mr Ian Martin)	1131135	Email	Sent as a combined representation comments 293-296 and 304 and 306	834
294	Yaxham Parish Council (Mr Ian Martin)	1131135	Email	Sent as a combined representation comments 293-296 and 304 and 306	834
295	Yaxham Parish Council (Mr Ian Martin)	1131135	Email	Sent as a combined representation comments 293-296 and 304 and 306	834
296	Yaxham Parish Council (Mr Ian Martin)	1131135	Email	Sent as a combined representation comments 293-296 and 304 and 306	834

297	Breckland Bridge (Mr Iain Hill)	1130112	Web		839
298	Breckland Bridge (Mr Iain Hill)	1130112	Web		841
299	Breckland Bridge (Mr Iain Hill)	1130113	Web		844
300	Breckland Bridge Ltd and C F Cole & Sons Ltd	1126434	Web		846
301	Breckland Bridge Ltd and C F Cole & Sons Ltd	1126434	Web		848
302	Breckland Bridge Ltd	1129859	Web		851
303	Breckland Bridge Ltd and C F Cole & Sons Ltd	1126434	Web		853
304	Yaxham Parish Council (Mr Ian Martin)	1131135	Email	Sent as a combined representation comments 293-296 and 304 and 306	855
305	Breckland Bridge Ltd	1129859	Web		860
306	Yaxham Parish Council (Mr Ian Martin)	1131135	Email	Sent as a combined representation comments 293-296 and 304 and 306	862
307	Breckland Bridge Ltd	1129859	Web		867
308	Breckland Bridge Ltd	1129859	Web		869
309	Shipdham parish Council (Mrs Patty Harris)	1131212	Web		871
310	Lanpro Services (Jane Crichton)	1031284	Email		873
311	Mr Andrew Thornton	975280	Web		878
312	Mr Andrew Thornton	975280	Web		880
313	Stapleford Group Thetford Ltd (Stapleford Group Thetford Ltd)	1131249	Email		882
314	Great Hockham Estate (Nicol Perryman)	1131105	Web		890
315	Great Hockham Estate (Nicol Perryman)	1131105	Web		892
316	Great Hockham Estate (Nicol	1131105	Web		894

	Perryman)				
317	Mr Les Scott	971309	Web		897
318	Dr Nick Grandy	1032053	Web		899
319	Dr Nick Grandy	1032054	Web		901
320	Dr Nick Grandy	1032055	Web		903
321	Dr Nick Grandy	1032056	Web		905
322	New Buckenham Parish Council (Mr Trevor Wenman (Parish Clerk New PC)	1131261	Web		907
323	Dr Nick Grandy	1032056	Web		909
324	RSPB (Mike Jones RSPB)	462653	Web		911
325	Dr Nick Grandy	1032056	Web		913
326	RSPB (Mike Jones RSPB)	462653	Web		915
327	RSPB (Mike Jones RSPB)	462653	Web		917
328	Crone's Cider (Mr Robert Crone)	1131328	Email		919
329	Ovington Parish Council (Ms Heidi Frary)	874753	Email		921
330	Ovington Parish Council (Ms Heidi Frary)	874753	Email		923
331	Ovington Parish Council (Ms Heidi Frary)	874753	Email		925
332	Ovington Parish Council (Ms Heidi Frary)	874753	Email		927
333	Ovington Parish Council (Ms Heidi Frary)	874753	Email		929
334	Ovington Parish Council (Ms Heidi Frary)	874753	Email		931
335	Ovington Parish Council (Ms Heidi Frary)	874753	Email		933
336	Ovington Parish Council (Ms Heidi Frary)	874753	Email		935
337	Ovington Parish Council (Ms Heidi Frary)	874753	Email		937
338	Orbit Homes (2020) Limited (Orbit	1129978	Email	Sent as a combined representation	939

	Homes (2020) Limited)			comments 180, 222 and 338-341	
339	Orbit Homes (2020) Limited (Orbit Homes (2020) Limited)	1129979	Email	Sent as a combined representation comments 180, 222 and 338-341	939
340	Orbit Homes (2020) Limited (Orbit Homes (2020) Limited)	1129980	Email	Sent as a combined representation comments 180, 222 and 338-341	939
341	Orbit Homes (2020) Limited (Orbit Homes (2020) Limited)	1129981	Email	Sent as a combined representation comments 180, 222 and 338-341	939
342	Attleborough Land Ltd	502323	Email		951
343	Attleborough Land Ltd	502323	Email		954
344	Attleborough Land Ltd	502323	Email		956
345	Spaceward	875126	Email	Sent as a combined representation comments 345-347	958
346	Spaceward	875126	Email	Sent as a combined representation comments 345-347	958
347	Spaceward	875126	Email	Sent as a combined representation comments 345-347	958
348	Mountleigh Development Holdings (Mountleigh Development Holdings)	1131634	Email		976
349	Mountleigh Development Holdings (Mountleigh Development Holdings)	1131634	Email		978
350	Mountleigh Development Holdings (Mountleigh Development Holdings)	1131634	Email		980
351	Mountleigh Development Holdings (Mountleigh	1131634	Email		982

	Development Holdings)				
352	Blue Oak Development (Blue Oak Developments)	1131636	Email		984
353	Blue Oak Development (Blue Oak Developments)	1131636	Email		988
354	De Merke Estates (De Merke Estates)	1132036	Email		992
355	Taylor Wimpey UK ltd (Mr Daniel Hewett)	1132181	Email		994
356	Taylor Wimpey UK ltd (Mr Daniel Hewett)	1132181	Email		996
357	Taylor Wimpey UK ltd (Mr Daniel Hewett)	1132181	Email		999
358	Taylor Wimpey UK ltd (Mr Daniel Hewett)	1132181	Email		1001
359	Mr Robert Whittaker	1132269	Email		1003
360	Sainsbruy's Supermarkets Ltd	12056	Email		1005
361	Glavenhill Strategic Land (Glavenhill Strategic Land)	1132253	Email		1007
362	Glavenhill Strategic Land (Glavenhill Strategic Land)	1132253	Email		1010
363	Glavenhill Strategic Land (Glavenhill Strategic Land)	1132253	Email		1013
364	Heritage Developments (Mr Matt Bartram)	1132400	Email		1016
365	Glavenhill Strategic Land (Glavenhill Strategic Land)	1132253	Email		1018
366	Glavenhill Strategic Land (Glavenhill Strategic Land)	1132253	Email		1020
367	Albanwise Limited (Roland Bohn)	1132458	Email		1022
368	Albanwise Limited (Roland Bohn)	1132458	Email		1024
369	Albanwise Limited (Roland Bohn)	1132458	Email		1026
370	Albanwise Limited	1132458	Email		1028

	(Roland Bohn)				
371	Albanwise Limited (Roland Bohn)	1132458	Email		1030
372	De Merke Estates (De Merke Estates)	1132036	Email		1032
373	De Merke Estates (De Merke Estates)	1132036	Email		1034
374	De Merke Estates (De Merke Estates)	1132036	Email		1036
375	De Merke Estates (De Merke Estates)	1132036	Email		1038
376	De Merke Estates (De Merke Estates)	1132036	Email		1040
377	De Merke Estates (De Merke Estates)	1132036	Email		1042
378	De Merke Estates (De Merke Estates)	1132036	Email		1044
379	De Merke Estates (De Merke Estates)	1132037	Email		1046
380	De Merke Estates (De Merke Estates)	1132038	Email		1048
381	Goymour Properties (Martin Goymour)	1132853	Email		1050
382	Goymour Properties (Martin Goymour)	1132853	Email		1052
383	Goymour Properties (Martin Goymour)	1132853	Email		1054
384	Goymour Properties (Martin Goymour)	1132853	Email		1056
385	The Diocese of Norwich (The Diocese of Norwich)	1133000	Email		1058
386	The Diocese of Norwich (The Diocese of Norwich)	1133000	Email		1060
387	Stapleford Group Thetford Ltd (Stapleford Group Thetford Ltd)	1131249	Email		1062
388	Lexham Estate (Lexham Estate)	1133331	Email		1066
389	Lexham Estate (Lexham Estate)	1133331	Email		1068
390	Lexham Estate (Lexham Estate)	1133331	Email		1070
391	Lexham Estate (Lexham Estate)	1133331	Email		1072

392	Lexham Estate (Lexham Estate)	1133331	Email		1074
393	Goymour Properties (Martin Goymour)	1132853	Email		1077
394	Justin Brookes	1133548	Email		1079
395	Justin Brookes	1133548	Email		1081
396	Millard Tuddenham (Mr James Millard)	1133624	Email		1083
397	Millard Tuddenham (Mr James Millard)	1133624	Email		1085
398	Suffolk County Council (Mr Robert Feakes)	1133646	Email		1087
399	Attleborough Academy Norwich (Mr Neil McShane)	1133651	Email		1089
400	Bridgeham Parish Council (Mandy Maguire)	1133658	Email		1091
401	Sport England (Mr Philip Raiswell)	500604	Email		1092
402	Orbit and Longhurst (in capacity of Housing Associations) (Orbit and Longhurst)	1133952	Email		1097
403	Orbit and Longhurst (in capacity of Housing Associations) (Orbit and Longhurst)	1133952	Email		1099
404	Orbit and Longhurst (in capacity of Housing Associations) (Orbit and Longhurst)	1133952	Email		1101
405	Breckland Bridge Ltd	1129859	Email		1103
406	Breckland Bridge Ltd	1129859	Email		1106
407	Breckland Bridge Ltd and C F Cole & Sons Ltd	1126434	Email		1108
408	Breckland Bridge Ltd	1129859	Email		1110
409	Abel Developments (Mr Garth Hanlon)	11968	Email		1112
410	Abel Developments (Mr Garth Hanlon)	11968	Email		1114

	Abel Developments (Mr Garth Hanlon)	11968	Email		
412	NP4 Yaxham" Yaxham Neighbourhood Plan Working Group (Maggie Oechsle)	1134348	Email		1117
413	NP4 Yaxham" Yaxham Neighbourhood Plan Working Group (Maggie Oechsle)	1134348	Email		1119
414	NP4 Yaxham" Yaxham Neighbourhood Plan Working Group (Maggie Oechsle)	1134348	Email		1121
415	NP4 Yaxham" Yaxham Neighbourhood Plan Working Group (Maggie Oechsle)	1134348	Email		1123
416	NP4 Yaxham" Yaxham Neighbourhood Plan Working Group (Maggie Oechsle)	1134348	Email		1125
417	NP4 Yaxham" Yaxham Neighbourhood Plan Working Group (Maggie Oechsle)	1134348	Email		1127
418	Mr Tony Needham	1134647	Letter		1129
419	Mr Tony Needham	1134647	Letter		1131
420	Mr Tony Needham	1134648	Letter		1134
421	Mr Tony Needham	1134649	Letter		1136
422	Mr Tony Needham	1134650	Letter		1138
423	Mr Tony Needham	1134651	Letter		1140
424	Mr Tony Needham	1134652	Letter		1142
425	Mr Tony Needham	1134653	Letter		1144
426	Mr Tony Needham	1134654	Letter		1146
427	Mr Tony Needham	1134655	Letter		1148
428	Mr Tony Needham	1134656	Letter		1150

429	Mr Tony Needham	1134657	Letter		1152
430	Mr Tony Needham	1134658	Letter		1154
431	Mr Tony Needham	1134659	Letter		1156
432	Mr Tony Needham	1134660	Letter		1158
433	Mr Tony Needham	1134661	Letter		1160
434	Mr Tony Needham	1134662	Letter		1162
435	Mr John Carey Bennett	1135560	Email		1165
436	Hans House Group of Companies	1032208	Email		1167
437	Hans House Group of Companies	1032208	Email		1169
438	Hans House Group of Companies	1032208	Email		1171
439	Breckland Bridge Ltd	1129859	Email		1175
440	Great Hockham Estate (Nicol Perryman)	1131105	Email		1178
441	Goymour Properties (Martin Goymour)	1132853	Email		1181
442	Anglian Water Services Ltd (Mr Steward Patience)	1135889	Email		1184
443	The Shadwell Estate Company Ltd (Mr Chris Kennard)	1032087	Email		1186
444	The Shadwell Estate Company Ltd (Mr Chris Kennard)	1032087	Email		1188
445	The Shadwell Estate Company Ltd (Mr Chris Kennard)	1032087	Email		1190
446	The Shadwell Estate Company Ltd (Mr Chris Kennard)	1032087	Email		1193
447	Eastern Attachments Limited (Eastern Attachements Limited)	1136116	Email		1195
448	Eastern Attachments Limited (Eastern Attachements Limited)	1136116	Email		1197
449	Mr Graeme Robertson	975295	Email		1199
450	Anglian Water	1135889	Email		1201

	Services Ltd (Mr Steward Patience)				
451	Anglian Water Services Ltd (Mr Steward Patience)	1135889	Email		1203
452	Anglian Water Services Ltd (Mr Steward Patience)	1135889	Email		1205
453	Anglian Water Services Ltd (Mr Steward Patience)	1135889	Email		1207
454	Anglian Water Services Ltd (Mr Steward Patience)	1135889	Email		1209
455	Anglian Water Services Ltd (Mr Steward Patience)	1135889	Email		1211
456	Anglian Water Services Ltd (Mr Steward Patience)	1135889	Email		1213
457	Anglian Water Services Ltd (Mr Steward Patience)	1135889	Email		1215
458	Anglian Water Services Ltd (Mr Steward Patience)	1135889	Email		1217
459	Anglian Water Services Ltd (Mr Steward Patience)	1135889	Email		1219
460	Anglian Water Services Ltd (Mr Steward Patience)	1135890	Email		1221
461	Anglian Water Services Ltd (Mr Steward Patience)	1135891	Email		1223
462	Anglian Water Services Ltd (Mr Steward Patience)	1135892	Email		1225
463	Anglian Water Services Ltd (Mr Steward Patience)	1135893	Email		1227
464	Anglian Water Services Ltd (Mr Steward Patience)	1135894	Email		1229
465	Anglian Water Services Ltd (Mr Steward Patience)	1135895	Email		1231
466	Anglian Water Services Ltd (Mr Steward Patience)	1135896	Email		1233
467	Anglian Water	1135897	Email		1235

	Services Ltd (Mr Steward Patience)				
468	Anglian Water Services Ltd (Mr Steward Patience)	1135898	Email		1237
469	Historic England (Katie Parsons)	1136480	Email	Sent as a combined representation comments 469-534	1239
470	Historic England (Katie Parsons)	1136480	Email	Sent as a combined representation comments 469-534	1239
471	Historic England (Katie Parsons)	1136480	Email	Sent as a combined representation comments 469-534	1239
472	Historic England (Katie Parsons)	1136480	Email	Sent as a combined representation comments 469-534	1239
473	Historic England (Katie Parsons)	1136480	Email	Sent as a combined representation comments 469-534	1239
474	Historic England (Katie Parsons)	1136480	Email	Sent as a combined representation comments 469-534	1239
475	Historic England (Katie Parsons)	1136480	Email	Sent as a combined representation comments 469-534	1239
476	Historic England (Katie Parsons)	1136480	Email	Sent as a combined representation comments 469-534	1239
477	Historic England (Katie Parsons)	1136480	Email	Sent as a combined representation comments 469-534	1239
478	Historic England (Katie Parsons)	1136480	Email	Sent as a combined representation comments 469-534	1239
479	Historic England (Katie Parsons)	1136480	Email	Sent as a combined representation comments 469-534	1239
480	Historic England (Katie Parsons)	1136481	Email	Sent as a combined representation comments 469-534	1239
481	Historic England (Katie Parsons)	1136482	Email	Sent as a combined representation comments 469-534	1239
482	Historic England (Katie Parsons)	1136483	Email	Sent as a combined representation comments 469-534	1239
483	Historic England (Katie Parsons)	1136484	Email	Sent as a combined representation comments 469-534	1239
484	Historic England	1136485	Email	Sent as a combined	1239

	(Katie Parsons)			representation comments 469-534	
485	Historic England (Katie Parsons)	1136486	Email	Sent as a combined representation comments 469-534	1239
486	Historic England (Katie Parsons)	1136487	Email	Sent as a combined representation comments 469-534	1239
487	Historic England (Katie Parsons)	1136488	Email	Sent as a combined representation comments 469-534	1239
488	Historic England (Katie Parsons)	1136489	Email	Sent as a combined representation comments 469-534	1239
489	Historic England (Katie Parsons)	1136490	Email	Sent as a combined representation comments 469-534	1239
490	Historic England (Katie Parsons)	1136491	Email	Sent as a combined representation comments 469-534	1239
491	Historic England (Katie Parsons)	1136492	Email	Sent as a combined representation comments 469-534	1239
492	Historic England (Katie Parsons)	1136493	Email	Sent as a combined representation comments 469-534	1239
493	Historic England (Katie Parsons)	1136494	Email	Sent as a combined representation comments 469-534	1239
494	Historic England (Katie Parsons)	1136495	Email	Sent as a combined representation comments 469-534	1239
495	Historic England (Katie Parsons)	1136496	Email	Sent as a combined representation comments 469-534	1239
496	Historic England (Katie Parsons)	1136497	Email	Sent as a combined representation comments 469-534	1239
497	Historic England (Katie Parsons)	1136498	Email	Sent as a combined representation comments 469-534	1239
498	Historic England (Katie Parsons)	1136499	Email	Sent as a combined representation comments 469-534	1239
499	Historic England (Katie Parsons)	1136500	Email	Sent as a combined representation comments 469-534	1239
500	Historic England (Katie Parsons)	1136501	Email	Sent as a combined representation comments 469-534	1239
501	Historic England	1136502	Email	Sent as a combined	1239

	(Katie Parsons)			representation comments 469-534	
502	Historic England (Katie Parsons)	1136503	Email	Sent as a combined representation comments 469-534	1239
503	Historic England (Katie Parsons)	1136504	Email	Sent as a combined representation comments 469-534	1239
504	Historic England (Katie Parsons)	1136505	Email	Sent as a combined representation comments 469-534	1239
505	Historic England (Katie Parsons)	1136506	Email	Sent as a combined representation comments 469-534	1239
506	Historic England (Katie Parsons)	1136507	Email	Sent as a combined representation comments 469-534	1239
507	Historic England (Katie Parsons)	1136508	Email	Sent as a combined representation comments 469-534	1239
508	Historic England (Katie Parsons)	1136509	Email	Sent as a combined representation comments 469-534	1239
509	Historic England (Katie Parsons)	1136510	Email	Sent as a combined representation comments 469-534	1239
510	Historic England (Katie Parsons)	1136511	Email	Sent as a combined representation comments 469-534	1239
511	Historic England (Katie Parsons)	1136512	Email	Sent as a combined representation comments 469-534	1239
512	Historic England (Katie Parsons)	1136513	Email	Sent as a combined representation comments 469-534	1239
513	Historic England (Katie Parsons)	1136514	Email	Sent as a combined representation comments 469-534	1239
514	Historic England (Katie Parsons)	1136515	Email	Sent as a combined representation comments 469-534	1239
515	Historic England (Katie Parsons)	1136516	Email	Sent as a combined representation comments 469-534	1239
516	Historic England (Katie Parsons)	1136517	Email	Sent as a combined representation comments 469-534	1239
517	Historic England (Katie Parsons)	1136518	Email	Sent as a combined representation comments 469-534	1239
518	Historic England	1136519	Email	Sent as a combined	1239

	(Katie Parsons)			representation comments 469-534	
519	Historic England (Katie Parsons)	1136520	Email	Sent as a combined representation comments 469-534	1239
520	Historic England (Katie Parsons)	1136521	Email	Sent as a combined representation comments 469-534	1239
521	Historic England (Katie Parsons)	1136522	Email	Sent as a combined representation comments 469-534	1239
522	Historic England (Katie Parsons)	1136523	Email	Sent as a combined representation comments 469-534	1239
523	Historic England (Katie Parsons)	1136524	Email	Sent as a combined representation comments 469-534	1239
524	Historic England (Katie Parsons)	1136525	Email	Sent as a combined representation comments 469-534	1239
525	Historic England (Katie Parsons)	1136526	Email	Sent as a combined representation comments 469-534	1239
526	Historic England (Katie Parsons)	1136527	Email	Sent as a combined representation comments 469-534	1239
527	Historic England (Katie Parsons)	1136528	Email	Sent as a combined representation comments 469-534	1239
528	Historic England (Katie Parsons)	1136529	Email	Sent as a combined representation comments 469-534	1239
529	Historic England (Katie Parsons)	1136530	Email	Sent as a combined representation comments 469-534	1239
530	Historic England (Katie Parsons)	1136531	Email	Sent as a combined representation comments 469-534	1239
531	Historic England (Katie Parsons)	1136532	Email	Sent as a combined representation comments 469-534	1239
532	Historic England (Katie Parsons)	1136533	Email	Sent as a combined representation comments 469-534	1239
533	Historic England (Katie Parsons)	1136534	Email	Sent as a combined representation comments 469-534	1239
534	Historic England (Katie Parsons)	1136535	Email	Sent as a combined representation comments 469-534	1239
535	Gladman	1136859	Email	Sent as a combined	1270

	Developments Limited (Mr Richard Crosthwaite)			representation comments 535-543	
536	Gladman Developments Limited (Mr Richard Crosthwaite)	1136859	Email	Sent as a combined representation comments 535-543	1270
537	Gladman Developments Limited (Mr Richard Crosthwaite)	1136859	Email	Sent as a combined representation comments 535-543	1270
538	Gladman Developments Limited (Mr Richard Crosthwaite)	1136859	Email	Sent as a combined representation comments 535-543	1270
539	Gladman Developments Limited (Mr Richard Crosthwaite)	1136859	Email	Sent as a combined representation comments 535-543	1270
540	Gladman Developments Limited (Mr Richard Crosthwaite)	1136859	Email	Sent as a combined representation comments 535-543	1270
541	Gladman Developments Limited (Mr Richard Crosthwaite)	1136859	Email	Sent as a combined representation comments 535-543	1270
542	Gladman Developments Limited (Mr Richard Crosthwaite)	1136859	Email	Sent as a combined representation comments 535-543	1270
543	Gladman Developments Limited (Mr Richard Crosthwaite)	1136859	Email	Sent as a combined representation comments 535-543	1270
544	House Builders Federation (Mr Mark Behrendt)	1137235	Email		1444
545	House Builders Federation (Mr Mark Behrendt)	1137235	Email		1447
546	House Builders Federation (Mr Mark Behrendt)	1137235	Email		1449
547	House Builders Federation (Mr Mark Behrendt)	1137235	Email		1452
548	House Builders Federation (Mr Mark Behrendt)	1137235	Email		1454
549	House Builders	1137235	Email		1456

	Federation (Mr Mark Behrendt)				
550	House Builders Federation (Mr Mark Behrendt)	1137235	Email		1458
551	Anglia Water Services Ltd (Mr Steward Patience)	1135889	Email		1460
552	Anglia Water Services Ltd (Mr Steward Patience)	1135889	Email		1462
553	Heritage Developments Ltd	973867	Email		1464
554	Mrs Val Pitt	1127986	Letter		1468

Comment

Consultee Mr John Dunford (1118963)
Email Address
Address

Event Name Local Plan Pre-Submission Publication Document
Comment by Mr John Dunford
Comment ID 1
Response Date 27/08/17 17:59
Consultation Point 4 Transport ([View](#))
Status Processed
Submission Type Web
Version 0.4

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

Poor compliance with the use of Rail Transport. There have been discussions for some years now to re-open the Norfolk Circular Railway Line. If this was carried out it would provide not only a satisfactory link for non car users but provide a focus of where development could be carried out in a way that would considerably stop and quite likely reduce the growth in Road Traffic by providing a non road solution for commuting into Norwich and elsewhere. Industry could be encouraged to grow on the linear path of such a re opened Railway giving a sustainable future to the County that would be believable.

the plan makes many of the correct noises about concerns for Road Traffic reductions but I am sorry to say these are all just noises without any substance.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

. Notified of the Submission

Comment

Consultee Mr David Cockburn (868883)

Email Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Mr David Cockburn

Comment ID 2

Response Date 29/08/17 07:46

Consultation Point GEN 03 - Settlement Hierarchy ([View](#))

Status Processed

Submission Type Web

Version 0.4

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan justified?

Have you raised this issue before during previous consultations? (Please tick the appropriate box) . Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)
. Yes at Preferred Directions Stage (January - February 2016)
. Yes at Issues and Options Stage (November 2014 - January 2015)

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

Bawdeswell should not have been designated a Local Service Centre. Tweaking the criteria by removing certain requirements to include the village was wrong. The original criteria were valid and necessary.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? . Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee Mr David Cockburn (868883)

Email Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Mr David Cockburn

Comment ID 3

Response Date 29/08/17 07:56

Consultation Point Policy HOU 03 Development Outside of the Boundaries of Local Service Centres ([View](#))

Status Processed

Submission Type Web

Version 0.2

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

Items 2 & 3 of the criteria for HOU 03 has already been breached for Bawdeswell with the approval of 40 houses instead of 36 for the site adjacent to Two Fields Way. This application has only recently been approved.

- 1 It is immediately adjacent to the settlement boundary;
- 2 It would not lead to the number of dwellings in the settlement exceeding the housing target;
- 3 the design contributes to conserving, and where possible enhancing, the historic nature and connectivity of communities; and
- 4 the development avoids coalescence of settlements.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

It appears already, as in the case of Bawdeswell, that Breckland planners will ignore HOU 03.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

. Notified of the Submission
. Notified of the Inspectors Recommendations
. Notified of the Adoption

Comment

Consultee Mr David Cockburn (868883)

Email Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Mr David Cockburn

Comment ID 4

Response Date 29/08/17 08:03

Consultation Point Bawdeswell Housing Allocation 1 ([View](#))

Status Processed

Submission Type Web

Version 0.2

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

Issues were raised in relation to the planning applications for the land off Hall Road.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

Insufficient consideration has been given to the effect on vehicular traffic at the junction of Hall Road with Norwich Road and the junction of Norwich Road with the A1067. There are already significant delays at the latter junction and the parking of HGV's on Norwich Road for deliveries to the Garden Centre creates a road safety hazard.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee Mr David Cockburn (868883)

Email Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Mr David Cockburn

Comment ID 5

Response Date 29/08/17 08:13

Consultation Point 3.212 Paragraph ([View](#))

Status Processed

Submission Type Web

Version 0.2

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan justified?
. Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box) . Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)
. Yes at Preferred Directions Stage (January - February 2016)
. Yes at Issues and Options Stage (November 2014 - January 2015)

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

The X29 bus service has only one service each hour in each direction and there are no early morning or evening services. There is no bus service to our nearest Market Town Reepham, other than the school bus, and there is only a bus service to Dereham one day a week.

There is no public transport to the Doctors surgeries in North Elmham or Swanton Morely.

Nearly ALL the businesses in Bawdeswell are sole traders with no opportunity for employment. The larger employers will only employ staff if someone leaves so there is no additional employment potential whatsoever within the village.

Bawdeswell School is only coping with the use of temporary classrooms.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee MR TIM BORNETT BORNETT (966641)

Email Address

Event Name Local Plan Pre-Submission Publication Document

Comment by MR TIM BORNETT BORNETT

Comment ID 6

Response Date 01/09/17 08:54

Consultation Point GEN 4 - Development Requirements of Attleborough Strategic Urban Extension (SUE) Development Requirements of Attleborough Strategic Urban Extension (SUE) ([View](#))

Status Processed

Submission Type Web

Version 0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan justified?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

The policy states that the new road between london Road and Bunns Bank will be completed before the1200 dwellings are built..Thus all but one dwellings completed and then new road could be built before last one. A let out

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? . Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

Comment

Consultee MR TIM BORNETT BORNETT (966641)

Email Address

Event Name Local Plan Pre-Submission Publication Document

Comment by MR TIM BORNETT BORNETT

Comment ID 7

Response Date 03/09/17 02:24

Consultation Point GEN 4 - Development Requirements of Attleborough Strategic Urban Extension (SUE) Development Requirements of Attleborough Strategic Urban Extension (SUE) ([View](#))

Status Processed

Submission Type Web

Version 0.5

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box) . Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)
. Yes at Preferred Directions Stage (January - February 2016)
. Yes at Issues and Options Stage (November 2014 - January 2015)

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

Link Road needs to be in place before dwellings are built..Also the General policy on this is vague and ambiguous.as it says new road will be completed befor 1200 homes are built

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

. Notified of the Submission

Comment

Consultee MR TIM BORNETT BORNETT (966641)

Email Address

Event Name Local Plan Pre-Submission Publication Document

Comment by MR TIM BORNETT BORNETT

Comment ID 9

Response Date 03/09/17 07:13

Consultation Point GEN 4 - Development Requirements of Attleborough Strategic Urban Extension (SUE) Development Requirements of Attleborough Strategic Urban Extension (SUE) ([View](#))

Status Processed

Submission Type Web

Version 0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

- . Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)
- . Yes at Preferred Directions Stage (January - February 2016)
- . Yes at Issues and Options Stage (November 2014 - January 2015)

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

The General policy refers to the new link road being completed when 1200 homes have been built. Link road should precede before any dwellings occur .Also the wording is vague and ambiguous. 1199 home could be built no road.snarl up in Attelborough and heavy traffic on B1077

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

. Notified of the Submission
. Notified of the Adoption

Comment

Consultee	MR TIM BORNETT BORNETT (966641)
Email Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	MR TIM BORNETT BORNETT
Comment ID	10
Response Date	03/09/17 07:29
Consultation Point	Policy TR 02 Transport Requirements (View)
Status	Processed
Submission Type	Web
Version	0.4
Do you consider the Pre-Submission Publication to be:	. Unsound (You think the document needs changing)
If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).	. Is the plan consistent with national policy?
Have you raised this issue before during previous consultations? (Please tick the appropriate box)	. Yes at Preferred Directions Stage (January - February 2016)
If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.	
	Consideration should have occurred to a long term aim to provide a rail link between Attleborough and the Norwich to Diss line.This would offset traffic on the B1077.Help to reduce pollution et al.
Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?	. Yes, my representation can be satisfactorily dealt with by written representations
Do you wish to be:	. Notified of the Submission

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Part 1: Your Contact Details

Name: Lynn Fletcher	
Organisation:	
Address:	
Post code:	Telephone:
E-mail:	

If you have appointed someone to act as your agent please give their name and contact details.	
Name:	
Organisation:	
Address:	
Post code:	Telephone:
E-mail:	

Part 2: Your Representation (please use a separate form for each representation)

1. Do you consider the Pre-submission Publication to be: (Please tick the appropriate box)

Sound (You support the document)	
Unsound (You think the document needs changing)	X

2. On which part of the document do you wish to make a representation?

Policy	
Paragraph	
Site	Land to the West of Etling View LP[025]007
Proposals Map	
Settlement Boundary	
Other	

If you consider the document to be **SOUND**, please go to question 7.

3. If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).

Legal Tests	
Is the plan legally compliant?	
Soundness Tests	
Is the plan positively prepared?	X
Is the plan justified?	X
Is the plan effective?	X
Is the plan consistent with national policy?	X

4. Have you raised this issue before during previous consultations? (Please tick the appropriate box)

Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)	
Yes at Preferred Directions Stage (January - February 2016)	

5. If you have not raised this issue before please use the following box to explain why.

I have raised the issue before, but I cannot remember exactly at which stage. Since the issue of this development has been a matter of public debate for over two years, has had hundreds of written objections and has been highlighted in the local press, I honestly thought that common sense would prevail in the Breckland Council Planning Dept, and that I wouldn't be needing to comment on this again so didn't bother to note down the date that I submitted my written objection.

6. If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound. (Please attach extra sheets if necessary)

Land to the west of EtlingView (LP[025]007

1)

These two fields are located in a highly sensitive, historic and valued landscape; bordered by common land and historic rights of way. The level and density of the development proposed (60 dwellings) is not reflective of its context and would not enhance the character and appearance of the area, but would have a significant and harmful impact on the setting. A development of 60 dwellings cannot be accommodated successfully on the site without harming the landscape character and appearance of the area -

The application is contrary to the NPPF and Core Strategy Policy CP11/DC16. See also paragraphs 17 & 58 of the NPPF- **NOT SUSTAINABLE DEVELOPMENT**

2)

Proposed dwellings on the southern boundary of the site would cause an unacceptable level of overlooking and harm to the amenities of Rose Farm on Field 2 and neighbouring dwellings on Field 1 as well as to users of the surrounding common land and public rights of way. Contrary to Core Strategy Policy DC01. - **NOT SUSTAINABLE DEVELOPMENT**

3)

The likely impact on the risk of flooding elsewhere as a result of an increase in the volume of runoff post development. Contrary to NPPF paragraphs 103 and 109 -**NOT SUSTAINABLE DEVELOPMENT**

The NPPF makes it clear in Paragraph 8 that the three roles the planning system is required to perform in respect of sustainable development should not be taken in isolation because they are mutually dependant. For the above reasons the benefits of the housing provision proposed, taking into account the development plan and the policies of the NPPF as a whole, are clearly outweighed by the significant harmful impacts of the development. This proposal does not meet the criteria to be regarded as sustainable development and **should be refused.**

Natural environment objectives in the NPPF

The NPPF identifies (in paras 6 and 17) sustainable development as the purpose of the planning system and conserving and enhancing the natural environment as a 'core planning principle'. While specific policies on conserving and enhancing the natural environment are addressed in Section 11 of the NPPF, these should not be considered in isolation, as other natural environment related policies, and their consideration in plan- and decision-making, can be found throughout the document.

The objectives for the natural environment within the planning system are set out in the NPPF (in para. 109) and state that the planning system should contribute to and enhance the natural and

local environment by:

- protecting and enhancing valued landscapes;
- recognising the wider benefits of ecosystem services;
- minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

The NPPF stresses a proactive and strategic approach to planning for the natural environment. The ambition of the NPPF is not just to retain protection for existing designations, but to plan ahead for re-creation of habitat where possible. The NPPF states (in para.114) that 'local planning authorities should plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure'.

The NPPF makes it clear (in para. 110) that Plans should allocate land with the least environmental or amenity value. Planning policies and decision-making should seek to protect and enhance natural and heritage assets appropriate to their significance. Policies and decisions should also encourage multiple benefits from development.

Immediate concerns with Land to the west of EtlingView (LP[025]007:

FLOODING OF ADJOINING AREAS ESPECIALLY SHILLINGS LANE
LOSS OF A PROTECTED OAK TREE WITH A "TPO" ORDER ON IT
LOSS OF AMENITY
LACK OF SEWAGE PROVISION
INTRUSION INTO A COUNTY WILDLIFE SITE
DESTRUCTION OF HISTORIC HEDGEROWS
DENSITY OF PROPOSED DEVELOPMENT etc etc

To put it into layman's terms:

We don't want any more monstrosities like the ones at Etling View (quite possibly the ugliest dwellings it's ever been my misfortune to encounter). We're sick of Shillings Lane turning into something akin to the Florida Everglades every time we get the slightest bit of precipitation, which, although it used to get a little muddy, it didn't do before Etling View was forced upon us and we certainly don't want it to get any worse which it is guaranteed to do if Taylor Wimpey get their money-grabbing way. We don't want protected trees and ancient hedgerows uprooted to make way for more of the aforementioned monstrosities. We don't want to lose any more of our wildlife which has already been adversely affected by the existing development. We don't want any more problems with sewage as already experienced by Norwich Road residents and the area surrounding Etling View and we don't want the jewel in Dereham's crown ruined any further by Taylor Wimpey or anyone else. Our enjoyment of the area has already been severely impacted by the existing development. What we **do** want is for the Planning Department of Breckland Council to do their job **according to the guidelines** and to protect this valuable and irreplaceable area of historical and natural importance and to guarantee it's preservation for future generations of both residents and wildlife to enjoy.

I am frankly appalled that the proposed development has been recommended to go ahead. It is an outrageous disregard for the NPPF, the hundreds of valid objections from tax paying, long term residents of the area who know and love Neatherd Moor for the wonderful area that it is and for the hundreds of wildlife species, **NINE** of which are on the RSPB Red List, and **SEVEN** of which are on the RSPB Amber List (I have just checked the current list against species that I know to be resident or seasonal visitors), that inhabit the area (I know because I have personally spent literally hours upon hours watching them), not to mention the other endangered non-avian species that live in the area including hedgehogs and the Brown Hare which currently has a Species Action Plan under the UK Biodiversity Action Plan. How can Breckland Planning Department possibly justify such a blatant and wanton disregard and disrespect on each of the aforementioned issues? One has to wonder exactly what the incentives are for these individuals to be so flagrantly in breach of the guidelines?

I urge everyone involved in the planning process to reconsider and to protect this beautiful, irreplaceable corner of our wonderful county, before it's too late.

7. If you feel that the plan is sound, please tell us why.

--

8. Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? (Please tick appropriate box)

Yes, my representation can be satisfactorily dealt with by written representations	X
No, my representations can only be suitably dealt with by appearing at the Examination in Public	

9. If you wish to appear at the Examination in Public, please outline why you consider this to be necessary.

10. Do you wish to be: (Please tick appropriate boxes)

Notified of the Submission	X
Notified of the Inspectors Recommendations	
Notified of the Adoption	

Declaration: I understand that the details included on this form will be available in the public domain. (please tick box)	X
Signature: Lynn Fletcher	Date: 4/9/2017

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BRECKLAND COUNCIL
04 SEP 2017
POSTROOM



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Part 1: Your Contact Details

Name: IAN TARRY	
Organisation:	
Address:	
Post code: NR11 1	Telephone:
E-mail:	

If you have appointed someone to act as your agent please give their name and contact details.

Name:	
Organisation:	
Address:	
Post code:	Telephone:
E-mail:	

Part 2: Your Representation (please use a separate form for each representation)

1. Do you consider the Pre-submission Publication to be: (Please tick the appropriate box)

Sound (You support the document)	✓
Unsound (You think the document needs changing)	

2. On which part of the document do you wish to make a representation?

Policy	
Paragraph	
Site	
Proposals Map	
Settlement Boundary	✓ BEETLEY
Other	

If you consider the document to be **SOUND**, please go to question 7.

3. If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).

Legal Tests	
Is the plan legally compliant?	
Soundness Tests	
Is the plan positively prepared?	
Is the plan justified?	
Is the plan effective?	
Is the plan consistent with national policy?	

4. Have you raised this issue before during previous consultations? (Please tick the appropriate box)

Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)	
Yes at Preferred Directions Stage (January - February 2016)	
Yes at Issues and Options Stage (November 2014 - January 2015)	

5. If you have not raised this issue before please use the following box to explain why.

WE HAVE RECENTLY MOVED TO BEETLEY

6. If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound. (Please attach extra sheets if necessary)

7. If you feel that the plan is sound, please tell us why.

THE SETTLEMENT BOUNDARY IS SENSIBLE AND REQUIRES NO CHANGE, OUR VILLAGE IS NOT A SERVICE CENTRE AND LACKS THE INFRASTRUCTURE TO SUPPORT ANY CHANGE TO THE CURRENT PLAN, CURRENT NUMBER OF DEVELOPMENTS IN BEETLEY FAR EXCEED FUTURE NEED FOR OUR RURAL VILLAGE !!

8. Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? (Please tick appropriate box)

Yes, my representation can be satisfactorily dealt with by written representations	✓
No, my representations can only be suitably dealt with by appearing at the Examination in Public	

9. If you wish to appear at the Examination in Public, please outline why you consider this to be necessary.

10. Do you wish to be: (Please tick appropriate boxes)

Notified of the Submission	✓
Notified of the Inspectors Recommendations	✓
Notified of the Adoption	✓

Declaration: I understand that the details included on this form will be available in the public domain. (please tick box)	
Signature: _____	Date: 1-9-17

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<h2 style="margin: 0;">Breckland Local Plan Pre-Submission Publication Representation Form</h2>

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Part 1: Your Contact Details

Name: Mary Anne Feakes MBE (Chairman)	
Organisation: Garboldisham Parish Council	
Address:	
Post code:	Telephone:
E-mail:	

If you have appointed someone to act as your agent please give their name and contact details.	
Name:	
Organisation:	
Address:	
Post code:	Telephone:
E-mail:	

Part 2: Your Representation (please use a separate form for each representation)

1. Do you consider the Pre-submission Publication to be: (Please tick the appropriate box)

Sound (You support the document)	
Unsound (You think the document needs changing)	X

2. On which part of the document do you wish to make a representation?

Policy	Housing
Paragraph	3.219
Site	Garboldisham
Proposals Map	
Settlement Boundary	
Other	Local Service Centre criteria

If you consider the document to be **SOUND**, please go to question 7.

3. If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).

Legal Tests	
Is the plan legally compliant?	
Soundness Tests	
Is the plan positively prepared?	
Is the plan justified?	
Is the plan effective?	
Is the plan consistent with national policy?	X

4. Have you raised this issue before during previous consultations? (Please tick the appropriate box)

Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)	X
Yes at Preferred Directions Stage (January - February 2016)	X
Yes at Issues and Options Stage (November 2014 - January 2015)	

5. If you have not raised this issue before please use the following box to explain why.

6. If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound. (Please attach extra sheets if necessary)

Reference: Page 98 Section 3.218 - 3.227 Garboldisham

Garboldisham Parish Council have studied this pre-submission document and wish to make the following comment.

Ref: 3.219. As has been their contention throughout this process, Garboldisham Parish Council do not feel that the identification as a Local Service Centre village in the Local Plan is appropriate with regard to item (5) Bus Services. The only reason that there is any bus accessing Bury St Edmunds from Garboldisham is because it provides a convenient turning point for those buses to and from Hopton to Bury St Edmunds, Suffolk, and as such is subsidised by Suffolk County Council. As we have previously warned, since this current local plan has been in formation, one of the buses has been withdrawn already. This is the only public transport available in the village, apart from a shoppers' bus on a Thursday to Norwich, which is also vulnerable due to cuts. As one of the main concerns of the Local Plan (Section 4.7 Page 145), is to cut the reliance on private transport, the loss, and further potential loss of our sparse public transport should, in our opinion, preclude Garboldisham from being a Local Service Centre.

Ref. 3.219 Businesses. Garboldisham Parish Council were surprised to read that there are currently 25 viable businesses in the Village.

Ref. 3.222 Waste Water Treatment. This section reads as if the village has a universal Waste Water Treatment Works. The only Waste Water Treatment Works in the village serves 16 properties which were previously social housing in Back Street, now under the auspices of Flagship Housing. All other properties rely on individual septic tanks, or in the case of Elm Grove, Chapel Close and Thomas Bole Close, group waste collection points. The current Waste Water Treatment Works would therefore need huge structural work to accommodate all 35 new properties, or eventually, the entire village.

7. If you feel that the plan is sound, please tell us why.

30

8. Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? (Please tick appropriate box)

Yes, my representation can be satisfactorily dealt with by written representations	X
No, my representations can only be suitably dealt with by appearing at the Examination in Public	

9. If you wish to appear at the Examination in Public, please outline why you consider this to be necessary.

10. Do you wish to be: (Please tick appropriate boxes)

Notified of the Submission	X
Notified of the Inspectors Recommendations	X
Notified of the Adoption	X

Declaration: I understand that the details included on this form will be available in the public domain. (please tick box)	X
Signature: Mary Anne Feakes MBE	Date:

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BRECKLAND COUNCIL
07 SEP 2017
POST ROOM



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Part 1: Your Contact Details

Name: JOHN DENNIS	
Organisation: -	
Address: - - - - -	
Post code: - - -	Telephone: - - - - -
E-mail: -	

If you have appointed someone to act as your agent please give their name and contact details.	
Name: -	
Organisation:	
Address:	
Post code:	Telephone:
E-mail:	

Part 2: Your Representation (please use a separate form for each representation)

1. Do you consider the Pre-submission Publication to be: (Please tick the appropriate box)

Sound (You support the document)	<input type="checkbox"/>
Unsound (You think the document needs changing)	<input checked="" type="checkbox"/>

2. On which part of the document do you wish to make a representation?

Policy	<input type="checkbox"/>
Paragraph	<input type="checkbox"/>
Site	<input type="checkbox"/>
Proposals Map	<input checked="" type="checkbox"/>
Settlement Boundary	<input type="checkbox"/>
Other	<input type="checkbox"/>

If you consider the document to be **SOUND**, please go to question 7.

3. If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).

Legal Tests	
Is the plan legally compliant?	<input type="checkbox"/>
Soundness Tests	
Is the plan positively prepared?	<input type="checkbox"/>
Is the plan justified?	<input checked="" type="checkbox"/>
Is the plan effective?	<input type="checkbox"/>
Is the plan consistent with national policy?	<input type="checkbox"/>

4. Have you raised this issue before during previous consultations? (Please tick the appropriate box)

Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)	<input type="checkbox"/>
Yes at Preferred Directions Stage (January - February 2016)	<input type="checkbox"/>
Yes at Issues and Options Stage (November 2014 - January 2015)	<input type="checkbox"/>

5. If you have not raised this issue before please use the following box to explain why.

SCHOOL CAR PARKING CASTON

6. If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound. (Please attach extra sheets if necessary)

We own the land next to the Caston Church off England School, on the same side, As marked black on map inclosed, With the future development happening in Griston, Watton, Hingham and other close areas to Caston. Their is only parking on the road for the school. We may concider allowing an area off land for parking. If you allowed Planning for Houses. as well.

7. If you feel that the plan is sound, please tell us why.

Caston Policies Map

Pre-Submission Publication Summer 2017

001-862

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Approximate Scale 1:5000



Breckland

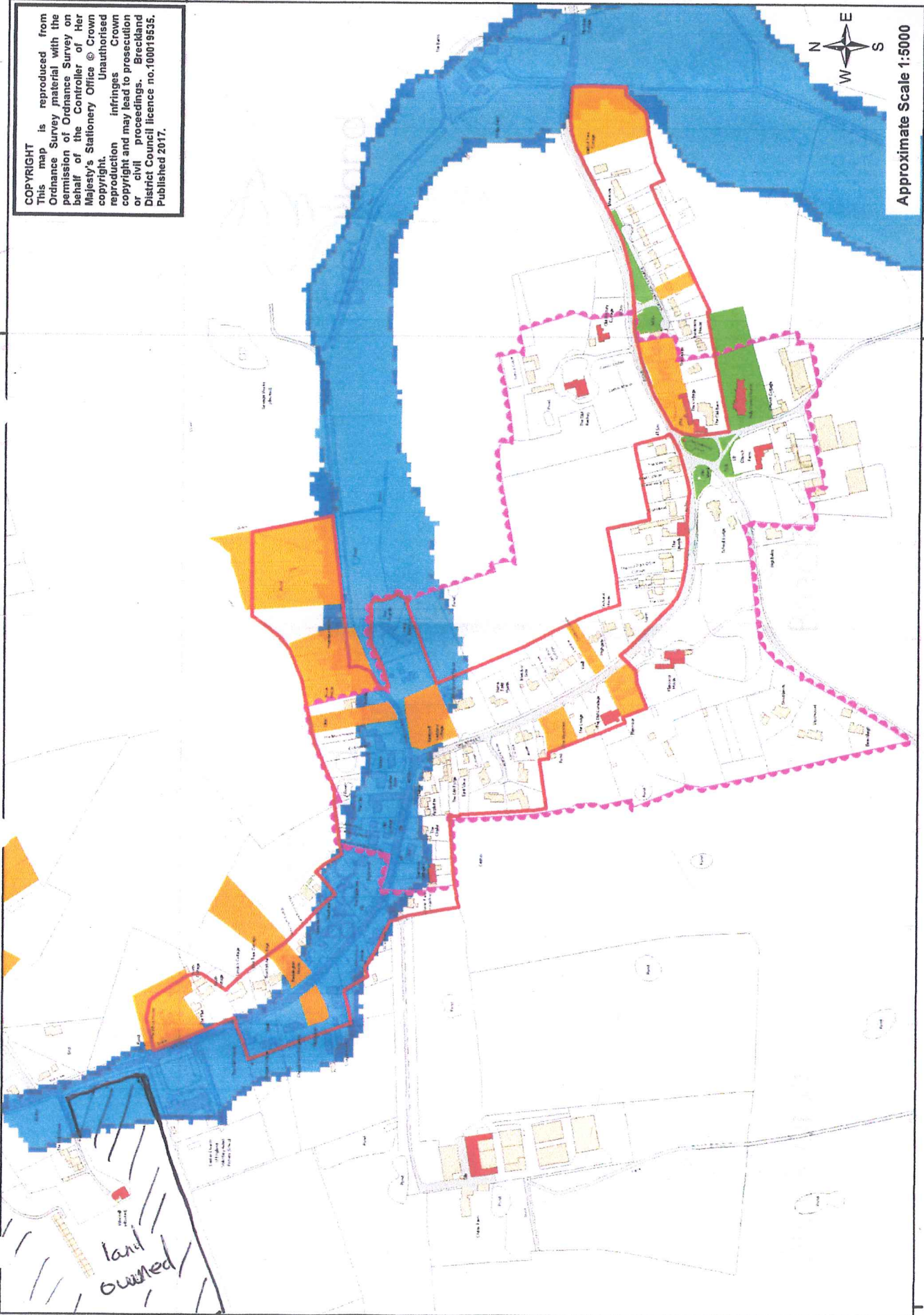
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land owned

8. Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? (Please tick appropriate box)

Yes, my representation can be satisfactorily dealt with by written representations	✓
No, my representations can only be suitably dealt with by appearing at the Examination in Public	

9. If you wish to appear at the Examination in Public, please outline why you consider this to be necessary.

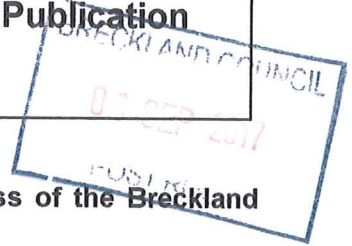
10. Do you wish to be: (Please tick appropriate boxes)

Notified of the Submission	✓
Notified of the Inspectors Recommendations	✓
Notified of the Adoption	

Declaration: I understand that the details included on this form will be available in the public domain. (please tick box)	
Signature: _____	Date: 4.09.2017

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Part 1: Your Contact Details

Name: Mrs Lesley Caillault	
Organisation:	
Address:	
Post code: NR20 2AV	Telephone:
E-mail:	

If you have appointed someone to act as your agent please give their name and contact details.	
Name:	
Organisation:	
Address:	
Post code:	Telephone:
E-mail:	

Part 2: Your Representation (please use a separate form for each representation)

1. Do you consider the Pre-submission Publication to be: (Please tick the appropriate box)

Sound (You support the document)	
Unsound (You think the document needs changing)	X

2. On which part of the document do you wish to make a representation?

Policy	
Paragraph	
Site	Land to the west of EtlingView (LP[025]007
Proposals Map	
Settlement Boundary	
Other	

If you consider the document to be **SOUND**, please go to question 7.

3. If you consider the document to be **UNSOUND**, to which test of soundness does your representation apply to: (Please mark the appropriate box).

Legal Tests	
Is the plan legally compliant?	
Soundness Tests	
Is the plan positively prepared?	X
Is the plan justified?	X
Is the plan effective?	X
Is the plan consistent with national policy?	X

4. Have you raised this issue before during previous consultations? (Please tick the appropriate box)

Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)	
Yes at Preferred Directions Stage (January - February 2016)	
Yes at Issues and Options Stage (November 2014 - January 2015)	

5. If you have not raised this issue before please use the following box to explain why.

Development of these 2 fields has been a matter of public debate for over 2 years. There has been considerable press coverage, 00's of written objections I had not expected Breckland ever to consider putting the site forward and requiring FURTHER comment.

6. If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound. (Please attach extra sheets if necessary)

Land to the west of EtlingView (LP[025]007

1) This 2 fields are located in a highly sensitive, historic and valued landscape; bordered by common land and historic rights of way. The level and density of development proposed (60 dwellings) is not reflective of its context and would not enhance the character and appearance of the area, but would have a significant and harmful impact on the setting. A development of 60 dwellings cannot be accommodated successfully on the site without harming the landscape character and appearance of the area. **The application is contrary to the NPPF and Core Strategy Policy CP11/DC16. See also paragraphs 17 & 58 of the NPPF-NOT SUSTAINABLE DEVELOPMENT**

2) Proposed dwellings on the southern boundary of the site would cause an unacceptable level of overlooking and harm to the amenities of Rose Farm on Field 2 and neighbouring dwellings on Field 1 as well as to users of the surrounding common land and public rights of way. **Contrary to Core Strategy Policy DC01. - NOT SUSTAINABLE DEVELOPMENT**

3) The likely impact on the risk of flooding elsewhere as a result of an increase in the volume of run off post development. **Contrary to NPPF paragraphs 103 and 109 -NOT SUSTAINABLE DEVELOPMENT**

The NPPF makes it clear in Paragraph 8 that the three roles the planning system is required to perform in respect of sustainable development should not be taken in isolation because they are mutually dependant. For the above reasons the benefits of the housing provision proposed, taking into account the development plan and the policies of the NPPF as a whole, are clearly outweighed by the significant harmful impacts of the development. This proposal does not meet the criteria to be regarded as sustainable development and should be refused.

Natural environment objectives in the NPPF

The NPPF identifies (in paras 6 and 17) sustainable development as the purpose of the planning system and conserving and enhancing the natural environment as a 'core planning principle'. While specific policies on conserving and enhancing the natural environment are addressed in Section 11 of the NPPF, these should not be considered in isolation, as other natural environment related policies, and their consideration in plan- and decision-making, can be found throughout the document.

The objectives for the natural environment within the planning system are set out in the NPPF (in para. 109) and state that the 'planning system should contribute to and enhance the natural and local environment by:

- • protecting and enhancing valued landscapes; • • recognising the wider benefits of ecosystem services;
- • minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

The NPPF stresses a proactive and strategic approach to planning for the natural environment. The ambition of the NPPF is not just to retain protection for existing designations, but to plan ahead for re-creation of habitat where possible. The NPPF states (in para. 114) that local planning authorities should 'plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure'.

The NPPF makes it clear (in para. 110) that 'Plans should allocate land with the least environmental or amenity value'.

Planning policies and decision-making should seek to protect and enhance natural and heritage assets appropriate to their significance. Policies and decisions should also encourage multiple benefits from development.

Immediate concerns with Land to the west of EtlingView (LP[025]007:

FLOODING OF ADJOINING AREAS especially SHILLINGS LANE
LOSS OF A PROTECTED OAK TREE WITH A "TPO" ORDER ON IT
LOSS OF AMENITY
LACK OF SEWAGE PROVISION
INTRUSION INTO A COUNTY WILDLIFE SITE
DESTRUCTION OF HISTORIC HEDGEROWS
DENSITY OF PROPOSED DEVELOPMENT etc etc

7. If you feel that the plan is sound, please tell us why.

8. Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? (Please tick appropriate box)

Yes, my representation can be satisfactorily dealt with by written representations	<input checked="" type="checkbox"/>
No, my representations can only be suitably dealt with by appearing at the Examination in Public	<input type="checkbox"/>

9. If you wish to appear at the Examination in Public, please outline why you consider this to be necessary.

--

10. Do you wish to be: (Please tick appropriate boxes)

Notified of the Submission	<input checked="" type="checkbox"/>
Notified of the Inspectors Recommendations	<input type="checkbox"/>
Notified of the Adoption	<input type="checkbox"/>

Declaration: I understand that the details included on this form will be available in the public domain. (please tick box)	<input checked="" type="checkbox"/>
Signature:	Date: 4/9/17

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NOW EMAIL TO : planningpolicyteam@breckland.gov.uk

**Breckland Local Plan Pre-Submission Publication
Representation Form**

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This form is in two parts and has four pages. Part 1 covers your contact details and Part 2 covers your representation. **Please use a separate form for each representation you make.**

Please return by 4pm on Monday 2nd October 2017. Late representations cannot be considered. Return by e-mail to planningpolicyteam@breckland.gov.uk or by post to Planning Policy, Breckland Council, Elizabeth House, Walpole Loke, Dereham, Norfolk, NR19 1EE.

Part 1: Your Contact Details

Name: Jane Woollestone	
Organisation:	
Address:	
Post code:	Telephone:
E-mail: j	

If you have appointed someone to act as your agent please give their name and contact details.	
Name:	
Organisation:	
Address:	
Post code:	Telephone:
E-mail:	

Part 2: Your Representation (please use a separate form for each representation)

1. Do you consider the Pre-submission Publication to be: (Please tick the appropriate box)

Sound (You support the document)	
Unsound (You think the document needs changing)	X

2. On which part of the document do you wish to make a representation?

Policy	
Paragraph	
Site	Land to the west of EtlingView (LP[025]007
Proposals Map	
Settlement Boundary	
Other	

If you consider the document to be **SOUND**, please go to question 7.

3. If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).

Legal Tests	
Is the plan legally compliant?	
Soundness Tests	
Is the plan positively prepared?	X
Is the plan justified?	X
Is the plan effective?	X
Is the plan consistent with national policy?	X

4. Have you raised this issue before during previous consultations? (Please tick the appropriate box)

Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)	
Yes at Preferred Directions Stage (January - February 2016)	
Yes at Issues and Options Stage (November 2014 - January 2015)	

5. If you have not raised this issue before please use the following box to explain why.

6. If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound. (Please attach extra sheets if necessary)

Impact to the local environment, flora and fauna.
There is already increased flooding in that area due to other houses being built.
Dereham can not cope as it is - the drain by the fire station regularly floods now and we end up with sewage all over the path and road.
The road system can't cope as it is
Basically Dereham's current infrastructure can't cope

7. If you feel that the plan is sound, please tell us why.

43

8. Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? (Please tick appropriate box)

Yes, my representation can be satisfactorily dealt with by written representations	X
No, my representations can only be suitably dealt with by appearing at the Examination in Public	

9. If you wish to appear at the Examination in Public, please outline why you consider this to be necessary.

10. Do you wish to be: (Please tick appropriate boxes)

Notified of the Submission	X
Notified of the Inspectors Recommendations	
Notified of the Adoption	

Declaration: I understand that the details included on this form will be available in the public domain. (please tick box)	<input type="checkbox"/>
Signature:	Date: 8/9/2017

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Part 1: Your Contact Details

Name: Julie Walmsley	
Organisation:	
Address:	
Post code:	Telephone:
E-mail:	

If you have appointed someone to act as your agent please give their name and contact details.	
Name:	
Organisation:	
Address:	
Post code:	Telephone:
E-mail:	

Part 2: Your Representation (please use a separate form for each representation)

1. Do you consider the Pre-submission Publication to be: (Please tick the appropriate box)

Sound (You support the document)	
Unsound (You think the document needs changing)	X

2. On which part of the document do you wish to make a representation?

Policy	
Paragraph	
Site	Land to the west of EtlingView (LP[025]007
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Settlement Boundary	
Other	

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3. If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).

Legal Tests	
Is the plan legally compliant?	
Soundness Tests	
Is the plan positively prepared?	X
Is the plan justified?	X
Is the plan effective?	X
Is the plan consistent with national policy?	X

4. Have you raised this issue before during previous consultations? (Please tick the appropriate box)

Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)	
Yes at Preferred Directions Stage (January - February 2016)	
Yes at Issues and Options Stage (November 2014 - January 2015)	

5. If you have not raised this issue before please use the following box to explain why.

I had understood that Breckland Capita would be taking account of both the unprecedented number of objections they already have (400+) for a current proposal on this site and the numerous technical challenges presented by this site. They have not hence this representation

6. If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound. (Please attach extra sheets if necessary)

Land to the west of EtlingView (LP[025]007

I feel the plan is unsound for the following reasons:

1) The 2 fields are located in a highly sensitive, historic and valued landscape; bordered by common land and historic rights of way. The level and density of development proposed (60 dwellings) is not reflective of its context and would not enhance the character and appearance of the area, but would have a significant and harmful impact on the setting. A development of 60 dwellings cannot be accommodated successfully on the site without harming the landscape character and appearance of the area. **The application is contrary to the NPPF and Core Strategy Policy CP11/DC16. See also paragraphs 17 & 58 of the NPPF-**

2) Proposed dwellings on the southern boundary of the site would cause an unacceptable level of overlooking and harm to the amenities of Rose Farm on Field 2 and neighbouring dwellings on Field 1 as well as to users of the surrounding common land and public rights of way. **Contrary to Core Strategy Policy DC01.**

3) The likely impact on the risk of flooding elsewhere as a result of an increase in the volume of run off post development. **Contrary to NPPF paragraphs 103 and 109**

The NPPF makes it clear in Paragraph 8 that the three roles the planning system is required to perform in respect of sustainable development should not be taken in isolation because they are mutually dependant. For the above reasons the benefits of the housing provision proposed, taking into account the development plan and the policies of the NPPF as a whole, are clearly outweighed by the significant harmful impacts of the development. **This proposal does not meet the criteria to be regarded as sustainable development and should be refused.**

The NPPF identifies (in paras 6 and 17) sustainable development as the purpose of the planning system and conserving and enhancing the natural environment as a 'core planning principle'. While specific policies on conserving and enhancing the natural environment are addressed in Section 11 of the NPPF, these should not be considered in isolation, as other natural environment related policies, and their consideration in plan- and decision-making, can be found throughout the document.

The objectives for the natural environment within the planning system are set out in the NPPF (in para. 109) and state that the 'planning system should contribute to and enhance the natural and local environment by:

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- • minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

The NPPF stresses a proactive and strategic approach to planning for the natural environment. The ambition of the NPPF is not just to retain protection for existing designations, but to plan ahead for re-creation of habitat where possible. **The NPPF states (in para. 114) that local planning authorities should 'plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure'.**

The NPPF makes it clear (in para. 110) that 'Plans should allocate land with the least environmental or amenity value'.

Planning policies and decision-making should seek to protect and enhance natural and heritage assets appropriate to their significance. Policies and decisions should also encourage multiple benefits from development.

The proposed Site which consists of one Arable field and one enclosed paddock /grazing land on the edge of a settlement contributes to a rural setting and compliments the adjoining County Wildlife site and surrounding lightly wooded amenity land.

Many of the 400+ local objectors have outlined the visual and landscape importance of the land together with numerous issues around flooding, degradation of hedgerows loss of wildlife area and concerns from the Police regarding crime.

The area is a cherished local asset due to its openness -the paddock field in particular due to its visual exposure from two popular footpaths including the medieval lane – Shillings Lane. The openness of the land is important in separating the built environment from the wildlife corridor and County Wildlife Site, such areas forming a "physical breathing" space away from the hustle and bustle of the residential areas nearby.

Moreover, the indicative layout illustrates a relatively high density, physically distinct development. wholly incongruous with the single existing dwelling adjoining the paddock field Rose Farm a comparatively low

*level dwelling with single storey appendages.
The dwellings are likely to result in an unduly urbanised built form, introducing harmful change which would be incompatible with the quality of the landscape and setting of the settlement.*

7. If you feel that the plan is sound, please tell us why.

--

8. Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? (Please tick appropriate box)

Yes, my representation can be satisfactorily dealt with by written representations	
No, my representations can only be suitably dealt with by appearing at the Examination in Public	x

9. If you wish to appear at the Examination in Public, please outline why you consider this to be necessary.

I have no confidence that the evidence presented by Breckland Capita who have spent the past 2 years working with developers attempting to force this proposal through will be fair or objective. Breckland Capita have already gone to extraordinary lengths to force this development through- including for example Breckland Capita Planning officer Chris Hobson suggesting to the planning Committee that properties be built with out sewage facilities,

10. Do you wish to be: (Please tick appropriate boxes)

Notified of the Submission	x
Notified of the Inspectors Recommendations	x
Notified of the Adoption	x

Declaration: I understand that the details included on this form will be available in the public domain. (please tick box)	x
Signature: Julie Walmsley	Date: 10th September 2017

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Please return by 4pm on Monday 2nd October 2017. Late representations cannot be considered. Return by e-mail to planningpolicyteam@breckland.gov.uk or by post to Planning Policy, Breckland Council, Elizabeth House, Walpole Loke, Dereham, Norfolk, NR19 1EE.

Part 1: Your Contact Details
Land to the west of Etling View, Dereham
3PL/2015/1045/O

Name: Janis Raynsford	
Organisation:	
Address:	
Post code:	Telephone:
E-mail:	

If you have appointed someone to act as your agent please give their name and contact details.	
Name:	
Organisation:	
Address:	
Post code:	Telephone:
E-mail:	

Part 2: Your Representation (please use a separate form for each representation)

1. Do you consider the Pre-submission Publication to be: (Please tick the appropriate box)

Sound (You support the document)	
Unsound (You think the document needs changing)	x

2. On which part of the document do you wish to make a representation?

Policy	x
Paragraph	
Site	x
Proposals Map	
Settlement Boundary	
Other	x

If you consider the document to be SOUND, please go to question 7.

3. If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).

Legal Tests	
Is the plan legally compliant?	No
Soundness Tests	
Is the plan positively prepared?	No
Is the plan justified?	No
Is the plan effective?	No
Is the plan consistent with national policy?	No

4. Have you raised this issue before during previous consultations? (Please tick the appropriate box)

Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)	
Yes at Preferred Directions Stage (January - February 2016)	x
Yes at Issues and Options Stage (November 2014 - January 2015)	

5. If you have not raised this issue before please use the following box to explain why.

6. If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound. (Please attach extra sheets if necessary)

Gross over-development of this very sensitive site
Flooding of adjoining areas especially Shillings Lane
Loss of amenity
Lack of sewage provision
Intrusion into a County Wildlife Site
Destruction of ancient hedgerows and loss of oak tree with a TPO
Density of development

You have received over 400 objections to this application which must be taken into consideration for not to do so, is a gross indictment of your duty to the Breckland residents which you are duty bound to serve.

Please reject this application.

7. If you feel that the plan is sound, please tell us why.

it necessary to attend the Examination in Public? (Please tick appropriate box)

Yes, my representation can be satisfactorily dealt with by written representations	x
No, my representations can only be suitably dealt with by appearing at the Examination in Public	

9. If you wish to appear at the Examination in Public, please outline why you consider this to be necessary.

--

10. Do you wish to be: (Please tick appropriate boxes)

Notified of the Submission	x
Notified of the Inspectors Recommendations	x
Notified of the Adoption	

Declaration: I understand that the details included on this form will be available in the public domain. (please tick box)	
Signature: Janis Raynsford	Date: 9.9.2017

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Comment

Consultee Mrs J M Raynsford (498955)

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Mrs J M Raynsford

Comment ID 18

Response Date 11/09/17 13:12

Consultation Point Local Plan Pre-Submission Publication Document
([View](#))

Status Processed

Submission Type Letter

Version 0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).

- . Is the plan legally compliant?
- . Is the plan positively prepared?
- . Is the plan justified?
- . Is the plan effective?
- . Is the plan consistent with national policy?

Have you raised this issue before during previous consultations? (Please tick the appropriate box) . Yes at Preferred Directions Stage (January - February 2016)

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

Gross over-development of this very sensitive site
Flooding of adjoining areas especially Shillings Lane
Loss of amenity
Lack of sewage provision
Intrusion into a County Wildlife Site
Destruction of ancient hedgerows and loss of oak tree with a TPO
Density of development

You have received over 400 objections to this application which must be taken into consideration for not to do so, is a gross indictment of your duty to the Breckland residents which you are duty bound to serve.

Please reject this application.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

. Notified of the Submission
. Notified of the Inspectors Recommendations

Comment

Consultee Mrs Faye LeBon (873890)
Email Address
Company / Organisation Swanton Morley Parish Council
Address

Event Name Local Plan Pre-Submission Publication Document
Comment by Swanton Morley Parish Council (Mrs Faye LeBon)
Comment ID 19
Response Date 12/09/17 11:23
Consultation Point 3.9 Paragraph ([View](#))
Status Processed
Submission Type Web
Version 0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan justified?

Have you raised this issue before during previous consultations? (Please tick the appropriate box) . Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)
. Yes at Preferred Directions Stage (January - February 2016)

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

Swanton Morley Parish Council would like to know why a figure of 10% was used for all local service centres and not a figure that takes into account the individual needs of each settlement (whether a settlement is able to take 10% or whether a settlement would benefit from more than 10%.

The plan reads as if 10% makes the balancing figure required for growth, therefore this is what each LSC will get.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Officer Response

The 10% figure allows for an equal distribution of growth across all of the Local Service Centres. The 10% figure was derived from the population information in the 2011 census and applying a householder multiplier figure, which assumed 2.3 people per household.

The allocation policies state 'at least' in regards to the number of dwellings proposed. This allows for further flexibility in the allocations.

Neighbourhood Plans also provide the opportunity to exceed the 10% growth target

Comment

Consultee	Mrs Faye LeBon (873890)
Email Address	
Company / Organisation	Swanton Morley Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Swanton Morley Parish Council (Mrs Faye LeBon)
Comment ID	20
Response Date	12/09/17 11:32
Consultation Point	5.44 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.4
Do you consider the Pre-Submission Publication to be:	<input type="checkbox"/> Unsound (You think the document needs changing)
If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).	<input type="checkbox"/> Is the plan consistent with national policy?
Have you raised this issue before during previous consultations? (Please tick the appropriate box)	<input type="checkbox"/> Yes at Preferred Directions Stage (January - February 2016)

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

Three areas of local green space have been put forward by Swanton Morley Parish Council. All three areas comply with the NPPF whereby: 1 where the green space is in reasonably close proximity to the community it serves; 2 where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and 3 where the green area concerned is local in character and is not an extensive tract of land. All three areas of land in the vicinity of Middleton Avenue in Swanton Morley meet these criteria so therefore should be designated as Local Green Space.

Breckland Council has denied this request, giving them the inferior protection of 'amenity land', despite the lands meeting all the above criteria.

What Breckland Council has not specified is that they own these lands, and have since tried to submit one piece of these lands to be allocated for development. Breckland Council clearly has a financial interest in these lands which has gone undeclared. The decision on whether these lands should be allocated Local Green Space status should be made by the examiner and not a body with a financial interest which has since tried to allocate the land for development

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

. Notified of the Submission
. Notified of the Inspectors Recommendations
. Notified of the Adoption

Comment

Consultee	Mr Nicholas Hartley (1124026)
Email Address	
Company / Organisation	Carbrooke Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Carbrooke Parish Council (Mr Nicholas Hartley)
Comment ID	21
Response Date	12/09/17 17:49
Consultation Point	3 Housing (View)
Status	Processed
Submission Type	Web
Version	0.5

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan justified?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

Dear Sirs,

With regard to the Pre Submission Publication of the Local Plan, the Parish Council would like to make the following observations:- Specifically with regard to Watton Housing Allocation 2 (land north of Norwich Road, page 86). This allocation is listed as Watton, but in fact is within the parish of Carbrooke, not Watton. This is not the first time that properties have been recorded as being in Watton when in fact those properties are in Carbrooke. The Parish Council is deeply concerned that the records for housing development from at least the year 2005 show that much/all of the main development that has taken place in Carbrooke has been recorded as being in Watton. The Council is concerned that this gives an inaccurate and unfair impression. Please note that all the development recorded as Blenheim Grange, for instance, is within Carbrooke, not Watton. As further evidence of this

inaccurate position, the Council would like to point out that Barrett Homes, which is currently constructing over 100 new homes at Blenheim Grange, is marketing this development as Knight Park, Watton, even though it is clearly in Carbrooke. A recent Planning Application from Broadland Housing (3PL/2017/1095) is also recorded as being in Watton. In fact it is in Carbrooke and it is the Council's opinion that it should be referred to correctly as Carbrooke, not Watton. The Council would be grateful if this error could be amended for the whole of Carbrooke, both in terms of current and future applications, but also in the records of housing development over at least the last 10 years so that the figures accurately portray the correct position. I would be grateful for your earliest response. Yours faithfully,

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

Dear Sirs,

With regard to the Pre Submission Publication of the Local Plan, the Parish Council would like to make the following observations:- Specifically with regard to Watton Housing Allocation 2 (land north of Norwich Road, page 86). This allocation is listed as Watton, but in fact is within the parish of Carbrooke, not Watton. This is not the first time that properties have been recorded as being in Watton when in fact those properties are in Carbrooke. The Parish Council is deeply concerned that the records for housing development from at least the year 2005 show that much/all of the main development that has taken place in Carbrooke has been recorded as being in Watton. The Council is concerned that this gives an inaccurate and unfair impression. Please note that all the development recorded as Blenheim Grange, for instance, is within Carbrooke, not Watton. As further evidence of this inaccurate position, the Council would like to point out that Barrett Homes, which is currently constructing over 100 new homes at Blenheim Grange, is marketing this development as Knight Park, Watton, even though it is clearly in Carbrooke. A recent Planning Application from Broadland Housing (3PL/2017/1095) is also recorded as being in Watton. In fact it is in Carbrooke and it is the Council's opinion that it should be referred to correctly as Carbrooke, not Watton. The Council would be grateful if this error could be amended for the whole of Carbrooke, both in terms of current and future applications, but also in the records of housing development over at least the last 10 years so that the figures accurately portray the correct position. I would be grateful for your earliest response. Yours faithfully,

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

Breckland Local Plan Pre-Submission Publication Representation Form

This form should be used to make representations on the soundness of the Breckland Local Plan Pre-Submission Publication only.

An interactive version of the Breckland Local Plan Pre-Submission Publication is available on the Council's consultation website: <http://consult.breckland.gov.uk>. Instructions on how to enter representations are provided on the website. This is the Council's preferred method of receiving representations as it will help us to handle your representation quickly and efficiently.

If you are unable to use the online system you may submit representations using this form. Further copies can be downloaded from the Council's website: www.breckland.gov.uk/pre-submission-publication or the form can be photocopied.

This form is in two parts and has four pages. Part 1 covers your contact details and Part 2 covers your representation. **Please use a separate form for each representation you make.**

Please return by 4pm on Monday 2nd October 2017. Late representations cannot be considered. Return by e-mail to planningpolicyteam@breckland.gov.uk or by post to Planning Policy, Breckland Council, Elizabeth House, Walpole Loke, Dereham, Norfolk, NR19 1EE.

Part 1: Your Contact Details

Name: George Hayes	
Organisation:	
Address:	
Post code:	Telephone:
E-mail:	

If you have appointed someone to act as your agent please give their name and contact details.	
Name:	
Organisation:	
Address:	
Post code:	Telephone:
E-mail:	

Part 2: Your Representation (please use a separate form for each representation)

1. Do you consider the Pre-submission Publication to be: (Please tick the appropriate box)

Sound (You support the document)	<input checked="" type="checkbox"/>
Unsound (You think the document needs changing)	<input type="checkbox"/>

2. On which part of the document do you wish to make a representation?

Policy	<input type="checkbox"/>
Paragraph	<input type="checkbox"/>
Site	<input type="checkbox"/>
Proposals Map	<input type="checkbox"/>
Settlement Boundary	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>

If you consider the document to be **SOUND**, please go to question 7.

3. If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).

Legal Tests	
Is the plan legally compliant?	<input type="checkbox"/>
Soundness Tests	
Is the plan positively prepared?	<input type="checkbox"/>
Is the plan justified?	<input type="checkbox"/>
Is the plan effective?	<input type="checkbox"/>
Is the plan consistent with national policy?	<input type="checkbox"/>

4. Have you raised this issue before during previous consultations? (Please tick the appropriate box)

Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)	<input type="checkbox"/>
Yes at Preferred Directions Stage (January - February 2016)	<input type="checkbox"/>
Yes at Issues and Options Stage (November 2014 - January 2015)	<input type="checkbox"/>

5. If you have not raised this issue before please use the following box to explain why.

6. If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound. (Please attach extra sheets if necessary)

7. If you feel that the plan is sound, please tell us why.

We support the plan for Beetley to keep the current settlement boundary as proposed. We believe this would maintain the current rural nature of the village and that any change would adversely impact on the open countryside. In particular the trees and bushes along the Fakenham Road would be fundamentally affected by any further development.

8. Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? (Please tick appropriate box)

Yes, my representation can be satisfactorily dealt with by written representations	V
No, my representations can only be suitably dealt with by appearing at the Examination in Public	

9. If you wish to appear at the Examination in Public, please outline why you consider this to be necessary.

10. Do you wish to be: (Please tick appropriate boxes)

Notified of the Submission	V
Notified of the Inspectors Recommendations	V
Notified of the Adoption	V

Declaration: I understand that the details included on this form will be available in the public domain. (please tick box)	V
Signature: G.L.J Hayes	Date: 18/09/2017

Breckland District Council is registered with the Data Protection Act 1998 for the purpose of processing personal data in the performance of its legitimate business. Any information held by the Council will be processed in compliance with the principles set out in the Act. The preparation of the Breckland Local Plan Pre-Submission Publication is a public process and your full representation and address details will be made public for this purpose.

Comment

Consultee MR TIM BORNETT BORNETT (966641)
Email Address
Address

Event Name Local Plan Pre-Submission Publication Document
Comment by MR TIM BORNETT BORNETT
Comment ID 23
Response Date 19/09/17 08:17
Consultation Point 2.20 Paragraph ([View](#))
Status Processed
Submission Type Web
Version 0.6

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan justified?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

Was led to believe that Attleborough SUE would fall within the boundary of the Town Council. Now it appears that a planning application from Attleborough Land Ltd which includes 4000 new homes, a link road etc etc suggests that part of the development falls within the parish of Old Buckenham. Attleborough SUE should only be within the Town council boundary

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

See the above

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

. Notified of the Submission

Comment

Consultee	Mr Julian Gibson (973939)
Email Address	
Company / Organisation	Stow Bedon & Breckles Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Stow Bedon & Breckles Parish Council (Mr Julian Gibson)
Comment ID	24
Response Date	20/09/17 11:25
Consultation Point	Policy HOU 05 - Small Villages and Hamlets Outside of Settlement Boundaries (View)
Status	Processed
Submission Type	Web
Version	0.3

Do you consider the Pre-Submission Publication to be: Sound (You support the document)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you feel that the plan is sound, please tell us why.

My Council was pleased that its opinions would be more strongly taken into account in HOU 05 and that the percentage increase in development proposal had been dropped.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

Comment

Consultee Mr Christopher Blow (963732)

Email Address

Company / Organisation Saham Toney Parish Council

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Saham Toney Parish Council (Mr Christopher Blow)

Comment ID 25

Response Date 21/09/17 10:15

Consultation Point GEN 1 - Sustainable Development in Breckland ([View](#))

Status Processed

Submission Type Web

Version 0.5

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

The principle in question was not included in the document at the time of previous consultations.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

In the principle "Support Breckland's wider rural economy helping to sustain local services and assist in helping rural communities adapt and grow **proportionately** to enhance their social and economic sustainability., the term "proportionately" lacks clarity or definition and would thus be difficult to apply consistently as a basis for planning decisions.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	26
Response Date	21/09/17 10:16
Consultation Point	GEN 2 Promoting High Quality Design (View)
Status	Processed
Submission Type	Web
Version	0.5

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

This policy was not included at the time of previous consultations.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

- 1) Almost all of the criteria for "high quality design" are subjective and therefore open to wide interpretation and difficult to apply consistently or reliably when making planning decisions.
- 2) This policy should additionally make reference to the local design requirements in any made Neighbourhood Plans.

3) The referenced Supplementary Planning Document on Design has not been made available for consultation and means the policy is incomplete with respect to that document.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

. Notified of the Submission
. Notified of the Inspectors Recommendations
. Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	27
Response Date	21/09/17 10:16
Consultation Point	2.14 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.5

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

Terminology in question was not used at the time of previous consultations.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

In the first sentence the term "villages with settlement boundaries" is inconsistent with that used elsewhere in the Plan, most notable in Policy HOU 04, in which the term "rural settlements with boundaries" is used. Amend accordingly.

Similarly in the criteria for transport amend "village" to "settlement". This is an important distinction, since settlement may be understood as an entire parish whereas village may be interpreted as just the inhabited centre of that parish.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	28
Response Date	21/09/17 10:16
Consultation Point	2.15 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.5

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

The text in question was not included at the time of previous consultations.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

Mention is made on an assessment as to the availability of services within each village. This is possibly the Council's Local Service Centre Topic Paper, but that is not made clear and hence this clause is not rigorous.

Add reference to the document in which the noted assessment can be found.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	30
Response Date	21/09/17 10:17
Consultation Point	2.16 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.6

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan justified?
. Is the plan effective?
. Is the plan consistent with national policy?

Have you raised this issue before during previous consultations? (Please tick the appropriate box) . Yes at Preferred Directions Stage (January - February 2016)

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

Neither at previous consultation versions of the Plan, nor in the present version has any reasoned and objective justification been given as to why only 2,650 houses can be delivered in the Attleborough SUE over the Plan period. This was previously noted as being a joint delivery of only 53 houses per year, by three separate developers. There appears to have been no attempt to engage more developers to address the claimed delivery problem. The consequence is that larger housing allocations have been made to other settlements to make up Attleborough's shortfall, which is unacceptable and not in accordance with the Council's principle of directing development to the most sustainable locations

Such seemingly arbitrary phasing to suit developers would also appear to be contrary to the NPPF.

Greater justification for scheduling the development of 1,350 houses in the Attleborough SUE beyond the Plan period is required.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	31
Response Date	21/09/17 10:17
Consultation Point	2.41 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.6

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

The text concerned is new.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

While recognition of and reference to the Attleborough Neighbourhood Plan is to be welcomed it is not clear why the neighbourhood plans for other settlement are not similarly mentioned in other relevant sections of the Plan and for consistency and awareness this omission should be rectified.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

. Notified of the Submission

. Notified of the Inspectors Recommendations

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	32
Response Date	21/09/17 10:17
Consultation Point	GEN 4 - Development Requirements of Attleborough Strategic Urban Extension (SUE) Development Requirements of Attleborough Strategic Urban Extension (SUE) (View)
Status	Processed
Submission Type	Web
Version	0.6
Do you consider the Pre-Submission Publication to be:	<input type="checkbox"/> Unsound (You think the document needs changing)
If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).	<input type="checkbox"/> Is the plan justified? <input type="checkbox"/> Is the plan consistent with national policy?
Have you raised this issue before during previous consultations? (Please tick the appropriate box)	<input type="checkbox"/> Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016) <input type="checkbox"/> Yes at Preferred Directions Stage (January - February 2016)

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

Identical to comments on paragraph 2.16.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	33
Response Date	21/09/17 10:17
Consultation Point	2.49 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.4

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

The text concerned is new.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

The final statement "Thetford's reputation will be improved" is far too vague and the need for this has not been explained. It needs to be made clear what problems exist regarding Thetford's reputation at present and in what way(s) improvement is desired. Without such context this part of the vision cannot be meaningfully achieved by policy, nor subsequently monitored or measured.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	34
Response Date	21/09/17 10:18
Consultation Point	Policy GEN 05 Settlement Boundaries (View)
Status	Processed
Submission Type	Web
Version	0.4

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

The text concerned is new.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

Amend the first sentence to read as follows:

"Within the defined settlement boundaries and the boundary for Attleborough SUE (as shown on the Policies Map) proposals for new development are acceptable **in principal**, subject to compliance with National and other Local Plan policies, **and the relevant policies of made Neighbourhood Plans.**"

The addition of "in principal" is consistent with paragraph 2.52 and will make clear that development is not acceptable in all circumstances - i.e. it is not equivalent to permitted development.

Reference to the policies of made Neighbourhood Plans will make clear that these must also be adhered to when making development proposals within settlement boundaries and given weight when making planning decisions.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

. Notified of the Submission
. Notified of the Inspectors Recommendations
. Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	35
Response Date	21/09/17 10:18
Consultation Point	3.3 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.3
Do you consider the Pre-Submission Publication to be:	<input type="checkbox"/> Unsound (You think the document needs changing)
If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).	<input type="checkbox"/> Is the plan justified?
Have you raised this issue before during previous consultations? (Please tick the appropriate box)	<input type="checkbox"/> Yes at Preferred Directions Stage (January - February 2016)

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

Note: This issue was also raised via a Freedom of Information request which Breckland Council failed to address adequately.

Neither the Plan nor the Central Norfolk Strategic Housing Market Assessment from which figures are taken provide a clear and justified calculation to explain how a population increase of 23,656 over the period 2011-2036 results in a housing need of 15,298 over the same period, given that the average household size in Breckland is assumed to be 2.3 (as used to establish number of households in settlements in paragraph 3.9). While it is understood there are other factors to consider when calculating housing need, that does not explain why that assessed need equates to an average household size of approximately 1.5.

This results in uncertainty about all of the housing allocations which could be rectified by giving a clear and concise calculation as part of the justification for total housing allocation to justify the figure of 15,298 new houses.

This also follows through into paragraph 3.6.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

- . Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	36
Response Date	21/09/17 10:18
Consultation Point	Policy HOU 01- Development Requirements (Minimum) (View)
Status	Processed
Submission Type	Web
Version	0.4
Do you consider the Pre-Submission Publication to be:	<input type="checkbox"/> Unsound (You think the document needs changing)
If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).	<input type="checkbox"/> Is the plan justified?
Have you raised this issue before during previous consultations? (Please tick the appropriate box)	<input type="checkbox"/> Yes at Preferred Directions Stage (January - February 2016)

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

Note: This issue was also raised via a Freedom of Information request which Breckland Council failed to address adequately.

Neither the Plan nor the Central Norfolk Strategic Housing Market Assessment from which figures are taken provide a clear and justified calculation to explain how a population increase of 23,656 over the period 2011-2036 results in a housing need of 15,298 over the same period, given that the average household size in Breckland is assumed to be 2.3 (as used to establish number of households in settlements in paragraph 3.9). While it is understood there are other factors to consider when calculating housing need, that does not explain why that assessed need equates to an average household size of approximately 1.5.

This results in uncertainty about all of the housing allocations which could be rectified by giving a clear and concise calculation as part of the justification for total housing allocation to justify the figure of 15,298 new houses.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

. Notified of the Submission
. Notified of the Inspectors Recommendations
. Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	37
Response Date	21/09/17 10:18
Consultation Point	3.7 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan justified?
. Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

The text is new.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

It is stated in the second sentence "Having regard to this figure..."; however it is not made clear by description what figure is being referred to, nor is any figure stated. It is hence difficult to follow the intended logic of the wording through to the actual housing allocations. It is also impossible to ascertain if the policy is adequately justified without clarity on what figure is being referred to.

The same sentence goes on to say "...the rest of the housing target (*note: i.e. that not directed to local service centres*) is directed to the larger market towns...". This is incorrect and should either read "...to

the larger market towns **and the rural settlements with boundaries...**", or the allocation to the rural settlements with boundaries should be deleted for consistency with this paragraph's text.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

. Notified of the Submission
. Notified of the Inspectors Recommendations
. Notified of the Adoption

Comment

Consultee Mr Christopher Blow (963732)

Email Address

Company / Organisation Saham Toney Parish Council

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Saham Toney Parish Council (Mr Christopher Blow)

Comment ID 38

Response Date 21/09/17 10:18

Consultation Point 3.8 Paragraph ([View](#))

Status Processed

Submission Type Web

Version 0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan justified?

Have you raised this issue before during previous consultations? (Please tick the appropriate box) . Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)
. Yes at Preferred Directions Stage (January - February 2016)

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

Deferral of planned development in the two SUE's beyond the plan period has not been justified and has a significant impact on the level of housing allocations to all other settlements.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? . Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	39
Response Date	21/09/17 10:19
Consultation Point	3.9 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan justified?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

The text concerned is new.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

The allocation of housing to different centres is a fundamental part of the Plan and yet it is stated that each local service centre "**has been assumed**" to see approximately 10% of the "**estimated**" number of households in 2011.

It is understood the Council has done a lot of work on site allocations over the period 2011-2017 and it is therefore inappropriate and unjustifiable to use assumed and estimated data for such an important issue..

Additionally it is unnecessary to use another assumption - that of household size - given that the number of households in any given settlement can be readily obtained from the 2011 census data .

Far greater justification and evidence is required in support of percentages of growth attributed to different centres in Policy HOU 02.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

. Notified of the Submission
. Notified of the Inspectors Recommendations
. Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	40
Response Date	21/09/17 10:19
Consultation Point	3.9 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan justified?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

The text concerned is new.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

The allocation of housing to different centres is a fundamental part of the Plan and yet it is stated that each local service centre "**has been assumed**" to see approximately 10% of the "**estimated**" number of households in 2011.

It is understood the Council has done a lot of work on site allocations over the period 2011-2017 and it is therefore inappropriate and unjustifiable to use assumed and estimated data for such an important issue..

Additionally it is unnecessary to use another assumption - that of household size - given that the number of households in any given settlement can be readily obtained from the 2011 census data .

Far greater justification and evidence is required in support of percentages of growth attributed to different centres in Policy HOU 02.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

. Notified of the Submission
. Notified of the Inspectors Recommendations
. Notified of the Adoption

Comment

Consultee Mr Christopher Blow (963732)

Email Address

Company / Organisation Saham Toney Parish Council

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Saham Toney Parish Council (Mr Christopher Blow)

Comment ID 41

Response Date 21/09/17 10:19

Consultation Point 3.10 Paragraph ([View](#))

Status Processed

Submission Type Web

Version 0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan justified?
. Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

The text in question is new.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

No evidence or justification has been presented for the statement "A 7% allowance for rural areas is identified as being consistent with the approach within Policy HOU 04...". It appears to be an arbitrary figure, applied to "make up the numbers - in part due to the unjustified delay in development of the two SUE's.

This is a change from the approach in the previous two consultation versions of the Plan, but is not justified by any representations on the matter (at least not those included in the Statement of Consultation).

This paragraph does mention representations from landowners and developers as evidence that sites are available and develop-able. Such evidence must be made available for scrutiny before the 7% figure can be accepted as sound. Additionally if evidence exists of such sites in the rural settlements that is then inconsistent with the Council's failure to identify housing allocations by individual settlement in Policy HOU 02.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

. Notified of the Submission
. Notified of the Inspectors Recommendations
. Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	42
Response Date	21/09/17 10:19
Consultation Point	3.11 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

The text in question is new.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

The statement that new homes targets are provided in each settlement in the settlement hierarchy (ref., policy GEN 03) is false. No such targets are provided individually for the rural settlements with boundaries which form part of the hierarchy. This means that the statement that certainty is provided for communities progressing or considering a neighbourhood plan is also untrue in the case of the 17 rural settlements.

Saham Toney Parish Council is preparing a neighbourhood plan and is experiencing much difficulty and uncertainty because of this omission.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

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. Notified of the Inspectors Recommendations
. Notified of the Adoption

Comment

Consultee Mr Christopher Blow (963732)

Email Address

Company / Organisation Saham Toney Parish Council

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Saham Toney Parish Council (Mr Christopher Blow)

Comment ID 43

Response Date 21/09/17 10:19

Consultation Point Policy HOU 02 - Level and Location of Growth ([View](#))

Status Processed

Submission Type Web

Version 0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan justified?
. Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box) . Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)
. Yes at Preferred Directions Stage (January - February 2016)

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

1) There is a zero allocation of new houses to Thetford from 2017-2036. This is unacceptable for one of the two "key" settlements in the district. It presumably results from developers not working quickly enough to deliver the SUE, but instead land-banking. Notwithstanding the SUE there should still be other development in Thetford over the plan period. As specified the consequence is that other less sustainable settlements have been allocated greater shares of new housing.

2) For consistency of terminology with Policy HOU 04 amend "villages with boundaries" to "rural settlements with boundaries".

3) As noted in the comment to paragraph 3.10 no evidence has been presented to justify an allocation of 7% of growth to the 17 rural settlements so this is just an arbitrary allocation.

4) For villages (settlements) with boundaries the policy notes there are zero housing allocations included within the Local Plan although paragraph 3.10 states that landowners and developers have given evidence of available sites. The allocation to rural settlements lacks any substantive basis and merely "makes up the numbers".

5) Email correspondence between Saham Toney parishioners and Breckland planning policy officers has identified that Breckland Council intends to publish a breakdown by settlement of the overall 150 house allocation in an appendix to the Local Plan which will form a modification to the Plan, but that the appendix will only be available during examination of the Plan. This is unacceptable as such an important document must form part of this consultation not a subsequent one which would only serve to delay examination. Saham Toney Parish Council seeks to support a sustainable and proportionate share of the overall allocation but cannot do that unless that share is defined and agreed. During preparation of its Neighbourhood Plan, via the Breckland Neighbourhood Plan Officer the Parish Council has requested a meeting between the 17 rural settlements and Breckland Council to discuss and agree individual allocations to each settlements or at least a method of calculating such an allocation, but has received no response. There is precedence for example in the South Oxfordshire Local Plan which has been carried forward into the made Woodcote Neighbourhood Plan. Since Breckland Council claims to have evidence from landowners and developers of sustainable and deliverable sites in the 17 rural settlements it should be straightforward to present this to the relevant parish councils, reach agreement on allocations and update the Local Plan accordingly. Not doing so simply results in uncertainty for 17 local communities.

6) Paragraph 3.3 and Policy HOU 01 both state the objectively assessed need (OAN) for housing between 2011 and 2036 is 15,298. Yet Policy HOU 02 specifies a total of 15,950 new houses over the plan period, an increase of 652 that lacks any evidence or justification. this means for example the entire future allocation to 17 rural settlements (150 houses) could be deleted (since it also lacks evidence or justification) and the OAN would still be satisfied. The individual allocations in Policy HOU 02 should be reduced on a justifiable basis to result in a total of 15,928.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

. Notified of the Submission
. Notified of the Inspectors Recommendations
. Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	44
Response Date	21/09/17 10:20
Consultation Point	3.17 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

The text in question is new.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

This paragraph twice mentions employment with respect to Policy HOU 04. But Policy HOU 04 deals with housing (ref its criteria 1) and not development for employment. Hence either employment references should be removed from 3.17 or criteria for such development should be added to Policy HOU 04 or a new policy for employment in rural settlements.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	46
Response Date	21/09/17 10:20
Consultation Point	3.20 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

The text in question is new.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

Delete "expected to" from the first sentence since it implies it is optional to submit a supporting statement but does not define the consequence if one is not submitted. The statement is to address important issues that must be accounted for in the planning decision and must therefore be obligatory.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	47
Response Date	21/09/17 10:20
Consultation Point	3.21 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

The text in question is new.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

1) Amend "Applicants should demonstrate ..." to "Applicants shall demonstrate..." since demonstration of adequate evidence must be obligatory.

2) It is unclear how a developer would demonstrate "appropriate" support by the parish council. Breckland's Neighbourhood Plan Officer has repeatedly told Saham Toney Parish Council that the Parish Council cannot consult with developers during the process of an application, although the Parish

Council would be willing to do so. Define how a developer would demonstrate parish council support in practice.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

. Notified of the Submission
. Notified of the Inspectors Recommendations
. Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	48
Response Date	21/09/17 10:21
Consultation Point	3.22 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

The text in question is new.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

1) Replace "Evidence could comprise" with "Evidence shall comprise". there must be no doubt about what evidence is required in support of a proposal.

2) Re demonstration of local support:

(a) delete "e.g." since this leaves too much room for interpretation resulting in necessary evidence not being submitted;

(b) see our comment to paragraph 3.21 regarding evidence of parish council support;

(c) a single defined method of surveying local opinion must be stated to ensure a consistent approach in all cases. As a minimum it must be specified that either all households or all eligible voters in a parish must be canvassed;

(d) As written a developer could address just one of the example means of showing evidence of local support and satisfy the criteria in this respect: this is unacceptable - parish council support and a survey of local opinion, at least, must be obligatory forms of evidence;

(e) in the 3rd and 4th bullet points incorrect terminology has been used - "adopted Neighbourhood Plan" should be "made Neighbourhood Plan".

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

. Notified of the Submission
. Notified of the Inspectors Recommendations
. Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	49
Response Date	21/09/17 10:21
Consultation Point	3.23 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.4

Do you consider the Pre-Submission Publication to be: Sound (You support the document)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

The text in question is new.

If you feel that the plan is sound, please tell us why.

Saham Toney Parish Council strongly supports the principle that significant benefit to the local community must be shown before any proposal is permitted, but note our support is subject to our comments on paragraph 3.22.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

- . Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	50
Response Date	21/09/17 10:21
Consultation Point	3.24 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

The text in question is new.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

For greater clarity and robustness amend "Proposals must be of a size, design and scale that seek to meet an identified need and respects the setting." to "Proposals must be of a size, design and scale that seek to meet an identified need **in the settlement itself** and respects the **local** setting."

Without this change an identified need in Breckland could be used to justify development in a settlement where no specific need exists.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	51
Response Date	21/09/17 10:21
Consultation Point	Policy HOU 05 - Small Villages and Hamlets Outside of Settlement Boundaries (View)
Status	Processed
Submission Type	Web
Version	0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

This is new policy wording.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

Greater clarity and definition is required to distinguish between those places covered by policy HOU 04 and those by HOU 05. At present it is possible to interpret that both to apply to a given settlement. In the case of Saham Toney for example, since Policy HOU 04 does not specify it applies to the entire parish it could be interpreted that Policy HOU 05 applies to outlying areas of the parish. The Parish

Council does not believe this to be intention and considers that of the two policies only HOU 04 applies to the parish but would like to see that clarified and defined in the wording of the two policies.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

- . Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee Mr Christopher Blow (963732)

Email Address

Company / Organisation Saham Toney Parish Council

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Saham Toney Parish Council (Mr Christopher Blow)

Comment ID 52

Response Date 21/09/17 10:21

Consultation Point 3.34 Paragraph ([View](#))

Status Processed

Submission Type Web

Version 0.4

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

This is new text.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

The SHMA sets out the type and size of new housing needed on a district wide basis. In order to apply its recommendations to individual settlements the Council needs to provide more evidence and justification of those individual needs. For example the SHMA identifies that in Breckland the predominant need is for 3 bedroom houses (more than 75% of the total) but there is no evidence to either support or discount this with respect to Saham Toney.

Recent development in Saham Toney has seen a preponderance of 4 and 5 bedroom houses but there is no information to suggest that meets local demand.

The Council should provide more guidance on types and sizes of new houses needed in particular settlements where allocations have been made.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

. Notified of the Submission
. Notified of the Inspectors Recommendations
. Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	53
Response Date	21/09/17 10:22
Consultation Point	3.36 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

The text in question is new

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

Amend "...Design and Access Statement should set out why a higher density is appropriate..." to "...Design and Access Statement **shall** set out why a higher density is appropriate...", since density of development has a great impact on the character and feel of a settlement (which the Council seeks to protect in other Plan clauses and policies) it must be obligatory to justify higher values rather than by choice as worded.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
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- . Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	54
Response Date	21/09/17 10:22
Consultation Point	3.37 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

This is new text.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

Amend "can be of a lower density, in the interests of efficient use of land..." to "can be of a lower density, **however** in the interests of efficient use of land..." for better clarity.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

- . Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee Mr Christopher Blow (963732)

Email Address

Company / Organisation Saham Toney Parish Council

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Saham Toney Parish Council (Mr Christopher Blow)

Comment ID 55

Response Date 21/09/17 10:22

Consultation Point 3.42 Paragraph ([View](#))

Status Processed

Submission Type Web

Version 0.4

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

The text is new.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

The term "very good walking access" requires definition. This could be taken from the "Guidelines for Providing For Journeys on Foot" by the Institution of Highways and Transportation Table 3.2 (as referenced in Department of Transport guidelines).

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	56
Response Date	21/09/17 10:22
Consultation Point	Policy HOU 06 - Principle of New Housing (View)
Status	Processed
Submission Type	Web
Version	0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

This is a new policy.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

It is unclear how SHMA housing needs regarding size, type and tenure on a district wide basis could be applied on a settlement by settlement basis. The Council should provide more guidance on this aspect.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	57
Response Date	21/09/17 10:23
Consultation Point	Policy HOU 07 - Affordable Housing (View)
Status	Processed
Submission Type	Web
Version	0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan justified?
. Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

This policy has been rewritten.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

Criteria 1 of this policy coupled with the 5 house limit in Policy HOU 04 will mean that affordable housing is not delivered in rural settlements with boundaries.

A mechanism should be added to ensure some level of affordable housing is delivered in those settlements or a justification provided as to why this is not considered necessary.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	58
Response Date	21/09/17 10:23
Consultation Point	3.58 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.4

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

This is new text.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

Evidence is required to justify that the level of the commuted sum (£50,000) is adequate and reasonable to allow development of an affordable home: it seems a very small sum for that purpose.

A mechanism also needs to be introduced to increase the level of the commuted sum over the period of the Plan since what may be adequate in 2017 is almost certain to be wholly inadequate by 2036.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee Mr Christopher Blow (963732)

Email Address

Company / Organisation Saham Toney Parish Council

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Saham Toney Parish Council (Mr Christopher Blow)

Comment ID 59

Response Date 21/09/17 10:23

Consultation Point 3.77 Paragraph ([View](#))

Status Processed

Submission Type Web

Version 0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

This is new text.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

The last sentence "However, national standards for some issues that can be applied by planning authorities." does not make any sense and appears to be incomplete. It should be rewritten in a way that is understandable.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	60
Response Date	21/09/17 10:23
Consultation Point	3.80 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

This is new text.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

The referenced topic paper "Optional Technical Standards" is not available in the public domain and therefore it is incorrect to state that it is evidence for Policy HOU 10.

Such evidence must be provided by the Council during the consultation period or further consultation allowed when it is made available.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	62
Response Date	21/09/17 10:23
Consultation Point	Policy HOU 10 - Technical Design Standards for New Homes (View)
Status	Processed
Submission Type	Web
Version	0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan justified?
. Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

This is a new policy.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

The final sentence refers to Building regulations and BS8300 for parking space. Elsewhere in the Plan reference for this is made to Appendix 2 of the Plan. It is not made clear if the different references are compatible. Plan references should be consistent to avoid confusion and misinterpretation.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	63
Response Date	21/09/17 10:24
Consultation Point	3.99 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

This is new text.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

In addition to Council policies GEN 02 and COM 01 make reference to relevant policies of any made Neighbourhood Plans. Otherwise this policy risks not giving weight to those neighbourhood plan policies when planning decisions are made.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	64
Response Date	21/09/17 10:24
Consultation Point	Policy HOU 14 - Affordable Housing Exceptions (View)
Status	Processed
Submission Type	Web
Version	0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan justified?
. Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

This is a rewritten policy.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

There are several mentions of an "element of market housing" being permitted in certain circumstances. What those circumstances might be is not defined and therefore very subject and subject to wide interpretation.

Similarly what quantity or proportion of market housing would comprise "an element" is not defined and could be argued to be any number that suited a developer.

Hence while the intention of this policy is good, its means of implementation in a way that will deliver the intention are very unclear and impossible to apply consistently and robustly.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

. Notified of the Submission
. Notified of the Inspectors Recommendations
. Notified of the Adoption

Comment

Consultee Mr Christopher Blow (963732)

Email Address

Company / Organisation Saham Toney Parish Council

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Saham Toney Parish Council (Mr Christopher Blow)

Comment ID 65

Response Date 21/09/17 10:24

Consultation Point Table 5.1 Occupancy rates ([View](#))

Status Processed

Submission Type Web

Version 0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan justified?
. Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box) . Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)

If you have not raised this issue before please use the following box to explain why.

The table is new.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

There is no evidence for the occupancy rates given in the table. They seem to be very low which will result in lower provision of open space under policy ENV 04. For example only 3 people in a 4 bedroom house. Provide evidence for the figures used.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	66
Response Date	21/09/17 10:24
Consultation Point	5.44 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

This is new text.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

There are other Local Green Spaces in the district besides the two identified in Table 5.3 (for example see the Yaxham made Neighbourhood Plan).

Therefore add the following text at the end of 5.44: "In addition refer to any made Neighbourhood Plans for the designation of Local Green Spaces in Neighbourhood Areas."

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee Mr Christopher Blow (963732)

Email Address

Company / Organisation Saham Toney Parish Council

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Saham Toney Parish Council (Mr Christopher Blow)

Comment ID 67

Response Date 21/09/17 10:24

Consultation Point 5.69 Paragraph ([View](#))

Status Processed

Submission Type Web

Version 0.4

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan justified?
. Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

This is new text

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

The referenced SFRA does not address flood risk in the parish of Saham Toney, nor in any of the other 16 rural settlements with boundaries. But all 17 settlements are allocated housing development which may be subject to flood risk.

The Council must add sufficient information to allow the assessment of flood risk due to new developments in the 17 rural settlements.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	68
Response Date	21/09/17 10:25
Consultation Point	Policy ENV 09 Flood Risk & Surface Water Drainage (View)
Status	Processed
Submission Type	Web
Version	0.5

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan justified?
. Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

Policy has been rewritten

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

While the policy addresses the use of SuDS it does not cover the situation where groundwater is inundated to the point where SuDS will not function as intended. Add criteria to address this omission.

The term "medium and higher flood risk areas must be defined, and it must be made clear that reference for these is to be made to the Environment Agency's "live" online flood risk maps rather than any maps taken at a particular point in time. Flood risk is regularly reassessed and climate change also has an

ongoing influence so flood risk areas may be larger in say 5-10 years and the Plan must take account of that.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

. Notified of the Submission
. Notified of the Inspectors Recommendations
. Notified of the Adoption

Comment

Consultee Mr Christopher Blow (963732)

Email Address

Company / Organisation Saham Toney Parish Council

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Saham Toney Parish Council (Mr Christopher Blow)

Comment ID 69

Response Date 21/09/17 10:25

Consultation Point Policy ENV 10 Renewable Energy Development ([View](#))

Status Processed

Submission Type Web

Version 0.4

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

New policy

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

Add to the phrase "...other relevant policies in the Local Plan..." the text "and made Neighbourhood Plans" to ensure such plans are also given weight when making planning decisions.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	70
Response Date	21/09/17 10:25
Consultation Point	6.94 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan justified?
. Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

This is new text.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

The policy specifies that development of visitor accommodation shall be in accordance with policies HOU 04 and HOU 05 in rural areas, as applicable. Policy EC 07 itself is not limited to visitor accommodation - it also covers such development as tourist attractions and infrastructure.

Even a single hotel (which would count as one dwelling under Policy HOU 04 could be of such a size as to be completely inappropriate in a rural settlement.

Tourist related development should hence not be simply referred to policies HOU 04 and 05 where it is proposed in rural areas. Instead specific criteria for such development in rural settlements should be included in Policy EC 07, with justification added to this paragraph or a new one.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

. Notified of the Submission
. Notified of the Inspectors Recommendations
. Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	71
Response Date	21/09/17 10:25
Consultation Point	Policy EC 07 Tourism Related Development (View)
Status	Processed
Submission Type	Web
Version	0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan justified?
. Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

This is a rewritten policy.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

Further to our comments on paragraph 6.94 the policy should be updated to provide specific criteria for tourist related development in rural settlements rather than simply refer to the criteria of policies HOU 04 and 05, which (a) cover residential developments which may not be appropriate for a large hotel for example; (b) do not cover the development of tourist attractions or infrastructure. Justification for the revised wording should be added to paragraph 6.94 or a new one.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	72
Response Date	21/09/17 10:26
Consultation Point	Policy COM 01 - Design (View)
Status	Processed
Submission Type	Web
Version	0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

This is a rewritten policy.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

In the last but one paragraph "current best practice" is referred to. Some guidance as to what this comprises and/or where to find it should be added to ensure consistency of approach by those making planning proposals.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	73
Response Date	21/09/17 10:26
Consultation Point	Policy COM 02 Healthy Lifestyles (View)
Status	Processed
Submission Type	Web
Version	0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

This is a rewritten policy.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

In item (ii) for full clarity add definition to specify if the criteria of 5 dwellings / 1000m2 should both apply or only one of them (i.e insert the word either "and" or "or" between those two.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	75
Response Date	21/09/17 10:26
Consultation Point	8.5 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

This is rewritten text.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

The final part of the first sentence "...it is known that existing infrastructure will need to be upgraded to meet the needs of all the new development." does not seem to be logical in the context of locations that development will be directed towards.

It is suggested that it should actually read "...it is known that existing infrastructure will **not** need to be upgraded to meet the needs of all the new development."

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	74
Response Date	21/09/17 10:26
Consultation Point	Policy COM 03 Protection of Amenity (View)
Status	Processed
Submission Type	Web
Version	0.4

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

Rewritten policy.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

The second sentence notes "unacceptable effects" on the residential amenity of neighbours and "adequate" levels of amenity for future occupants. Both of those terms are completely subjective and therefore impossible to apply consistently or robustly when making planning decisions. Replace that terminology with clear, well-defined terms that leave no room for doubt as to what is required.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	76
Response Date	21/09/17 10:27
Consultation Point	8.6 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan justified?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

This is new text.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

The referenced Infrastructure Development Plan has not been made available by the Council as part of this consultation and therefore cannot be considered as evidence to justify or explain Policy INF 02. It also means reviewers cannot make fully informed representations about that policy.

The Council must either make the document available during this consultation or publish it for another consultation at a future date before examination of the Plan.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	77
Response Date	21/09/17 10:27
Consultation Point	Table .1 (View)
Status	Processed
Submission Type	Web
Version	0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

This is a new appendix.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

The codes used to categorise the class of development proposal in Table 1 have not been defined and have not been found in the public domain.

A key explaining the codes should be added to allow full review of the table.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	78
Response Date	21/09/17 10:27
Consultation Point	Map .13 Saham Toney Settlement Boundary (View)
Status	Processed
Submission Type	Web
Version	0.3

Do you consider the Pre-Submission Publication to be: Sound (You support the document)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

The settlement boundary differs from that at the previous stages.

If you feel that the plan is sound, please tell us why.

Saham Toney Parish Council considers the proposed settlement boundary to be the most appropriate and fully supports it.

It is however noted that a small part of the Watton boundary is shown at the bottom right of map 13 and for total clarity should be removed from this map.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee Mr Christopher Blow (963732)

Email Address

Company / Organisation Saham Toney Parish Council

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Saham Toney Parish Council (Mr Christopher Blow)

Comment ID 79

Response Date 21/09/17 10:27

Consultation Point Breckland Local Plan Pre-Submission Publication ([View](#))

Status Processed

Submission Type Web

Version 0.4

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan justified?
. Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

This comment relates to the updated Saham Toney Policies Map Summer 2017 which although not part of the online consultation was sent to Saham Toney Parish Council together with the Local Plan.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

Comments relating to the Saham Toney Policies Map summer 2017 are as follows:

1) This map should be made available as part of the online consultation so that parishioners as well as the Parish Council can make comments on it should they wish.

2) The map does not show the full extent of the settlement boundary as it has been truncated at both top and bottom of the map. Similarly the full southern extent of open spaces and flood zones are not shown.

3) The map only shows the main developed part of the parish but Local Plan policies cover the whole parish. The policies map must be updated to show the whole parish of Saham Toney with the parish boundary clearly identified.

4) Some of the sites shown as having planning permissions appear to have been granted that permission before 2011; the start of the Plan period. This would not appear logical in the context of the Plan period and they should be removed.

5) The map would be much easier to use if each site with planning permission was numbered and a separate list provided giving the planning application numbers for each. It would also be very useful to list the number of new houses granted permission against each site.

6) Alternatively to (5) the sites having planning permission should be removed from the map since this is just a "snapshot in time" and even between the Plan's consultation and adoption is likely to be added to.

7) The flood zones shown are a "snapshot in time" with no definition as to their source or date. They are also incorrect when compared with the latest online maps on the Government / Environment Agency's website, and therefore misleading. Such data will continue to change and be updated throughout the Plan period. At the very least this should be noted on the Policy map with a reference added to the up to date online maps.

8) As a result of the various shortcomings of the Policy map as noted above, it is recommended that the Council adopts regularly updated online Policy maps with a warning that paper versions downloaded may become out of date and that the online version should be used as the master copy.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

. Notified of the Submission
. Notified of the Inspectors Recommendations
. Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	80
Response Date	21/09/17 10:27
Consultation Point	5.64 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.4

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

Comment relates to new text

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

In order to safeguard non-designated heritage assets adequately Breckland Council should introduce a local list. In the absence of such a list Policy ENV 08 and its supporting text should refer to the definition of such assets in made Neighbourhood Plans.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

<h2 style="margin: 0;">Breckland Local Plan Pre-Submission Publication Representation Form</h2>

This form should be used to make representations on the soundness of the Breckland Local Plan Pre-Submission Publication only.

An interactive version of the Breckland Local Plan Pre-Submission Publication is available on the Council's consultation website: <http://consult.breckland.gov.uk>. Instructions on how to enter representations are provided on the website. This is the Council's preferred method of receiving representations as it will help us to handle your representation quickly and efficiently.

If you are unable to use the online system you may submit representations using this form. Further copies can be downloaded from the Council's website: www.breckland.gov.uk/pre-submission-publication or the form can be photocopied.

This form is in two parts and has four pages. Part 1 covers your contact details and Part 2 covers your representation. **Please use a separate form for each representation you make.**

Please return by 4pm on Monday 2nd October 2017. Late representations cannot be considered. Return by e-mail to planningpolicyteam@breckland.gov.uk or by post to Planning Policy, Breckland Council, Elizabeth House, Walpole Loke, Dereham, Norfolk, NR19 1EE.

Part 1: Your Contact Details

Name: GINA LOPES (TOWN CLERK)	
Organisation: ATTLEBOROUGH TOWN COUNCIL	
Address:	
Post code:	Telephone:
E-mail:	

If you have appointed someone to act as your agent please give their name and contact details.	
Name:	
Organisation:	
Address:	
Post code:	Telephone:
E-mail:	

Part 2: Your Representation (please use a separate form for each representation)

1. Do you consider the Pre-submission Publication to be: (Please tick the appropriate box)

Sound (You support the document)	
Unsound (You think the document needs changing)	√

2. On which part of the document do you wish to make a representation?

Policy	
Paragraph	√
Site	
Proposals Map	
Settlement Boundary	
Other	√

If you consider the document to be **SOUND**, please go to question 7.

3. If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).

Legal Tests	
Is the plan legally compliant?	
Soundness Tests	
Is the plan positively prepared?	
Is the plan justified?	
Is the plan effective?	√
Is the plan consistent with national policy?	

4. Have you raised this issue before during previous consultations? (Please tick the appropriate box)

Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)	√
Yes at Preferred Directions Stage (January - February 2016)	√
Yes at Issues and Options Stage (November 2014 - January 2015)	√

5. If you have not raised this issue before please use the following box to explain why.

6. If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound. (Please attach extra sheets if necessary)

Members have considered the Breckland Local Plan Pre-submission publication and wish to make the following comments:-

- The proportion of growth to be delivered in Attleborough is stated as 2,650 dwellings within the Plan period and this is noted as reduced from the original target of 4,000
- There is concern that the link road will be triggered on completion of 1,200 dwellings; members feel it is vital that the road is delivered prior to the housing and understand a loan is being facilitated between Norfolk County Council and the developer to ensure this is possible
- The link road must be built to accommodate two HGVs to pass easily (4.8m minimum)
- Concerns were raised at the proposed two way traffic flows on Connaught Road and the possible closure of Church Street
- The plan states a “strategic employment site of 10 hectares” and members request this is amended to “a minimum of 10 hectares”

Members stress that the Breckland Local Plan must reflect the vision and policies clearly laid out in the Attleborough Neighbourhood Plan

7. If you feel that the plan is sound, please tell us why.

8. Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? (Please tick appropriate box)

Yes, my representation can be satisfactorily dealt with by written representations	√
No, my representations can only be suitably dealt with by appearing at the Examination in Public	

9. If you wish to appear at the Examination in Public, please outline why you consider this to be necessary.

--

10. Do you wish to be: (Please tick appropriate boxes)

Notified of the Submission	√
Notified of the Inspectors Recommendations	√
Notified of the Adoption	√

Declaration: I understand that the details included on this form will be available in the public domain. (please tick box)	√
Signature:	Date: 22.09.2017

Breckland District Council is registered with the Data Protection Act 1998 for the purpose of processing personal data in the performance of its legitimate business. Any information held by the Council will be processed in compliance with the principles set out in the Act. The preparation of the Breckland Local Plan Pre-Submission Publication is a public process and your full representation and address details will be made public for this purpose.

Comment

Consultee Mrs Val Pitt (1127986)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Mrs Val Pitt

Comment ID 82

Response Date 22/09/17 17:58

Consultation Point Breckland Local Plan Pre-Submission Publication
([View](#))

Status Processed

Submission Type Web

Version 0.3

Do you consider the Pre-Submission Publication to be: . Sound (You support the document)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).

Have you raised this issue before during previous consultations? (Please tick the appropriate box) . Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)
. Yes at Preferred Directions Stage (January - February 2016)
. Yes at Issues and Options Stage (November 2014 - January 2015)

If you feel that the plan is sound, please tell us why.

In light that govt. will release money to Breckland as long as they build houses, then it is sound. Also regarding Dereham south, the west Toftwood build is sensible.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? . Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

. **Notified of the Submission**

Officer Response

Support noted.

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	83
Response Date	23/09/17 07:35
Consultation Point	GEN 03 - Settlement Hierarchy (View)
Status	Processed
Submission Type	Web
Version	0.5

Do you consider the Pre-Submission Publication to be: Sound (You support the document)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

The terminology in question was not used at the time of previous consultations

If you feel that the plan is sound, please tell us why.

The designation of Saham Toney as a rural settlement with boundary is appropriate and correct and is supported.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	84
Response Date	23/09/17 07:38
Consultation Point	GEN 03 - Settlement Hierarchy (View)
Status	Processed
Submission Type	Web
Version	0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

The terminology in question was not used at the time of previous consultations

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

The term "Villages with boundaries" is inconsistent with other section of the Plan, most importantly Policy HOU 04. Amend to "Rural settlements with boundaries".In the final paragraph amend "development hierarchy" to "settlement hierarchy" to ensure consistency with the policy title and avoid potential confusion as to what is being referred to.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee	Mr Christopher Blow (963732)
Email Address	
Company / Organisation	Saham Toney Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Saham Toney Parish Council (Mr Christopher Blow)
Comment ID	85
Response Date	23/09/17 07:42
Consultation Point	Policy HOU 04 - Rural Settlements With Boundaries (View)
Status	Processed
Submission Type	Web
Version	0.3

Do you consider the Pre-Submission Publication to be: Sound (You support the document)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

This is a completely revised policy.

If you feel that the plan is sound, please tell us why.

The classification of Saham Toney as a rural settlement with boundary is fully supported by the Parish Council.

But note: Other aspects of the Policy are unsound as noted in a separate comment..

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee Mr Christopher Blow (963732)

Email Address

Company / Organisation Saham Toney Parish Council

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Saham Toney Parish Council (Mr Christopher Blow)

Comment ID 86

Response Date 23/09/17 07:47

Consultation Point Policy HOU 04 - Rural Settlements With Boundaries ([View](#))

Status Processed

Submission Type Web

Version 0.1

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan justified?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

This is a completely revised policy.

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

1) The policy fails to clarify that a "rural settlement" comprises an entire parish rather than just the developed village. This lack of clarity is intensified by earlier inconsistency of terms (i.e. use of the word village instead of settlement).2) "Appropriate development will be allowedsubject to being supported by other policies within the Local Plan*..." to be amended to "Appropriate development will be allowedsubject to being supported by other policies within the Local Plan* and in made

Neighbourhood Plans..." in order to reflect the weight that must be given to made neighbourhood plans when making planning decisions.3) Amend criteria (2) from "It would not lead to the number of dwellings..." to "It would not lead to the cumulative number of dwellings...", since as written it can be interpreted that any one development could increase the number of dwellings by 5%.4) A means of establishing the number of dwellings inside the settlement boundary should be added or the actual numbers stated in the Plan. Clarity is also required as to how that number will be measured on the date of the Plan's adoption. This date should more reasonably be the start of the Plan period in 2011 since that is when the housing allocations commence. As specified there is no clarity or certainty for planning officers, developers or the local community as to what the numerical cap is.

5) Criteria (4) is entirely subjective and requires better definition as to what would be acceptable in order to be rigorously applied.

6) With reference to our comment (5) to Policy HOU 02 there is no clear, justifiable and logical link between the fact that overall allocation in the 17 settlements is 150 but each could see development up to 5% of the number of dwellings within the settlement boundary. Without provision of housing numbers within the settlement boundaries it is not possible to be exact, but it is likely that applied across all 17 settlements the 5% limit would result in around double the number of houses as the 150 allocation. If the intention is to allow development within a range of numbers, that should be stated in the policy (subject to the agreement of the 17 parish councils to their individual allocations).7) Criteria should be added to prevent the co-location of more than one development of up to 5 houses - i.e. to prevent one development of 5 houses immediately adjacent to another.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

. Notified of the Submission
. Notified of the Inspectors Recommendations
. Notified of the Adoption

<p>Breckland Local Plan Pre-Submission Publication Representation Form</p>

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If you are unable to use the online system you may submit representations using this form. Further copies can be downloaded from the Council's website: www.breckland.gov.uk/pre-submission-publication or the form can be photocopied.

This form is in two parts and has four pages. Part 1 covers your contact details and Part 2 covers your representation. **Please use a separate form for each representation you make.**

Please return by 4pm on Monday 2nd October 2017. Late representations cannot be considered. Return by e-mail to planningpolicyteam@breckland.gov.uk or by post to Planning Policy, Breckland Council, Elizabeth House, Walpole Loke, Dereham, Norfolk, NR19 1EE.

Part 1: Your Contact Details

Name: James McSwiney	
Organisation: Snetterton Park Limited	
Address:	
Post code:	Telephone:
E-mail:	

If you have appointed someone to act as your agent please give their name and contact details.	
Name: Edward Keymer	
Organisation: Keymer Cavendish Limited	
Address:	
Post code:	Telephone:
E-mail:	

Part 2: Your Representation (please use a separate form for each representation)

1. Do you consider the Pre-submission Publication to be: (Please tick the appropriate box)

Sound (You support the document)	
Unsound (You think the document needs changing)	✓

2. On which part of the document do you wish to make a representation?

Policy	EC02 and related
Paragraph	
Site	
Proposals Map	✓
Settlement Boundary	
Other	

If you consider the document to be **SOUND**, please go to question 7.

3. If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).

Legal Tests	
Is the plan legally compliant?	
Soundness Tests	
Is the plan positively prepared?	NO
Is the plan justified?	
Is the plan effective?	
Is the plan consistent with national policy?	NO

4. Have you raised this issue before during previous consultations? (Please tick the appropriate box)

Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)	✓
Yes at Preferred Directions Stage (January - February 2016)	
Yes at Issues and Options Stage (November 2014 - January 2015)	

5. If you have not raised this issue before please use the following box to explain why.

6. If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound. (Please attach extra sheets if necessary)

Whilst we and numerous recently published employment-focused reports support commercial development at Snetterton Heath, landowners Snetterton Park Limited, who own 28 hectares in the southwest of the general employment area, feel that Policy EC02 is unsound because:

- it has not been positively prepared
- many of the other restrictions are not justified
- and it is inconsistent with national policy

Please see pages attached

7. If you feel that the plan is sound, please tell us why.

8. Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? (Please tick appropriate box)

Yes, my representation can be satisfactorily dealt with by written representations	
No, my representations can only be suitably dealt with by appearing at the Examination in Public	✓

9. If you wish to appear at the Examination in Public, please outline why you consider this to be necessary.

The issues are complex and need to be addressed by reference to maps past and present.

10. Do you wish to be: (Please tick appropriate boxes)

Notified of the Submission	✓
Notified of the Inspectors Recommendations	✓
Notified of the Adoption	✓

Declaration: I understand that the details included on this form will be available in the public domain. (please tick box)	
Signature:	Date: 22 September 2017

Breckland District Council is registered with the Data Protection Act 1998 for the purpose of processing personal data in the performance of its legitimate business. Any information held by the Council will be processed in compliance with the principles set out in the Act. The preparation of the Breckland Local Plan Pre-Submission Publication is a public process and your full representation and address details will be made public for this purpose.

Keymer Cavendish Limited

Planning & Development Consultants

Frolic Farm, Lode, Cambridge CB25 9HF

Telephone: 01223 811303 Mobile: 07836 727377

Email: edward.keymer@keymer-cavendish.co.uk

Breckland Local Plan pre-submission Publication Representation form on behalf of Snetterton Park Limited

Re Policy EC02 and related

Page 3: item 6. *If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.*

Whilst we and numerous recently published employment-focused reports support commercial development at Snetterton Heath, landowners Snetterton Park Limited, who own 28 hectares in the southwest of the general employment area, feel that Policy EC02 is unsound because:

- it has not been positively prepared
- many of the other restrictions are not justified
- and it is inconsistent with national policy

General background

In 2015 South Norfolk, Breckland and Forest Heath Councils commissioned Bruton Knowles together with Amion Consulting to advise on how economic growth might be delivered in the recently dualled A11 corridor. At that time, paragraph 2.3.4 of the report noted that Snetterton Heath was a key employment centre with 24 hectares of land allocated for industrial and commercial development in the period to 2026.

Of the 14 Key Location Sites in the A11 Growth Corridor, six are in Breckland District, of which Snetterton Heath is one.

There is significant economic development potential offered by the A11 Corridor but there are 'barriers to growth'. One of these is the deficiency in electricity power, identified as being around 5MW. A biomass plant has been constructed at Snetterton and is now in operation generating 44MW of green electricity a year. The project was developed through a Joint Venture between Eco2 and Icen Energy Limited. However, output from the plant is fed to the National Grid at Diss.

To enable electricity to be delivered to Snetterton, a transformer would be required to reduce the voltage, which would likely cost £2m-£6m. Norfolk County Council has a licence to deliver 1MW into the local grid and is looking to develop a PV farm to deliver this supply. Match funding of 50% is in place to deliver this project which has a cost of £1.8m.

Company No: 04712151

Registered office: 3 Morley's Place, Sawston, Cambridge CB22 3TG

VAT No: 815 6575 12

The Council and Local Enterprise Partnership are now funding a project to connect Snetterton Heath to the grid and to the biomass boiler at a cost of approximately £3 million to produce 6MW of power. They will implement the project in such a way that the power supply can be increased in stages (eg a second 6MW for another £3 million etc). This is to be implemented by February 2019.

Drainage of foul and surface water is another issue, and Snetterton Heath in particular has insufficient sewer capacity, but an onsite solution could be provided.

The report stated that most of the development sites in the A11 Growth Corridor are in private ownership and releasing the land for development may require the Council to 'sell' the vision for the A11 Corridor to landowners. This is not the case with Snetterton Park Limited, owners of land parcel LP [087]011, who support development at Snetterton Heath and will offer their land. Additionally, the landowners will work to encourage and support the A11 technology corridor project.

In terms of deliverability, Snetterton Heath has been allocated the site reference BL3 with development timescales of short term (2015-21), medium term (2021-26), long term (2026-31) and beyond 2031. However Snetterton Heath has been identified as a site which would appear to make a significant contribution to overall development criteria.

The report concludes that transformation of the A11 Growth Corridor could lead to the construction of over 700,000 square metres of new employment floor space and the creation of 15,000 job opportunities. The preferred option is to drive forward the transformation by targeting eleven sites in seven major development areas and establish the likely level of public sector resources available to facilitate development.

The Breckland Employment Growth Study 2013 produced by Nathaniel Lichfield shows in paragraph 6.9, table 6.1 a 16.2% decline in manufacturing during the period 2011-2031 with a predicted loss of 1,280 jobs. Therefore no barriers should be placed in the way of any form of employment at Snetterton Heath.

When it comes to the exact wording of Policy EC02 – Snetterton Heath – paragraph 2 is far too restrictive in suggesting only B1 and B2 uses in the southern extent of the general employment area (GEA).

Although the report states B1 and B2, it does not specifically state that B8 uses are forbidden but that, nonetheless, for a prospective occupier the likelihood of gaining consent for a freestanding warehouse, or even a warehouse constructed in association with adjacent manufacturing, is uncertain. This is a particular disincentive to an occupier when the planning application fee alone for a 5,000 square metre warehouse would be around £20,000. A clear policy would facilitate development.

National policy

The NPPF is insistent that sustainable development also involves an economic role and stresses the necessity to ensure that sufficient land of the right type is available in the right place at the right time to support growth. It is felt that the restrictive nature of Policy EC02 paragraph 2, suggesting that B8 use should be excluded from this development, contradicts this economic imperative. The result of this infringes paragraph 9 in that it will not make it easier for jobs to be created at Snetterton Heath. Similarly, at paragraph 14, the need for flexibility to adapt around rapid change is emphasised, but again if the type of development is restricted on the un-zoned land southwest of the GEA, the objectives of the NPPF are thwarted.

It is incomprehensible that in July 2016 Breckland Council published and then withdrew a map which identified the Snetterton Park land (28 hectares) as site LP [087]011 [see plan Snetterton Land Use & Site Assessment Map (July 2016) attached] and designated the site as retail because it had operated as a Sunday and Bank Holiday market for many years.

The landowners do not necessarily require a retail allocation, but they want the flexibility to perhaps have buildings with trade counters, or even showrooms for the sale of commercial vehicles or high-performance cars and motorcycles. Certainly, if the Council wants the site to be fully developed, some clarity is required.

Planning principles

Paragraph 17 of the NPPF states:

Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals...taking account of the needs of the residential and business communities.

Sustainable development

Paragraph 19 states: *Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.*

We submit that the current wording of Policy EC02 does not achieve that objective, nor does it *proactively meet the development needs of business*, in accordance with paragraph 20. Indeed, these policies are already proving to be a *potential barrier to investment* (paragraph 21) and do not *positively and proactively encourage sustainable economic growth*.

Paragraph 21 continues to state: *Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances*. Policy EC02 does not do this and we repeat that it is not therefore sound.

Snetterton Park Limited are prepared to take a flexible attitude as to how the Local Plan should be adjusted. The simplest solution would be to extend the Snetterton GEA to cover the whole of the Snetterton Park land totalling 28 hectares [see map GEA extension - map 6.1 Summary of Snetterton Heath Allocations attached].

The majority of this land already has implemented planning consents for various market/retail uses. The remainder has been car parking for many years so it is effectively all previously developed land.

In these circumstances, whilst Snetterton Park have no objection to the new allocations being suggested north and south of the A11, it seems ironic that greenfield land is being promoted in preference to brownfield land. We do not suggest these greenfield allocations should be deleted, but merely that all the previously developed land is included within the GEA – in other words, the full 28 hectares of the Snetterton Park landholding.

In summary, whilst we support the promotion of economic development at Snetterton Heath and indeed the early suggestions that **at least** 20 hectares of land should be identified at Snetterton Heath as proposed in Policy EC01 and paragraph 6.14. But that **at least** seems to have been forgotten at paragraph 6.16 and there is the unnecessary suggestion that 20 hectares should be the maximum allocation.

Paragraph 6.7 of the Local Plan suggests that up to 74.7 hectares of employment land might be required yet the Local Plan suggests delivering less than this. What possible problem would there be in simply extending the GEA at Snetterton Heath to include the previously developed land which lies between GEA and the A11?

In conclusion, the aims of Snetterton Park Limited are:

- To get B8 allocation on their land
The reports imply that this is a sector that will experience most growth in the region. A good number of the enquiries that they have received from manufacturers also include substantial aspects of warehousing and logistics. A number of the enquiries have been from logistics companies. B8 allocation will assist the landowners to develop the site. Complete clarity in the planning policy will encourage development and enable the various landlords to compete on an even playing field.
- Clarity on how the rest of the site is zoned
Either get the whole site allocated as GEA land, or leave the GEA allocation as it is and get the rest of the land allocated as brownfield (a term that the Council has used in various documents to describe the site).

Currently the majority of the site has a very ambiguous status, which is not attractive from a development point of view. The second option (brownfield) might be preferable.

- The zoning implied in the Local Plan (motorsport and engineering will be actively encouraged), is understandable, but the Council reports indicate that growth on the A11 corridor will not come from manufacturing, but from logistics and other activities.

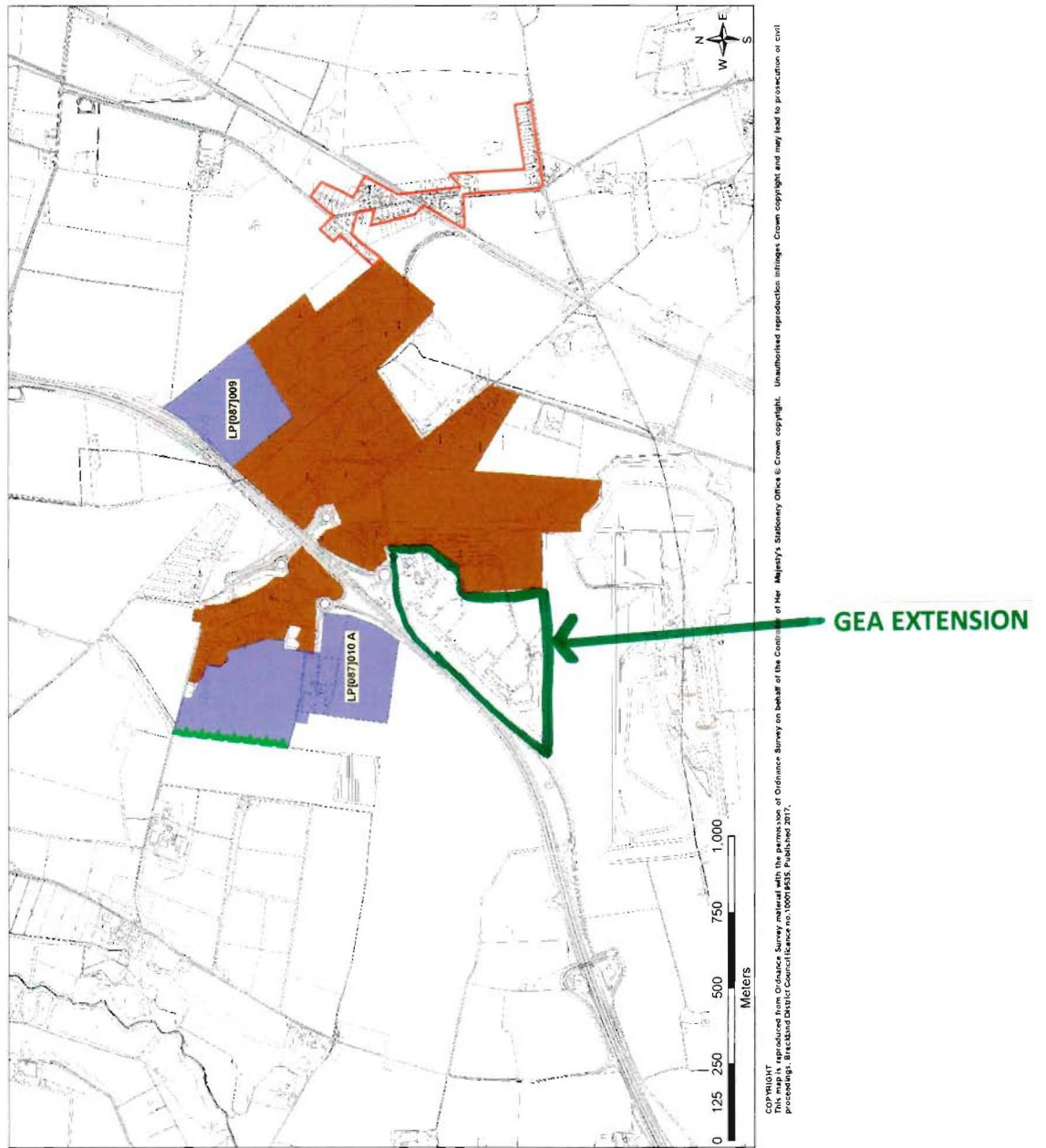
Where engineering hubs have been successful they have required intense support (i.e. Hethel, land supplied by the Council, no need to make a profit etc.). The Council has been proactive in resolving the power and transport issues in the area, which will greatly assist development in general. If it really wants more motorsport/engineering, it will probably need to put a support package together.

With the amendments suggested on this form, the Plan:

- will be positively prepared
- will not be subject to unjustified restrictions
- will be consistent with national policy

Snetterton Heath Allocations

Map 6.1 Summary of Snetterton Heath Allocations



Snetterton Land Use & Site Assessment Map (July 2016)

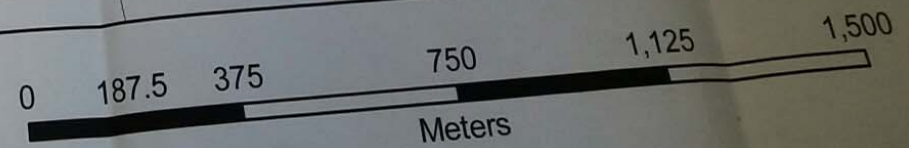
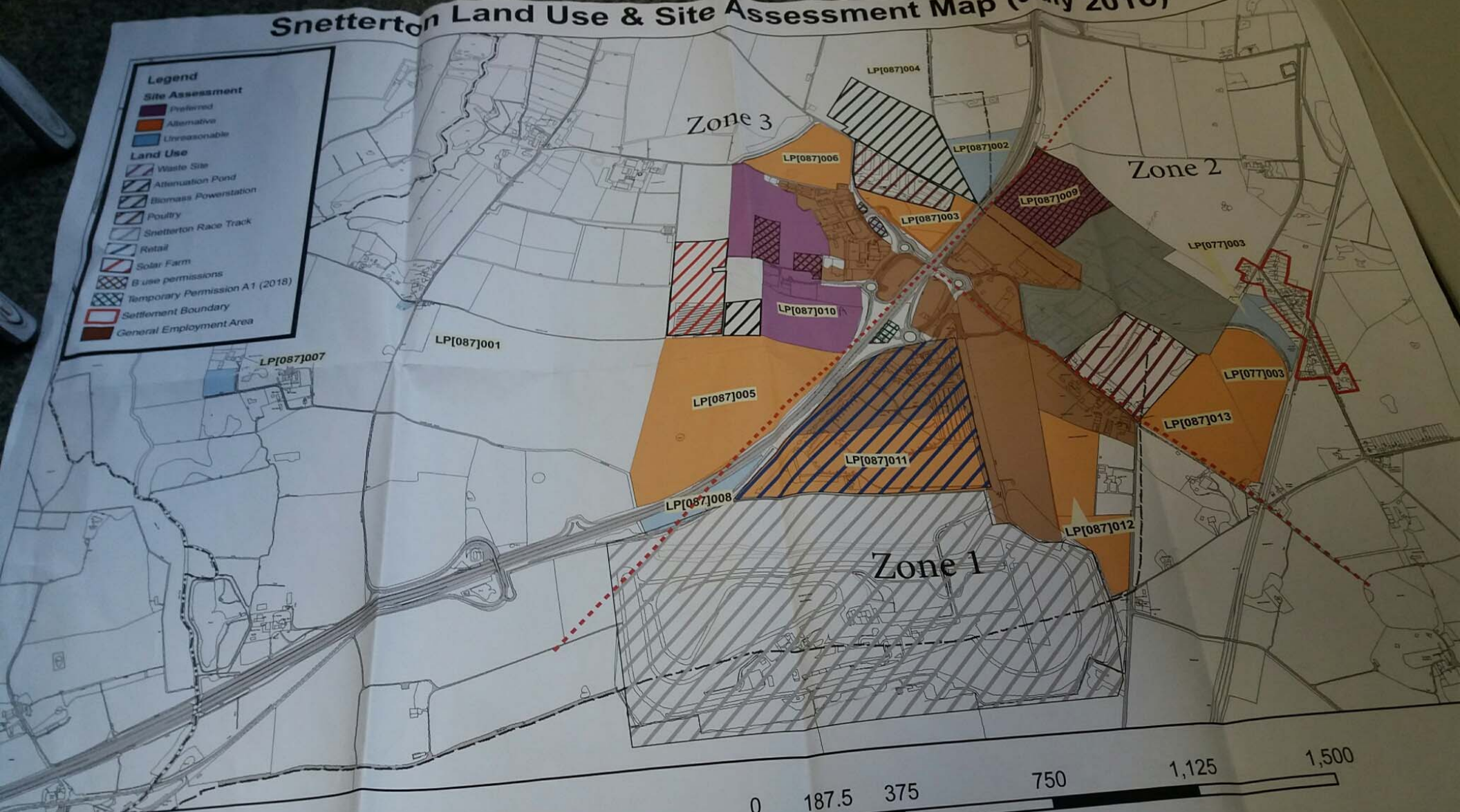
Legend

Site Assessment

- Preferred (Dark Purple)
- Alternative (Orange)
- Unreasonable (Light Blue)

Land Use

- Waste Site (Diagonal Hatching)
- Attenuation Pond (Blue)
- Biomass Powerstation (Cross-hatching)
- Poultry (Diagonal Hatching)
- Snetterton Race Track (Diagonal Hatching)
- Retail (Diagonal Hatching)
- Solar Farm (Diagonal Hatching)
- B use permissions (Diagonal Hatching)
- Temporary Permission A1 (2018) (Diagonal Hatching)
- Settlement Boundary (Red Dotted Line)
- General Employment Area (Brown)



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Part 1: Your Contact Details

Name: Hannah Grimes	
Organisation: Norfolk County Council	
Address:	
Post code:	Telephone:
E-mail:	

If you have appointed someone to act as your agent please give their name and contact details.	
Name:	
Organisation:	
Address:	
Post code:	Telephone:
E-mail:	

Part 2: Your Representation (please use a separate form for each representation)

1. Do you consider the Pre-submission Publication to be: (Please tick the appropriate box)

Sound (You support the document)	
Unsound (You think the document needs changing)	✓

2. On which part of the document do you wish to make a representation?

Policy	Banham Housing Allocation 1
Paragraph	Policy Text
Site	003 003
Proposals Map	
Settlement Boundary	
Other	

If you consider the document to be **SOUND**, please go to question 7.

3. If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).

Legal Tests	
Is the plan legally compliant?	
Soundness Tests	
Is the plan positively prepared?	
Is the plan justified?	
Is the plan effective?	✓
Is the plan consistent with national policy?	

4. Have you raised this issue before during previous consultations? (Please tick the appropriate box)

Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)	
Yes at Preferred Directions Stage (January - February 2016)	
Yes at Issues and Options Stage (November 2014 - January 2015)	

5. If you have not raised this issue before please use the following box to explain why.

No, because the allocations in the preferred options consultation and proposed policy were different from those in this Reg. 19 publication version of the plan.

6. If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound. (Please attach extra sheets if necessary)

The policy text for Banham is unclear in its description of the development that is allowed on site 003 003. The supporting text suggests that this site is unsuitable for residential development but the wording of the policy is not explicit on this point.

To make the plan sound the wording of Policy **Banham Housing Allocation 1** should be changed to either:

Be explicit that the land South of Greyhound Lane is not acceptable for residential development and ensure that appropriate footway provision is made to the village.

OR

If the site is to be available for residential development then the requirements for local highway improvements as set out in the last regulation consultation to '*Ensure that safe access can be achieved onto Greyhound Lane with appropriate highways improvements*' be included in Policy Banham Housing Allocation 1.

7. If you feel that the plan is sound, please tell us why.

8. Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? (Please tick appropriate box)

Yes, my representation can be satisfactorily dealt with by written representations	✓
No, my representations can only be suitably dealt with by appearing at the Examination in Public	

9. If you wish to appear at the Examination in Public, please outline why you consider this to be necessary.

--

10. Do you wish to be: (Please tick appropriate boxes)

Notified of the Submission	✓
Notified of the Inspectors Recommendations	✓
Notified of the Adoption	✓

Declaration: I understand that the details included on this form will be available in the public domain. (please tick box)	✓
Signature: Hannah Grimes	Date: 12.09.17

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Part 1: Your Contact Details

Name: David Robertson	
Organisation: Norfolk County Council	
Address:	
Post code:	Telephone:
E-mail:	

If you have appointed someone to act as your agent please give their name and contact details.	
Name: N/A	
Organisation:	
Address:	
Post code:	Telephone:
E-mail:	

Part 2: Your Representation (please use a separate form for each representation)

1. Do you consider the Pre-submission Publication to be: (Please tick the appropriate box)

Sound (You support the document)	
Unsound (You think the document needs changing)	√

2. On which part of the document do you wish to make a representation?

Policy	ENV 07
Paragraph	
Site	
Proposals Map	
Settlement Boundary	
Other	

If you consider the document to be **SOUND**, please go to question 7.

3. If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).

Legal Tests	
Is the plan legally compliant?	Yes
Soundness Tests	
Is the plan positively prepared?	Yes
Is the plan justified?	Yes
Is the plan effective?	No
Is the plan consistent with national policy?	No

4. Have you raised this issue before during previous consultations? (Please tick the appropriate box)

Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)	
Yes at Preferred Directions Stage (January - February 2016)	√
Yes at Issues and Options Stage (November 2014 - January 2015)	

5. If you have not raised this issue before please use the following box to explain why.

6. If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound. (Please attach extra sheets if necessary)

Policy ENV 07: Generally this policy is good, although it is confused about the types of heritage assets that are legally designated and those that are not. Scheduled Monuments, Listed Buildings, Conservation Areas and registered parks and gardens are legally designated (see paragraph 132 of the National Planning Policy Framework, for example; there are no protected wrecks, protected battlefields or World Heritage Sites in Breckland/Norfolk). The main problem is the policy considers all heritage assets included in the Historic Environment Record as designated – although Scheduled Monuments, Listed Buildings, Conservation Areas and registered parks and gardens feature in the Historic Environment Record, the majority of heritage assets included in the Historic Environment Record are not legally designated. This confusion means there is considerable scope for this policy to be challenged by developers, their agents and members of the public and it is not consistent with the legal and policy definition of designated heritage assets (sections 132-134 and 137-138 of the National Planning Policy Framework, for example). It is therefore not effective nor compliant with legislation or national policy. Norfolk County Council Historic Environment Service highlighted this confusion in comments provided on an earlier draft of the plan. Revising the text would take away the confusion and ensure this section of the plan is sound.

The revised text could read:

The significance of designated heritage assets, including nationally protected listed buildings and their settings, scheduled monuments, archaeological sites, registered parks and gardens, conservation areas and their settings, will be conserved and enhanced and given the highest level of protection. Proposals that would affect the significance of a designated heritage asset will be required to provide sufficient information to enable any impact to be assessed.

Development that will affect any designated heritage asset will be subject to comprehensive assessment and will be expected to conserve and, wherever possible, enhance the character, appearance and setting of Conservation Areas, Scheduled Monuments, Historic Parks and Gardens and other designated areas of historic interest. Where a proposed development will affect the character or setting of a Listed Building, particular regard will need to be given to the protection, conservation and potential enhancement of any features of historic or architectural interest; this includes internal features, floor plans and spaces or any object or structure within the curtilage of a listed building that predates 1st July 1948.

The conversion of listed buildings or buildings of particular architectural or historic interest within Conservation Areas for economic or residential purposes in locations that would otherwise be unacceptable will be considered where this would ensure the retention and ongoing conservation of the building. Proposals will be considered having regard to national policy and relevant guidance.

FINAL PARAGRAPH, WHICH IN THE MAIN REFERS TO UNDESIGNATED HERITAGE ASSETS, HAS BEEN REMOVED – SEE REPRESENTATION FORM FOR POLICY ENV08

7. If you feel that the plan is sound, please tell us why.

209

8. Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? (Please tick appropriate box)

Yes, my representation can be satisfactorily dealt with by written representations	√
No, my representations can only be suitably dealt with by appearing at the Examination in Public	

9. If you wish to appear at the Examination in Public, please outline why you consider this to be necessary.

10. Do you wish to be: (Please tick appropriate boxes)

Notified of the Submission	√
Notified of the Inspectors Recommendations	√
Notified of the Adoption	√

Declaration: I understand that the details included on this form will be available in the public domain. (please tick box)	√
Signature: David Robertson	Date: 17 September 2017

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Organisation: Norfolk County Council	
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Post code:	Telephone:
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If you have appointed someone to act as your agent please give their name and contact details.	
Name: N/A	
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Post code:	Telephone:
E-mail:	

Part 2: Your Representation (please use a separate form for each representation)

1. Do you consider the Pre-submission Publication to be: (Please tick the appropriate box)

Sound (You support the document)	
Unsound (You think the document needs changing)	√

2. On which part of the document do you wish to make a representation?

Policy	ENV 08
Paragraph	
Site	
Proposals Map	
Settlement Boundary	
Other	

If you consider the document to be **SOUND**, please go to question 7.

3. If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).

Legal Tests	
Is the plan legally compliant?	Yes
Soundness Tests	
Is the plan positively prepared?	Yes
Is the plan justified?	Yes
Is the plan effective?	No
Is the plan consistent with national policy?	No

4. Have you raised this issue before during previous consultations? (Please tick the appropriate box)

Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)	
Yes at Preferred Directions Stage (January - February 2016)	√
Yes at Issues and Options Stage (November 2014 - January 2015)	

5. If you have not raised this issue before please use the following box to explain why.

6. If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound. (Please attach extra sheets if necessary)

Policy ENV 08: When a development has the potential to affect the significance of a heritage asset, paragraph 128 of the National Planning Policy Framework requires applicants to describe this significance. This requirement is covered by ENV 08's expectation that appropriate assessments (potentially called Heritage Statements) will be provided. However, where known heritage assets are or there is potential for heritage assets with archaeological interest to be present on a development site, paragraph 128 also requires an appropriate desk-based assessment and, where necessary, a field evaluation. This requirement is not currently covered by ENV 08, which must be updated to include it. Leaving this requirement out may result in developers and their agents refusing to commission desk-based assessments and field evaluations. It also means that the draft plan is not consistent with national planning policy. The Historic Environment Service highlighted this issue in comments provided on an earlier draft of the plan.

The revised text could read:

Development will be expected to conserve and wherever possible enhance the character, appearance and setting of non-designated historic assets. Proposals that could affect known or previously unrecognised heritage assets will be expected, through agreement with the Council, to undergo an appropriate assessment in line with the significance of the asset. The assessment must provide sufficient information for any impact to be assessed. As a minimum the relevant Historic Environment Record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.

The conversion of non-designated buildings of particular architectural or historic merit for economic or residential purposes in locations that would otherwise be unacceptable will be considered where this would ensure the retention of the building. Proposals will be considered having regard to relevant national policy and relevant guidance.

In the case of traditional dwellings which positively contribute to the character of Breckland, applications for replacement will be expected to be accompanied by a Design and Access Statement which includes a structural survey that demonstrates that the demolition is necessary and that there is no alternative and viable solution of renovation to provide an acceptable standard of accommodation.

Where a development site includes or has the potential to include heritage assets with archaeological interest, an appropriate desk-based assessment and, where necessary, a field evaluation will be required to allow any impact to be assessed. Where appropriate, archaeological remains can be left *in situ* following further design and/or carefully considered engineering work. If the benefits of a particular development are considered to outweigh the importance of retaining archaeological remains *in situ* satisfactory excavation and recording of remains, with provision for dissemination and archiving of the results, will be required before development is begun.

7. If you feel that the plan is sound, please tell us why.

214

8. Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? (Please tick appropriate box)

Yes, my representation can be satisfactorily dealt with by written representations	√
No, my representations can only be suitably dealt with by appearing at the Examination in Public	

9. If you wish to appear at the Examination in Public, please outline why you consider this to be necessary.

10. Do you wish to be: (Please tick appropriate boxes)

Notified of the Submission	√
Notified of the Inspectors Recommendations	√
Notified of the Adoption	√

Declaration: I understand that the details included on this form will be available in the public domain. (please tick box)	√
Signature: David Robertson	Date: 17 September 2017

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Organisation: Norfolk County Council	
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Post code:	Telephone:
E-mail:	

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Name: N/A	
Organisation:	
Address:	
Post code:	Telephone:
E-mail:	

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1. Do you consider the Pre-submission Publication to be: (Please tick the appropriate box)

Sound (You support the document)	
Unsound (You think the document needs changing)	√

2. On which part of the document do you wish to make a representation?

Policy	
Paragraph	Sections 5.54-5.63
Site	
Proposals Map	
Settlement Boundary	
Other	

If you consider the document to be **SOUND**, please go to question 7.

3. If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).

Legal Tests	
Is the plan legally compliant?	yes
Soundness Tests	
Is the plan positively prepared?	Yes
Is the plan justified?	No
Is the plan effective?	No
Is the plan consistent with national policy?	No

4. Have you raised this issue before during previous consultations? (Please tick the appropriate box)

Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)	
Yes at Preferred Directions Stage (January - February 2016)	√
Yes at Issues and Options Stage (November 2014 - January 2015)	

5. If you have not raised this issue before please use the following box to explain why.

6. If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound. (Please attach extra sheets if necessary)

Sections 5.54-5.63: There is confusion in this text about the types of heritage assets that are legally designated and those that are not. Scheduled Monuments, Listed Buildings, Conservation Areas and registered parks and gardens are legally designated (see paragraph 132 of the National Planning Policy Framework, for example; there are no protected wrecks, protected battlefields or World Heritage Sites in Breckland/Norfolk). The main problem is these sections consider all heritage assets included in the Historic Environment Record as designated – although Scheduled Monuments, Listed Buildings, Conservation Areas and registered parks and gardens feature in the Historic Environment Record, the majority of heritage assets included in the Historic Environment Record are not legally designated. This confusion means there is considerable scope for these sections of the plan to be challenged by developers, their agents and members of the public and it is not consistent with the legal and policy definition of designated heritage assets (sections 132-134 and 137-138 of the National Planning Policy Framework, for example). It is therefore not effective and not compliant with legislation or national policy. Norfolk County Council Historic Environment Service highlighted this confusion in comments provided on an earlier draft of the plan. Revising the text would take away the confusion and ensure this section of the plan is sound.

The revised text could read:

5.54 Paragraph 126 of the National Planning Policy Framework states that: “local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment”. The NPPF also states that local plans should include strategic policies to deliver the conservation and enhancement of the historic environment (paragraph 156) and should identify land where development is inappropriate because of its environmental or historic significance (paragraph 157).

5.55 The historic environment of Breckland is recognised as a unique and irreplaceable resource. Breckland District is fortunate to possess a rich and diverse architectural heritage, displaying the use of a wide range of materials, dictated prior to industrialism by the immediate geology and landscape of the surrounding area. Typically, the use of brick, flint, chalk, clay lump and timber framing for walling with thatch; clay tiles and, in later years following industrialism, slates for roofing.

5.56 The District also contains numerous designated heritage assets: over 1,500 Listed Buildings, 50 Conservation Areas, 200 scheduled monuments and 9 Historic Parks and Gardens included on the Historic England Register, designated to assist in the conservation and enhancement of particular features of historic or architectural interest. Breckland also has a wealth of other important non-designated heritage assets that contribute to both the urban and rural contexts and the historic environment as a whole

5.57 The character of the District is defined by the combination of elements such as the mixture and style of buildings, the extent and form of open spaces, the quality and relationship of buildings, prevalent building materials and the amount of trees or other green features. These features contribute to the overall character of the area and need to be recognised and respected in proposals for new development.

ADDED FROM 5.60 A number of existing documents analyse particular aspects of the heritage significance of the District. **IDEALLY THESE DOCUMENTS SHOULD BE NAMED**

5.58 There are many types of heritage asset within the District, some of which are protected through national or local designations, others which have no formal designation or protection. The Council has developed two separate policies to deal with the different types of assets.

Designated Heritage Assets

5.59 There are a total of 50 Conservation Areas in the District, most based on historic village centres. It is important that the nature of conservation areas and historic buildings is maintained to ensure their protection for future generations and their continued contribution to the economic prosperity of the District. Social, environmental and cultural benefits are derived from this link to the past and it helps to reinforce a sense of place, quality of life, local identity and character.

5.60 DELETED (as refers to undesignated heritage assets and documents that describe designated and undesignated heritage assets)

5.61 There are 1,536 Listed Buildings in the District, including 113 Grade I and 102 Grade II*. Whilst the majority of the listed buildings in the District are in good or reasonable repair, a number of buildings are in severe disrepair. There are 25 Grade I or Grade II* Listed Buildings at Risk as registered by Historic England.

5.62 There are also 9 Registered Parks and Gardens (all Grade II), 130 scheduled monuments, plus three shared with adjoining Local Authorities.

5.63 Breckland Council understands that heritage assets are an irreplaceable resource and the policy below aims to conserve designated heritage assets in a manner appropriate to their significance.

7. If you feel that the plan is sound, please tell us why.

8. Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? (Please tick appropriate box)

Yes, my representation can be satisfactorily dealt with by written representations	√
No, my representations can only be suitably dealt with by appearing at the Examination in Public	

9. If you wish to appear at the Examination in Public, please outline why you consider this to be necessary.

--

10. Do you wish to be: (Please tick appropriate boxes)

Notified of the Submission	√
Notified of the Inspectors Recommendations	√
Notified of the Adoption	√

Declaration: I understand that the details included on this form will be available in the public domain. (please tick box)	√
Signature: David Robertson	Date: 17 September 2017

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Please return by 4pm on Monday 2nd October 2017. Late representations cannot be considered. Return by e-mail to planningpolicyteam@breckland.gov.uk or by post to Planning Policy, Breckland Council, Elizabeth House, Walpole Loke, Dereham, Norfolk, NR19 1EE.

Part 1: Your Contact Details

Name: Richard Smith	
Organisation: NPS Property Consultants on behalf of Norfolk County Council as landowner	
Address:	
Post code:	Telephone:
E-mail:	

If you have appointed someone to act as your agent please give their name and contact details.	
Name:	
Organisation:	
Address:	
Post code:	Telephone:
E-mail:	

Part 2: Your Representation (please use a separate form for each representation)

1. Do you consider the Pre-submission Publication to be: (Please tick the appropriate box)

Sound (You support the document)	
Unsound (You think the document needs changing)	Yes

2. On which part of the document do you wish to make a representation?

Policy	
Paragraph	
Site	
Proposals Map	
Settlement Boundary	Beetley
Other	

If you consider the document to be **SOUND**, please go to question 7.

3. If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).

Legal Tests	
Is the plan legally compliant?	
Soundness Tests	
Is the plan positively prepared?	
Is the plan justified?	
Is the plan effective?	No
Is the plan consistent with national policy?	No

4. Have you raised this issue before during previous consultations? (Please tick the appropriate box)

Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)	Yes
Yes at Preferred Directions Stage (January - February 2016)	Yes
Yes at Issues and Options Stage (November 2014 - January 2015)	Yes

5. If you have not raised this issue before please use the following box to explain why.

6. If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound. (Please attach extra sheets if necessary)

Norfolk County Council owns Gressenhall Depot a 0.84 hectare brownfield site adjacent to the settlement boundary of Beetley. The site was included as a 'reasonable alternative' for development in Breckland Council's Emerging Site Options document. The site scored well being brownfield and adjacent to the settlement boundary and was considered to be deliverable in the 2015 SHLAA. However, the site has been excluded from the settlement boundary of Beetley.

Although policy HOU 04 would allow for development immediately adjacent to settlement boundaries, it currently restricts the number of units to 5 (a separate representation has been made in response to policy HOU 04 to allow more flexibility with regard to housing numbers). The housing number limit would affect the viability of redeveloping this brownfield site which will have greater development costs and prevent the redevelopment for a more appropriate use.

We would suggest this brownfield site be included within the settlement boundary so that planning permission can be sought for a greater number of houses to ensure the redevelopment of the site is viable.

7. If you feel that the plan is sound, please tell us why.

The exclusion of the Gressenhall Depot site from within Beetley settlement boundary would prevent its redevelopment as although policy HOU 04 allows development of up to five houses outside the settlement boundary, this would not be viable for the redevelopment of the brownfield site. This is likely to result in other housing developments on greenfield land being required to meet local housing demand which would not result in the most sustainable form of development. The settlement boundary, housing policy and plan would not therefore be consistent with NPPF policy and would be ineffective and unsound.

8. Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? (Please tick appropriate box)

Yes, my representation can be satisfactorily dealt with by written representations	Yes
No, my representations can only be suitably dealt with by appearing at the Examination in Public	

--	--

9. If you wish to appear at the Examination in Public, please outline why you consider this to be necessary.

--

10. Do you wish to be: (Please tick appropriate boxes)

Notified of the Submission	Yes
Notified of the Inspectors Recommendations	Yes
Notified of the Adoption	Yes

Declaration: I understand that the details included on this form will be available in the public domain. (please tick box)	
Signature: Richard Smith (NPS)	Date: 19/9/17

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Name: Richard Smith	
Organisation: NPS Property Consultants on behalf of Norfolk County Council as landowner	
Address:	
Post code:	Telephone:
E-mail:	

If you have appointed someone to act as your agent please give their name and contact details.	
Name:	
Organisation:	
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E-mail:	

Part 2: Your Representation (please use a separate form for each representation)

1. Do you consider the Pre-submission Publication to be: (Please tick the appropriate box)

Sound (You support the document)	
Unsound (You think the document needs changing)	Yes

2. On which part of the document do you wish to make a representation?

Policy	
Paragraph	
Site	
Proposals Map	
Settlement Boundary	Dereham
Other	

If you consider the document to be **SOUND**, please go to question 7.

3. If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).

Legal Tests	
Is the plan legally compliant?	
Soundness Tests	
Is the plan positively prepared?	
Is the plan justified?	
Is the plan effective?	No
Is the plan consistent with national policy?	

4. Have you raised this issue before during previous consultations? (Please tick the appropriate box)

Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)	Yes
Yes at Preferred Directions Stage (January - February 2016)	Yes
Yes at Issues and Options Stage (November 2014 - January 2015)	Yes

5. If you have not raised this issue before please use the following box to explain why.

6. If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound. (Please attach extra sheets if necessary)

We would also like to take this opportunity to highlight again our concerns regarding the relationship between the existing development boundaries of towns and villages on the proposal maps and school sites. At present there appears to be some inconsistencies regarding whether school sites (buildings/playing fields) are located within the development boundaries or not. We are seeking a more consistent approach to the designation of development boundaries in relation to school buildings and playing fields across Norfolk to allow the opportunity for schools to expand when necessary.

We would request the school buildings and hardstanding at St Nicholas Junior School and Neatherd High School, Dereham be included within the development boundary for Dereham.

7. If you feel that the plan is sound, please tell us why.

The plan and proposals maps are inconsistent regarding whether school sites are located within development boundaries. This would make it more difficult for some schools to expand than others and would not result in an effective or sound local plan.

8. Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? (Please tick appropriate box)

Yes, my representation can be satisfactorily dealt with by written representations	Yes
No, my representations can only be suitably dealt with by appearing at the Examination in Public	

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10. Do you wish to be: (Please tick appropriate boxes)

Notified of the Submission	Yes
Notified of the Inspectors Recommendations	Yes
Notified of the Adoption	Yes

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Signature: Richard Smith (NPS)	Date: 19/9/17

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Unsound (You think the document needs changing)	Yes

2. On which part of the document do you wish to make a representation?

Policy	
Paragraph	
Site	
Proposals Map	
Settlement Boundary	Watton
Other	

If you consider the document to be **SOUND**, please go to question 7.

3. If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).

Legal Tests	
Is the plan legally compliant?	
Soundness Tests	
Is the plan positively prepared?	
Is the plan justified?	
Is the plan effective?	No
Is the plan consistent with national policy?	

4. Have you raised this issue before during previous consultations? (Please tick the appropriate box)

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Yes at Preferred Directions Stage (January - February 2016)	Yes
Yes at Issues and Options Stage (November 2014 - January 2015)	Yes

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We would also like to take this opportunity to highlight again our concerns regarding the relationship between the existing development boundaries of towns and villages on the proposal maps and school sites. At present there appears to be some inconsistencies regarding whether school sites (buildings/playing fields) are located within the development boundaries or not. We are seeking a more consistent approach to the designation of development boundaries in relation to school buildings and playing fields across Norfolk to allow the opportunity for schools to expand when necessary.

We would request the school buildings and hardstanding at Westfields Infant School, Watton be included within the development boundary.

7. If you feel that the plan is sound, please tell us why.

The plan and proposals maps are inconsistent regarding whether school sites are located within development boundaries. This would make it more difficult for some schools to expand than others and would not result in an effective or sound local plan.

8. Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? (Please tick appropriate box)

Yes, my representation can be satisfactorily dealt with by written representations	Yes
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Notified of the Submission	Yes
Notified of the Inspectors Recommendations	Yes
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Name: Richard Smith	
Organisation: NPS Property Consultants on behalf of Norfolk County Council as landowner	
Address:	
Post code:	Telephone:
E-mail:	

If you have appointed someone to act as your agent please give their name and contact details.	
Name:	
Organisation:	
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E-mail:	

Part 2: Your Representation (please use a separate form for each representation)

1. Do you consider the Pre-submission Publication to be: (Please tick the appropriate box)

Sound (You support the document)	
Unsound (You think the document needs changing)	Yes

2. On which part of the document do you wish to make a representation?

Policy	HOU 04
Paragraph	
Site	
Proposals Map	
Settlement Boundary	
Other	

If you consider the document to be **SOUND**, please go to question 7.

3. If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).

Legal Tests	
Is the plan legally compliant?	
Soundness Tests	
Is the plan positively prepared?	
Is the plan justified?	
Is the plan effective?	No
Is the plan consistent with national policy?	

4. Have you raised this issue before during previous consultations? (Please tick the appropriate box)

Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)	Yes
Yes at Preferred Directions Stage (January - February 2016)	Yes
Yes at Issues and Options Stage (November 2014 - January 2015)	Yes

5. If you have not raised this issue before please use the following box to explain why.

6. If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound. (Please attach extra sheets if necessary)

We believe the proposed criteria to allow development adjacent to settlement boundaries in policy HOU 04 is too prescriptive and would not result in a very sustainable form of development. The policy restricts development to no more than 5 units of accommodation. It is considered that the amount of housing should be dependent upon the individual site characteristics, scale of the village, site size, viability (brownfield sites), accessibility etc. This would ensure an appropriate and sustainable scale of development is allowed for each site/village in accordance with NPPF advice.

For example Norfolk County Council owns Gressenhall Depot a 0.84 hectare brownfield site adjacent to the settlement boundary of Beetley. The site was included as a 'reasonable alternative' for development in Breckland Council's Emerging Site Options document. The site scored well being brownfield and adjacent to the settlement boundary and was considered to be deliverable in the 2015 SHLAA. However the site was not allocated for development or included within a revised settlement boundary.

Although policy HOU 04 would allow for development immediately adjacent to settlement boundaries, it restricts the number of units to 5. The housing number limit would affect the viability of redeveloping this brownfield site which will have greater development costs and prevent the redevelopment for a more appropriate use. This may result in less sustainable greenfield land being developed. It also highlights the problem with this threshold as it fails to recognise site specific issues and constraints.

We believe policy HOU 04 should be less prescriptive in terms of housing numbers and should be worded to be more responsive to individual site circumstances/sustainability criteria.

7. If you feel that the plan is sound, please tell us why.

Policy HOU 04 is considered to be unsound as the policy is too prescriptive and does not allow individual site circumstances to be considered when developing sites outside of the settlement boundary. The policy would prevent a proper consideration of sustainability issues e.g. how many dwellings would be appropriate on each site taking into account site context, individual site constraints, settlement size, services and facilities and local housing need. The policy would not, therefore, maximise the potential for sustainable development as a one rule fits all approach has been taken for all development outside of settlement boundaries. This would make the policy and plan ineffective and unsound.

8. Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? (Please tick appropriate box)

Yes, my representation can be satisfactorily dealt with by written representations	Yes
No, my representations can only be suitably dealt with by appearing at the Examination in Public	

9. If you wish to appear at the Examination in Public, please outline why you consider this to be necessary.

10. Do you wish to be: (Please tick appropriate boxes)

Notified of the Submission	Yes
Notified of the Inspectors Recommendations	Yes
Notified of the Adoption	Yes

Declaration: I understand that the details included on this form will be available in the public domain. (please tick box)	
Signature: Richard Smith	Date: 19/7/19

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Organisation: NPS Property Consultants on behalf of Norfolk County Council as landowner	
Address:	
Post code:	Telephone:
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Name:	
Organisation:	
Address:	
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E-mail:	

Part 2: Your Representation (please use a separate form for each representation)

1. Do you consider the Pre-submission Publication to be: (Please tick the appropriate box)

Sound (You support the document)	
Unsound (You think the document needs changing)	Yes

2. On which part of the document do you wish to make a representation?

Policy	HOU 05
Paragraph	
Site	
Proposals Map	
Settlement Boundary	
Other	

If you consider the document to be **SOUND**, please go to question 7.

3. If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).

Legal Tests	
Is the plan legally compliant?	
Soundness Tests	
Is the plan positively prepared?	
Is the plan justified?	
Is the plan effective?	No
Is the plan consistent with national policy?	

4. Have you raised this issue before during previous consultations? (Please tick the appropriate box)

Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)	Yes
Yes at Preferred Directions Stage (January - February 2016)	Yes
Yes at Issues and Options Stage (November 2014 - January 2015)	Yes

5. If you have not raised this issue before please use the following box to explain why.

--

6. If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound. (Please attach extra sheets if necessary)

<p>Policy HOU 05 restricts the amount of dwellings that can be built in rural villages without settlement boundaries to 3 units. This will restrict village growth, potential demand for services and facilities and the provision of sufficient housing to meet local need. This approach will not deliver 'thriving rural communities' as required by NPPF advice.</p> <p>As an example, the Primary School in Mileham had to be closed in 2015 as there was not sufficient school place demand. Due to the school closure Mileham has now been included within the other rural areas with no settlement boundary and a lower housing allowance.</p> <p>This could result in other services and facilities such as the village shop, post office and bus services being lost in the village as the size and growth of the village will be unable to support them.</p> <p>We would suggest the scale of development is increased in villages/rural areas outside of the settlement boundaries to encourage local villages/communities to thrive. We would suggest the policy should be less prescriptive in terms of housing numbers and worded to be more responsive to individual site/village circumstances. This would ensure small housing schemes are viable, provide a mix of house types to meet local need and the scale of development supports existing services and facilities.</p>
--

7. If you feel that the plan is sound, please tell us why.

<p>Policy HOU 05 is considered to be unsound as it would restrict village growth, potential demand for services and facilities and the provision of 'sufficient' housing to meet local need. The policy and plan would be ineffective and will not deliver 'thriving rural communities' as required by NPPF advice.</p>

8. Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? (Please tick appropriate box)

Yes, my representation can be satisfactorily dealt with by written representations	Yes
--	-----

No, my representations can only be suitably dealt with by appearing at the Examination in Public	
--	--

9. If you wish to appear at the Examination in Public, please outline why you consider this to be necessary.

10. Do you wish to be: (Please tick appropriate boxes)

Notified of the Submission	Yes
Notified of the Inspectors Recommendations	Yes
Notified of the Adoption	Yes

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Signature: Richard Smith (NPS)	Date: 19/9/17

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Comment

Consultee Mr Stephen Faulkner (442915)

Email Address

Company / Organisation Norfolk County Council

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Norfolk County Council (Mr Stephen Faulkner)

Comment ID 99

Response Date 25/09/17 13:37

Consultation Point Attleborough Employment Allocation 1 ([View](#))

Status Processed

Submission Type Email

Version 0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

Issue not raised previously there was no inconsistency in the Reg 18 version between policies as outlined below in respect of the new Plan (Reg 19).

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

The Local Plan in paragraph 2.32 (page 22) refers to a strategic employment site of “10 ha” in Attleborough, which is allocated in the Plan on sites LP[002]029 & LP[002]007 (Page 179) and in Policy “Attleborough Employment Allocation 1” (page 180).

Policy EC 01 of the Local Plan (page 177) refers to new employment allocations of “at least 10 ha” for Attleborough.

While supporting the allocated sites in Attleborough for employment uses, it is felt that the figure of “10 ha” referred to in paragraph 2.32 and in the above Policy (Attleborough Employment Allocation 1) should be changed to as “**at least 10 ha**”, which would be consistent with Policy EC 01 (Economic Development) of the Local Plan (page 177).

As written paragraph 2.32 and Policy Attleborough Employment Allocation 1 are inconsistent with Policy EC 01 and as such creates uncertainty in the Plan making it ineffective and unsound.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

. Notified of the Submission
. Notified of the Inspectors Recommendations
. Notified of the Adoption

Comment

Consultee mr les scott (971309)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by mr les scott

Comment ID 100

Response Date 25/09/17 20:58

Consultation Point 2.4 Paragraph ([View](#))

Status Processed

Submission Type Web

Version 0.5

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan consistent with national policy?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

I have only recently gained insight into the planning system in action

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

The LPA is unable to comply with NPPF which requires the plan to address the affordable housing needs. In practice the commitment by developers is invariably reduced.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? . Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee mr les scott (971309)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by mr les scott

Comment ID 101

Response Date 26/09/17 06:42

Consultation Point 3.151 Paragraph ([View](#))

Status Processed

Submission Type Web

Version 0.3

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan consistent with national policy?

Have you raised this issue before during previous consultations? (Please tick the appropriate box)

If you have not raised this issue before please use the following box to explain why.

I have only become aware after working on preparations for swaffham NP

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

NNPF states that LPA's should have an up to date conservation area appraisal. Not only has Swaffham's conservation area not been updated but there is no information held on record. A new appraisal should be carried out immediately in order that 3.151 can be used.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

<h2 style="margin: 0;">Breckland Local Plan Pre-Submission Publication Representation Form</h2>

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Part 1: Your Contact Details

Name: Chris Smith	
Organisation: Hopkins Homes Limited	
Address:	
Post code:	Telephone:
E-mail:	

If you have appointed someone to act as your agent please give their name and contact details.	
Name: N/A	
Organisation:	
Address:	
Post code:	Telephone:
E-mail:	

Part 2: Your Representation (please use a separate form for each representation)

1. Do you consider the Pre-submission Publication to be: (Please tick the appropriate box)

Sound (You support the document)	
Unsound (You think the document needs changing)	X

2. On which part of the document do you wish to make a representation?

Policy	GEN03
Paragraph	3.113
Site	
Proposals Map	
Settlement Boundary	
Other	

If you consider the document to be **SOUND**, please go to question 7.

3. If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).

Legal Tests	
Is the plan legally compliant?	
Soundness Tests	
Is the plan positively prepared?	X
Is the plan justified?	X
Is the plan effective?	X
Is the plan consistent with national policy?	X

4. Have you raised this issue before during previous consultations? (Please tick the appropriate box)

Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)	X
Yes at Preferred Directions Stage (January - February 2016)	X
Yes at Issues and Options Stage (November 2014 - January 2015)	X

5. If you have not raised this issue before please use the following box to explain why.

6. If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound. (Please attach extra sheets if necessary)

Hopkins Homes have long advocated that the spatial strategy for the District should provide balanced growth proportionate to the size, role and function of the respective settlements throughout the District, in order to achieve 'sustainable' development.

To this end, Hopkins Homes would continue to suggest that additional strategic growth should be apportioned to Dereham, as the administrative, economic and social centre of the District, along with proportionate levels of growth to the Market Towns of Attleborough, Swaffham and Watton. Hopkins Homes would agree with the proposal to encompass additional, sustainable villages as 'Local Service Centre' Villages where similarly proportionate levels of growth could be accommodated.

Whilst acknowledging that the planned growth of Thetford will happen in the medium to longer-term, Hopkins Homes remains of the view that the previously suggested levels of growth for Attleborough are wholly disproportionate to the existing size, role and function of the town, such that they are commercially and socially unachievable. It is disappointing that the Local Planning Authority continue to attempt to apportion undue levels of growth to Attleborough, given that the previous Plan failed to deliver such strategic growth in this location. The continued pursuit of this strategy is likely to result in the continued lack of a deliverable 5-year land supply in the District and development occurring on an ad-hoc rather than planned basis.

To this end, the level of growth shown for Attleborough should be substantially reduced, with the bulk of this then apportioned between Dereham, Watton and Swaffham, relative to the size of each town.

Hopkins Homes would suggest that this is likely to result in new allocations of approximately 2,000 dwellings to Dereham and 750 dwellings each to both Watton and Swaffham, with the residual 500 dwellings remaining allocated to Attleborough.

Such a strategy is likely to be far more deliverable and thus achieve the sustainable development of the District over the next Plan period than has unfortunately been the case to date.

7. If you feel that the plan is sound, please tell us why.

8. Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? (Please tick appropriate box)


Yes, my representation can be satisfactorily dealt with by written representations	
No, my representations can only be suitably dealt with by appearing at the Examination in Public	X

9. If you wish to appear at the Examination in Public, please outline why you consider this to be necessary.

In order to be able to appraise the Inspector of the views given above and question the views expressed by the local planning authority.

10. Do you wish to be: (Please tick appropriate boxes)

Notified of the Submission	X
Notified of the Inspectors Recommendations	X
Notified of the Adoption	X

Declaration: I understand that the details included on this form will be available in the public domain. (please tick box)	
Signature: Chris Smith	Date: 26/09/2017

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Name: Chris Smith	
Organisation: Hopkins Homes Limited	
Address:	
Post code:	Telephone:
E-mail:	

If you have appointed someone to act as your agent please give their name and contact details.	
Name: N/A	
Organisation:	
Address:	
Post code:	Telephone:
E-mail:	

Part 2: Your Representation (please use a separate form for each representation)

1. Do you consider the Pre-submission Publication to be: (Please tick the appropriate box)

Sound (You support the document)	
Unsound (You think the document needs changing)	X

2. On which part of the document do you wish to make a representation?

Policy	
Paragraph	
Site	
Proposals Map	3.1
Settlement Boundary	
Other	Table 3.2

If you consider the document to be **SOUND**, please go to question 7.

3. If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).

Legal Tests	
Is the plan legally compliant?	
Soundness Tests	
Is the plan positively prepared?	X
Is the plan justified?	X
Is the plan effective?	X
Is the plan consistent with national policy?	X

4. Have you raised this issue before during previous consultations? (Please tick the appropriate box)

Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)	X
Yes at Preferred Directions Stage (January - February 2016)	X
Yes at Issues and Options Stage (November 2014 - January 2015)	X

5. If you have not raised this issue before please use the following box to explain why.

6. If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound. (Please attach extra sheets if necessary)

Hopkins Homes would continue to suggest that the land south of Dumpling Green, East of Yaxham Road (*identified in orange as a 'Reasonable Alternative' under Reference LP(025) 003 on Map 5.1 within the previous 'Dereham Preferred and Alternative Sites' Consultation*) provides the most suitable and sustainable location to accommodate the future strategic growth of Dereham. As is clear from Map 5.1, this site provides the most sustainable location, closest to the town centre and strategic road network, whilst is of sufficient size and scale to enable phased growth to occur throughout the proposed Plan period.

As was identified by the cross-hatching over the orange shading on Map 5.1, the site is the subject of a long-standing Planning Application (3PL/2010/1361/F) for the erection of 255 dwellings, together with new associated public open space. This application was recommended by Officers for Approval to the Council's Planning Committee in September 2014, with formal determination subsequently deferred by the Planning Committee pending receipt of further updated technical information upon highway impacts, landscape & ecology impacts, an updated affordable housing mix and overall development viability. These additional elements of information are currently being compiled, in order to enable further consideration by the Council's Planning Committee in the Autumn of 2017, with a likelihood that construction could then commence by Spring 2018.

The remaining eastern-most portions of the site, up to the existing access tracks serving Salt Lake Farm to the east and south, are also available to accommodate further phase(s) of residential development in the medium to longer-term, alongside and further open space and/or additional community infrastructure that may subsequently be required.

Within '*Table 5.2 Dereham Alternative Sites*', despite an acknowledgement that '*The site lies adjacent to the settlement boundary and has good access to the services and facilities within the town, including retail and employment areas*' the justification for not favouring the allocation of Site LP(025)003 was stated to be that '*Highways concerns in relation to Yaxham Road have previously been raised and it is for this reason that the site is not considered a preferred option*'.

In reviewing matters, it is strongly contended that there is no logical explanation as to how such a conclusion has been arrived at, on the basis of the available evidence. The text accompanying '*Table 3.2 Sustainability Appraisal of Sites in Dereham*' at the previous '*Preferred Options*' stage indicated that '*the majority of sites score well against the sustainability objectives. There is limited differences between the sites*'. Furthermore, the largest of the Preferred Sites (LP(025)030) did not appear to have been assessed at all, with no reference made to this site within Table 3.2.

In comparing the sites which were previously '*Preferred*' for allocation and continue to remain so at this subsequent 'Pre-Submission' Stage, Site *LP(025)030* as indicated above and Site *LP(025)023* remain favoured for allocation ahead of Site *LP(025)003*, despite more obvious deficiencies in accessibility and highway concerns.

Site *LP(025)030* lies further to the south-west of Site *LP(025)003*, to the west of the railway line and south of the existing extent of the town, comprising of three linked field parcels. Whilst the primary access to the site would be from the A1075 Shipdham Road to the west of the western-most of the three parcels, the resulting elongated nature of the site would require the construction of a new link-road through to the B1135 Yaxham Road to the east. The eastern extent of the three field parcels proposed for allocation falls somewhat short of the B1135 Yaxham Road, concluding at the western side of the railway line, with no obvious link available to the Yaxham Road, despite the wording of the Policy confirming that '*An access link should be provided from Shipdham Road to Yaxham Road*'.

Below Site *LP(025)030*, the next largest allocation is proposed to the North-East of the town, upon two triangular-shaped parcels of land to either side of the relatively narrow, unclassified Swanton Road, together identified as Site *LP(025)023*. An existing railway line lies immediately adjacent to the west, physically dividing the site(s) from the existing built form of the town, with a Gated Level Crossing then lying between the sites and the existing extent of the town. The wording of the Policy and the subsequent text within Paragraph 3.134 highlights the inadequacies of the Swanton Road in this location, noting a requirement that highway improvements are made to Swanton Road to achieve safe access to and from the site.

Given such obvious deficiencies in accessibility, it is incomprehensible how Site *LP(025)003*, which has direct access onto the B1135 Yaxham Road, which itself is one of the main routes into Dereham from the south and south-east, cannot be Preferred for allocation in this respect.

In reviewing matters in more detail, there are no principle access or highway-based objections from Officers of either the Local Planning Authority or the Highway Authority to current pending proposals for the erection of 255 dwellings upon Site *LP(025)003*. The September 2014 Planning Committee Report highlighted that the Highway Authority had '*No objection, subject to conditions and the provision of off-site highway works*' whilst the LPA Case Officer concluded that '*The applicants have submitted a comprehensive Traffic Assessment (TA) with the application, which has been reviewed by Norfolk County Council and the Highways Agency. No objection to the development has been raised.*'

Whilst the September 2014 Planning Committee nevertheless resolved to defer the current planning application on Site *LP(025)003* for further information, including those in relation to highway impacts, the resulting further works, including the Local Planning Authorities own recent town-wide '*Dereham Transport Study*' have not raised any additional concerns which are specifically applicable to Site *LP(025)003*. Instead, the '*Dereham Transport Study*' indicates a package of additional measures required to improve highway infrastructure around the town, for which contributions will be required from all major developments, and which are equally applicable upon whichever site residential development occurs.

In summary, therefore, there is no justification for proposing the allocation of Sites *LP(025)023* or *LP(025)030* ahead of Site *LP(025)003*.

To this end, Hopkins Homes would strongly contend that Site *LP(025)003* should now be identified as a Proposed Allocation for the residential development of approximately 450 dwellings and associated open space, with Sites *LP(025)023* and *LP(025)030* significantly reduced in scale to deliver the remaining balance of dwellings required.

7. If you feel that the plan is sound, please tell us why.

8. Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? (Please tick appropriate box)


Yes, my representation can be satisfactorily dealt with by written representations	
No, my representations can only be suitably dealt with by appearing at the Examination in Public	X

9. If you wish to appear at the Examination in Public, please outline why you consider this to be necessary.

In order to be able to appraise the Inspector of the views given above and question the views expressed by the local planning authority.

10. Do you wish to be: (Please tick appropriate boxes)

Notified of the Submission	X
Notified of the Inspectors Recommendations	X
Notified of the Adoption	X

Declaration: I understand that the details included on this form will be available in the public domain. (please tick box)	
Signature: Chris Smith	Date: 26/09/2017

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**Breckland Local Plan Pre-Submission Publication
Representation Form**

BRECKLAND COUNCIL
- 2 OCT 2017
POST ROOM

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Part 1: Your Contact Details

Name: VAL PITT	
Organisation:	
Address:	
Post code:	Telephone: C
E-mail:	

If you have appointed someone to act as your agent please give their name and contact details.

Name:	
Organisation:	
Address:	
Post code:	Telephone:
E-mail:	

Part 2: Your Representation (please use a separate form for each representation)

1. Do you consider the Pre-submission Publication to be: (Please tick the appropriate box)

Sound (You support the document)	<input checked="" type="checkbox"/>
Unsound (You think the document needs changing)	<input type="checkbox"/>

2. On which part of the document do you wish to make a representation?

Policy	<input type="checkbox"/>
Paragraph	<input type="checkbox"/>
Site	<input type="checkbox"/>
Proposals Map	<input checked="" type="checkbox"/>
Settlement Boundary	<input type="checkbox"/>
Other	<input type="checkbox"/>

If you consider the document to be **SOUND**, please go to question 7.

3. If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).

Legal Tests	
Is the plan legally compliant?	<input type="checkbox"/>
Soundness Tests	
Is the plan positively prepared?	<input type="checkbox"/>
Is the plan justified?	<input type="checkbox"/>
Is the plan effective?	<input type="checkbox"/>
Is the plan consistent with national policy?	<input type="checkbox"/>

4. Have you raised this issue before during previous consultations? (Please tick the appropriate box)

Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)	<input checked="" type="checkbox"/>
Yes at Preferred Directions Stage (January - February 2016)	<input checked="" type="checkbox"/>
Yes at Issues and Options Stage (November 2014 - January 2015)	<input checked="" type="checkbox"/>

5. If you have not raised this issue before please use the following box to explain why.

6. If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound. (Please attach extra sheets if necessary)

7. If you feel that the plan is sound, please tell us why.

YES it is Sound, because West Toftwood - Shipdham Rd is preferred Site NOT Dumping Steen. But, a small point in Par 3.121 Noticed area claimed as 'moderate' impact. As long as this does not mean Hopkins build, with Planning Committee Consent there/Some Houses. I thought it odd this area mentioned on 3.121 when no others Specific. Also Bradley 900/ EPS, thus any Housing as Hopkins suggest could expand to/Near this area is Not Sustainable & Probably illegal.

8. Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? (Please tick appropriate box)

Yes, my representation can be satisfactorily dealt with by written representations	<input type="checkbox"/>
No, my representations can only be suitably dealt with by appearing at the Examination in Public	<input type="checkbox"/>

9. If you wish to appear at the Examination in Public, please outline why you consider this to be necessary.

Hopkins Home, Ref o/L Planning outside area, requested to appear to put an unsubstantiated case for building @ Dumping Green.

10. Do you wish to be: (Please tick appropriate boxes)

Notified of the Submission	<input checked="" type="checkbox"/>
Notified of the Inspectors Recommendations	<input checked="" type="checkbox"/>
Notified of the Adoption	<input checked="" type="checkbox"/>

Declaration: I understand that the details included on this form will be available in the public domain. (please tick box)	<input type="checkbox"/>
Signature:	Date: 29/9/17

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Part 1: Your Contact Details

Name: Chris Smith	
Organisation: Hopkins Homes Limited	
Address:	
Post code:	Telephone:
E-mail:	

If you have appointed someone to act as your agent please give their name and contact details.	
Name: N/A	
Organisation:	
Address:	
Post code:	Telephone:
E-mail:	

Part 2: Your Representation (please use a separate form for each representation)

1. Do you consider the Pre-submission Publication to be: (Please tick the appropriate box)

Sound (You support the document)	
Unsound (You think the document needs changing)	X

2. On which part of the document do you wish to make a representation?

Policy	HOU2
Paragraph	
Site	
Proposals Map	
Settlement Boundary	
Other	

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Soundness Tests	
Is the plan positively prepared?	X
Is the plan justified?	X
Is the plan effective?	X
Is the plan consistent with national policy?	X

4. Have you raised this issue before during previous consultations? (Please tick the appropriate box)

Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)	X
Yes at Preferred Directions Stage (January - February 2016)	X
Yes at Issues and Options Stage (November 2014 - January 2015)	X

5. If you have not raised this issue before please use the following box to explain why.

6. If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound. (Please attach extra sheets if necessary)

Given the changes requested to Policy GEN03, the allocation of dwellings should be altered to correspond.

Hopkins Homes would suggest that this is likely to result in new allocations of approximately 2,000 dwellings to Dereham and 750 dwellings each to both Watton and Swaffham, with the residual 500 dwellings remaining allocated to Attleborough.

7. If you feel that the plan is sound, please tell us why.

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Yes, my representation can be satisfactorily dealt with by written representations	
No, my representations can only be suitably dealt with by appearing at the Examination in Public	X

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In order to be able to appraise the Inspector of the views given above and question the views expressed by the local planning authority.

10. Do you wish to be: (Please tick appropriate boxes)

Notified of the Submission	X
Notified of the Inspectors Recommendations	X
Notified of the Adoption	X

Declaration: I understand that the details included on this form will be available in the public domain. (please tick box)	
Signature: Chris Smith	Date: 26/09/2017

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Part 1: Your Contact Details

Name:	
Organisation: Rentplus	
Address:	
Post code:	Telephone: 0
E-mail: j	

If you have appointed someone to act as your agent please give their name and contact details.	
Name: Mrs Meghan Rossiter	
Organisation: Tetlow King Planning Ltd.	
Address:	
Post code:	Telephone:
E-mail: c k	

Part 2: Your Representation (please use a separate form for each representation)

1. Do you consider the Pre-submission Publication to be: (Please tick the appropriate box)

Sound (You support the document)	
Unsound (You think the document needs changing)	✓

2. On which part of the document do you wish to make a representation?

Policy	HOU 07
Paragraph	3.51
Site	
Proposals Map	
Settlement Boundary	
Other	

If you consider the document to be **SOUND**, please go to question 7.

3. If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).

Legal Tests	
Is the plan legally compliant?	
Soundness Tests	
Is the plan positively prepared?	
Is the plan justified?	
Is the plan effective?	✓
Is the plan consistent with national policy?	✓

4. Have you raised this issue before during previous consultations? (Please tick the appropriate box)

Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)	
Yes at Preferred Directions Stage (January - February 2016)	
Yes at Issues and Options Stage (November 2014 - January 2015)	

5. If you have not raised this issue before please use the following box to explain why.

Responding to emerging changes in national planning policy.

6. If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound. (Please attach extra sheets if necessary)

As per attached letter.

7. If you feel that the plan is sound, please tell us why.

--

8. Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? (Please tick appropriate box)

Yes, my representation can be satisfactorily dealt with by written representations	✓
No, my representations can only be suitably dealt with by appearing at the Examination in Public	

9. If you wish to appear at the Examination in Public, please outline why you consider this to be necessary.

--

10. Do you wish to be: (Please tick appropriate boxes)

Notified of the Submission	✓
Notified of the Inspectors Recommendations	✓
Notified of the Adoption	✓

Declaration: I understand that the details included on this form will be available in the public domain. (please tick box)	✓
Signature: Mrs Meghan Rossiter	Date: 25/09/2017

Breckland District Council is registered with the Data Protection Act 1998 for the purpose of processing personal data in the performance of its legitimate business. Any information held by the Council will be processed in compliance with the principles set out in the Act. The preparation of the Breckland Local Plan Pre-Submission Publication is a public process and your full representation and address details will be made public for this purpose.

Planning Policy Team
Breckland Council
Elizabeth House
Dereham
NR19 1EE

Date: 26 September 2017

Our Ref: MR M15/0715-144

By email only:

planningpolicyteam@breckland.gov.uk

Dear Sirs

RE: BRECKLAND EMERGING LOCAL PLAN: PRE-SUBMISSION PUBLICATION CONSULTATION

We represent **Rentplus**, a company providing an innovative affordable housing model that delivers affordably rented homes to buy (a 'rent to buy' model) for people who aspire to own their own home, but are currently unable to save for a mortgage deposit.

Policy HOU 07 - Affordable Housing

We consider this policy to be unsound in its current form. The National Planning Policy Framework (NPPF) does not expect affordable housing to be retained *in perpetuity* unless delivered on rural exception sites. Whilst the definition of affordable housing contained in the NPPF expects provisions to be made for affordable housing to remain at an affordable price, this is not as onerous as the policy expectation set out for all affordable rented housing. This should be amended to properly reflect the national approach, as this enables all providers of affordable housing to manage affordable properties more flexibly. Policies should be responsive to local circumstances and needs without recourse to the planning system if an affordable housing provider wishes to switch a property's tenure. In our experience this is well already well covered by clauses set out within Section 106 planning obligations, and does not force unnecessary planning applications. **Point iv** of this policy should be removed.

Whilst paragraph 3.51 references the publication of the Government's housing White Paper in March 2017, it would be further helpful within this supporting text for reference to be made to the range of affordable housing products that would best meet local housing needs. For example, there is a clear need for affordable rented products, but also a clear and significant aspiration locally for housing to purchase. Paragraphs 4.145-4.148 set out the potential scale of demand for starter homes, but this overlooks the contribution that could be made by the rent to buy model to meeting local housing needs. Unlike starter homes, there is no need for a mortgage deposit to access rent to buy housing, as each home is rented at an affordable rent for a set period before each home is purchased. This bridges a considerable gap many households experience in saving for a deposit while renting, often in prohibitively expensive private rented accommodation.

Enclosed with this consultation response is an Affordable Housing Statement setting out the details of the rent to buy model as delivered by Rentplus, which uses a partnership approach in combination with local planning authorities and Registered Providers (details of completed schemes can be viewed on their website www.rentplus-uk.com). Rentplus homes are allocated as with other affordable housing tenures through the local choice based lettings scheme and targeted lettings plans, and provide households with a managed route to home ownership at years 5, 10, 15 or 20 after the initial occupation. Rentplus provides a 10% gifted deposit to assist with each purchase. As rent to buy homes are initially occupied at an affordable rent, they are accessible to a significant proportion of local households in need; one recently completed Rentplus scheme was 30% filled by households living in social and affordable rented properties, releasing those homes for families in need.

The SHMA notes the “clear group of private renters ... who in the past have been owner occupiers and they form an identifiable need to occupy the proposed delivery of at least 10% affordable home ownership units on larger sites” (paragraph 4.147). For **Policy HOU 07** to be sufficiently responsive to national planning policy we recommend the below amendments:

“i. Residential development proposals capable of delivering 11 or more units (or exceeding a Gross Internal Area of 1000 sq m) will be expected to deliver a proportion of the development as affordable housing on-site to help meet existing and future affordable housing needs of the District as set out in the current Central Norfolk Strategic Housing Market Assessment (CNSHMA) and other up to date local housing needs surveys;

...

iii. The size, mix, type and tenure of affordable homes, as defined in national policy, will meet the full range of identified housing needs and aspirations of Breckland as established by the CNSHMA, local housing needs surveys and agreed by Breckland District Council;”

These amendments will ensure that the policy is effective by ensuring it remains responsive to the local market and local housing needs across the whole of the Plan period and not solely the static view provided by the SHMA. This will ensure that individual developments may respond to housing needs identified in a specific area as the SHMA does not provide detailed data below the district level.

The references to meeting the full range of housing needs and aspirations will also ensure the policy remains consistent with the emerging national planning policy approach set out in multiple consultation documents and statements by this Government. Indeed, the Housing Minister Alok Sharma recently confirmed in the House of Commons that the definition of affordable housing to be included in the next iteration of the NPPF is to include rent to buy and therefore this should be considered as part of the response to meeting local housing needs. We consider the above recommended amendments are justified by the evidence set out in the SHMA which recognises a significant level of need for affordable rented products, but also a significant demand for housing to purchase. Without considering models not explicitly set out in the current national definition of affordable housing, many families across Breckland may miss the opportunity to purchase their own home and obtain housing security.

We would like to be consulted on further stages of the new Local Plan and other planning related publications by the Council, by email only to consultation@tetlow-king.co.uk. Please ensure that **Rentplus** is retained on the consultation database, with **Tetlow King Planning** listed as their agents.

Yours faithfully



MEGHAN ROSSITER BSc (Hons.) MSc MRTPI
PRINCIPAL PLANNER
For and On Behalf Of
TETLOW KING PLANNING

Enc: Affordable Housing Statement

Cc: Sue Coulson and Anthony Eke, Rentplus

RENTPLUS: AN AFFORDABLE MODEL

Affordable Housing Statement

AFFORDABLE HOUSING STATEMENT

Rentplus

January 2016

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Contents

	Executive Summary	
Section 1	Introduction	1
Section 2	Affordable Housing as a Material Consideration and the National Planning Policy Framework	3
Section 3	Making the Case for Diversity of Supply	16
Section 4	Rentplus: The Model	34
Section 5	Considering the Definition	36
Section 6	Recommendations	39

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Executive Summary

George Osborne pledged in his Autumn Statement to “*choose to build the homes that people can buy*”. The pledge to build 10,000 affordable homes to buy that will allow a tenant to save for a deposit while they rent provides explicit Government support for a new model of housing provision, enabling working households to enter the housing market with assistance not already offered.

Rentplus is a new model that seeks to provide a route to home ownership for those households aspiring to home ownership, but unable to afford to save for a mortgage. It is an affordable, privately financed alternative to the private rented sector, providing a managed route to home ownership in collaboration with housing associations. The delivery of Rentplus will be managed through S106 agreements tailored specifically to the product, and can act as a catalyst for bringing forward stalled developments.

The Government has stated its intention to diversify the form of affordable housing being delivered to meet the needs of those families aspiring to home ownership. This report confirms that the model conforms to the definitions of affordable housing, as set out in the Annex to the NPPF, by providing a hybrid product spanning affordable rent and intermediate affordable housing. As a product complementary to those models of affordable housing already being provided by housing associations, Rentplus will contribute to the NPPF’s aims of boosting housing supply and creating mixed and balanced communities.

This report describes the significant shortfall in affordable housing nationwide and the steady decline in the availability of grant funding over the past decade. Together with the rent reductions to housing associations taking effect from April 2016, it is likely that affordable housing delivery from this sector will be constrained, and so it is clear that there remains a need for further assistance in the market. This has been supported by organisations such as Shelter, which in a 2014 report on improving access to housing makes clear that public and private investment will have multiple, stabilising benefits, including reduced welfare dependency. The social benefits for

those aspiring to home ownership but unable to achieve this security whilst trapped in often prohibitively expensive private rented sector accommodation are numerous.

As housing associations come under strain from reduced public funding, rent reductions and the extension of Right to Buy this new model, which can be delivered quickly and in high volumes with no recourse to public funding, has been explicitly supported by the Government. It should be encouraged on a local level for its clear ability to make a significant contribution to improving lives and communities. The Government's proposed amendments to the definition of affordable housing in the NPPF to include rent to buy housing only confirms this.

Owing to the fixed period of tenancy at affordable rents for Rentplus dwellings before purchase, households have the ability to save for a deposit on the home they have rented. This offers a new product to those households whose needs are not already met by the market, whilst also diversifying the local housing stock and contributing to the development of mixed and balanced communities. Changes to local planning policy both generally and relative to individual sites should be prioritised to encourage early, accelerated delivery.

The Rentplus product has a wide pool of prospective households for whom saving towards a home purchase is not currently possible due to falling outside eligibility for current affordable housing stock. Rentplus should be considered a route towards a more diverse housing sector by local authorities seeking to provide mixed, balanced communities whilst reducing the number of households on the local housing register. The Rentplus model would make a valuable, NPPF-compliant contribution towards significantly boosting housing supply, and most importantly in meeting need for affordable housing without public sector funding. With full Government support, Rentplus will deliver the national aim to turn *Generation Rent* into *Generation Buy*.

Introduction

Section 1

- 1.1 **Tetlow King Planning Ltd.** has been commissioned by **Rentplus** to prepare this Affordable Housing Statement to accompany its promotion of a new affordable housing model aimed at delivering discounted rented homes to buy for people who are unable to acquire a property on the open market. This report sets out Tetlow King Planning's expertise and credentials in the field of affordable housing, and confirms our professional opinion that the Rentplus model fully meets the need for affordable housing.

Who We Are: Qualifications and Experience

- 1.2 Tetlow King Planning Ltd. is a town planning and housing consultancy, co-founded by the current Chairman, Robin Tetlow, in 1985. Over the past 30 years the company has accumulated specialist expertise in affordable housing, becoming acknowledged leaders in the field.
- 1.3 Tetlow King Planning Ltd. provides strategic and detailed advice to *inter alia* housing associations, developers, landowners and investors on numerous sites and developments located throughout the UK. The company has been retained more generically by national research organisations, such as the Joseph Rowntree Foundation, representative/trade organisations, such as the National Housing Federation, professional institutions, such as the Royal Institution of Chartered Surveyors and government/ government related organisations, such as the Housing Corporation/ Homes and Communities Agency. The company is also regularly employed by local authorities.
- 1.4 The principal individual authors of this report have provided expert evidence to courts of law, tribunals and to parliamentary committees and groups; and appeared nationwide at Regional Planning Guidance, Regional Spatial Strategy and Structure Plan examinations in public, Local Plan / Unitary Development Plan inquiries and Local Development Document public examinations.
- 1.5 The principal individual authors of this report have also provided expert evidence extensively at S77/S78 inquiries, including many relating to planning appeals and called-in applications of regional and national significance.

- 1.6 Since the inception of the National Planning Policy Framework in 2012, Tetlow King Planning's input on the need for and the provision of affordable housing as part of planning application and appeal proposals has become of even greater importance in demonstrating the social and economic benefits of developments which decision makers are obliged to weigh in the overall planning balance.

This Report

- 1.7 The report comprises six sections, setting out the national planning policy framework; the evidence calling for a more diverse affordable housing sector; the proposed affordable housing model; how we consider this fits within the planning definition of affordable housing; and our recommendations for how this can best be utilised to help meet diverse housing needs.

Affordable Housing as a Material Consideration and the National Planning Policy Framework

Section 2

Introduction

- 2.1 It is useful to put any affordable housing offer in its historic, legal and planning appeal context. This section sets out the importance of affordable housing as a material consideration, and highlights a number of relevant legal and planning appeal decisions.

Affordable Housing as a Material Consideration: Historic Context

- 2.2 The importance of affordable housing as a material consideration has long been established, originating from PPG3 (1992). A community's need for affordable housing is a material planning consideration which may properly be taken into account in formulating development plan policies; authorities may also seek to negotiate with developers for the inclusion of an element of affordable housing in new schemes and it is Government policy that this approach is appropriate on-site unless off-site provision or a financial contribution can be robustly justified. Where there is a policy as to the provision of affordable housing in the development plan, the willingness of a developer to include an element of such housing in accordance with the policy will be a material consideration. The essence, however, is **reasonable flexibility**; policies should not seek to impose a uniform quota on all developments, regardless of market or site conditions.
- 2.3 As set out in Section 38(6) of the Planning and Compulsory Purchase Act 2004 and the National Planning Policy Framework (NPPF, 2012), where an adopted or approved development plan contains relevant policies an application for planning permission or an appeal should be determined in accordance with the plan unless material considerations indicate otherwise. Account can also be taken of policies in emerging development plans which are going through the statutory procedures towards adoption or approval; the weight to be attached depends upon the stage of plan preparation and the nature of representations relative to particular policies. Most adopted or approved and emerging development plans now include policies on affordable housing. Furthermore affordable housing can be regarded as a '*material*

consideration' in its own right as per the provisions of the NPPF and other Government advice. Supplementary Planning Documents and Housing Strategies may also be '*material*' subject to the level of public consultation and the extent to which they are broadly consistent with development plan policies.

Affordable Housing as a Material Consideration: Legal Context

- 2.4 The importance of affordable housing has been reflected in a number of court cases including *Mitchell v Secretary of State for the Environment and Another* (1994); *ECC Construction Limited v Secretary for the Environment and Carrick District Council* (1994); and *R v Tower of Hamlets London Borough Council, ex parte Barratt Homes Ltd* (2000). Of particular relevance is the case of *Harry Rowlinson and Lynda Rowlinson as Trustees of the Linson Construction Pension Fund v Warrington Borough Council and the Department of Transport, Local Government and the Regions* (2002).
- 2.5 In this case, the Inspector had concluded that the opportunity to provide 100 affordable dwellings to address unmet need for affordable housing across the Warrington Borough Council area provided an overriding justification for immediately releasing a substantial Greenfield site at Lymm, with a capacity for approximately 200 dwellings, on the edge of the settlement. In reaching this conclusion, the Inspector had weighed other facets of PPG3, in particular the sequential approach towards site selection. This decision was challenged by Warrington Borough Council, with the consent of the Secretary of State.
- 2.6 The High Court initially quashed the Inspector's decision but the Court of Appeal subsequently upheld it, with leave to appeal to the House of Lords refused. Paragraph 45 of the Court of Appeal judgement concludes that the Inspector's reasoning was perfectly clear:
- "The provision of affordable housing is a material planning consideration. His assessment was that the assessed need for affordable housing was not likely to be met in the foreseeable future and meeting it was a compelling material consideration in the proposals favour which outweighed the general principle of sequential approach to development land."*
- 2.7 In a more recent case, of *Oadby and Wigston Borough Council v CLG and Bloor Homes Limited* (2015) the Council sought to challenge the grant of permission at appeal for up to 150 dwellings at Oadby. The Council brought the challenge on the ground that the Inspector failed in his assessment of the full objectively assessed

need for housing. The claim failed, and the application to quash the decision was dismissed on the grounds that the Inspector had not failed in his decision making. . In this case the local planning authority's Strategic Housing Market Assessment (SHMA) had confirmed that private rented sector housing is not affordable housing, however the local authority had sought to rely upon this sector for meeting the shortfall in affordable housing provision to satisfy the full objectively assessed need. The decision reinforces the principle that private rented accommodation does not fall within the definition of affordable housing.

Secretary of State appeal decision: Addlestone, Surrey

2.8 A number of important planning appeal decisions demonstrate that affordable housing should meet a wide range of housing needs beyond a local authority's 'Reasonable Preference' obligations, and that permanence is not a prerequisite to appropriate affordable housing provision. An example of this is set out in a Secretary of State appeal decision¹ for 350 dwellings, 100% affordable, on a greenfield site identified as suitable for housing in the Local Plan for development considered the issue of whether a suitable mix of development would be provided. Whilst the development was proposed for 100% affordable housing, the tenure mix was offered as 49% social rented and 51% intermediate affordable housing. The Inspector's Report notes that the proportions of social rented and intermediate housing were "*at odds with the proportions identified as needed in the Council's own Housing Needs Assessment*" and in local policy (paragraph 3.65). One of the issues at the heart of the appeal was therefore the Council's intention for affordable housing to be delivered that would meet their Reasonable Preference groups.

2.9 Reasonable Preference groups are defined as those households with high levels of assessed housing need. The law requires that reasonable preference is given to the following categories:

- People who are homeless, including those who are intentionally homeless and in priority need;
- People who are owed a re-housing duty under the homelessness legislation, where this duty has not been discharged by an offer of suitable accommodation, which may be to a letting in the private sector;
- People occupying insanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions;

¹ Appeal decision relating to Land at Franklands Drive, Addlestone ref. APP/ Q3630/A/05/1198326

- People who need to move on medical or welfare grounds, including grounds related to a disability; and
- People who need to move to a particular locality, where failure to meet that need would cause hardship to themselves or to others.

2.10 In other words they are those households in most priority need. The Housing Register is a limited source for identifying the full current need for affordable housing. The Inspector drew an important distinction between the narrow statutory duty of the Housing Department in meeting priority need, and the wider ambit of the planning system to meet the need for affordable housing. As such the number of households on the Register will only be an indication of those in priority need and who the housing department have a duty to house. But it misses thousands of households who are in need of affordable housing, a large proportion who will either be living in overcrowded conditions with other households or turning to the private rented sector and paying unaffordable market rents.

2.11 Paragraph 7.13 of the Inspector's Report on the Secretary of State appeal decision states:

"The case advanced by the Borough Council was founded on the long established experience of the Council in grappling with issues of 'housing need'. This has long been an area of concern for local authorities, initially through the active twentieth century tradition of Council House building and transformed, via the process of producing Housing Investment Programmes (HIPs), into a general concern with Social Housing and the production of local housing strategies.

The direct link between such local housing strategies and assessment of 'housing need' is made explicit within the Department of the Environment, Transport and the Regions' "Local Housing Needs Assessment: A Guide to Good Practice" (CD199). This document published in 2000 remains the source of guidance for Runnymede's January 2005 Housing Needs Assessment (CD72) carried out by Fordham Associates. However, while I recognise that this approach will have value in identifying groups most in need of assistance in realising their housing aspirations, I regard the approach as retaining a relatively narrow and unduly restrictive approach to the concept of what comes within the ambit of the term Affordable Housing."

2.12 In this case, the Inspector noted evidence that most households in the Borough aspired to home ownership but many would be unlikely to purchase for a significant

period, or not at all, remaining instead in the private rented sector. As summarised by the Inspector, such households:

“should not be confused with those who can only afford social rented or intermediate housing. Ignoring the private rented sector as part of the housing market ... not only deprives the more hard pressed household of appropriate intermediate housing, but frustrates Government’s intention to develop a ‘ladder’ up which those able to do so may ‘climb’ to full owner occupation.” (Paragraph 3.116)

- 2.13 In this case, the Inspector concluded that the scheme for 100% affordable housing would provide an acceptable mix of tenures, and that the range of house types would therefore not produce a uniformity of house types. The Inspector posed the question of whether the *“households residing in this development would be a sufficient mix of social and economic groups”* (IR7.18), taking account of the mix that would result from the particular cascade arrangement for this scheme. The total mix on the scheme, the Inspector concluded, would be:

“likely to accommodate households of differing character, such that the overall development would be accommodating a range and variety of households. Even if the mix of tenures being made available by the operation of the cascade mechanism, were to alter the balance of these tenure groups, the result would be to increase the proportion of equity sharing households and I see no reason to anticipate that there would be any unusual concentration of socially disadvantaged households.” (IR7.19)

- 2.14 The Inspector’s overall conclusions found that the scheme represented a *bona fide* 100% affordable housing scheme which would *“result in a mixed development, accommodating households of different sizes and with a variety of socio-economic characteristics”* (IR7.72). He recommended that planning permission be granted. The Secretary of State agreed with her Inspector’s conclusions, noting in particular that:

“if the mix of tenures being made available by the operation of the cascade mechanism secured in the Unilateral Undertaking were to alter the balance of the proposed tenure groups, the result would be to increase the proportion of equity sharing households. She therefore agrees with the Inspector that there is no reason to anticipate that the proposed scheme would result in any unusual concentration of socially disadvantaged households.” (DL16)

- 2.15 The appeal was allowed on this basis.

Appeal Decision: St Albans

- 2.16 An appeal decision² considered the 6 units of affordable housing offered as part of an approved scheme for 55 dwellings in St Albans. There was an issue as to whether the proposed key workers accommodation would meet the need for affordable housing in the area. The appellants proposed the freehold sale of 6 units to a housing association at 60% of market value. The housing association would then liaise with local employers and let the units to key workers at affordable rents to those with incomes below £25,000 per annum. The local authority argued that such housing would not meet priority needs. The Inspector agreed but ruled that the needs of key workers were not being addressed in the District, noting that the Council's housing evidence had not investigated the needs of key workers, and that it was legitimate to provide for the full range of housing needs, not just those with priority needs.
- 2.17 The appellants referred to the 'polarisation' that can result if only those who can afford market prices and rents, and those with priority needs for affordable housing, have access to local housing stock. The Inspector agreed that the scheme would offset that tendency, meeting the national objectives to provide for the housing needs of the whole community and to increase choice. The Inspector concluded on this point that the Council should "*aim to meet a wide range of housing needs for middle as well as low income earners*" (paragraph 19). As local housing prices are too high and private renting too expensive, the needs of key workers were not being met. The scheme would meet this need.
- 2.18 The local authority also objected to the fact that the housing would not be secured *in perpetuity* as affordable housing. The Inspector noted that the privately financed model indicated that they would be lost as affordable units at the end of 20 years. However, it was concluded that permanence was not a realistic objective for affordable housing even when a housing association is involved; it is worth quoting these paragraphs at length:
- "When a RSL uses Social Housing Grant to provide dwellings for rent, every tenant has the right to purchase by virtue of the Housing Act 1996. Every 'shared owner' has the right to 'staircase' to 100% ownership. ...*
- The Council brought no evidence to the Inquiry to support its judgment that 20 years was not a sufficiently long period of time for the provision of affordable housing on a*

² Appeal decision relating to Old Albanians Sports Ground, St Albans ref. APP/B1930/A/01/1073344

site. I consider that this is a long period in development plan terms. Also, there would be a reasonable prospect of the units being retained for affordable housing for a longer period as they would be in the hands of a RSL ... The Council argued that the scheme should be differentiated from one wherein the tenant exercised the right to buy, because that would benefit someone in housing need. However, I agree with the Appellants that the tenant exercising the right to buy would be no longer in need.

On permanence, I conclude that this is not a realistic objective for affordable housing even where a RSL is involved. I consider that the scheme, in the hands of a RSL operating under the auspices of the Housing Corporation, would offer benefits to the District for a substantial period of 20 years.” (Paragraphs 24-26)

- 2.19 The Inspector also rejected the Council’s concerns about enforceability in relation to rent control and the timing of individual sales of units, since the scheme would be run by a housing association.

National Planning Policy Framework (NPPF, 2012)

- 2.20 The National Planning Policy Framework (NPPF) is a material planning consideration, central to setting out the role of affordable housing in the planning and decision making process. The delivery of sustainable development, encompassing social, economic and environmental roles, is at the heart of the NPPF; the paragraphs below set out the key points in relation to affordable housing.
- 2.21 Fundamental to the social role is *“supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations”* (paragraph 7).
- 2.22 Paragraph 8 is clear that these roles *“should not be undertaken in isolation, because they are mutually dependent”*. Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly through the planning system.
- 2.23 In pursuit of sustainable development paragraph 9 notes the importance of *“widening the choice of high quality homes”*.
- 2.24 Paragraph 14 sets out a presumption in favour of sustainable development, stating:
“at the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision taking.

For decision taking this means:

- *Approving development proposal that accord with the development plan without delay; and*
- *Where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
 - *specific policies in this Framework indicate development should be restricted.”*

2.25 Paragraph 17 sets out 12 core principles which underpin both plan making and decision taking. These include that planning should:

- *“be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up-to-date, and be based on joint working and co-operation to address larger than local issues. They should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency;*
- *not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives;*
- *proactively drive and support sustainable economic development to deliver the homes, businesses and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;*
- *... actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling and focus significant development in locations which are or can be made sustainable; and*

- *take account of and support local strategies to improve health, social and cultural well being for all, and deliver sufficient community and cultural facilities and services to meet local needs.”*
- 2.26 There is a clear emphasis on supporting enterprise, including the statement at paragraph 19 that planning *“should not act as an impediment to sustainable growth”*, and at paragraph 21 that investment in business *“should not be over-burdened by the combined requirements of planning policy expectations”*.
- 2.27 Section 6 sets the Government’s agenda for delivering a wide choice of high quality homes. Paragraph 47 clearly sets out the Government’s aim to *“boost significantly the supply of housing”* through a number of methods. Local Planning Authorities (LPAs) should *“use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing”* and identify and update annually a five year supply of housing.
- 2.28 The NPPF is clear that delivering sufficient housing is a key consideration for LPAs; and in particular that this should widen opportunities for home ownership and create sustainable, inclusive and mixed communities. LPAs should:
- *“plan for a mix of housing based on current and future demographic trends, market trends and the needs for different groups in the community (such as but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);*
 - *identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; and*
 - *where they have identified that affordable housing is needed, set policies for meeting this ... and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.”* (Paragraph 50)
- 2.29 The section on plan-making emphasises the need for LPAs to reflect the vision and aspirations of local communities in Local Plans (paragraph 150), and for Plans to be aspirational but realistic (paragraph 154). Opportunities should be sought to achieve the economic, social and environmental dimensions of sustainable development, and net gains across all three.
- 2.30 The NPPF is clear that LPAs should have a *“clear understanding of housing needs in their area”* by assessing *“their full housing needs”* (paragraph 159) through a

Strategic Housing Market Assessment (SHMA). This should *“identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period”*, including *“the need for all types of housing, including affordable housing.”*

2.31 Paragraph 173 states that Plans should be deliverable, with developments not subject to *“such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs ... [should] provide competitive returns to a willing land owner and willing developer”*.

2.32 The NPPF encourages a positive and proactive approach to the delivery of development through positive decision-taking. Paragraphs 186 and 187 indicate:

“Local Planning Authorities should approach decision-taking in a positive way to foster the delivery of sustainable development. The relationship between decision-taking and plan-making should be seamless, translating plans into high quality development on the ground.

Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.”

2.33 The NPPF also notes that planning conditions and obligations should be used to address unacceptable impacts or otherwise unacceptable development. Planning obligations should only be sought where they *“meet all of the following tests:*

- *necessary to make the development acceptable in planning terms;*
- *directly related to the development; and*
- *fairly and reasonably related in scale and kind to the development”*

2.34 **Annex 2: Glossary** defines affordable housing for planning purposes as follows:

“Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.

Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.

Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).

Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.

Homes that do not meet the above definition of affordable housing, such as 'low cost market' housing, may not be considered as affordable housing for planning purposes."

National Planning Practice Guidance (PPG)

2.35 The Planning Practice Guidance (PPG) was first published in 2014 to complement the NPPF in providing guidance on its practical implementation. The PPG is an online-only resource divided into 47 sections. The principal section relevant to this statement is the section entitled *Housing and economic development needs assessments*.

2.36 The guidance is clear that there should be an objective and unconstrained assessment of the total housing need. It states:

"The assessment of development needs is an objective assessment of need based on facts and unbiased evidence. Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints. However, these considerations will need to be addressed when bringing evidence bases together to identify specific policies within development plans."

- 2.37 A methodological approach is set out for assessing housing need. Councils are required to take into account under-supply and worsening affordability of housing, with assessments needing to reflect past under delivery of housing. Affordability is highlighted as a key factor in assessing overall housing targets.
- 2.38 Under the heading *How should plan makers respond to market signals?* the guidance states that *“A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections.”*
- 2.39 It goes on to state:
- “Assessing affordability involves comparing house costs against the ability to pay. The ratio between lower quartiles house prices and the lower quartile incomes or earnings can be used to assess the relative affordability of housing. The Department for Communities and Local Government publishes quarterly the ratio of lower quartile house prices to lower quartile earnings by local authority district.”*
- 2.40 Other factors to be considered are land prices, house prices, rents, rate of development and overcrowding.
- 2.41 The Viability section of the PPG notes that Local Plans’ visions for an area should *“not undermine ambition for high quality design and wider social and environmental benefit”* (Paragraph: 001 Reference ID: 10-001-20140306).
- 2.42 The Government introduced the Starter Homes model through a new section in the PPG. This enables exception sites to come forward specifically to meet the housing needs of first time buyers through the provision of below open market value homes. This product is to be delivered on under-used or unviable industrial and commercial land not currently identified for housing. The Government encourages LPAs to make these sites exempt from affordable housing and tariff-style contributions. The introduction of this model shows the Government’s clear intention to widen the availability of home ownership through more affordable models of delivery.

Summary

- 2.43 Over the past 30 years, the need for affordable housing has been recognised as being integral to the planning system. A consistent thread has run through various policy documents, with the need now firmly stated in the NPPF and the PPG.
- 2.44 The Courts have confirmed that affordable housing is capable of being a compelling material consideration in the determination of planning applications, the weight

attached to any material consideration being at the discretion of the decision maker. As confirmed by a Secretary of State appeal decision, housing provision need not be exclusively for the benefit of those households at the extremes of need. Affordable housing such as Rentplus rent to buy will, as with the schemes referenced above, accommodate a range and variety of households of different character while freeing up existing social rented housing for those in need.

- 2.45 There is no requirement for all affordable housing to be retained *in perpetuity*. As set out in the St Albans appeal decision, it is unrealistic to expect affordable housing to be retained for a period longer than 20 years, due to the Right to Buy for social housing tenants and for shared ownership occupiers to 'staircase' to full ownership. Even though these homes are lost from the general affordable housing stock, housing associations are not required to replace each home on a one-for-one basis in the local authority area, nor to recycle receipts for future investment. The commitment by Rentplus to replace each home sold on a one-for-one basis, securing long term delivery of homes to rent to local people, will fulfil local authority duties to meet local needs whilst also diversifying the local housing stock.

Making the Case for Diversity of Supply

Section 3

Introduction

- 3.1 This section highlights those reports and statements from Government that define the case for a diversity of affordable housing supply to meet the full range of housing needs, as required by the NPPF and PPG. This encompasses reports from Government departments, including CLG and HM Treasury, leading think tanks, and respected charities such as Shelter.

Government Statements

George Osborne MP, Chancellor of the Exchequer, Autumn Statement (25 November 2015)

- 3.2 In his Autumn Statement, George Osborne verbally pledged:

*“For another of the great social failures of our age has been the failure to build enough houses. In the end Spending Reviews like this come down to choices about what your priorities are. And I am clear: **in this Spending Review, we choose to build.***

Above all, we choose to build the homes that people can buy. For there is a growing crisis of home ownership in our country. 15 years ago, around 60% of people under 35 owned their own home, next year it’s set to be just half of that. We made a start on tackling this in the last Parliament, and with schemes like our Help to Buy the number of first time buyers rose by nearly 60%. But we haven’t done nearly enough yet. So it’s time to do much more. Today, we set out our bold plan to back families who aspire to buy their own home.

*First, I am doubling the housing budget. Yes, doubling it to over £2 billion per year. We will deliver, with government help, 400,000 affordable new homes by the end of the decade. **And affordable means not just affordable to rent, but affordable to buy.** That’s the biggest house building programme by any government since the 1970s. Almost half of them will be our Starter Homes, sold at 20% off market value to young first time buyers. 135,000 will be our brand new Help to Buy: Shared Ownership which we announce today. We’ll remove many of the restrictions on*

shared ownership – who can buy them, who can build them and who they can be sold on to.

... So this Spending Review delivers: A doubling of the housing budget. 400,000 new homes; with extra support for London. Estates regenerated. Right to Buy rolled-out. Paid for by a tax on buy-to-lets and second homes. **Delivered by a government committed to helping working people who want to buy their own home. For we are the builders.**”

3.3 Most importantly, the written statement clarifies the Government’s:

“...**Five Point Plan for housing to:**

1. **Deliver 400,000 affordable housing starts by 2020-21, focussed on low cost home ownership. This will include:**

- ... **10,000 homes that will allow a tenant to save for a deposit while they rent.** This will be in addition to 50,000 affordable homes from existing commitments

The scale of this programme of house building will require all sectors to play a role in delivery. As a result, the government will remove constraints that prevent private sector organisations from participating in delivery of these programmes, including the constraints to bidding for government funding.” [Underlining added]

DCLG Statement (25th November 2015)

3.4 The Department for Communities and Local Government announced as part of its settlement at the Spending Review 2015:

*“The government will double the housing budget from 2018 to 2019 to deliver at least 400,000 affordable homes [over this Parliament] including 200,000 Starter Homes, 135,000 new Help to Buy Shared Ownership homes and **10,000 Rent to Buy homes.**”*

3.5 In these statements the Government at the highest levels has set out its explicit support for the affordable Rent to Buy model being offered by Rentplus.

Impact of Social Rent Changes on the Delivery of Affordable Housing (Minister of State for Housing and Planning Brandon Lewis MP, 9 November 2015)

3.6 The Minister wrote to all local authorities to ask that a more flexible approach is taken to S106 agreements and negotiations on tenure mix. In this letter he notes that

following the announcement of rent reductions some approved or emerging schemes:

“are not being built out at the anticipated rate. Delay risks planned homes not coming forward and the ability of councils being able to demonstrate a five-year supply of deliverable housing land”.

- 3.7 Whilst the ability to renegotiate S106 agreements is already in place, the Minister has used this letter to encourage local authorities to:

“respond constructively, rapidly and positively to requests for such renegotiations and to take a pragmatic and proportionate approach to viability.”

- 3.8 The letter specifically asks that local authorities expedite negotiations where simple adjustments to tenure mix are proposed, without the need for full open book viability appraisals. In circumstances whereby the overall amount of affordable housing is proposed, the Minister is encouraging the “minimum amount of viability information necessary” to be sought. The letter also indicates that CLG will produce guidance on cascade mechanisms for S106 agreements to encourage flexible arrangements.

Greg Clark MP, Secretary of State for Communities and Local Government (5th October 2015)

- 3.9 At the Conservative Party Conference Greg Clark spoke of the need to deliver more housing for those increasingly shut out of home ownership:

“... the opportunities that our generation took for granted, have been slipping out of reach for the next generation. In the 20 years to 2012, the proportion of 25-34 year olds owning their own homes fell from 67% to 43%. The number of 20-34 year olds living with their parents increased by two thirds of a million.

...

*Most people in our country want to own their own home. For years governments have talked about affordable homes but in my view, not enough of them have been affordable homes to buy. I want us to put that right. I want us to build many more homes and I want to build homes that people can buy as well as rent. Shared ownership homes, starter homes for young people. **Now, homes for rent will always have a role. But why should signing a tenancy agreement mean signing away your aspirations to become a homeowner?**”*

David Cameron MP, Prime Minister, Conservative Party Conference Speech (7 October 2015)

- 3.10 The Prime Minister in his conference speech said that he wants to turn ‘Generation Rent’ into ‘Generation Buy’:

“But for me, there’s one big piece of unfinished business in our economy: housing. A Greater Britain must mean more families owning a home of their own. ... If you’ve worked hard and saved, I don’t want you just to have a roof over your head – I want you to have a roof of your own.

In the last 5 years, 600,000 new homes have been built. More than 150 people a day are moving in thanks to our Help to Buy scheme. ... 1.3 million to be given the chance to become homeowners. ... But the challenge is far, far bigger. When a generation of hardworking men and women in their 20s and 30s are waking up each morning in their childhood bedrooms – that should be a wakeup call for us. We need a national crusade to get homes built. That means banks lending, government releasing land, and yes – planning being reformed.

... Increasing home ownership means something else. For years, politicians have been talking about building what they call “affordable homes” – but the phrase was deceptive. It basically meant homes that were only available to rent. What people want are homes they can actually own. ...

*So today, I can announce a dramatic shift in housing policy in our country. Those old rules which said to developers: you can build on this site, but only if you build affordable homes for rent, we’re replacing them with new rules: you can build here, and those affordable homes can be available to buy. **Yes, from Generation Rent to Generation Buy**”*

Brandon Lewis MP, Housing Minister

- 3.11 In oral evidence delivered to the CLG Select Committee on 9th November 2015, the Housing Minister emphasised the Government’s aim to increase access to home ownership, *“whether it is rent-to-buy schemes”* or other avenues; *“all these avenues will play an important part”*.
- 3.12 On 15th December the Housing Minister answered two questions posed by Solihull MP Julian Knight on affordable rent to buy housing. The first of which asked if the Government would make rent to buy housing exempt from pay to stay proposals for higher income social tenants. The Minister responded:

“Higher income social tenants in a Rent to Buy scheme will not face increased rent under proposals for pay to stay. This is because the rent they pay is an intermediate rent which is excluded from social rent policy.”

- 3.13 A further question on whether the Government will include rent to buy housing as part of the Housing and Planning Bill's proposed general duty on local authorities to promote the supply of Starter Homes. The Minister referred to rent to buy:

*“The Housing and Planning Bill will support our manifesto commitment to build 200,000 Starter Homes to help more young people into home ownership. **Like other valuable products which support access to home ownership, affordable rent-to-buy, can be considered by councils as part of their wider affordable housing requirements for their area.**”*

Housing and Planning Bill: Committee Stage

- 3.14 The Housing and Planning Bill includes a number of proposed reforms to both the planning system and the way in which affordable housing is managed. One of the proposed reforms is to phase out 'tenancies for life', removing security of tenancy by changing to fixed terms of 2 to 5 years which will not automatically be removed. Should the proposed clauses be accepted as part of the Bill, the availability of fixed term tenancies will be much reduced.
- 3.15 The Bill is currently at report stage; further amendments to the Bill were first considered in the House of Commons on 5th January 2016. Amongst these Greg Clark tabled a series of amendments confirming that private registered providers of affordable housing will not be required to charge high income social tenants specific rents, confirming that 'pay to stay' will not be mandatory. Consideration of the Bill continues.

Other Publications

Laying the Foundations – A Housing Strategy for England (CLG, 2011)

- 3.16 This document sets out an intention to 'unblock' the housing market and tackle the social and economic consequences of the failure to develop sufficient high quality homes over recent decades.
- 3.17 The problems noted in this Strategy and the methods to achieve the 'unblocking' include the following:

- A thriving, active but stable housing market that offers choice, flexibility and affordable housing - this is critical to England's economic and social wellbeing;
- *"The problems we face are stark"* and have been compounded by the impact of the credit crunch;
- *"Urgent action to build new homes"* is necessary as children will grow up without the opportunities to live near their family;
- *"Housing is crucial for our social mobility, health and wellbeing"*;
- *"Housing is inextricably linked to the wider health of the economy"*; and
- Fundamental to the whole approach of the strategy is communities (including prospective owners and tenants), landlords and developers working together.

3.18 The Strategy proposed an increase in the estimated output of affordable homes between 2011 and 2015 to 170,000 dwellings (from the 150,000 dwellings proposed by the previous Government).

3.19 The Strategy also sets out the support needed to deliver new homes and 'support aspiration', including ***"including encouraging new private entrants into the social housing market, and considering innovative new approaches to funding affordable housing in the medium term"***. This Strategy gives explicit support for the entry of for-profit providers into the affordable housing market. The ability to charge rents at up to 80% of market levels is encouraged to provide additional financial capacity to:

"deliver more housing than would otherwise be possible ... reducing the pressure on funding from the taxpayer ... This means that we can ... help a greater number of households experience the benefits of an affordable rented home".

3.20 The Strategy further states that the entry of for-profit providers adds to the affordable housing sector's diversity and potential financial capacity, as raised by the investment opportunity presented to institutional investors such as pension funds.

Fixing the Foundations: Creating a More Prosperous Nation

3.21 Planning reforms were announced in this document, itself following on from *Laying the Foundations*. These reforms are aimed at driving up living standards and providing a better quality of life in Britain. At paragraph 9.23 the report commits the Government to delivering affordable homes to buy, confirming this Government's

support for models of extending opportunities for affordable home ownership to many more households.

Building the Homes We Need (KPMG and Shelter, 2014)

- 3.22 This report is the result of a year-long project by KPMG and Shelter to understand the housing shortage and provide advice to the Government on the housing crisis following the 2008 recession. The report starts by setting out:

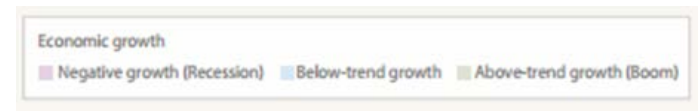
“Everyone now accepts that we have a desperate housing shortage in England.

Each year we build 100,000 fewer homes than we need, adding to a shortage that has been growing for decades. What’s more, our current house building system seems incapable of delivering growth on the scale required. Growing demand means that without a step change in supply we will be locked into a spiral of increasing house prices and rents – making the current housing crisis worse”.

- 3.23 The report highlights that if firm action is not taken to build more homes there will be significant adverse consequences for the UK economy and society, including rising homelessness, stalled social mobility, declining pension saving and an ever-rising benefit bill.
- 3.24 The report includes the graph shown on the following page, displaying the levels of house building in England since 1946.

Figure 3.1: House building since 1946

Source: Shelter and KPMG, 2014



3.25 This shows four interrelated trends:

- An overall decline in house building since 1946, including two recessionary declines after 1980 and 2007;
- High levels of social housing provision by local authorities until the mid-1970s;
- The growing contribution to affordable housing provision by housing associations since the late 1980s; providing most of the new affordable housing stock but not matching anything like the previous local authority contribution; and
- The gradual increase in the nominal house price through until about 1985 which then grows significantly over the subsequent 30 years.

Home Truths 2014/15: Broken Market Broken Dreams (NHF, 2014)

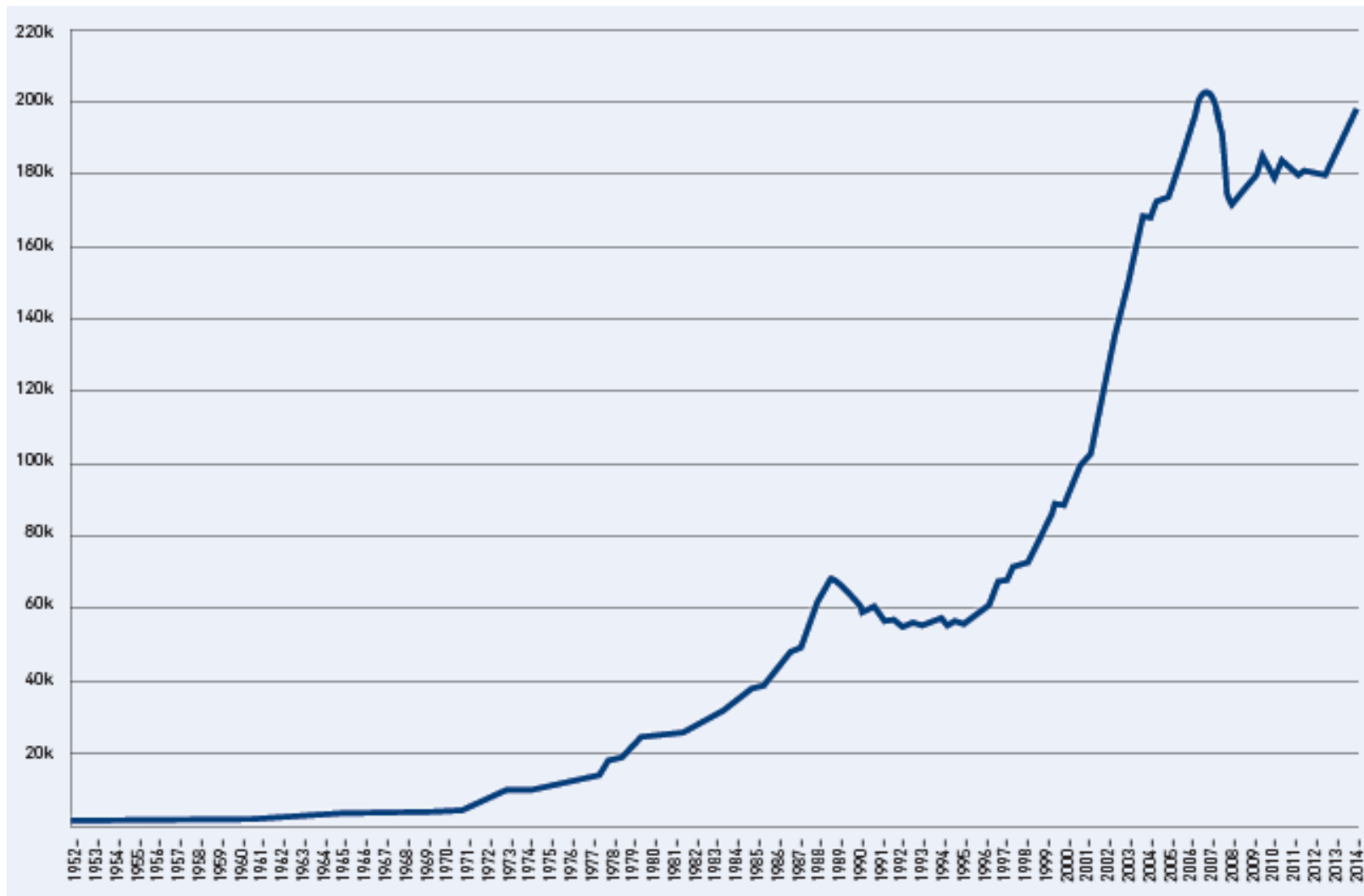
3.26 The report sets out that England is suffering a catastrophic housing crisis that has been more than a generation in the making. The number of new homes built each year is not nearly enough – to keep pace with demand another 245,000 homes per year are needed in England; currently only around half of this is built each year.

3.27 The report illustrates that house prices and private sector rents are rising ever higher, locking more people out of home ownership, as demand has outstripped supply for many years. It notes that a rising number of people are now private renters and face high costs. As well as impacting on day-to-day living, high housing costs have also previously increased the benefit bill. The number of people who claim housing benefit but are also in employment has doubled over the last six years. Increasingly, earnings do not cover all living costs and so households need assistance from the Government and the taxpayer.

3.28 The report offers alarm bells: people struggling with rent, needing housing benefit to keep a roof over their heads, being unable to be near family, unable to buy their own home or downsize to suitable and more affordable homes. This would be mitigated if more homes of all types were built at different price points in the market to meet more needs.

3.29 Demand for housing - through increasing population, decreased household size and other factors is outstripping a chronic undersupply of housing. Estimates show around 245,000 new homes are required each year to keep up with demand, and even more would be needed to clear the backlog of demand. As a result, house prices have more than doubled (after accounting for inflation) in 40 years, as illustrated by Figure 3.2, overleaf.

Figure 3.2: Nominal House Prices in the UK



Source: Home Truths 2014/15: Broken Market Broken Dreams (2014)

3.30 In the 1960s, a home was four and a half times the average salary and within the realms of being attainable with a reasonable deposit. As house prices have risen, wages have not been able to keep up; across the UK the average home now costs almost seven times the average salary, making home ownership largely unattainable for most young people.

Housing Britain: Building New Homes for Growth (CBI, 2014)

3.31 This report states that the UK's housing market has not functioned healthily for decades, with an imbalance between the supply of new homes relative to demand being at the centre of this problem. This has created the current situation whereby half the number of houses needed every year has been built over the last decade.

3.32 The report notes that UK house prices have increased 54% since 2004. Housing shortages are also pushing up market rent at a time when forecasts for disposable income remain weak, putting severe strain on household finances and limiting housing choice. This demand gap has inflated the cost of buying or renting a house, making it more difficult for people to join and move within the housing market. Following the 2008 recession, from 2011 UK house prices once more began rising.

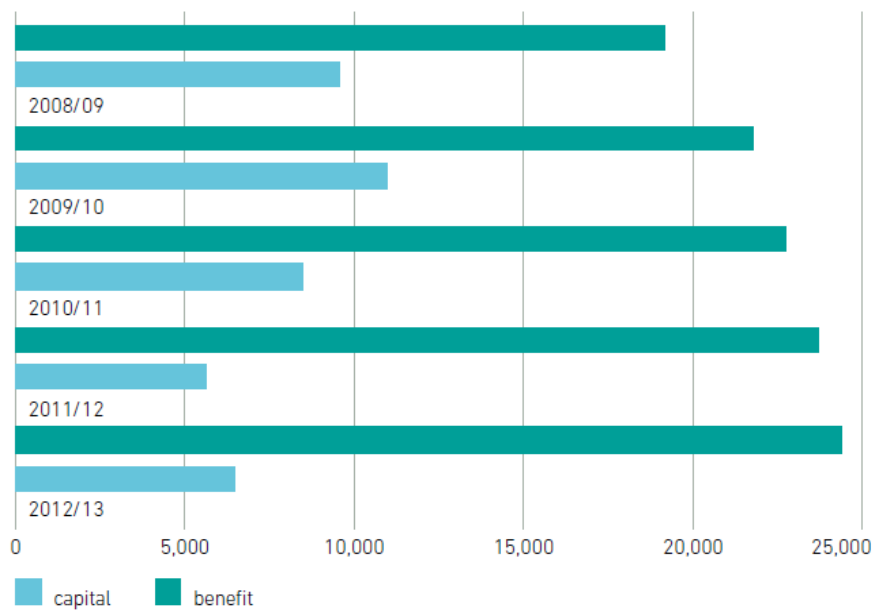
3.33 The report notes that the 1.8 million people on local authority waiting lists for social rented properties clearly demonstrate the strong demand for affordable housing from families up and down the country³.

3.34 Figure 3.3 (overleaf) shows the upward trend in levels of housing benefit paid out in recent years, compared to increasingly low levels of capital investment in boosting the housing stock. In 2013 over £24bn was spent on housing benefit in total, whilst just under £6.5bn was used for capital development⁴. Rising government spending on housing benefits is symptomatic of a housing market unaffordable for many people.

³ *Improving the Rented Housing Sector*, Department for Communities and Local Government

⁴ It should be noted that the Government has implemented rent reductions for housing associations; this may impact overall supply of affordable housing from the sector due to financial capacity being limited.

Figure 3.3: Housing Benefit and Capital Spend Comparison 2008/09 to 2012/13



Source: Housing Britain: Building New Homes for Growth (2014)

In the Mix: The Need for a Diverse Supply of New Homes (Shelter, 2014)

3.35 In this briefing, Shelter set out the need for a balance of tenures across the housing growth in England, following on from the KPMG and Shelter report described above, at paragraph 3.10. It emphasises the need for a balanced mix of tenures, from a diverse range of funding sources and delivery models “*involving both the private and public sectors*” in order to achieve a more resilient housing stock:

“...this diversity makes the housing system more productive over the long term by making it more resilient to fluctuations in house prices and less prone to cyclical shocks. Diversity of supply will not only help us to increase supply to 250,000 homes a year, but will help ensure that high levels of output can be sustained over time.”

3.36 The benefits of this diversity will not only provide longer-term benefits to the economy, but also have wider social benefits:

“England’s housing crisis has impacted different people in different ways, and no single tenure can offer the best solution for everyone. Each different type of housing plays a different role in the English housing system, catering for different preferences and needs – and we need more of all of them. Just as not everyone needs an intermediate or social rented home, not everyone will be able to afford to buy, even if total housing output is dramatically increased and house prices stabilised.”

3.37 Shelter note that by building a mix of housing, including intermediate homes, more people’s aspirations to home ownership can be met; a “*better alternative to private*

renting” may be provided and the “*steady rise of in-work housing benefit claimants*” can be halted. To achieve the upswing in delivery required (as set out in the earlier KPMG and Shelter report) to achieve a more balanced housing market, the briefing states that there should be a boost to public and private investment in affordable housing. Of the 6 recommendations set out in this briefing, one is for the Government to “*explore new forms of intermediate tenure to widen access to intermediate homes, including low share shared ownership and affordable rent-to-buy homes.*”

- 3.38 The briefing notes the national preference for home ownership, as set out in a prior Shelter report⁵, for reasons such as greater stability and control over the home. It also recognises that achieving a significant boost in housing supply is likely to achieve political legitimacy by “*the majority of new homes offering a route to some form of ownership*”. Research⁶ has shown that:

“66% of private rented are unable to save anything towards a deposit for purchasing their own home ... [the] net result is that fewer people can cross the widening financial gap between renting ... and market homeownership in one leap: if ownership is to be extended to more people a substantial increase in the intermediate options for people who can’t afford to buy a suitable home is needed.”

- 3.39 Without intervention, many families will continue to be trapped in the ‘insecure’ private rented sector, spending significant proportions of household income on rent. To meet the needs of those households currently priced out of accessing home ownership, Shelter suggest more affordable, intermediate homeownership solutions to be vital to helping those out of private renting and a commensurate reduction in in-work housing benefit claimants. Rent-to-buy offers one solution to these problems.

NatWest Millennials Home Buying Survey (NatWest, June 2015)

- 3.40 This Survey has shown that of those polled, 69% of young adults (aged 22-30 years old) currently either renting or living with parents believe they will not save enough for a house deposit within 5 years. 44% considered their prospects of buying a home to be more optimistic as a result of the Help to Buy scheme.

⁵ Homes for Forgotten Families (Shelter, 2013)

⁶ England’s ‘rent-trap’: just another reason housing is now a top 5 issue for voters (YouGov for Shelter, 2014)

Build to Rent: Funding Britain's Rental Revolution (Addleshaw Goddard and BPF, July 2015)

- 3.41 This report sets out an overview of the 'transformation' of the housing market in Britain over the past 15 years, in which time homeownership has steadily declined from a peak of 69% in 2001. The private rented sector has grown significantly over the same period, overtaking the social rented sector in providing homes and forecast to provide homes to one in four households by 2020:

"Growing demand for rented accommodation and the response to this demand from professional investors looks set to change the market, perhaps permanently.

... businesses are looking to create new clusters of homes for rent, as long-term investment opportunities. The result has been dubbed Build to Rent".

- 3.42 The report references research which estimates that Build to Rent could generate over £30 billion of new investment in Britain over the next five years, delivering over 150,000 homes. The report notes the 'dire' need for affordable housing, *"but this must not diminish the need for quality market-rented housing or housing for sale either"*.

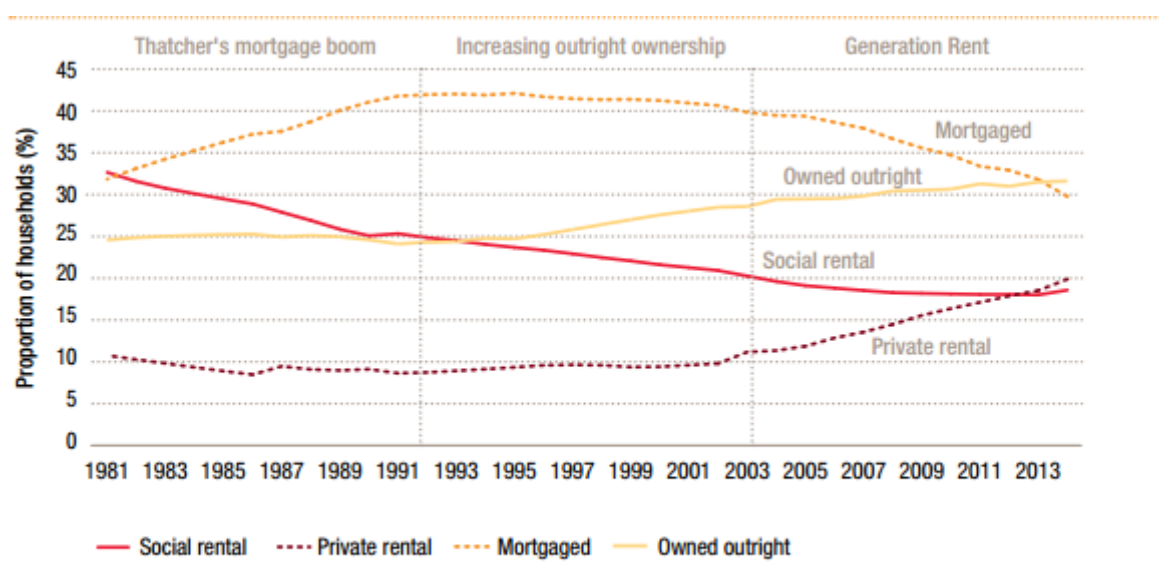
UK Economic Outlook – UK housing market outlook: the continuing rise of Generation Rent (PwC, July 2015)

- 3.43 This report notes:

"As house prices have risen and social housing supply remains constrained, the number of households in the private rented sector has more than doubled since 2001, rising from 2.3 million to 5.4 million by 2014, around 20% of the total. We project that this trend will continue with an additional 1.8 million households becoming private renters by 2025. This would take the total to 7.2 million households – almost one in four of the UK total. The trend is particularly strong in the 20-39 age group where more than half will be renting privately by 2025. The rise of 'Generation Rent' will continue."

- 3.44 The report also notes the fall in households who own a home with a mortgage (from almost 45% in 2001 to under 30%), linking this with a limited housing supply, affordability of the housing market and poor mortgage availability. This is shown in the graph, overleaf:

Figure 3.4: UK share of households by tenure type (%)



Source: PwC analysis of English Housing Survey, DCLG

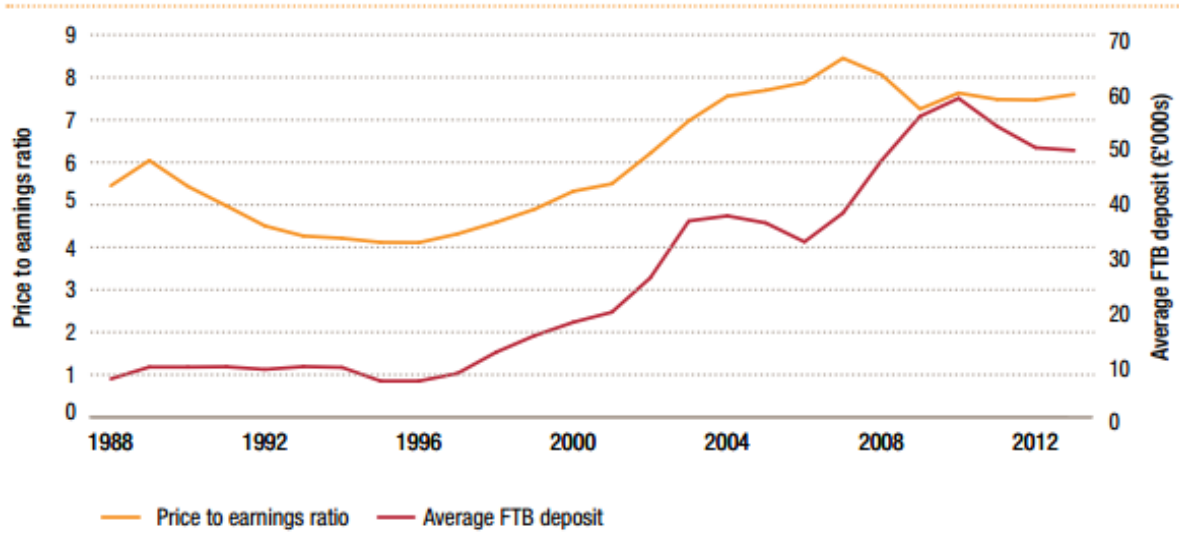
3.45 It adds:

“A significant rise in the supply of affordable housing might change this in the long run, but seems unlikely to occur fast enough to stem the rise in Generation Rent between now and 2025.

... the ability of people to use the mortgage market to make the transition from renting to owning appears to be diminishing, with younger generations having to wait longer to buy in many cases.”

3.46 The report notes that this affordability crisis, and inaccessibility for many to mortgages, stems from the *“combined effect of rising house prices and lenders withdrawing higher Loan-to-Value mortgages”*. This point is highlighted in the graph, overleaf. Average first time buyer deposits have increased almost five-fold, an increase much greater than the growth in average earnings over the same period.

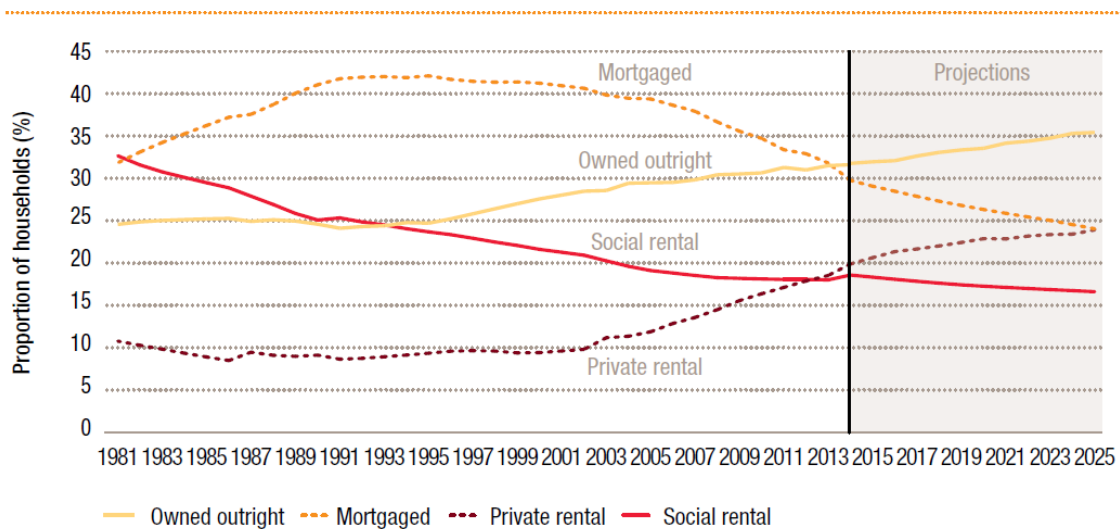
Figure 3.5: House price to earnings ratio and average first time buyer deposit, 1988-2013



Source: PwC analysis of ONS data

3.47 The report summarises: *“This trend threatens to lock large segments of society out of the housing market, especially those on middle or low incomes, and who live in higher priced areas”*. Forward projections for housing tenure in this report suggest that current trends will continue (see Figure 3.6, below).

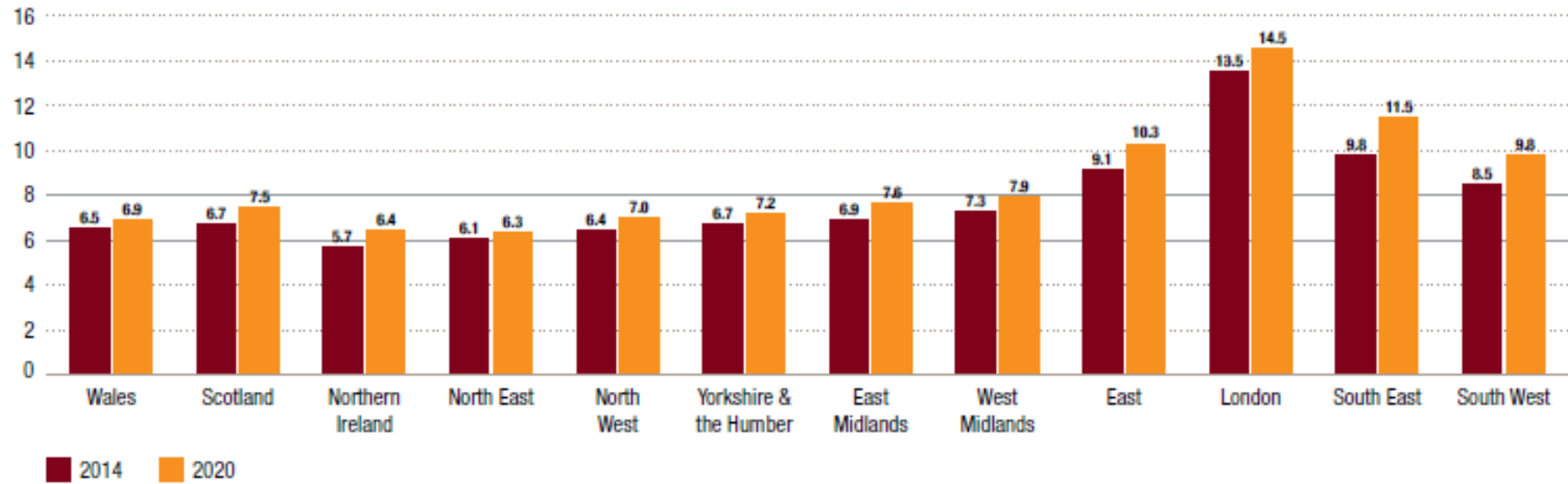
Figure 3.6: Projections for UK housing tenure, share of households



Source: PwC analysis, English Housing Survey

3.48 The report also sets out house price projections for the UK regions, indicating that the current difficulties of affordability across the country will continue (see overleaf).

Figure 3.7: Regional average house price to individual full-time earnings ratios



Source: ONS for 2014, PwC main scenario projections for 2020

National Housing Federation Statement (NHF, 20 August 2015)

- 3.49 The National Housing Federation's Assistant Director of Campaigns commented on the May-July 2015 quarter housing statistics released by CLG:

"Britain is in the grips of a housing crisis, and at the centre of this huge national issue is the fact that we've failed to build enough homes for a generation or more.

Today's figures are encouraging as they show housebuilding is at its highest level since 2008. However, we need to continue to increase our efforts as a nation to build the homes that are desperately needed. Last year alone we built less than half of the homes needed, pushing house prices and home ownership further out of reach for millions of families and young people.

... We want to work together to end the housing crisis and provide quality affordable homes to everyone who needs them."

Summary

- 3.50 The Chancellor of the Exchequer in his first Autumn Statement of this Parliament and the Prime Minister during PMQs announced explicit support for the development of affordable homes to buy. The recognition of affordable housing to buy in helping to resolve the nation's housing crisis follows on from a growing wealth of evidence that demonstrates a clear and pressing requirement to build more homes to meet a significant level of unmet need. The Minister for Housing and Planning, Brandon Lewis MP, has also recently expressed his support for local authorities taking a more flexible approach to negotiating tenure mix, expediting negotiations in order to speed up delivery of affordable housing.
- 3.51 The need for affordable housing is not solely met by social rented homes, which only meet the needs of the poorest. The evidence in this section highlights the ability of more affordable homeownership solutions to help households out of private renting. Those who cannot yet afford to buy on the open market because they are either trapped by poor quality and expensive private rented accommodation, or have not yet been able to leave the parental home due to the inhibitive cost of buying have had their needs recognised by this Government. The Chancellor's Statement clearly signals this Government's intention to widen opportunities for home ownership by removing barriers to private for-profit providers entering the market to deliver more affordable homes – specifically including £200m to support delivery of 10,000 Rent to Buy homes – and add to the diversity of the sector.

Rentplus: The Model

Section 4

- 4.1 The Rentplus model is aimed at providing an affordable rented home to households until such time as the occupier can afford to purchase the property. In this way it aims to assist those households who cannot currently purchase a house on the open market but who would otherwise not be considered a priority, or qualify for social or affordable rented homes.
- 4.2 The model is essentially one of rent to buy, with a five year renewable tenancy at an affordable rent, managed by a housing association. All dwellings are to be leased to Registered Providers at an affordable rent for up to 20 years; the housing association will be responsible for managing and maintaining the properties. Homes will be sold on a phased basis every 5 years; those homes not sold at year 5 will be re-let to tenants for a further 5 years.
- 4.3 Upon registering interest in a scheme households are assessed on their suitability for a 5, 10, 15 or 20 year tenancy after which it is expected that the home will be purchased at market value. At the time of purchase, the occupier will be gifted 10% of the purchase price as a deposit towards a mortgage by Rentplus.
- 4.4 Rental of the property before purchase will be at the lower of 80% open market rental (including service charge) or Local Housing Allowance (LHA). The household will be supported through the term of their tenancy by the managing housing association to save and increase the deposit to assist the mortgage application. The assured tenancy period also benefits from improving a tenant's ability to prove credit-worthiness.
- 4.5 The Rentplus model aims to improve the ability of purchasers to build a suitable deposit, as well as improving, or creating a good credit rating, by paying a reduced (affordable) rent rather than a private market rent for the duration of the tenancy (as set out at paragraph 4.4, above).
- 4.6 During the period of rental tenancy occupiers can serve notice to vacate a Rentplus unit on one month's notice. Assistance may be sought from the managing housing association to assist in re-housing.

- 4.7 The Rentplus model permits tenants to swap with other tenants who are able to bring forward an early purchase of the unit, to assist those who are unable to purchase the property at the programmed time.
- 4.8 If the property is sold within 2 years of the original occupier purchase then all or a part of the gifted deposit will be repayable to Rentplus on such disposal, subject to a maximum cap of the original sum gifted.
- 4.9 All Rentplus homes are sold after 20 years. If the occupier does not purchase the property then the housing association has the option to acquire the unit, with Rentplus providing a 10% discount on open market value to the housing association. The future use of the unit as any other NPPF compliant affordable property can then be determined by the housing association.
- 4.10 In the circumstances of neither the tenant nor housing association purchasing the property after 20 years, the property is sold on the open market and 7.5% of the net sales proceeds are paid to the Local Authority to reinvest in new affordable housing provision.
- 4.11 A Memorandum of Understanding may be entered into with each individual LPA to seek to replenish the stock of Rentplus homes on a one for one basis, retaining a proportion of the affordable housing stock in the local area.

Considering the Definition

Section 5

- 5.1 This section discusses the model's compliance with the planning definition of affordable housing as in Annex 2 of the NPPF, set out below for ease of reference:

“Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.”

- 5.2 Affordable rent and intermediate affordable are defined in the Annex as:

“Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).

“Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.”

- 5.3 The Rentplus model is unusual in that it conforms to two of the three definitions of affordable housing, falling under the remit of affordable rent and intermediate for sale at different points of its lifetime. It cannot be considered a social rent product due to the rent falling outside the guideline level of the national rent regime. The definitions set out within the Annex are not prescriptive, but offer a number of different terms within which to describe various affordable tenures and products. The Rentplus model is not unique in this aspect of diverging from the more traditional social rented / intermediate affordable tenures, as there are other models of affordable tenure being delivered by private registered providers across the UK.

- 5.4 The Rentplus model is considered to be a hybrid form of affordable housing. Unlike widely understood shared ownership or shared equity products, in which an initial percentage of the home's value is purchased and rent is paid on the remaining share, Rentplus households have the opportunity to save towards the deposit before purchase of that same home. This is achieved by paying a reduced, affordable rent

during the agreed period of tenancy which is fixed (and secure) for a period of 5 years, the same as currently offered by housing associations for affordable rent units.

- 5.5 As set out in Section 4, the model fixes the rent at an affordable level, being the lower of either 80% below market rent or the Local Housing Allowance (LHA), including service charge. This is strictly in accordance with the definition of affordable rent as defined in the NPPF Annex. The model will be managed by a registered provider to households who are allocated according to local authority priorities through the local housing register or other local mechanisms (such as choice based lettings or Help to Buy agents), further bringing this into compliance with the NPPF definition of affordable rent.
- 5.6 As defined by the Annex, the sale of Rentplus properties will be in line with other intermediate affordable homes, at a cost above social rent. The purchase price will be at the level of open market value, but will effectively be discounted by 10% by the 'gifted' deposit from Rentplus. The model should also therefore be considered a low cost home for sale under the definition of intermediate affordable. This is also comparable with rented properties on which tenants can exercise the Right to Buy through existing legislation.
- 5.7 The NPPF definition includes the provision that affordable housing should *"include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision."* Such provisions are secured by the Rentplus model by direct subsidy (in the form of a 10% discount to the Housing Association and 7.5% of net proceeds payable to the local authority upon sale) for future affordable housing.
- 5.8 Where a Memorandum of Understanding (MoU) has been agreed Rentplus will, upon the sale of homes, use its best endeavours to invest in new units on a one-for-one basis. Each MoU is to be negotiated on an individual basis with each local planning authority, but is considered an integral part of the product, comparable with the recycling of receipts from shared equity units by housing associations. The recycling of funds by housing associations is not guaranteed to be reinvested within the same local authority area as the original units, whereas the Rentplus MoU provides a best endeavours commitment to deliver further affordable units on a one-for-one basis in that local authority area. This thereby raises the overall level of affordable housing that is delivered, whilst reducing the numbers on housing registers and increasing the financial investment in the creation of sustainable communities in that area.

5.9 Each subsequent unit delivered by Rentplus would be on the same affordable rent basis. Where a property is not purchased by the occupier, the managing housing association has the opportunity to purchase instead, retaining this as part of its stock of affordable units. Whether through direct reinvestment by Rentplus or recycling by the managing housing association, where an MoU has been agreed, this ensures the affordable housing subsidy is reinvested for the benefit of local people.

Recommendations

Section 6

We Are the Builders: Generation Rent to Generation Buy

- 6.1 The Government has announced its full, explicit support for private investors to deliver affordable Rent to Buy homes in order to extend the opportunities for home ownership to back families *“who aspire to buy their own home”*. The Chancellor of the Exchequer, George Osborne MP, in his Autumn Statement pledged to deliver *“10,000 homes that will allow a tenant to save for a deposit while they rent”, “removing constraints that prevent private sector organisations from participating in delivery”*. The Prime Minister also announced in his Party Conference speech to turn *Generation Rent* into *Generation Buy*; this Government is explicit in its support for affordable homes available as rent to buy.
- 6.2 Rentplus seeks to fulfil that role to extend a hand to those households currently unable to save for and access the open market to purchase their own home whose needs are not met by the current affordable housing sector and other home ownership initiatives.

Moving In: The Benefits of Rentplus

- 6.3 The purpose and practical detail of the Rentplus model, as described in **Section 3**, demonstrates that Rentplus has been developed as an investment product that will enable a rolling stock of homes for rent and eventual sale to complement other affordable housing products. As set out in **Section 2**, the delivery of a large quantity of affordable housing is considered highly beneficial in areas of high need. As Rentplus homes are sold on a phased basis every 5 years the model also creates its own mixed tenure development over the lifetime of the scheme. As Rentplus is a fully funded model and does not require any public subsidy to deliver homes, it will result in significant additional investment that would not otherwise be available.
- 6.4 As noted in **Section 3**, the current problems with the housing market do not meet the diverse needs of all, but are instead forcing greater welfare dependency through an increasing reliance on the private rented sector. This includes those who are in-work housing benefit claimants, for whom rent costs take up such a proportion of income that it is very difficult to save towards a house deposit. There is considerable

aspiration towards home ownership; this is recognised in Government policy and encouragement towards intermediate affordable housing delivery.

- 6.5 This is also supported by planning decisions; as set out in the Secretary of State appeal decision referred to in **Section 2**, it is important to recognise that affordable housing delivery should not be restricted to meet a narrow definition of need, providing homes only for those households with 'Reasonable Preference'. This is regarded as 'unduly restrictive', failing to recognise the needs of 'hard pressed' households for appropriate affordable housing which meets the Government's intention to enable households to "*climb' to full owner occupation*". Households entering a scheme with a mix of house types and with the ability to save towards accessing home ownership at a flexible point in time will create a full mix of social and economic groups.
- 6.6 Those reports referenced in **Section 3** demonstrate that current affordable housing tenures do not meet the full needs of all those aspiring to ownership, principally as these rely on ready availability of savings to access shared ownership mortgages. Equally, this product will be a realistic alternative for those households who are not able to purchase their home through the Government's Starter Home Initiative, as acknowledged in the Autumn Statement. As a great number of those households would not be considered eligible for social rented homes, access to any affordable product is significantly constrained. The Rentplus model will diversify the affordable housing stock available to those households, and enable a greater number of households to access affordable housing without recourse to welfare support. This diversity of supply is a crucial factor in solving the nation's significant housing crisis.
- 6.7 The Rentplus product offers the security of rental at an affordable level whilst allowing households aspiring to home ownership the opportunity to save towards and purchase with a gifted deposit. The basis for setting and charging rent levels is guaranteed through an assured shorthold tenancy, giving added certainty to those households who may otherwise be subject to private rent level fluctuations (typically rent rises) and insecure tenancy agreements. This is a significant benefit of the model which is likely to be very attractive to those not able or desiring to access other forms of affordable housing before obtaining a mortgage. This will also remove households from the housing register, allowing local housing authorities the ability to focus greater resources on those most in need.
- 6.8 The product also offers the flexibility to alter the point of purchase on a phased basis at five year intervals, as well as the benefit of a property being managed and

maintained by a housing association throughout the period of it being a Rentplus property.

- 6.9 The product is new, and therefore not previously considered within either housing evidence documents such as SHMA or in Local Plan policies. Section 4 has set out the model's compliance with the NPPF definition of affordable housing. The NPPF seeks to encourage LPAs to plan for a range of housing to meet all needs, across market and affordable tenures, whilst the Government has made it clear that encouraging home ownership is central to the country's economic stability and social justice⁷. It is clear that mixed, sustainable communities are at the heart of planning and that planning should not seek to threaten the ambition of business, or to prevent viable schemes from bringing forward social, economic and environmental benefits.
- 6.10 By providing a rental product at the lower of 80% below market rent or at Local Housing Allowance (LHA), households are also given a hitherto-unavailable opportunity to save towards a deposit without the need to revert to parental handouts, remain living with parents in their teenage bedrooms, or possibly to live in poor quality cramped rental conditions. Not only does the Rentplus model offer households the opportunity to be able to afford to save for a deposit and the costs associated with purchasing a property, but the gifted 10% deposit effectively offers the property for sale at below-market rate at the point of purchase.
- 6.11 Certainty is also offered to local planning authorities as units are managed and maintained by a housing association, with the product only being offered to eligible households on the local housing register. Those households may otherwise fail to be offered an affordable property due to not being categorised as a high priority household. As described in **Section 3**, this situation traps a considerable number of the non-home owner population, and in particular what has become known as *Generation Rent*, in a hard to escape cycle of renting at private market rates. Unable to save any significant sum for a deposit this generation is struggling to obtain a mortgage; this has contributed to the ever-rising age at which Britons enter home ownership.
- 6.12 A further point to note is the potential for delivery on rural exception sites where a small quantity of market housing is already accepted to improve scheme viability. In rural areas affected by poor affordability the existing supply of affordable housing products would be complemented by Rentplus homes. These would further support

⁷ Here's how to build a homeowning Britain (David Cameron and George Osborne, The Times, 4 July 2015) and the Autumn Statement (HM Treasury, 25 November 2015)

the diversity of housing delivered in rural areas, contributing to the ongoing sustainability of those communities and assist those trapped by being unable to afford market housing but not high priority enough to receive social or affordable rented homes.

Plan-Making to include Rentplus

- 6.13 Local Planning Authorities are encouraged by the NPPF to significantly boost the supply of housing, including through the provision of affordable housing which is a material planning consideration, and an inherent part of planning for housing through a proper, full objective assessment of housing need. By including a proportion of Rentplus units within the mix of any scheme, the local planning authority is also given the opportunity to increase the diversity of homes on offer. Together with open market, social rented, affordable rent, and intermediate affordable units local authorities have the ability to approve schemes that fully accord with the NPPF's aim to create mixed and sustainable communities.
- 6.14 People also aspire to home ownership. This provides households with a financial stake in the local community. The specific Rentplus model, together with other forms of affordable housing, also widens local housing choice adding to a more mixed, balanced local community.
- 6.15 It is the intention of the Rentplus model to be delivered alongside other forms of affordable housing, acting as a complementary product as part of the housing mix to meet the needs of those households whose aspirations towards home ownership are not currently achievable through other intermediate affordable tenures. This can also deliver the benefit of enhancing the overall affordable housing offer and increasing the certainty of deliverability on sites where viability may be an issue. Early delivery of Rentplus homes, in volume, is a further benefit of this diversity of tenure offer.
- 6.16 Whilst the transitional nature of the product (from affordable rent to ownership) may present a difficulty for local planning authorities in defining it for the purposes of determining applications or counting for housing land supply, it should be considered a suitable method of diversifying local affordable housing offer without recourse to public funding. This also enables a greater overall level of affordable housing to be delivered both in the short term on individual sites, and in the longer term, as Rentplus stock is replaced.

- 6.17 We recommend that to incorporate the Rentplus model into the local plan, that the below text is included within an affordable housing policy. This will enable a degree of flexibility to be employed when negotiating the tenure mix on individual sites.

“The Council will seek a developer contribution of X% towards the provision of affordable housing on residential developments of X dwellings or more. The mix of affordable dwellings may be negotiated, taking into account site specific issues and viability. The mix should take into account local need for social rented and intermediate affordable tenures, including Rent to Buy models, such as Rentplus.

There will be a strong presumption in favour of the affordable homes being fully integrated within proposed development. However the Council may consider off site provision, for instance to enable other policy objectives to be met, subject to an equivalent level of developer contribution being provided. There will be a presumption in favour of cross-subsidy to enable a higher proportion of affordable housing to be provided, preferably through an element of affordable Rent to Buy, such as Rentplus, or market housing. Off site provision could be by way of direct affordable housing provision on an alternative site, or by a financial contribution which would enable provision elsewhere in the local authority area.”

Incorporating Rentplus: S106 Sites and Current Developments

- 6.18 Rentplus has been established as a specialist provider of affordable housing in the private sector. The model as described in **Section 3** is specifically designed to provide housing which is affordable to local people aspiring to home ownership. The involvement of a housing association should give the security and assurance that such homes are to be properly managed, whilst the sale of the homes provides Rentplus with a capital sum return. This enables replacement affordable housing delivery in the local authority area by Rentplus as well as a return to the local authority in the case of sale on the open market to reinvest in local affordable housing. The ability for the managing housing association to purchase the unit at a 10% discount if the occupier does not wish to purchase offers a further method of retaining an affordable unit within the local stock.
- 6.19 Other social benefits which are a material consideration in decision making include the ability of households to integrate with neighbours over a longer period before purchasing the property; the ability to renew tenancies; and swapping with other tenants at the time of purchase which offers flexibility to those not ready to purchase at the previously envisaged date.

- 6.20 As noted in **Sections 4** and **5**, upon the sale of each Rentplus property a Memorandum of Understanding, where agreed with each individual LA, will set out the basis for the replacement of those units on a one-for-one basis in that local authority area. Other forms of affordable tenure result in a loss of housing stock, such as with shared ownership in which households can 'staircase out'; where a LA has agreed a MoU, the Rentplus model would secure the replacement of units in accordance with the terms of the MoU in order to continue meeting local needs over the longer term through continued housing stock replenishment. This is an important consideration at a time when Right to Buy is being further encouraged, and established rented tenures no longer have permanence.
- 6.21 The availability of funding for the product also makes this model potentially attractive on stalled developments where this model could improve scheme viability. As the model has readily available private funding, it is also easily translated to high volume output which could assist in areas of particular need or where housing land supply could benefit from being boosted.

Conclusions and Recommendations

- 6.22 There is a significant shortfall in affordable housing nationwide and the availability of grant funding has steadily declined over the past decade. The Rentplus product has a wide pool of prospective households for whom saving towards a home purchase is not currently possible due to falling outside eligibility for current affordable housing stock. The private rented sector offers no security, and security of tenure for traditional affordable housing looks likely to be removed by changes in the Housing Bill. The fixed period of tenancy at affordable rents in Rentplus dwellings before the point of purchase offers a significant benefit to households who will have the ability to save for a deposit - on the home they have rented - for the first time. Rentplus homes will be excluded from Pay to Stay policy, offering further certainty to those households wishing to save for home ownership.
- 6.23 Rentplus therefore offers a new product to those households whose needs are not already met by the market, whilst also diversifying local housing stock and contributing to the development of mixed and balanced communities.
- 6.24 In order for Local Planning Authorities to enable those households for whom access to social rented housing is not suitable, and whose needs are not otherwise met by affordable and intermediate tenures to enter the housing market it may be necessary to review affordable housing policies in the Local Plan, or to consider revising model conditions and clauses for S106 agreements.

6.25 The Government has pledged to significantly raise the numbers of affordable homes being delivered during this Parliamentary session, and to meet the diverse needs of those in need. This includes a significant drive towards meeting families' aspirations to home ownership. The Autumn Statement included a commitment to remove constraints that prevent private sector organisations from delivering affordable homes to deliver this promise. CLG has had its housing budget doubled and will over the period of this Parliament be focused on the delivery of at least 400,000 affordable homes, including 10,000 Rent to Buy homes. As supported by the Government, the Rentplus model would make a valuable, NPPF-compliant contribution towards significantly boosting housing supply, and most importantly in meeting need for affordable housing without further recourse to public funding.

Comment

Consultee Leigh (873983)

Email Address

Company / Organisation Beetley Parish Council

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Beetley Parish Council (Leigh)

Comment ID 107

Response Date 26/09/17 18:05

Consultation Point Map .2 Beetley Settlement Boundary ([View](#))

Status Processed

Submission Type Web

Version 0.4

Do you consider the Pre-Submission Publication to be: . Unsound (You think the document needs changing)

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan positively prepared?
. Is the plan justified?
. Is the plan effective?

Have you raised this issue before during previous consultations? (Please tick the appropriate box) . Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)
. Yes at Preferred Directions Stage (January - February 2016)
. Yes at Issues and Options Stage (November 2014 - January 2015)

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

The Parish Council has consistently requested that the settlement boundary be amended to incorporate a parcel of land that the Parish Council considers is suitable for development. The consultations have requested that sites were considered so why were the Parish Council not listened to. Members attended meetings and discussions concerning this and were informed that this site was reasonable. The Parish Council also feels that the restriction to 5 houses which is now lower than originally does not facilitate

satisfactory development of the site. Any development along the Fakenham Road could be designed to maintain the street scene at this point. There has been infill along Fakenham Road to the south of this parcel of land and this would be no more of an intrusion than the 8 houses built previously.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

. Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment

Consultee	Leigh (873985)
Email Address	
Company / Organisation	Litcham Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Litcham Parish Council (Leigh)
Comment ID	108
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Status	Processed
Submission Type	Web
Version	0.3
Do you consider the Pre-Submission Publication to be:	<input checked="" type="radio"/> Sound (You support the document)
If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).	
Have you raised this issue before during previous consultations? (Please tick the appropriate box)	<input checked="" type="checkbox"/> Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)
If you feel that the plan is sound, please tell us why.	
	The Parish Council accepts the document and the provision of 22 houses over the period of the plan.
Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?	<input checked="" type="checkbox"/> Yes, my representation can be satisfactorily dealt with by written representations
Do you wish to be:	<input checked="" type="checkbox"/> Notified of the Submission

- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

**Breckland Local Plan Pre-Submission Publication
Representation Form**

This form should be used to make representations on the soundness of the Breckland Local Plan Pre-Submission Publication only.

An interactive version of the Breckland Local Plan Pre-Submission Publication is available on the Council's consultation website: <http://consult.breckland.gov.uk>. Instructions on how to enter representations are provided on the website. This is the Council's preferred method of receiving representations as it will help us to handle your representation quickly and efficiently.

If you are unable to use the online system you may submit representations using this form. Further copies can be downloaded from the Council's website: www.breckland.gov.uk/pre-submission-publication or the form can be photocopied.

This form is in two parts and has four pages. Part 1 covers your contact details and Part 2 covers your representation. **Please use a separate form for each representation you make.**

Please return by 4pm on Monday 2nd October 2017. Late representations cannot be considered. Return by e-mail to planningpolicyteam@breckland.gov.uk or by post to Planning Policy, Breckland Council, Elizabeth House, Walpole Loke, Dereham, Norfolk, NR19 1EE.

Part 1: Your Contact Details

Name:	
Mr A Presslee	
Organisation:	
Cornerstone Planning Ltd	
Address:	
Post code:	Telephone:
E-mail:	

If you have appointed someone to act as your agent please give their name and contact details.	
Name:	
Organisation:	
Address:	
Post code:	Telephone:
E-mail:	

Part 2: Your Representation (please use a separate form for each representation)

1. Do you consider the Pre-submission Publication to be: (Please tick the appropriate box)

Sound (You support the document)	
Unsound (You think the document needs changing)	x

2. On which part of the document do you wish to make a representation?

Policy	
Paragraph	Paragraph 3.228 (Great Ellingham)
Site	
Proposals Map	
Settlement Boundary	Map 3.7 Great Ellingham
Other	

If you consider the document to be **SOUND**, please go to question 7.

3. If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).

Legal Tests	
Is the plan legally compliant?	
Soundness Tests	
Is the plan positively prepared?	
Is the plan justified?	
Is the plan effective?	x
Is the plan consistent with national policy?	

4. Have you raised this issue before during previous consultations? (Please tick the appropriate box)

Yes at Preferred Site Options and Settlement Boundaries Stage (September to October 2016)	
Yes at Preferred Directions Stage (January - February 2016)	
Yes at Issues and Options Stage (November 2014 - January 2015)	

5. If you have not raised this issue before please use the following box to explain why.

The errors do not arise in previous iterations

6. If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound. (Please attach extra sheets if necessary)

Paragaraph 3.228 - The reference to "including 75 with decision to grant subject to a Section 106 legal agreement" should be deleted. The Planning permission (ref. 3PL/2016/0648/O) has been issued.

Map 3.7 (Great Ellingham) There is a drafting error in the settlement boundary. Assuming it is intended to include sites with planning permission within the boundary, then there is an error in excluding part of the Mellor Metals site, for which outline planning permission has been granted (ref. 3PL/2016/0648/O). A copy of Map 3.7 altered to show the correct boundary line is attached, together with the approved site location plan for reference.

7. If you feel that the plan is sound, please tell us why.