

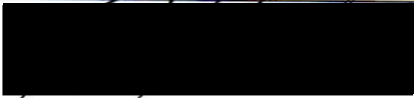
8. Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? (Please tick appropriate box)

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.

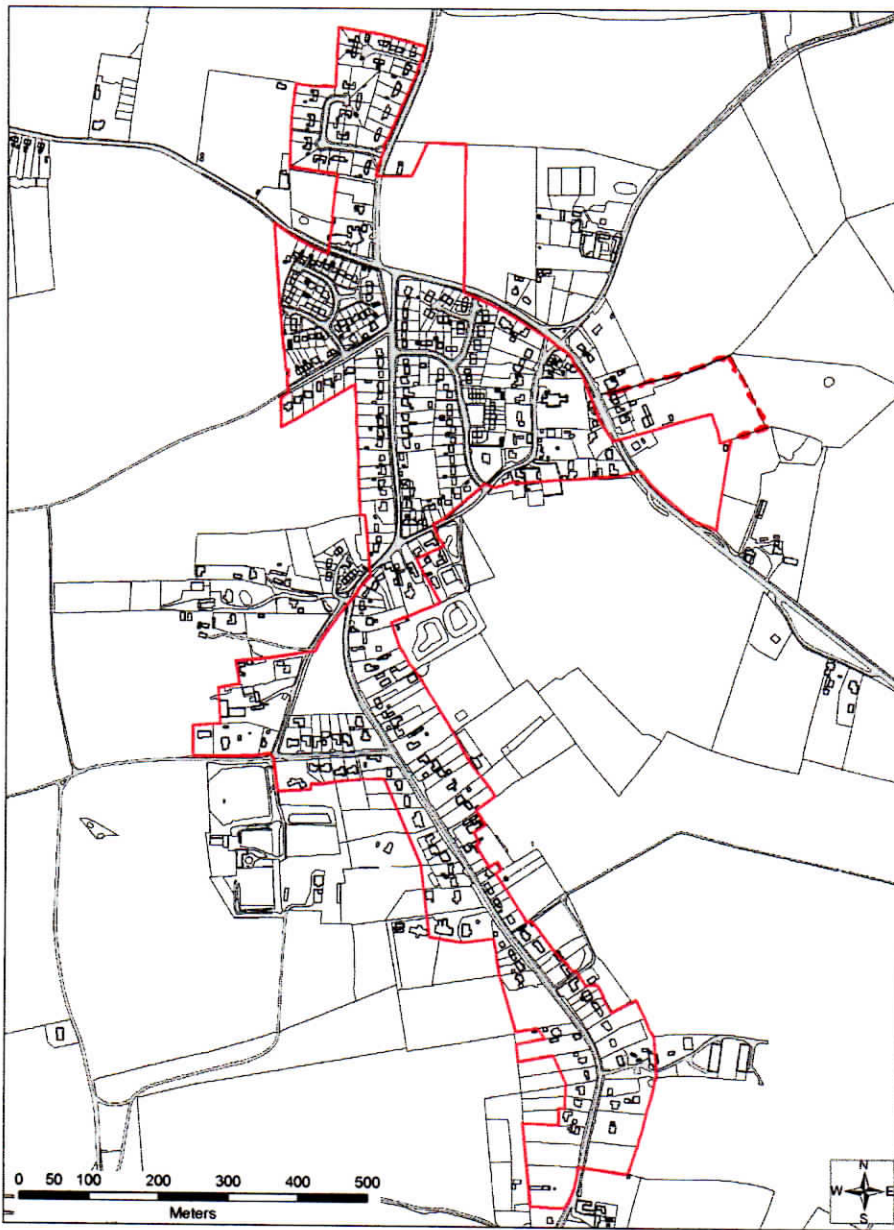
10. Do you wish to be: (Please tick appropriate boxes)

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

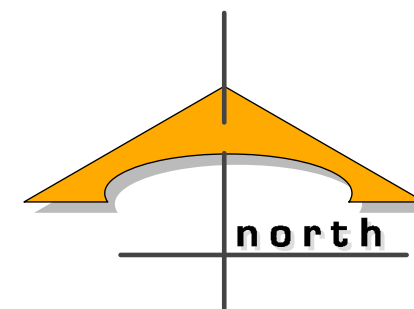
Declaration: I understand that the details included on this form will be available in the public domain. (please tick box)	
Signature: 	Date: 26.09.17

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Map 3.7 Great Ellingham Settlement Boundary



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REV B: 16/05/16: Planning Application Site Line Amended

REV A: 04/05/16: Planning Application Site Line Amended



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Tel 01603 666151 - Fax 01603 621476
info@camarchitects.co.uk - www.camarchitects.co.uk

Client
Mellor Metals Ltd

Project Details
New Residential Development

Project Address
**New Residential Development
Attleborough Rd
GREAT ELLINGHAM**

Drawing Title
Site Location Plan

Job No. 1394	Drawing Number 1394-A-PL01
Date 16-05-16	Scale 1:500 @A3
Drawn EA	Checked EA
	CSO Date B

Comment

Consultee Jarl Barnes (1129327)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Jarl Barnes

Comment ID 110

Response Date 27/09/17 13:01

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

Status Processed

Submission Type Letter

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?
 . 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.

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Land to the west of EtlingView (LPJ025J007)

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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.

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

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 DCO1.

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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 Inspectors Recommendations**

Comment

Consultee	Debbie Dingor (1129331)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Debbie Dingor
Comment ID	111
Response Date	27/09/17 13:14
Consultation Point	Dereham Housing Allocation 1 (View)
Status	Processed
Submission Type	Letter
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).

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- . Is the plan justified?
- . Is the plan effective?
- . Is the plan consistent with national policy?

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

Do you wish to be:

Notified of the Inspectors Recommendations

Comment

Consultee	Andy Carr (1129340)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Andy Carr
Comment ID	113
Response Date	27/09/17 13:19
Consultation Point	Dereham Housing Allocation 1 (View)
Status	Processed
Submission Type	Letter
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?

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Do you wish to be:

Notified of the Submission

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

Comment

Consultee	Sonia Meacher (1129345)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Sonia Meacher
Comment ID	114
Response Date	27/09/17 13:24
Consultation Point	Dereham Housing Allocation 1 (View)
Status	Processed
Submission Type	Letter
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?
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Have you raised this issue before during previous consultations? (Please tick the appropriate box)

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Do you wish to be:

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<p>Breckland Local Plan Pre-Submission Publication Representation Form</p>

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: Jane Whitehead	
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)
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.

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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	
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)	x
Signature:	Date: 15/9/17

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	Chloe Green (1129352)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Chloe Green
Comment ID	116
Response Date	27/09/17 13:28
Consultation Point	Dereham Housing Allocation 1 (View)
Status	Processed
Submission Type	Letter
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?
. 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 had understood that Breckland Capita would be taking account of both the unprecedented number of written objections already made (400+) for a current proposal on this site and the numerous technical challenges presented by this site- It is clear that in recommending it they have done neither!!!!!!

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.

Land to the west of EtlingView (LPj025]007

The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock/grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate. Many of the 400+ local

objectors to the current scheme proposed for the land have outlined the visual, landscape and amenity 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 small 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 both the existing and proposed 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.

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

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 DCO1.

The fields traditionally flood- it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that because the adjoining Shillings Lane is lower that flooding of the lane once a rare occurrence now occurs frequently. Development as proposed will further increase this flooding. 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 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.

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 Inspectors Recommendations**

Comment

Agent Mrs Erica Whettingsteel (598312)

Email Address

Company / Organisation EJW Planning Ltd

Address

Consultee Mrs Erica Whettingsteel (609986)

Email Address

Company / Organisation EJW Planning Ltd

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by EJW Planning Ltd (Mrs Erica Whettingsteel)

Comment ID 117

Response Date 27/09/17 13:40

Consultation Point Policy GEN 05 Settlement Boundaries ([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).

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.

It is an issue relevant to the wording of this version of the plan only

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.

Policy GEN 05 confirms that proposals for new development within settlement boundaries will be acceptable in principle subject to compliance with National and other Local Plan policies. It is suggested that the word 'relevant' should replace 'other' as the use of the word 'other' could mean that policies that were not relevant to a particular form of development would have to be complied with.

It is noted that development outside of settlement boundaries is restricted unless one or more of a list of other policies is complied with. This list makes reference to Policy HOU 13 Agricultural Workers Exceptions. The use of the phrase 'Agricultural Worker' is a term derived from former Planning Policy Guidance (most recently PPS7) the NPPF recognises the wider definition of 'Rural Worker' to describe the essential needs of rural workers to live permanently at or near their place of work in the countryside (see paragraph first bullet point).

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

Agent Mrs Erica Whettingsteel (598312)

Email Address

Company / Organisation EJW Planning Ltd

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Consultee Mrs Erica Whettingsteel (609986)

Email Address

Company / Organisation EJW Planning Ltd

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Event Name Local Plan Pre-Submission Publication Document

Comment by EJW Planning Ltd (Mrs Erica Whettingsteel)

Comment ID 118

Response Date 27/09/17 13:42

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 consistent with national policy?

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 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 policy is unsound as it is not consistent with national policy as it restricts growth within the rural areas. Breckland is a predominantly rural area and its Local Plan policies need to recognise this with a better distribution of growth across the District.

The NPPF seeks to support a prosperous rural economy and acknowledges the need to promote development in rural areas by 'locating housing where it will enhance or maintain the vitality of rural communities'.

Paragraph 14 of the NPPF makes it clear that 'local planning authorities should meet objectively assessed needs with sufficient flexibility to adapt to rapid change, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits'.

The policy as drafted does not allow for the flexibility required to deliver growth elsewhere, if one, or other of the proposed SUE's are, for any reasons delayed in coming forward. It also puts significant pressure on the market towns to deliver more than a quarter of the total housing growth in the District.

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

Agent	Mrs Erica Whettingsteel (598312)
Email Address	
Company / Organisation	EJW Planning Ltd
Address	
Consultee	Mrs Erica Whettingsteel (609986)
Email Address	
Company / Organisation	EJW Planning Ltd
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	EJW Planning Ltd (Mrs Erica Whettingsteel)
Comment ID	119
Response Date	27/09/17 13:44
Consultation Point	Policy HOU 03 Development Outside of the Boundaries of Local Service Centres (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 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)

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.

Policy HOU 03 provides for circumstances where the Local Plan has not identified sufficient sites to achieve the Council's house target. It sets out a range of criteria, all of which must be met in order for further development to be supported:

These criteria are too prescriptive, particularly bullet point (2) which limits the number of dwellings to be provided.

This does not take account of the opportunities that larger brownfield sites outside of settlement boundaries may provide in delivering a greater increase in housing numbers.

The policy is therefore unsound as it does not accord with the NPPF's objective for 'Boosting significantly the supply of housing' (paragraph 47) or encouraging the development of brownfield sites in preference to greenfield sites.

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	Maeve McBride (1129365)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Maeve McBride
Comment ID	120
Response Date	27/09/17 13:31
Consultation Point	Dereham Housing Allocation 1 (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 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)

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 written objections already made (400+) for a current proposal on this site and the numerous technical challenges presented by this site- It is clear that in recommending it they have done neither!!!!!!

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.

Land to the west of EtlingView (LPj025]007

The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock/grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate. Many of the 400+ local objectors to the current scheme proposed for the land have outlined the visual, landscape and amenity

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 small 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 both the existing and proposed 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.

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

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 DCO1.

The fields traditionally flood- it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that because the adjoining Shillings Lane is lower that flooding of the lane once a rare occurrence now occurs frequently. Development as proposed will further increase this flooding. 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 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.

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 Inspectors Recommendations

Comment

Agent Mrs Erica Whettingsteel (598312)

Email Address

Company / Organisation EJW Planning Ltd

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Consultee Mrs Erica Whettingsteel (609986)

Email Address

Company / Organisation EJW Planning Ltd

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Event Name Local Plan Pre-Submission Publication Document

Comment by EJW Planning Ltd (Mrs Erica Whettingsteel)

Comment ID 121

Response Date 27/09/17 13:46

Consultation Point Policy HOU 04 - Rural Settlements With Boundaries
([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 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.

The wording of the draft policy has changed

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 listed criteria are too prescriptive, particularly bullet points (1) and (2) which limit the number of dwellings to be provided.

This does not take account of larger brownfield sites outside of settlement boundaries coming forward that may provide for a greater increase in housing numbers. The housing number limit would affect the viability of redeveloping brownfield sites which often have greater development costs.

The policy is therefore unsound as it does not accord with the NPPF's objective for 'Boosting significantly the supply of housing' (paragraph 47) or Paragraph 17 that encourages the development of brownfield sites in preference to greenfield sites.

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

Agent Mrs Erica Whettingsteel (598312)

Email Address

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Consultee Mrs Erica Whettingsteel (609986)

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Event Name Local Plan Pre-Submission Publication Document

Comment by EJW Planning Ltd (Mrs Erica Whettingsteel)

Comment ID 122

Response Date 27/09/17 13:47

Consultation Point Policy HOU 05 - Small Villages and Hamlets Outside of Settlement Boundaries ([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 positively prepared?

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 wording of the policy has changed

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 criteria as drafted, are too restrictive, particularly bullet point (3) that requires the applicant to demonstrate the appropriate support of the Parish Council. Whilst the use of the word 'appropriate' indicates that any support must be for planning reasons, or other material considerations, a lack of support may actually be for reasons other than those related to planning issues. The inclusion of bullet point 3 is therefore unsound and unreasonable as it is a test that the applicant is not necessarily able to meet.

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

Agent Mrs Erica Whettingsteel (598312)

Email Address

Company / Organisation EJW Planning Ltd

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Consultee Mrs Erica Whettingsteel (609986)

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Company / Organisation EJW Planning Ltd

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Event Name Local Plan Pre-Submission Publication Document

Comment by EJW Planning Ltd (Mrs Erica Whettingsteel)

Comment ID 123

Response Date 27/09/17 13:50

Consultation Point Policy HOU 07 - Affordable Housing ([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 consistent with national policy?

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.

The Policy requires affordable housing to be distributed across developments as single units or small clusters, rather than in a single area.

More precision is needed and therefore a definition of 'small clusters' is required. This would be better dealt with stating the size of the anticipated clusters; for example 'clusters of no greater than 10-15 units'.

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

Agent Mrs Erica Whettingsteel (598312)

Email Address

Company / Organisation EJW Planning Ltd

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Consultee Mrs Erica Whettingsteel (609986)

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Company / Organisation EJW Planning Ltd

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Event Name Local Plan Pre-Submission Publication Document

Comment by EJW Planning Ltd (Mrs Erica Whettingsteel)

Comment ID 125

Response Date 27/09/17 13:53

Consultation Point Policy HOU 12 - Conversion of Buildings in the Countryside ([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 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.

Not seen a draft of this policy previously

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.

Policy HOU12 permits the re-use of appropriately located and constructed buildings in the countryside for economic purposes, and their re-use for residential purposes where a commercial use has been shown not to be viable. In addition it indicates that the residential re-use of modern agricultural or industrial buildings of no aesthetic value, regardless of their location will not be considered appropriate.

The wording of this policy has not changed significantly from that set out in the adopted Policy CP20.

It does not therefore accord with the NPPF, which takes a more positive approach to the conversion and redevelopment for residential purposes of all redundant, or disused buildings regardless of their age, type of construction, or previous use.

The policy as drafted is therefore unsound as it does not accord with more up-to-date policies and guidance provided by the NPPF and NPPG.

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

Agent Mrs Erica Whettingsteel (598312)

Email Address

Company / Organisation EJW Planning Ltd

Address

Consultee Mrs Erica Whettingsteel (609986)

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Company / Organisation EJW Planning Ltd

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Event Name Local Plan Pre-Submission Publication Document

Comment by EJW Planning Ltd (Mrs Erica Whettingsteel)

Comment ID 126

Response Date 27/09/17 13:54

Consultation Point Policy HOU 13 - Agricultural Workers Exceptions
([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 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.

Not previously seen draft of this 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.

Policy HOU 13 permits the development of permanent dwellings in the countryside for full-time workers in a range of rural activities

The title of this policy should be substituted for 'Rural Workers Exceptions' or 'Essential Worker Dwellings' to reflect the wider definition described in the policy and to accord with wording used in Paragraph 55 of the NPPF.

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

. No, my representations can only be suitably dealt with by appearing at the Examination in Public

Do you wish to be:

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

Comment

Agent Mrs Erica Whettingsteel (598312)

Email Address

Company / Organisation EJW Planning Ltd

Address

Consultee Mrs Erica Whettingsteel (609986)

Email Address

Company / Organisation EJW Planning Ltd

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by EJW Planning Ltd (Mrs Erica Whettingsteel)

Comment ID 127

Response Date 27/09/17 13:56

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

Status Processed

Submission Type Web

Version 0.2

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.

The site is located to the east of Saham Road immediately north of the built up area of Watton. There is existing residential development to the south. Land to the north and east in agricultural use. An existing footway extends from the town centre as far as Richmond Golf Club on the western side of Saham Road. The site is within walking and cycling distance of the town centre where there is a comprehensive range of services and facilities, and is well located for bus stops from where there are services to Norwich, Kings Lynn, Dereham and Thetford. The site is therefore highly sustainable in terms of its location.

The site could be developed on its own or in conjunction with the adjoining site LP(104)019 which would allow for the development of at least 160 dwellings.

Site LP(104)008 is achievable, deliverable and available now. The site is privately owned and there are no known constraints to its development. It is considered that the site is able to contribute to the future housing needs of Watton in the short term, bring direct and indirect benefits to the local economy consistent with the aims of supporting the economic growth of the wider area.

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 K Powles (1129385)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by K Powles

Comment ID 128

Response Date 27/09/17 13:52

Consultation Point Dereham Housing Allocation 1 ([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 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)

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 written objections already made (400+) for a current proposal on this site and the numerous technical challenges presented by this site- It is clear that in recommending it they have done neither!!!!!!

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.

Land to the west of EtlingView (LPJ025J007)

The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock/grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate. Many of the 400+ local

objectors to the current scheme proposed for the land have outlined the visual, landscape and amenity 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 small 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 both the existing and proposed 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.

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

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 DCO1.

The fields traditionally flood- it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that because the adjoining Shillings Lane is lower that flooding of the lane once a rare occurrence now occurs frequently. Development as proposed will further increase this flooding. 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.

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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 Inspectors Recommendations**

Comment

Agent Mrs Erica Whettingsteel (598312)

Email Address

Company / Organisation EJW Planning Ltd

Address

Consultee Mrs Erica Whettingsteel (609986)

Email Address

Company / Organisation EJW Planning Ltd

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by EJW Planning Ltd (Mrs Erica Whettingsteel)

Comment ID 129

Response Date 27/09/17 13:59

Consultation Point Necton Housing Allocation 3 ([View](#))

Status Processed

Submission Type Web

Version 0.2

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)

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

The site LP(067)011 as identified in emerging Local Plan is accessed from Pickenham Road and extends to the rear of existing residential development of Masons Drive. A parcel of land at the front of the site currently owned and operated by Necton Management Limited as a builders yard and offices is excluded. The allocation should be extended to include this land as Necton Management Limited has the potential to relocate their business to an alternative location to the south of the village away from the residential areas. This would enable the entire site to be redeveloped for residential use, which would benefit the residential amenity existing and proposed occupiers in the area.

This site provides a highly sustainable location for residential development being close to local shops and services within Necton and adjoining existing residential development and would make a logical extension to the village.

The site comprises previously developed land is relatively flat and well screened by mature trees. Access can be readily achieved from North Pickenham Road. The site is owned by a local house builder, and there are no known constraints to its development.

It is suitable, available and achievable and as such meets the requirements of the NPPF to demonstrate that the site is deliverable within the next five years.

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

Agent Mrs Erica Whettingsteel (598312)

Email Address

Company / Organisation EJW Planning Ltd

Address

Consultee Mrs Erica Whettingsteel (609986)

Email Address

Company / Organisation EJW Planning Ltd

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by EJW Planning Ltd (Mrs Erica Whettingsteel)

Comment ID 130

Response Date 27/09/17 14:01

Consultation Point Shipdham Residential Allocation 2 ([View](#))

Status Processed

Submission Type Web

Version 0.2

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.

The land west of Brick Kiln Lane (LP (085)006) lies to the east of and wraps around land north of Chapel Street that benefits from planning permission for 90 dwellings. The site would act as a logical extension to that development. The site is located at the centre of the village close to existing and proposed shops and services and is accessible to the local school, doctors' surgery and local bus services. The site is therefore in a very sustainable, location in term of its location within Shipdham. The impact of development of the site on open countryside to the east will be limited by maturing hedgerow and trees planted adjacent to Brick Kiln Lane. The development would be partially visible from a limited number of locations to the north but would be seen in the context of existing development.

The site has the potential to deliver at least 55 additional dwellings. The site is achievable, deliverable and available now. The site is privately owned and there are no known constraints to its development. It is considered that the site is able to contribute to the future housing needs of the village in the short term, bring direct and indirect benefits to the local economy consistent with the aims of supporting the economic growth of the area.

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	Michelle Hoskins (1129398)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Michelle Hoskins
Comment ID	131
Response Date	27/09/17 14:09
Consultation Point	Dereham Housing Allocation 1 (View)
Status	Processed
Submission Type	Letter
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?
. 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 had understood that Breckland Capita would be taking account of both the unprecedented number of written objections already made (400+) for a current proposal on this site and the numerous technical challenges presented by this site- It is clear that in recommending it they have done neither!!!!!!

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.

Land to the west of EtlingView (LPj025]007

The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock/grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate. Many of the 400+ local

objectors to the current scheme proposed for the land have outlined the visual, landscape and amenity 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 small 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 both the existing and proposed 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.

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

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 DCO1.

The fields traditionally flood- it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that because the adjoining Shillings Lane is lower that flooding of the lane once a rare occurrence now occurs frequently. Development as proposed will further increase this flooding. 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.

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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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Comment

Consultee	Keith Francis (1129403)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Keith Francis
Comment ID	132
Response Date	27/09/17 14:11
Consultation Point	Dereham Housing Allocation 1 (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 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)

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Land to the west of EtlingView (LPj025]007

The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock/grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate. Many of the 400+ local

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Do you wish to be:

. **Notified of the Inspectors Recommendations**

Comment

Consultee Jackie Francis (1129409)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Jackie Francis

Comment ID 133

Response Date 27/09/17 14:14

Consultation Point Dereham Housing Allocation 1 ([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 positively prepared?
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Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

. **Notified of the Inspectors Recommendations**

Comment

Consultee	Mr H Wilcox (1129414)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Mr H Wilcox
Comment ID	134
Response Date	27/09/17 14:18
Consultation Point	Dereham Housing Allocation 1 (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 positively prepared?
- . Is the plan justified?
- . Is the plan effective?
- . Is the plan consistent with national policy?

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Do you wish to be:

. Notified of the Submission

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

Comment

Consultee	A Pendergrest (1129420)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	A Pendergrest
Comment ID	135
Response Date	27/09/17 14:20
Consultation Point	Dereham Housing Allocation 1 (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 positively prepared?
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Do you wish to be:

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

Comment

Consultee Mr Hollett (1129423)
Email Address
Address

Event Name Local Plan Pre-Submission Publication Document
Comment by Mr Hollett
Comment ID 136
Response Date 27/09/17 14:23
Consultation Point Dereham Housing Allocation 1 ([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 positively prepared?
. Is the plan justified?
. Is the plan effective?
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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.

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

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Do you wish to be:

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

Comment

Consultee	Edwin Atkinson (1129426)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Edwin Atkinson
Comment ID	137
Response Date	27/09/17 14:25
Consultation Point	Dereham Housing Allocation 1 (View)
Status	Processed
Submission Type	Letter
Version	0.3

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Notified of the Submission

- . Notified of the Inspectors Recommendations
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Part 1: Your Contact Details

Name: <u>MR TREVOR WARD</u>	
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
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)	
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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.**

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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)	
Signature: _____	Date: 14 SEP 17

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Part 1: Your Contact Details

Name: <u>D. M. WARD</u>	
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:	

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Proposals Map	
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Comment

Consultee	Emily Makcrow (1129464)
Address	32 Moorgate Road Dereham NR19 1NT
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Emily Makcrow
Comment ID	140
Response Date	27/09/17 14:52
Consultation Point	Dereham Housing Allocation 1 (View)
Status	Processed
Submission Type	Letter
Version	0.3

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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 DCO1.

The fields traditionally flood- it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that because the adjoining Shillings Lane is lower that flooding of the lane once a rare occurrence now occurs frequently. Development as proposed will further increase this flooding. 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.

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

Do you wish to be:

Notified of the Inspectors Recommendations

Officer Response

History of the site in the Local Plan

The site, LP[025]007, known as 'Land to the west of Etling View', was identified as a 'reasonable alternative' during the Emerging Site Options consultation. The site was then considered to be a proposed allocation through the Preferred Sites and Settlement Boundaries consultation. During these consultations no significant objections were raised by any of the statutory consultees. The site's inclusion within the Local Plan is supported and underpinned by a range of evidence including, but not exclusive to: the Historic Characterisation Study, the Sequential Test, the Water Cycle Study and the Infrastructure Delivery Plan.

The site is now subject to a planning application (3PL/2015/1045/O), which is still under consideration. However, through this further detailed comments have been provided.

Landscape & Natural Environment

The site adjoins Neatherd Moor Common to the west, which is designated both as a County Wildlife Site and as Natural/Semi –natural green space. The Breckland District Settlement Fringe Landscape Assessment defines the character area as the Northall Green Open Arable Plateau, which is of Moderate-High sensitivity. The Assessment states that, as part of the general landscape management plan, Neatherd Moor must be conserved and enhanced through appropriate landscape management including grazing.

The proposed allocation would extend the built up area of the town north and the appearance of the site would change from open farmland to a built up housing area. However, the scheme would largely be contained visually by the adjacent built environment to the south and east and the existing boundary hedging/trees and woodland to the north and west. From the County Wildlife Site, the Neatherd and Shillings Lane to the east, the proposal would be screened during part of the year by existing mature landscaping along Shillings Lane and the northern boundary of the site. When seen within the autumn, winter and early spring months the proposed buildings would be seen adjacent to the existing buildings to the east and would bring the built form closer to Shillings Lane and the Neatherd. The proposal would transform and erode the open aspect of the neighbouring dwellings immediately to the south of the site. However, this would be localised and could be mitigated through landscaping and additional planting. The policy wording of the allocation seeks the 'Retention and enhancement of native hedgerows and trees on the outer edge of the site boundary'. This would seek to mitigate the impact. The proposal seeks at least 60 dwellings on a 2.3 hectare site, which would provide a density of approximately 26 dwellings per hectare; this would be in keeping with the neighbouring dwellings. Natural England have commented on the Pre-submission Publication and raised no objections. It is therefore considered that the impact upon the landscape and natural environment would not be significant.

Through the application, the Public Rights of Way officer raised no objection as long as long as there is no adverse impact on either the registered common land to the west or Restricted Byway (RB32) along the northern boundary of the site. The allocation itself seeks to respect the northern boundary of the site by being set back from Shillings Lane.

Historic Character

During the Preferred sites and Settlement Boundaries consultation, Historic England commented that further work should be carried out to assess the impact of preferred and alternative sites upon the Historic Environment. The Historic Characterisation Study was carried out in early 2017 and in relation to site LP[025]007, concluded that: *"Development proposals must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken so as to inform an appropriate design response. In this case the established pattern of adjacent mixed development will be an additional factor in the formation of the proposal."*

On the planning application itself NCC Historic Environment Service commented that the proposal does not have any implications for the historic environment and that no recommendations for archaeological work would be made.

Flood Risk

The SA highlighted that the site is situated within an area of flood risk. However, this is only a very small extent to the north and north east. Through the Preferred Sites and Settlement Boundaries consultation the Lead Local Flood Authority recommended that conditions are attached to any planning permission granted under the current planning application. At this stage the Lead Local Flood Authority commented on the site specifically stating: *"We welcome that the site has been reduced in its extent from the original allocation and now does not include areas at risk of flooding from surface water. An assessment of the actual risk of flooding should be undertaken by any development on this site."*

Following the Preferred Sites and Settlement Boundaries Consultation the Sequential Test looked at all defined as 'preferred' or 'alternative'. As part of this the extent of surface water flooding on the site was not considered to be substantial, with only approximately 2% of the site subject to surface water flooding.

Through the planning application the Environment Agency and the Lead Local Flood Authority have raised no objections to the proposed development subject to conditions.

Wastewater treatment

As part of the evidence base underpinning the Local Plan a Water Cycle Study was carried out. As part of this study it was highlighted that improvements may be required to the treatment capacity. The study recommends that all applications for development proposals in Dereham are accompanied by a pre-development enquiry with Anglian Water Services to demonstrate that sufficient capacity is available to treat wastewater from the proposals. This wording has been added to the key development considerations within the allocation wording.

Conclusion

In conclusion it is considered that the site represents a sustainable site on the edge of one of five Market Towns within the district. There are no constraints that would be considered severe enough to affect the designation of the site.

Comment

Consultee	John Dawson (1129622)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	John Dawson
Comment ID	141
Response Date	27/09/17 07:46
Consultation Point	Dereham Housing Allocation 1 (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 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)

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objectors to the current scheme proposed for the land have outlined the visual, landscape and amenity 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 small 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 both the existing and proposed 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.

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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 Inspectors Recommendations**

**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: Danny Rae	
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
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.

I had understood that Breckland Capita would be taking account of both the unprecedented number of written objections already made (400+) for a current proposal on this site and the numerous technical challenges presented by this site- It is clear that in recommending it they have done neither!!!!!!

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)

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Many of the 400+ local objectors to the current scheme proposed for the land have outlined the visual, landscape and amenity 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 small 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 both the existing and proposed 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.

It is clear that most harm will be caused by developing the smaller paddock field In order for the plan to even approach being sound this field should not be developed in any way.

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-**

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.**

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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	
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)	x ✓
Signature:	Date: 22.9.2017

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	Kevin Green (1129659)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Kevin Green
Comment ID	143
Response Date	27/09/17 09:12
Consultation Point	Dereham Housing Allocation 1 (View)
Status	Processed
Submission Type	Letter
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?
- . Is the plan consistent with national policy?

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

Do you wish to be:

Notified of the Inspectors Recommendations

Comment

Consultee Beverley Hatherall (1129664)
Email Address
Address

Event Name Local Plan Pre-Submission Publication Document
Comment by Beverley Hatherall
Comment ID 144
Response Date 27/09/17 09:16
Consultation Point Dereham Housing Allocation 1 ([View](#))
Status Processed
Submission Type Letter
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?
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Do you wish to be:

. Notified of the Inspectors Recommendations

Comment

Consultee	Paul Sandford (1129669)
Email Address	
Company / Organisation	Railway Tavern
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Railway Tavern (Paul Sandford)
Comment ID	145
Response Date	27/09/17 09:21
Consultation Point	Dereham Housing Allocation 1 (View)
Status	Processed
Submission Type	Letter
Version	0.3

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Land to the west of EtlingView (LPj025j007

The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock/grazing land. On the edge

of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate. Many of the 400+ local objectors to the current scheme proposed for the land have outlined the visual, landscape and amenity 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 small 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 both the existing and proposed 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.

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

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 DCO1.

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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.

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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.

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 Inspectors Recommendations**

Comment

Consultee	Shaun Small (1129674)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Shaun Small
Comment ID	146
Response Date	27/09/17 09:26
Consultation Point	Dereham Housing Allocation 1 (View)
Status	Processed
Submission Type	Letter
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?
- . Is the plan consistent with national policy?

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

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Notified of the Inspectors Recommendations

Comment

Consultee	Huw David (1129685)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Huw David
Comment ID	147
Response Date	27/09/17 09:29
Consultation Point	Dereham Housing Allocation 1 (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 positively prepared?
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Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

Notified of the Inspectors Recommendations

Comment

Consultee	B Bird (1129687)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	B Bird
Comment ID	148
Response Date	27/09/17 09:43
Consultation Point	Dereham Housing Allocation 1 (View)
Status	Processed
Submission Type	Letter
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).

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Do you wish to be:

Notified of the Submission

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

Comment

Consultee	J Bird (1129689)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	J Bird
Comment ID	149
Response Date	27/09/17 09:45
Consultation Point	Dereham Housing Allocation 1 (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 positively prepared?
- . Is the plan justified?
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Do you wish to be:

Notified of the Submission

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

Comment

Consultee	Gemma Gilding (1129694)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Gemma Gilding
Comment ID	150
Response Date	27/09/17 09:52
Consultation Point	Dereham Housing Allocation 1 (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).

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Do you wish to be:

Notified of the Inspectors Recommendations

Comment

Consultee	Mrs Emma Reeve (1129696)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Mrs Emma Reeve
Comment ID	151
Response Date	27/09/17 09:55
Consultation Point	Dereham Housing Allocation 1 (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)

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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 DCO1.

The fields traditionally flood- it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that because the adjoining Shillings Lane is lower that flooding of the lane once a rare occurrence now occurs frequently. Development as proposed will further increase this flooding. 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.

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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 Inspectors Recommendations

Comment

Consultee	Mr Colin Reeve (1129699)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Mr Colin Reeve
Comment ID	152
Response Date	27/09/17 09:58
Consultation Point	Dereham Housing Allocation 1 (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 positively prepared?
- . Is the plan justified?
- . Is the plan effective?
- . Is the plan consistent with national policy?

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importance of the land together with numerous issues around flooding, degradation of hedgerows loss of wildlife area and concerns from the Police regarding crime.

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Do you wish to be:

Notified of the Inspectors Recommendations

Comment

Consultee Naomi Daghish-Gage (1129702)
Email Address
Address

Event Name Local Plan Pre-Submission Publication Document
Comment by Naomi Daghish-Gage
Comment ID 153
Response Date 27/09/17 10:00
Consultation Point Dereham Housing Allocation 1 ([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)

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Do you wish to be:

. **Notified of the Inspectors Recommendations**

Comment

Consultee	Susan Gilding (1129705)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Susan Gilding
Comment ID	154
Response Date	27/09/17 10:04
Consultation Point	Dereham Housing Allocation 1 (View)
Status	Processed
Submission Type	Letter
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).

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Do you wish to be:

. Notified of the Inspectors Recommendations

Comment

Consultee	Louise Daghish (1129707)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Louise Daghish
Comment ID	155
Response Date	27/09/17 10:07
Consultation Point	Dereham Housing Allocation 1 (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 positively prepared?
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Do you wish to be:

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Comment

Consultee	Stephen Gilding (1129710)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Stephen Gilding
Comment ID	156
Response Date	27/09/17 10:10
Consultation Point	Dereham Housing Allocation 1 (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).

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Notified of the Inspectors Recommendations

Comment

Consultee	Stephen Dean (1129715)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Stephen Dean
Comment ID	157
Response Date	27/09/17 10:19
Consultation Point	Dereham Housing Allocation 1 (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)

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

Do you wish to be:

Notified of the Inspectors Recommendations

k

Comment

Consultee	Teresa Small (1129717)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Teresa Small
Comment ID	158
Response Date	27/09/17 10:22
Consultation Point	Dereham Housing Allocation 1 (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 positively prepared?
. Is the plan justified?
. Is the plan effective?
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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: <i>Stuart Wing</i>	
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
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)	

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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	
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)	x
Signature: _____	Date: 22.9.17

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Part 1: Your Contact Details

Name: <i>Kelly King</i>	
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:	

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

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Paragraph	
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Proposals Map	
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Notified of the Inspectors Recommendations	x
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Comment

Consultee Kirsty-R Hann (1129728)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Kirsty-R Hann

Comment ID 161

Response Date 27/09/17 10:39

Consultation Point Dereham Housing Allocation 1 ([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 positively prepared?
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Do you wish to be:

. **Notified of the Inspectors Recommendations**

Comment

Consultee	Mr R Kingdom (1129734)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Mr R Kingdom
Comment ID	162
Response Date	27/09/17 10:43
Consultation Point	Dereham Housing Allocation 1 (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)

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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 DCO1.

The fields traditionally flood- it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that because the adjoining Shillings Lane is lower that flooding of the lane once a rare occurrence now occurs frequently. Development as proposed will further increase this flooding. 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 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.

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	Albert Harris (1129738)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Albert Harris
Comment ID	163
Response Date	27/09/17 10:46
Consultation Point	Dereham Housing Allocation 1 (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 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)

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 written objections already made (400+) for a current proposal on this site and the numerous technical challenges presented by this site- It is clear that in recommending it they have done neither.

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.

Land to the west of EtlingView (LPj025]007

The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock/grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate. Many of the 400+ local objectors to the current scheme proposed for the land have outlined the visual, landscape and amenity

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 small 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 both the existing and proposed 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.

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

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 DCO1.

The fields traditionally flood- it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that because the adjoining Shillings Lane is lower that flooding of the lane once a rare occurrence now occurs frequently. Development as proposed will further increase this flooding. 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 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.

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 Inspectors Recommendations

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: Douglas McNab	
Organisation: Education and Skills Funding Agency	
Address: Department for Education, 5 th floor Sanctuary Buildings, 20 Great Smith Street, London	
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)	X
Unsound (You think the document needs changing)	

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

Policy	GEN 4 - Development Requirements of Attleborough Strategic Urban Extension; INF 02 Developer Contributions
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?	n/a
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)	n/a
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.

Previously team have not looked and responded to Local Plan consultations.

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)

n/a

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

1. The Education and Skills Funding Agency (ESFA) welcomes the opportunity to contribute to the development of planning policy at the local level. We aim to work closely with local authority education departments and planning authorities to meet the demand for new school places and new schools. In this capacity, we would like to offer the following comments in response to the Local Plan.
2. The ESFA notes that, as highlighted in the Local Plan and supporting draft Infrastructure Delivery Plan (August 2017), there appears to be a good working relationship between Norfolk County Council and the LPA and that planning and delivery of new schools where they are needed to support growth appears to be well progressed. The ESFA notes in particular the progress on planning for schools for in the strategic urban extensions at Thetford and Attleborough, where much of the district's housing growth is focused.
3. The ESFA supports policy GEN 4 which includes a requirement for provision of two new primary schools within the Attleborough SUE area (this is justified based on evidence of the need for school places that will be generated by the development). It is recommended that the size (number of FE) of all proposed new schools is included in the Local Plan to provide greater clarity to all stakeholders, along with a caveat highlighting that requirements could change in future if it were demonstrated and agreed that the site had become surplus to requirements, and is therefore no longer required for school use.
4. The ESFA notes that school planning is already well progressed for the Thetford SUE, with an adopted Area Action Plan in place and a signed s106 agreement allowing for potentially 3 new primary schools.
5. One of the tests of soundness is that a Local Plan is 'effective' i.e. the plan should be deliverable over its period. In this context and with specific regard to planning for schools, there is a need to ensure that education contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments. The ESFA supports policy INF 2 on developer contributions, noting the detailed information on education infrastructure in the draft Infrastructure Delivery Plan and Norfolk County Council's clear, up-to-date guidance on planning obligations for education.

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.

n/a

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: Douglas McNab	Date: 27/9/17

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

Agent Mr Michael Hendry (868056)

Email Address

Company / Organisation PlanSurv Limited

Address

Consultee (868057)

Company / Organisation Orbit Homes Limited

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Orbit Homes Limited ()

Comment ID 165

Response Date 28/09/17 11:07

Consultation Point Map 2.1 Emerging Attleborough Neighbourhood Plan Policies Map ([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 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 Plan and Neighbourhood Plan fails to allocate the land at Haverscroft House Farm, London Road Attleborough for approximately 200 dwellings. The site has a resolution to grant full planning permission for 200 dwellings under reference 3PL/2016/0325/F with the S106 having been engrossed with planning permission expected to be granted on or before 6 October 2017 and as such the site should be included as an existing commitment and an allocation as part of the Local Plan. As currently drafted the plan is not positively prepared, justified or effective as it ignores the resolution to grant planning permission for 200 dwellings which must be recognised in the Local Plan in order for it to be found sound.

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

No, my representations can only be suitably dealt with by appearing at the Examination in Public

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

It is essential that the Inspector be made aware of the deficiencies in the projected delivery rates anticipated by the council and the need to allocate additional sites not least those with resolutions to grant planning permission and engrossed S106 agreements.

Do you wish to be:

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

Comment

Agent Mr Michael Hendry (868056)

Email Address

Company / Organisation PlanSurv Limited

Address

Consultee (868057)

Company / Organisation Orbit Homes Limited

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Orbit Homes Limited ()

Comment ID 166

Response Date 28/09/17 11:09

Consultation Point 2.16 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 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 Plan fails to allocate the land at Haverscroft House Farm, London Road Attleborough for approximately 200 dwellings. The site has a committee resolution to grant full planning permission for 200 dwellings under reference 3PL/2016/0325/F with the S106 having been engrossed and as such should be included as an existing commitment and an allocation as part of the Local Plan. As currently drafted the plan is not positively prepared, justified or effective as it ignore an resolution to grant planning permission for 200 dwellings which must be recognised in the Local Plan in order for it to be found sound. The over-reliance on the delivery of one large urban extension of 4,000 dwellings risks delivery of housing as a delay on that one project will have a significant effect and it is unlikely that developers will rush to deliver the large sites for fear of oversupplying the local market and depressing values; therefore, additional allocations such as the 200 dwellings on the land at Haverscroft House Farm, London Road Attleborough should be included in the Local Plan to help disperse the risk and assist delivery.

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

No, my representations can only be suitably dealt with by appearing at the Examination in Public

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

It is essential that the Inspector be made aware of the deficiencies in the projected delivery rates anticipated by the council and the need to allocate additional sites not least those with resolutions to grant planning permission.

Do you wish to be:

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

Comment

Agent Mr Michael Hendry (868056)

Email Address

Company / Organisation PlanSurv Limited

Address

Consultee (868057)

Company / Organisation Orbit Homes Limited

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Orbit Homes Limited ()

Comment ID 167

Response Date 28/09/17 11:10

Consultation Point 2.17 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 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 over-reliance on a single large urban extension that requires a link road to be built over the railway line to facilitate its delivery risks housing delivery as a delay to this project will have a significant impact on delivery rates and as such makes the Plan ineffective as it is vulnerable to the timing of a single allocation. Additional residential allocations such as the land at Haverscroft House Farm, Attleborough for 200 dwellings would reduce the risk to delivery as no link road is required in order to deliver the site and a resolution to grant planning permission has been made and the section 106 agreement as been engrossed 3PL/2016/0325/F.

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

No, my representations can only be suitably dealt with by appearing at the Examination in Public

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

The Inspector needs to be made fully aware of the risk to delivery due to the over reliance on a single large allocation at Attleborough.

Do you wish to be:

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

Comment

Agent Mr Michael Hendry (868056)

Email Address

Company / Organisation PlanSurv Limited

Address

Consultee (868057)

Company / Organisation Orbit Homes Limited

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Event Name Local Plan Pre-Submission Publication Document

Comment by Orbit Homes Limited ()

Comment ID 168

Response Date 28/09/17 11:12

Consultation Point 2.28 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 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 Plan fails to allocate the land at Haverscroft House Farm, London Road Attleborough for approximately 200 dwellings. The site has a resolution to grant planning permission for 200 dwellings under reference 3PL/2016/0325/F and as such should be included as an existing commitment and an allocation as part of the Local Plan. As currently drafted the plan is not positively prepared, justified or effective as it ignores a resolution to grant planning permission for 200 dwellings which must be recognised in the Local Plan in order for it to be found sound. The over-reliance on the delivery of one urban extension risks delivery of housing as a delay on one project will have a significant effect and it is unlikely that developers will rush to deliver the large sites for fear of oversupplying the local market and depressing values; therefore, additional allocations such as the 200 dwellings on the land at Haverscroft House Farm, London Road Attleborough should be included in the Local Plan to help disperse the risk and assist delivery.

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

No, my representations can only be suitably dealt with by appearing at the Examination in Public

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

The Inspector needs to be made fully aware of the risk to delivery due to the over reliance on a single large allocation at Attleborough

Do you wish to be:

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

Comment

Agent Mr Michael Hendry (868056)

Email Address

Company / Organisation PlanSurv Limited

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Consultee (868057)

Company / Organisation Orbit Homes Limited

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Event Name Local Plan Pre-Submission Publication Document

Comment by Orbit Homes Limited ()

Comment ID 169

Response Date 28/09/17 11:14

Consultation Point 2.41 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 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 Neighbourhood Plan fails to allocate the land at Haverscroft House Farm, London Road, Attleborough for residential development despite the site having a committee resolution to grant planning permission under reference 3PL/2016/0325/F. The Local Plan needs to specifically allocate the committed development on land at Haverscroft House Farm, London Road, Attleborough in order to give the accurate context of growth within the town and thereby make the plan sound.

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

No, my representations can only be suitably dealt with by appearing at the Examination in Public

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

It is essential that the Inspector be made aware of the deficiencies in the projected delivery rates anticipated by the council and the need to allocate additional sites not least those with a resolution to grant planning permission.

Do you wish to be:

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

Comment

Agent	Mr Michael Hendry (868056)
Email Address	
Company / Organisation	PlanSurv Limited
Address	
Consultee	(868057)
Company / Organisation	Orbit Homes Limited
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Orbit Homes Limited ()
Comment ID	170
Response Date	28/09/17 11:15
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	0.2
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 positively prepared? <input type="checkbox"/> Is the plan justified? <input type="checkbox"/> Is the plan effective?
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)

- . 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 proposed reliance on the delivery of such a large urban extension within Attleborough risks a shortfall in delivery given the almost inevitable delays that occur with such projects, particularly the required link road. The rate of delivery anticipated seems to take no account of other committed sites within Attleborough and therefore delivery is likely to be slower than anticipated given that developers will not want to flood the market. The Plan is therefore not effective in delivering the identified housing need. Allocations should be made on other sites around Attleborough, such as the 200 dwellings with resolution to grant planning permission on the land at Haverscroft House Farm, Attleborough and across the district to ensure that delivery is not unreasonably delayed to ensure the effectiveness of the Local Plan.

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

- . No, my representations can only be suitably dealt with by appearing at the Examination in Public

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

It is essential that the Inspector be made aware of the deficiencies in the projected delivery rates anticipated by the council and the need to allocate additional sites not least those with a resolution to grant planning permission.

Do you wish to be:

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

Comment

Agent Mr Michael Hendry (868056)

Email Address

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Consultee (868057)

Company / Organisation Orbit Homes Limited

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Orbit Homes Limited ()

Comment ID 171

Response Date 28/09/17 11:18

Consultation Point 3.1 Paragraph ([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) . 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 Local Plan' suggested delivery rate appears to be too low to meet what is likely to be the OAN for Breckland. A rate of delivery in the region of at least 900 dwellings a year is likely to be needed in order to support the future level of economic growth and also address on-going future projected decline in household formation rates. Further allocations will be needed across the district such as the land at Haverscroft House Farm, London Road, Attleborough that has a resolution to grant planning permission for 200 dwellings (3PL/2016/0325/F) as well as an engrossed section 106 agreement agreed by all parties and awaiting signatures.

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

No, my representations can only be suitably dealt with by appearing at the Examination in Public

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

It is essential that the Inspector be made aware of the deficiencies in the projected delivery rates anticipated by the council and the need to allocate additional sites not least those with a resolution to grant planning permission.

Do you wish to be:

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

Comment

Agent Mr Michael Hendry (868056)

Email Address

Company / Organisation PlanSurv Limited

Address

Consultee (868057)

Company / Organisation Orbit Homes Limited

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Orbit Homes Limited ()

Comment ID 172

Response Date 28/09/17 11:19

Consultation Point 3.2 Paragraph ([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) . 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 suggested delivery rate is too low to meet the identified need and should be revised with additional allocation being made to meet demand.

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

No, my representations can only be suitably dealt with by appearing at the Examination in Public

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

It is essential that the Inspector be made aware of the deficiencies in the projected delivery rates anticipated by the council and the need to allocate additional sites not least those with a resolution to grant planning permission.

Do you wish to be:

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

Comment

Agent Mr Michael Hendry (868056)

Email Address

Company / Organisation PlanSurv Limited

Address

Consultee (868057)

Company / Organisation Orbit Homes Limited

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Orbit Homes Limited ()

Comment ID 173

Response Date 28/09/17 11:20

Consultation Point Policy HOU 02 - Level and Location of Growth ([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) . 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.

A further 200 dwellings should be added to the Attleborough Commitment column to take account of the resolution to grant planning permission (3PL/2016/0325/F) on land at Haverscroft House Farm, London Road, Attleborough and the recently engrossed Section 106 agreement in order to reflect an up to date position with regards existing commitments.

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

No, my representations can only be suitably dealt with by appearing at the Examination in Public

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

It is essential that the Inspector be made aware of the deficiencies in the projected delivery rates anticipated by the council and the need to allocate additional sites not least those with a resolution to grant planning permission.

Do you wish to be:

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

Comment

Agent Mr Michael Hendry (868056)

Email Address

Company / Organisation PlanSurv Limited

Address

Consultee (868057)

Company / Organisation Orbit Homes Limited

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Orbit Homes Limited ()

Comment ID 174

Response Date 28/09/17 11:21

Consultation Point Policy INF 02 Developer Contributions ([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 positively prepared?
. 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)

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

Not come up as an issue before.

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 draft policy fails to allow for consideration of viability as part of the negotiations of developer contributions and therefore is not effective, positively prepared or consistent with national policy as it cannot easily respond to changing economic circumstances. The first sentence of Policy INF02 should be reworded to read "The Council will secure site specific developer contributions in order to properly service, manage and mitigate the impact of development, subject to viability, which:"

The proposed changes will allow the issue of viability to be considered during the negotiation of the developer contributions so that delivery is not frustrated.

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

Agent Mr Michael Hendry (868056)

Email Address

Company / Organisation PlanSurv Limited

Address

Consultee (868057)

Company / Organisation Orbit Homes Limited

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Orbit Homes Limited ()

Comment ID 175

Response Date 28/09/17 11:22

Consultation Point Appendix 1 - Housing Trajectory ([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?

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 projected level of completions is over estimated and further allocations are required to ensure delivery.

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

No, my representations can only be suitably dealt with by appearing at the Examination in Public

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

The Inspector needs to be made aware of the local delivery rates and their implications for the effectiveness of the Local Plan and the associated need for additional housing allocations.

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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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: Douglas McNab	
Organisation: Education and Skills Funding Agency	
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)	X
Unsound (You think the document needs changing)	

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

Policy	GEN 4 - Development Requirements of Attleborough Strategic Urban Extension; INF 02 Developer Contributions
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?	n/a
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)	n/a
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.

Previously team have not looked and responded to Local Plan consultations.

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)

n/a

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

1. The Education and Skills Funding Agency (ESFA) welcomes the opportunity to contribute to the development of planning policy at the local level. We aim to work closely with local authority education departments and planning authorities to meet the demand for new school places and new schools. In this capacity, we would like to offer the following comments in response to the Local Plan.
2. The ESFA notes that, as highlighted in the Local Plan and supporting draft Infrastructure Delivery Plan (August 2017), there appears to be a good working relationship between Norfolk County Council and the LPA and that planning and delivery of new schools where they are needed to support growth appears to be well progressed. The ESFA notes in particular the progress on planning for schools for in the strategic urban extensions at Thetford and Attleborough, where much of the district's housing growth is focused.
3. The ESFA supports policy GEN 4 which includes a requirement for provision of two new primary schools within the Attleborough SUE area (this is justified based on evidence of the need for school places that will be generated by the development). It is recommended that the size (number of FE) of all proposed new schools is included in the Local Plan to provide greater clarity to all stakeholders, along with a caveat highlighting that requirements could change in future if it were demonstrated and agreed that the site had become surplus to requirements, and is therefore no longer required for school use.
4. The ESFA notes that school planning is already well progressed for the Thetford SUE, with an adopted Area Action Plan in place and a signed s106 agreement allowing for potentially 3 new primary schools.
5. One of the tests of soundness is that a Local Plan is 'effective' i.e. the plan should be deliverable over its period. In this context and with specific regard to planning for schools, there is a need to ensure that education contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments. The ESFA supports policy INF 2 on developer contributions, noting the detailed information on education infrastructure in the draft Infrastructure Delivery Plan and Norfolk County Council's clear, up-to-date guidance on planning obligations for education.

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.

n/a

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: Douglas McNab	Date: 27/9/17

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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: Mrs Amy Wright	
Organisation: West Suffolk	
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)	X
Unsound (You think the document needs changing)	

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

Policy	TR01
Paragraph	4.3 & 4.4 & 8.5
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.

The issue is ongoing and this considered the most appropriate forum to raise this.

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.

West Suffolk meet with Breckland under the duty to co-operate, and during these discussions it will be important to ensure that the highway requirements of cumulative developments (particularly those using the cross-boundary A134) are adequately addressed, to enable appropriate growth within both districts.

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.

N/a

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: A Wright	Date: 28/09/17

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.

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

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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: Francesca Shapland	
Organisation: Natural England	
Address: Eastbrook, Shaftesbury Road, Cambridge	
Post code: CB2 8DR	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)

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

Natural England considers that the plan includes appropriate policies in line with all relevant aspects of the NPPF, as pertaining to our remit. In particular, it is consistent with the objectives of paragraphs 109-125, 157 and 165-168 concerning the natural environment and the need for robust evidence. We consider the plan sound on this basis.


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: 28/09/17

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Part 1: Your Contact Details

Name:	
Organisation: Orbit Homes (2020) Limited	
Address: C/o Agent	
Post code:	Telephone:
E-mail:	

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

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	Policy HOU 01 - Development Requirements (Minimum) Policy HOU 02 - Level and Location of Growth Policy HOU 07 - Affordable Housing Policy HOU 10 - Technical Design Standards for New Homes Policy COM 02 - Healthy Lifestyles Policy ENV 04 - Open Space, Sport & Recreation
Paragraph	
Site	
Proposals Map	
Settlement Boundary	
Other	Land off Greenfields Road, Dereham allocated by Policy D2 of the Site Specific Policies and Proposals Development Plan Document (2012) should be re-allocated for 285 dwellings.

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)

Please see cover 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	X

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

<p>To ensure issues raised are adequately discussed.</p>
--

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:	Date: 28/09/17
-------------------	-----------------------

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Ref: GA/DJ/05217/L0001

Sent by email to planningpolicyteam@breckland.gov.uk

28 September 2017

Planning Policy Team
Breckland District Council
Elizabeth House
Walpole Lane
Dereham
Norfolk
NR19 1EE

Dear Sir/Madam

**Representations to Breckland Local Plan Pre-Submission Publication
Land off Greenfields Road, Dereham
On behalf of Orbit Homes (2020) Limited**

On behalf of our client Orbit Homes (2020) Limited we wish to make representations to the current Breckland Local Plan Pre-Submission Publication. It is understood that the plan is being consulted on in accordance with Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012 and that the Council therefore consider it to be a sound plan which they will submit to the government for examination following the consultation.

Our representations, which are detailed in this letter and on the enclosed Representations Form, raise significant concerns regarding the soundness of the Pre-Submission document. In its current form we consider the Local Plan to be unsound when judged against the tests set out at National Planning Policy Framework (NPPF) Paragraph 182 (i.e. whether it is positively prepared, justified, effective and consistent with national policy) and we consider that significant changes are required to rectify this situation. In particular, we wish to raise concerns regarding the following proposed policies that we consider to be unsound:

- Policy HOU 01- Development Requirements (Minimum)
- Policy HOU 02 - Level and Location of Growth
- Policy HOU 07 - Affordable Housing
- Policy HOU 10 - Technical Design Standards for New Homes
- Policy COM 02 - Healthy Lifestyles
- Policy ENV 04 - Open Space, Sport & Recreation

We also wish to promote our client's Land off Greenfields Road, Dereham for re-allocation as a residential development site for 285 dwellings. The site is already allocated for 220 dwellings by Policy D2 of the Council's Site Specific Policies and Proposals Development Plan Document (2012), but we consider that a higher level of

development would represent a more sustainable and efficient use of the site as is demonstrated by Orbit Homes' current application for 285 dwellings (Ref: 3PL/2016/1397/F). This letter demonstrates that the Council will need to allocated several hundred more homes, with a focus on delivery within the next 5 years, if the Local Plan is to be found sound. In this context, Land off Greenfields Road represents a uniquely sustainable option to help deliver the required uplift and we are pleased to confirm that the proposals are considered to be deliverable within five years.

Policy HOU 01- Development Requirements (Minimum)

This policy is unsound as the housing requirement is neither positively prepared, justified, nor is it consistent with national policy.

Policy HOU 01 states that the Local Plan will provide for no less than 15,298 new homes between 2011 and 2036, an average of 612 dwellings per annum and that the annualised level of new housing provision will increase during the plan period, from 584 per year for the first 5 years (2017/18 to 2021/22) to 622 per year from 2021/22. The supporting text to this policy explains at Paragraph 3.3 that the reason for this stepped housing trajectory is to reflect the delivery timelines of the two Sustainable Urban Extensions in Thetford and Attleborough.

We consider that the housing need identified in this policy is unsound on the basis that:

1. It fails to adequately consider market signals and specifically housing affordability in calculating an appropriate uplift on household projections; and
2. It fails to justify the use of a stepped trajectory

Market Signals – Housing Affordability

The Central Norfolk Strategic Housing Market Assessment's (SHMA) response to the market signals for the Central Norfolk Housing Market Area (HMA) is to propose an uplift of 10% across the entire area. We consider that this 10% uplift is too low. Affordability across the HMA is poor and particularly so in the areas outside Norwich. The Office for National Statistics (ONS) latest data on the ratio of house price to work-place based earnings¹ (which is the government's recommended source for affordability data in the current consultation on housing needs methodology²) shows that median house prices in Breckland are 8.19 times higher than median earnings for jobs in the district. The data also shows a worsening trend in Breckland over the last 15 years with the ratio having increased from 4.33 in 2001.

The Local Plan Expert Group's recommendations to central government published in March 2016³, recommend at Appendix 6 that where the ratio of median quartile house prices to median earnings is above 7 and less than 8.7, a 20% uplift should be applied. Furthermore, using the proposed new housing needs methodology contained in the government's current consultation, the levels of affordability in the district would require a 26.19% uplift against household projections. Whilst the government's current housing needs methodology consultation can only be given limited weight as it is still a consultation and could change, it does give a reasonable indication of the level of uplift in relation to market signals that the government consider to be reasonable. We would therefore consider an uplift of an additional 10% on the current uplift to be more appropriate to provide a meaningful adjustment to account for market signals.

¹ Ratio of House Price to Work-Place Based Earnings (lower quartile and median), Office for National Statistics, 2016:
<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian>

² Planning for the right homes in the right places: consultation proposals, Department for Communities and Local Government, 2017:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/644955/Planning_for_Homes_consultation_document.pdf

³ Report to the Communities Secretary and to the Minister of Housing and Planning, March 2016:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/508345/Local-plans-report-to-governement.pdf
<http://lpeg.org/wp-content/uploads/2016/02/Appendices-local-plans-report-to-government.pdf>

An additional 10% uplift would result in a need for an increase of 1,391 dwellings (based on Figure 95 of the SHMA) between 2011 and 2036, or an additional 73 dwellings per year for the remaining 19 years of the Local Plan period. This would require an annual delivery rate of 685 new homes. This level of uplift is also in line with the requirement being proposed in the government's housing needs methodology consultation which gives a figure of 680 dwellings per annum for Breckland.

In respect of the above, the Local Plan Pre-Submission Publication cannot be considered to be positively prepared in its current form as it is not based on a strategy that seeks to meet the true objectively assessed need for new homes in the district. It is therefore unsound.

Recommendation: In order to make the plan sound we consider that an additional 10% uplift on household projections needs to be planned for (circa 1,391 dwellings). As is discussed further below, Land off Greenfields Road represents a uniquely sustainable opportunity to deliver an additional 65 dwellings towards this required uplift.

Stepped Housing Trajectory

The Council propose within Policy HOU 01 to use a stepped trajectory in relation to housing delivery in order to extend the period over which the back log in housing will be met. National Planning Practice Guidance (PPG) states that Local Planning Authorities should aim to deal with any undersupply within the first 5 year of the plan period where possible (ID: 3-035-20140306). The Local Plan Pre-Submission Publication indicates that the Council consider a stepped trajectory to be necessary to reflect the delivery times of the Sustainable Urban Extensions in Thetford and Attleborough. This approach is not considered to be justified, nor is it in line with national policy in the PPG as there is nothing to suggest that it wouldn't be possible for the Council to meet its backlog in the first 5 years of the plan.

Recommendation: The proposed stepped trajectory is not considered to be sound and we recommend that further sites should be allocated for delivery in the next five years to meet the Council's current undersupply between 2011 and 2016 of 669 dwellings⁴ and any undersupply resulting from the additional 10% uplift recommended above. Land off Greenfields Road is deliverable within 5 years and is considered to be a uniquely sustainable option to help the Council meet their backlog in housing delivery.

Policy HOU 02 - Level and Location of Growth

This policy is unsound as it sets an unjustified distribution of development that cannot deliver the required level of housing for the next five years.

Policy HOU 02 requires 50% of new homes over the plan period to be delivered in the Sustainable Urban Extensions (SUEs) at Attleborough and Thetford. The SUEs are not predicted to start delivering houses for several years and, as outlined above, the Council's over-reliance on them as a source of housing during the plan period has resulted in the proposal for an unjustified 'stepped' approach to housing delivery that is contrary to national policy. The proposed distribution of housing is therefore not considered to be an appropriate strategy and Policy HOU 02 is therefore unjustified and unsound.

To remedy this situation, we consider that additional allocations need to be identified outside of Thetford and Attleborough that are deliverable within the next 5 years. We consider that Dereham is the most sustainable location for these additional allocations. This is demonstrated by paragraph 3.115 of the Local Plan which states that Dereham had a population of 18,609 at the 2011 census and is currently the second largest town in Breckland after Thetford. In comparison, Attleborough had a population of just 10,482 at the 2011 census and yet paragraph 1.22 of the Local Plan states that Thetford and Attleborough are considered to be 'major towns', whereas Dereham is only a 'medium sized town'. It is clear from this that Dereham has been overlooked as a location for sustainable growth and that it can sustainably accommodate many more homes than currently proposed.

⁴ Statement of Five Year Housing Land Supply 2017, Breckland Council, July 2017

Recommendation: More development needs allocating outside of the SUEs to ensure the Council can meet its annual housing requirement for the first five years of the plan. As the district's second largest town we consider Dereham to be the most sustainable location for this growth.

HOU 07 - Affordable Housing

This Policy is largely considered sound, but the specific requirements regarding the distribution of affordable housing across a development (point v.) and viability testing (point vi.) are considered unjustified and therefore unsound.

We consider that points i-iv of Policy HOU 07 are sound:

- i. The threshold of 11 units or greater than 1,000 sqm GIA is considered sound as it is in line with national policy and it will ensure delivery of affordable housing on smaller schemes which previously would have avoided affordable provision. It is imperative that the Council is flexible in regards to the tenure on the smaller developments where potentially low number of rented units (e.g. under 5) may be unviable for the developer and/or inappropriate for an RP. In lieu, low cost home ownership products should be supported to ensure the delivery of some affordable housing;
- ii. The requirement for 25% of qualifying developments to be affordable housing is considered sound as it better reflects the viability of schemes in the district and should support the acceleration of delivery of all types of homes, avoiding lengthy delays arising from viability negotiations;
- iii. The requirement for the the mix of affordable housing to reflect the need of the local area at the time of consideration is agreed as sound.
- iv. Orbit Homes agree that affordable rented housing provision on site should be maintained as affordable housing in perpetuity, although suitable Mortgagee in Possession clauses are essential with the S106 agreement to enable RP's to borrow against these homes and generate future capacity for investment in new affordable homes.

We wish to raise concern regarding points v-vi of Policy HOU 07 which in their current form we do not consider to be sound:

- v. This part of the policy states that the council will seek for affordable housing to be distributed across the development as single units or small clusters. We consider that this policy should be amended to reflect the practicalities of "pepper-potting" to the suggested level of single units. This is in terms of both initial acquisition by the RP and longer term management. It would be practical, and not to the detriment of the sustainability of the community created within new development, to allow for clusters of affordable housing of say no more than 10. This aligns with policies in other neighbouring districts which have been successful in delivering affordable housing and ensuring tenure blind communities.

Recommendation: In its current form this policy does not reflect the most appropriate strategy and can therefore not be considered sound. We recommend the policy is amended to allow for small clusters of affordable housing up to a maximum of 10 properties.

- vi. This part of the policy requires an open book viability assessment where schemes do not meet the above policy requirements. In order to support the accelerated delivery of all housing tenures we would suggest that the Council withhold the ability to negotiate directly with the developer on the affordable housing delivery (either overall percentage or tenure split) in instances where the impact is marginal. Reverting in the first instance to the lengthy option of full viability is both costly to the developer and creates

unnecessary delays in which both impact on the initial viability of the scheme and overall the provision of affordable housing.

Recommendation: In its current form, this policy could affect the deliverability of the plan over its period by increasing delays in decision-making and therefore the delivery of affordable housing. This policy cannot therefore be considered effective and is unsound. We recommend that the policy is amended to give the Council greater flexibility in whether to request an open book viability assessment or not. For example: "The Council reserve the right to request an open book viability assessment where schemes do not meet the above policy requirements".

Policy HOU 10 - Technical Design Standards

This policy is unsound as it is not supported by sufficient evidence on viability and is therefore contrary to national planning policy.

Policy HOU 10 sets optional building regulation requirements and nationally described space standards for water efficiency, internal space and the accessibility of homes. It states that this is to ensure new homes provide quality living environments for residents both now and in the future and to help deliver sustainable communities.

Planning Practice Guidance states that local planning authorities should consider the impact of using these standards as part of their Local Plan viability assessment (ID: 56-003-20150327). There is a considerable cost impact relating to these higher standards and it is essential that they are assessed as part of the whole plan viability assessment. The Local Plan and CIL Viability Assessment 2017 does not appear to reference the optional standards for accessibility or water efficiency and while it does mention the nationally described space standards it states that "The Council has no current plans to introduce these standards, however has asked for an assessment of their introduction. On the whole the modelling is in line with these requirements". This statement suggests that an incomplete assessment may have been carried out, but no results of this assessment or conclusion is drawn regarding the impact of applying these standards on viability. The inclusion of these standards in HOU 10 is therefore contrary to national policy in the PPG and must be considered unsound. We note that the Council have mentioned that further supporting evidence is set out in the "Optional Technical Standards" Topic Paper however this has not been published under the Council's evidence base and it is therefore unclear if it addresses viability issues.

In addition to the above issues regarding the impact of the optional standards on the viability of developments, we consider that insufficient justification has been provided to demonstrate that there is a need to set specific space standards in the district over and above the design requirements of building regulations.

Recommendation: Delete this policy as insufficient evidence has been provided to justify applying the optional technical design standards.

COM 02 – Healthy Lifestyles

This policy is unsound as it is not justified or effective.

We recognise the importance of ensuring new development supports the wider aims of local authorities and their partners to improve the health and well-being of their residents and workforce. However, the requirement for all large and complex applications to undertake a Health Impact Assessment (HIA) and all applications to demonstrate how they have mitigated any potential negative effects on health is unnecessary and an additional burden on applicants. The PPG sets out that HIAs "*may be a useful tool to use where there is expected to be significant impacts*" but it also outlines the importance of the local plan in considering the wider health issues in an area and ensuring policies respond to these. As such Local Plans should already have considered the impact of development on the health and well-being of their communities and set out policies to address any concerns. Where a development is in line with policies in the local plan an HIA should not be necessary. Only where there is a departure from the plan should the Council consider requiring an HIA.

Recommendation: This policy should be amended to only require a Health Impact Assessment where there are expected to be significant impacts and there is a departure from the development plan.

Policy ENV 04 – Open Space, Sport & Recreation

This policy is unsound as it is unjustified in requiring a rural standard of outdoor playing space provision in urban areas.

Policy ENV 04 requires all new development to provide a contribution towards outdoor playing space equivalent to 2.56 hectares per 1,000 population, which equates to 25.6 sqm per person, broken down into 17.6 sqm of outdoor sport area and 8 sqm of children's play space.

The figure of 25.6 sqm per person represents an increase on current outdoor playing space standards contained at Core Strategy Policy DC11 which requires 24 sqm per person. The standards set out in both adopted Policy DC11 and emerging Policy ENV 04 are taken from guidelines set out by Fields in Trust (FIT), of which the latest guidelines are contained in their Guidance for Outdoor Sport and Play Beyond the 6 Acre Standard (2015), which are an update on previously more detailed guidelines in Planning and Design for Outdoor Sport and Play (2008).

The standards recommended by FIT are for 0.8ha of children's play space per 1,000 people and either 1.6ha of outdoor sports provision in urban areas or 1.76ha in rural areas per 1,000 people. These standards have not changed between the adoption of Policy DC11 and the development of emerging Policy ENV 04 and it is therefore unclear why the Council has chosen to use the rural standards over the urban standards in the new Local Plan.

The FIT guidelines suggest a higher level of provision should be provided in rural areas due to the distance between facilities on offer (i.e. the distance between villages), whereas in urban areas adjoining neighbourhood facilities are much closer to one another which means they are accessible by more people. It is clear from this that the 25.6 sqm standard should apply in Breckland's rural areas, but that requiring the same standard in Breckland's towns is unjustified.

Recommendation: This policy should be updated to require 24 sqm of outdoor playing space per person in urban areas of the district (e.g. the market towns).

Summary of Recommendations

This letter has demonstrated that the Local Plan's current housing requirement is unsound as the SHMA fails to sufficiently account for market signals in providing an uplift on household projections. On this basis, we recommend that the Council increase their housing target by a further 10% against household projects which would result in a need for an additional 1,391 homes over the plan period.

The Council's failure to plan for sufficient homes is compounded by the over-reliance on housing delivery from two SUEs at the expense of sites that are deliverable in the short term over the next five years. This decision has resulted in the Council attempting to justify a stepped trajectory with lower levels of delivery in the first five years of the plan. It is considered that there is no reasonable justification for this approach as it would be entirely possible for the Council to identify additional allocations to come forwards in the early years of the plan to meet their full annual housing requirement.

In the context of the above, we recommend that more development needs to be allocated outside of the SUEs to ensure the Council can meet its annual housing requirement for the first five years of the plan. As the district's second largest town we consider Dereham to be the most sustainable location for this growth and, as set-out below, we consider Land off Greenfields Road to be a uniquely sustainable option to deliver an additional 65 dwellings towards the increased requirement.

In addition to finding the housing requirement and distribution set by the Pre-Submission document to be unsound, this letter makes several recommendations to either amend or delete specific development management policies regarding outdoor playing space, affordable housing, optional technical design standards and Health Impact Assessments. Without these changes, we consider that the plan is unsound.

Land off Greenfields Road, Dereham

As outlined above, we wish to promote our client's site at Land off Greenfields Road, Dereham for re-allocation as a residential development site for 285 dwellings. The site is already allocated for 220 dwellings by Policy D2 of the Council's Site Specific Policies and Proposals Development Plan Document (2012), but we consider that a higher level of development would represent a more sustainable and efficient use of the site in the context of the Council's clear need to increase the number of homes allocated for delivery in the first 5 years of the plan.

The site's sustainability and deliverability for this higher level of development is demonstrated by the Orbit Homes' current planning application for 285 dwellings on the site (Ref: 3PL/2016/1397/F). This application was submitted in late 2016 and was recommended for approval by officers at committee in May 2017. At this meeting it was deferred by members to enable further details of outdoor playing space provision to be provided. This information is currently being collated and will be submitted to the Council in due course, at which point it is expected that the application will again be recommended for approval by officers.

It is clear therefore that officers consider the site to be appropriate for 285 dwellings. We are also pleased to confirm that the proposals are considered to be deliverable within 5 years as they are promoted by a housebuilder with a proven track record of delivery in the district. The Council cannot currently demonstrate a 5 year supply of housing and it is noted that their latest Statement of Five Year Housing Land Supply (July 2017) only identifies 135 dwellings as being delivered on the site in the next 5 years. We are pleased to confirm that, subject to planning approval, this figure could be increased significantly and we therefore respectfully request that the Council re-allocate our client's land for the increased figure of 285 dwellings. This allocation would provide the added security of an allocation and ensure that there are no delays in achieving planning consent on the site.

We trust that these comments will be given the due consideration and look forward to participating further as the Local Plan preparation progresses. Should you have any further queries or questions then please do not hesitate to contact me.

Yours faithfully

Geoff Armstrong
Director
Armstrong Rigg Planning

Comment

Consultee	Matthew Pendercrest (1130020)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Matthew Pendercrest
Comment ID	181
Response Date	28/09/17 14:37
Consultation Point	Dereham Housing Allocation 1 (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 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)

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 written objections already made (400+) for a current proposal on this site and the numerous technical challenges presented by this site- It is clear that in recommending it they have done neither!!!!!!

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.

Land to the west of EtlingView (LPj025]007

The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock/grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate. Many of the 400+ local objectors to the current scheme proposed for the land have outlined the visual, landscape and amenity

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 small 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 both the existing and proposed 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.

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

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 DCO1.

The fields traditionally flood- it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that because the adjoining Shillings Lane is lower that flooding of the lane once a rare occurrence now occurs frequently. Development as proposed will further increase this flooding. 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 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’.

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

Do you wish to be:

Notified of the Inspectors Recommendations

Comment

Consultee	Danielle O'Connell (1130028)
Email Address	
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Danielle O'Connell
Comment ID	182
Response Date	28/09/17 14:57
Consultation Point	Dereham Housing Allocation 1 (View)
Status	Processed
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Comment

Consultee	Demi Fossitt (1130035)
Email Address	
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Demi Fossitt
Comment ID	183
Response Date	28/09/17 15:08
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Comment

Consultee Mrs Lesley Manns (1130041)
Email Address
Address

Event Name Local Plan Pre-Submission Publication Document
Comment by Mrs Lesley Manns
Comment ID 184
Response Date 28/09/17 15:14
Consultation Point Dereham Housing Allocation 1 ([View](#))
Status Processed
Submission Type Letter
Version 0.3

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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.

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

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 DCO1.

The fields traditionally flood- it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that because the adjoining Shillings Lane is lower that flooding of the lane once a rare occurrence now occurs frequently. Development as proposed will further increase this flooding. 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 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.

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 Inspectors Recommendations**

Comment

Consultee	Caroline Green (1130046)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Caroline Green
Comment ID	185
Response Date	28/09/17 15:21
Consultation Point	Dereham Housing Allocation 1 (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 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)

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 written objections already made (400+) for a current proposal on this site and the numerous technical challenges presented by this site- It is clear that in recommending it they have done neither!!!!!!

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.

Land to the west of EtlingView (LPj025]007

The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock/grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate. Many of the 400+ local objectors to the current scheme proposed for the land have outlined the visual, landscape and amenity

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 small 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 both the existing and proposed residential areas nearby.

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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.

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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 Inspectors Recommendations

Comment

Consultee Leslie Alan Thompson (1130049)
Email Address
Address

Event Name Local Plan Pre-Submission Publication Document
Comment by Leslie Alan Thompson
Comment ID 186
Response Date 28/09/17 15:25
Consultation Point Dereham Housing Allocation 1 ([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 positively prepared?
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. Is the plan effective?
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Land to the west of EtlingView (LPJ025J007)

The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock/grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate. Many of the 400+ local

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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 Inspectors Recommendations

Comment

Consultee	Susan Hollings (1130056)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Susan Hollings
Comment ID	187
Response Date	28/09/17 15:28
Consultation Point	Dereham Housing Allocation 1 (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 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)

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

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Land to the west of EtlingView (LPj025]007

The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock/grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate. Many of the 400+ local objectors to the current scheme proposed for the land have outlined the visual, landscape and amenity

importance of the land together with numerous issues around flooding, degradation of hedgerows loss of wildlife area and concerns from the Police regarding crime.

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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 Inspectors Recommendations

Comment

Consultee	Ian Hollings (1130058)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Ian Hollings
Comment ID	188
Response Date	28/09/17 15:31
Consultation Point	Dereham Housing Allocation 1 (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 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)

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 written objections already made (400+) for a current proposal on this site and the numerous technical challenges presented by this site- It is clear that in recommending it they have done neither!!!!!!

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

Land to the west of EtlingView (LPj025]007

The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock/grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate. Many of the 400+ local objectors to the current scheme proposed for the land have outlined the visual, landscape and amenity

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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 Inspectors Recommendations

Comment

Consultee	Craig La Mont (1130065)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Craig La Mont
Comment ID	189
Response Date	28/09/17 15:35
Consultation Point	Dereham Housing Allocation 1 (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).

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

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Land to the west of EtlingView (LPj025]007

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

Do you wish to be:

Notified of the Inspectors Recommendations

Comment

Consultee	Alison Baker (1130069)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Alison Baker
Comment ID	190
Response Date	28/09/17 15:51
Consultation Point	Dereham Housing Allocation 1 (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 positively prepared?
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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

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 DCO1.

The fields traditionally flood- it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that because the adjoining Shillings Lane is lower that flooding of the lane once a rare occurrence now occurs frequently. Development as proposed will further increase this flooding. 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 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.

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 Inspectors Recommendations

Comment

Consultee	Richard Biggs (1130073)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Richard Biggs
Comment ID	191
Response Date	28/09/17 15:55
Consultation Point	Dereham Housing Allocation 1 (View)
Status	Processed
Submission Type	Letter
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?
. 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 had understood that Breckland Capita would be taking account of both the unprecedented number of written objections already made (400+) for a current proposal on this site and the numerous technical challenges presented by this site- It is clear that in recommending it they have done neither.

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.

Land to the west of EtlingView (LPj025]007

The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock/grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate. Many of the 400+ local

objectors to the current scheme proposed for the land have outlined the visual, landscape and amenity 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 small 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 both the existing and proposed 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.

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

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The fields traditionally flood- it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that because the adjoining Shillings Lane is lower that flooding of the lane once a rare occurrence now occurs frequently. Development as proposed will further increase this flooding. 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

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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	Brian Ottis (1130241)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Brian Ottis
Comment ID	192
Response Date	28/09/17 07:48
Consultation Point	Dereham Housing Allocation 1 (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 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)

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

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Land to the west of EtlingView (LPj025]007

The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock/grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate. Many of the 400+ local objectors to the current scheme proposed for the land have outlined the visual, landscape and amenity

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 small 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 both the existing and proposed 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.

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

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The fields traditionally flood- it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that because the adjoining Shillings Lane is lower that flooding of the lane once a rare occurrence now occurs frequently. Development as proposed will further increase this flooding. 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

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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 Inspectors Recommendations

Comment

Consultee	Gordon Kay (1130247)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Gordon Kay
Comment ID	193
Response Date	28/09/17 07:59
Consultation Point	Dereham Housing Allocation 1 (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 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)

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

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Land to the west of EtlingView (LPj025]007

The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock/grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate. Many of the 400+ local objectors to the current scheme proposed for the land have outlined the visual, landscape and amenity

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 small 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 both the existing and proposed 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.

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

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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 Inspectors Recommendations

**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: <i>T WEBSTER.</i>	
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
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.

I had understood that Breckland Capita would be taking account of both the unprecedented number of written objections already made (400+) for a current proposal on this site and the numerous technical challenges presented by this site- It is clear that in recommending it they have done neither.

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

The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock /grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate.

Many of the 400+ local objectors to the current scheme proposed for the land have outlined the visual, landscape and amenity 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 small 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 both the existing and proposed 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.

It is clear that most harm will be caused by developing the smaller paddock field In order for the plan to even approach being sound this field should not be developed in any way.

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-**

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.**

The fields traditionally flood- it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that because the adjoining Shillings Lane is lower that flooding of the lane once a rare occurrence now occurs frequently- Development as proposed will further increase this flooding.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.**

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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	
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)	x
Signature:	Date:

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	Jemma Shepherd (1130252)
Email Address	
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Jemma Shepherd
Comment ID	195
Response Date	28/09/17 08:11
Consultation Point	Dereham Housing Allocation 1 (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 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)

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

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Land to the west of EtlingView (LPJ025J007)

The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock/grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate. Many of the 400+ local

objectors to the current scheme proposed for the land have outlined the visual, landscape and amenity 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 small 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 both the existing and proposed 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.

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

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 DCO1.

The fields traditionally flood- it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that because the adjoining Shillings Lane is lower that flooding of the lane once a rare occurrence now occurs frequently. Development as proposed will further increase this flooding. 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

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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 Inspectors Recommendations**

Comment

Consultee Tom Brady (1130255)

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Tom Brady

Comment ID 196

Response Date 28/09/17 08:14

Consultation Point Dereham Housing Allocation 1 ([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 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)

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 written objections already made (400+) for a current proposal on this site and the numerous technical challenges presented by this site- It is clear that in recommending it they have done neither!!!!!!

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.

Land to the west of EtlingView (LPj025]007

The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock/grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate. Many of the 400+ local

objectors to the current scheme proposed for the land have outlined the visual, landscape and amenity 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 small 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 both the existing and proposed 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.

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

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 DCO1.

The fields traditionally flood- it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that because the adjoining Shillings Lane is lower that flooding of the lane once a rare occurrence now occurs frequently. Development as proposed will further increase this flooding. 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 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.

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 Inspectors Recommendations**

**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: <u>MR M. WILKINS</u>	
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
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.

I had understood that Breckland Capita would be taking account of both the unprecedented number of written objections already made (400+) for a current proposal on this site and the numerous technical challenges presented by this site- It is clear that in recommending it they have done neither!!!!!!

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

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Many of the 400+ local objectors to the current scheme proposed for the land have outlined the visual, landscape and amenity 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 small 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 both the existing and proposed 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.

It is clear that most harm will be caused by developing the smaller paddock field In order for the plan to even approach being sound this field should not be developed in any way.

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-**

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.**

The fields traditionally flood- it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that because the adjoining Shillings Lane is lower that flooding of the lane once a rare occurrence now occurs frequently- Development as proposed will further increase this flooding. 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.

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

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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	
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)	x
Signature: _____	Date: <i>KIM Sed 2017</i>

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	J Moore (1130263)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	J Moore
Comment ID	198
Response Date	28/09/17 08:25
Consultation Point	Dereham Housing Allocation 1 (View)
Status	Processed
Submission Type	Letter
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).

- . 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)

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Land to the west of EtlingView (LPj025]007

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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.

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

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 DCO1.

The fields traditionally flood- it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that because the adjoining Shillings Lane is lower that flooding of the lane once a rare occurrence now occurs frequently. Development as proposed will further increase this flooding. 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

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

Do you wish to be:

Notified of the Inspectors Recommendations

Comment

Consultee Chris Chitty (1130294)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Chris Chitty

Comment ID 199

Response Date 28/09/17 08:55

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

Status Processed

Submission Type Letter

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?
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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 Inspectors Recommendations**

Comment

Consultee	Kenneth Powles (1130300)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Kenneth Powles
Comment ID	200
Response Date	28/09/17 09:00
Consultation Point	Dereham Housing Allocation 1 (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 positively prepared?
. Is the plan justified?
. Is the plan effective?
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Have you raised this issue before during previous consultations? (Please tick the appropriate box)

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importance of the land together with numerous issues around flooding, degradation of hedgerows loss of wildlife area and concerns from the Police regarding crime.

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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.

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

Do you wish to be:

Notified of the Inspectors Recommendations

Comment

Consultee	Derek Brown (1130309)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Derek Brown
Comment ID	201
Response Date	28/09/17 09:09
Consultation Point	Dereham Housing Allocation 1 (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 positively prepared?
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If you feel that the plan is sound, please tell us why.

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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.

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 Inspectors Recommendations

Comment

Consultee Ms Geraldine Sayers Cowper (1125802)

Email Address

Company / Organisation Banham Parish Council

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Banham Parish Council (Ms Geraldine Sayers Cowper)

Comment ID 202

Response Date 29/09/17 09:17

Consultation Point Policy HOU 03 Development Outside of the Boundaries of Local Service Centres ([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 legally compliant?
. 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 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.

LP(003)012: Farmland behind Wayland Way: This is agricultural land outside the village boundary and not immediately adjacent to it, as required by Policy HOU 03, but next to a designated open space (LP(003)009). Building here will also contravene HOU 03 by failing to conserve or enhance the historic nature of the village, as it is part of the countryside which envelopes it.

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	Ms Geraldine Sayers Cowper (1125802)
Email Address	
Company / Organisation	Banham Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Banham Parish Council (Ms Geraldine Sayers Cowper)
Comment ID	203
Response Date	29/09/17 09:26
Consultation Point	3.9 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)

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 figure of 10% appears to have been arbitrarily assumed. Banham Parish Council is unaware of any housing need survey, specific to Banham, conducted by Breckland Council, at any time. On the contrary, numerous previous Heads of the Planning Department have categorically stipulated that there is no housing need in Banham, with the exception for a need for social housing through requests from those who have stated a desire to live here or in a neighbouring village. At the time of Banham's designation as a Local Service Centre, it was stipulated 'without further development', which was assured by the then Head of Planning, Phil Daines. To assume that all LSCs can sustain 10% of further

development without ascertaining whether this is possible, needed or even lawful undermines the soundness of 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

Comment

Consultee	Diane Ogilvy (1130319)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Diane Ogilvy
Comment ID	204
Response Date	28/09/17 09:21
Consultation Point	Dereham Housing Allocation 1 (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 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)

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 written objections already made (400+) for a current proposal on this site and the numerous technical challenges presented by this site- It is clear that in recommending it they have done neither!!!!!!

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.

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

The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock/grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate. Many of the 400+ local objectors to the current scheme proposed for the land have outlined the visual, landscape and amenity

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 small 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 both the existing and proposed 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.

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

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 DCO1.

The fields traditionally flood- it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that because the adjoining Shillings Lane is lower that flooding of the lane once a rare occurrence now occurs frequently. Development as proposed will further increase this flooding. 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.

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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 Inspectors Recommendations

Comment

Consultee	Ian Dent (1130335)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Ian Dent
Comment ID	205
Response Date	28/09/17 09:43
Consultation Point	Dereham Housing Allocation 1 (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 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)

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

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

The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock/grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate. Many of the 400+ local objectors to the current scheme proposed for the land have outlined the visual, landscape and amenity

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 small 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 both the existing and proposed 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.

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

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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 Inspectors Recommendations

Comment

Consultee	D Chambers (1130339)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	D Chambers
Comment ID	206
Response Date	28/09/17 09:45
Consultation Point	Dereham Housing Allocation 1 (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 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)

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

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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.

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

The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock/grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate. Many of the 400+ local objectors to the current scheme proposed for the land have outlined the visual, landscape and amenity

importance of the land together with numerous issues around flooding, degradation of hedgerows loss of wildlife area and concerns from the Police regarding crime.

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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.

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

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

No, my representations can only be suitably dealt with by appearing at the Examination in Public

Do you wish to be:

Notified of the Inspectors Recommendations

Comment

Consultee Jennifer Manns (1130345)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Jennifer Manns

Comment ID 207

Response Date 28/09/17 09:49

Consultation Point Dereham Housing Allocation 1 ([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 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)

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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 Inspectors Recommendations

Comment

Consultee	Luke Carrol (1130350)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Luke Carrol
Comment ID	208
Response Date	28/09/17 09:52
Consultation Point	Dereham Housing Allocation 1 (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 positively prepared?
- . Is the plan justified?
- . Is the plan effective?
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Have you raised this issue before during previous consultations? (Please tick the appropriate box)

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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 Inspectors Recommendations

Comment

Consultee Jamie Beeby (1130357)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Jamie Beeby

Comment ID 209

Response Date 28/09/17 09:57

Consultation Point Dereham Housing Allocation 1 ([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 positively prepared?
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Have you raised this issue before during previous consultations? (Please tick the appropriate box)

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

The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock/grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate. Many of the 400+ local

objectors to the current scheme proposed for the land have outlined the visual, landscape and amenity 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 small 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 both the existing and proposed 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.

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

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 DCO1.

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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.

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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.

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 Inspectors Recommendations**

Comment

Consultee	Bethany Hollings (1130359)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Bethany Hollings
Comment ID	210
Response Date	28/09/17 10:01
Consultation Point	Dereham Housing Allocation 1 (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 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)

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 written objections already made (400+) for a current proposal on this site and the numerous technical challenges presented by this site- It is clear that in recommending it they have done neither!!!!!!

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Do you wish to be:

Notified of the Inspectors Recommendations

Comment

Consultee	Debbie Dungan (1130367)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Debbie Dungan
Comment ID	211
Response Date	29/09/17 10:03
Consultation Point	Dereham Housing Allocation 1 (View)
Status	Processed
Submission Type	Letter
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 positively prepared?
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Yes, my representation can be satisfactorily dealt with by written representations

Do you wish to be:

Notified of the Inspectors Recommendations

Comment

Consultee	Mr King (1130376)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Mr King
Comment ID	212
Response Date	28/09/17 10:15
Consultation Point	Dereham Housing Allocation 1 (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 positively prepared?
. Is the plan justified?
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Do you wish to be:

Notified of the Inspectors Recommendations

Comment

Consultee	Marie Da Silva (1130393)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Marie Da Silva
Comment ID	213
Response Date	28/09/17 10:27
Consultation Point	Dereham Housing Allocation 1 (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 positively prepared?
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Do you wish to be:

Notified of the Inspectors Recommendations

Comment

Consultee	Dawn Mastin (1130398)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Dawn Mastin
Comment ID	214
Response Date	28/09/17 10:32
Consultation Point	Dereham Housing Allocation 1 (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 positively prepared?
- . Is the plan justified?
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**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: Mrs Tina Wilkin	
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
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.

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

The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock /grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate.

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The area is a cherished local asset due to its openness -the small 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 both the existing and proposed 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.

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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-**

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.**

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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	
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)	x
Signature: _____	Date: _____

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.

<p>Breckland Local Plan Pre-Submission Publication Representation Form</p>

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: Elaine Wintebone	
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
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)	

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

Notified of the Submission	
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)	x
Signature:	Date: 19/9/17

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Comment

Consultee	Michael Meers (1130408)
Address	-
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Michael Meers
Comment ID	217
Response Date	28/09/17 10:40
Consultation Point	Dereham Housing Allocation 1 (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 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)

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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 DCO1.

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Do you wish to be:

Notified of the Inspectors Recommendations

Comment

Consultee	Ronald Hart (1130412)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Ronald Hart
Comment ID	218
Response Date	28/09/17 10:43
Consultation Point	Dereham Housing Allocation 1 (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 positively prepared?
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No, my representations can only be suitably dealt with by appearing at the Examination in Public

Do you wish to be:

Notified of the Inspectors Recommendations

Comment

Consultee Rod James Ranger (1130417)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Rod James Ranger

Comment ID 219

Response Date 28/09/17 10:45

Consultation Point Dereham Housing Allocation 1 ([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 positively prepared?
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Do you wish to be:

. **Notified of the Inspectors Recommendations**

Comment

Consultee	Morgan Da Silva (1130426)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Morgan Da Silva
Comment ID	220
Response Date	28/09/17 10:48
Consultation Point	Dereham Housing Allocation 1 (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)

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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

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 DCO1.

The fields traditionally flood- it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that because the adjoining Shillings Lane is lower that flooding of the lane once a rare occurrence now occurs frequently. Development as proposed will further increase this flooding. 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 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.

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 Inspectors Recommendations

Comment

Consultee	Mr Stephen Gibson (1130432)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Mr Stephen Gibson
Comment ID	221
Response Date	28/09/17 10:51
Consultation Point	Dereham Housing Allocation 1 (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 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)

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 written objections already made (400+) for a current proposal on this site and the numerous technical challenges presented by this site- It is clear that in recommending it they have done neither.

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.

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

The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock/grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate. Many of the 400+ local objectors to the current scheme proposed for the land have outlined the visual, landscape and amenity

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 small 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 both the existing and proposed 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.

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

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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.

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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.

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 Inspectors Recommendations

<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:	
Organisation: Orbit Homes (2020) Limited	
Address: C/o Agent	
Post code:	Telephone:
E-mail:	

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

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	Policy HOU 01 - Development Requirements (Minimum) Policy HOU 02 - Level and Location of Growth Policy HOU 07 - Affordable Housing Policy HOU 10 - Technical Design Standards for New Homes Policy COM 02 - Healthy Lifestyles Policy ENV 04 - Open Space, Sport & Recreation
Paragraph	
Site	
Proposals Map	
Settlement Boundary	
Other	Land off Greenfields Road, Dereham allocated by Policy D2 of the Site Specific Policies and Proposals Development Plan Document (2012) should be re-allocated for 285 dwellings.

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
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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)

Please see cover letter

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

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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.

<p>To ensure issues raised are adequately discussed.</p>
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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
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Signature:	Date: 28/09/17
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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.

Ref: GA/DJ/05217/L0001

Sent by email to planningpolicyteam@breckland.gov.uk

28 September 2017

Planning Policy Team
Breckland District Council
Elizabeth House
Walpole Lane
Dereham
Norfolk
NR19 1EE

Dear Sir/Madam

**Representations to Breckland Local Plan Pre-Submission Publication
Land off Greenfields Road, Dereham
On behalf of Orbit Homes (2020) Limited**

On behalf of our client Orbit Homes (2020) Limited we wish to make representations to the current Breckland Local Plan Pre-Submission Publication. It is understood that the plan is being consulted on in accordance with Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012 and that the Council therefore consider it to be a sound plan which they will submit to the government for examination following the consultation.

Our representations, which are detailed in this letter and on the enclosed Representations Form, raise significant concerns regarding the soundness of the Pre-Submission document. In its current form we consider the Local Plan to be unsound when judged against the tests set out at National Planning Policy Framework (NPPF) Paragraph 182 (i.e. whether it is positively prepared, justified, effective and consistent with national policy) and we consider that significant changes are required to rectify this situation. In particular, we wish to raise concerns regarding the following proposed policies that we consider to be unsound:

- Policy HOU 01- Development Requirements (Minimum)
- Policy HOU 02 - Level and Location of Growth
- Policy HOU 07 - Affordable Housing
- Policy HOU 10 - Technical Design Standards for New Homes
- Policy COM 02 - Healthy Lifestyles
- Policy ENV 04 - Open Space, Sport & Recreation

We also wish to promote our client's Land off Greenfields Road, Dereham for re-allocation as a residential development site for 285 dwellings. The site is already allocated for 220 dwellings by Policy D2 of the Council's Site Specific Policies and Proposals Development Plan Document (2012), but we consider that a higher level of

development would represent a more sustainable and efficient use of the site as is demonstrated by Orbit Homes' current application for 285 dwellings (Ref: 3PL/2016/1397/F). This letter demonstrates that the Council will need to allocated several hundred more homes, with a focus on delivery within the next 5 years, if the Local Plan is to be found sound. In this context, Land off Greenfields Road represents a uniquely sustainable option to help deliver the required uplift and we are pleased to confirm that the proposals are considered to be deliverable within five years.

Policy HOU 01- Development Requirements (Minimum)

This policy is unsound as the housing requirement is neither positively prepared, justified, nor is it consistent with national policy.

Policy HOU 01 states that the Local Plan will provide for no less than 15,298 new homes between 2011 and 2036, an average of 612 dwellings per annum and that the annualised level of new housing provision will increase during the plan period, from 584 per year for the first 5 years (2017/18 to 2021/22) to 622 per year from 2021/22. The supporting text to this policy explains at Paragraph 3.3 that the reason for this stepped housing trajectory is to reflect the delivery timelines of the two Sustainable Urban Extensions in Thetford and Attleborough.

We consider that the housing need identified in this policy is unsound on the basis that:

1. It fails to adequately consider market signals and specifically housing affordability in calculating an appropriate uplift on household projections; and
2. It fails to justify the use of a stepped trajectory

Market Signals – Housing Affordability

The Central Norfolk Strategic Housing Market Assessment's (SHMA) response to the market signals for the Central Norfolk Housing Market Area (HMA) is to propose an uplift of 10% across the entire area. We consider that this 10% uplift is too low. Affordability across the HMA is poor and particularly so in the areas outside Norwich. The Office for National Statistics (ONS) latest data on the ratio of house price to work-place based earnings¹ (which is the government's recommended source for affordability data in the current consultation on housing needs methodology²) shows that median house prices in Breckland are 8.19 times higher than median earnings for jobs in the district. The data also shows a worsening trend in Breckland over the last 15 years with the ratio having increased from 4.33 in 2001.

The Local Plan Expert Group's recommendations to central government published in March 2016³, recommend at Appendix 6 that where the ratio of median quartile house prices to median earnings is above 7 and less than 8.7, a 20% uplift should be applied. Furthermore, using the proposed new housing needs methodology contained in the government's current consultation, the levels of affordability in the district would require a 26.19% uplift against household projections. Whilst the government's current housing needs methodology consultation can only be given limited weight as it is still a consultation and could change, it does give a reasonable indication of the level of uplift in relation to market signals that the government consider to be reasonable. We would therefore consider an uplift of an additional 10% on the current uplift to be more appropriate to provide a meaningful adjustment to account for market signals.

¹ Ratio of House Price to Work-Place Based Earnings (lower quartile and median), Office for National Statistics, 2016:
<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian>

² Planning for the right homes in the right places: consultation proposals, Department for Communities and Local Government, 2017:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/644955/Planning_for_Homes_consultation_document.pdf

³ Report to the Communities Secretary and to the Minister of Housing and Planning, March 2016:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/508345/Local-plans-report-to-governement.pdf
<http://lpeg.org/wp-content/uploads/2016/02/Appendices-local-plans-report-to-government.pdf>

An additional 10% uplift would result in a need for an increase of 1,391 dwellings (based on Figure 95 of the SHMA) between 2011 and 2036, or an additional 73 dwellings per year for the remaining 19 years of the Local Plan period. This would require an annual delivery rate of 685 new homes. This level of uplift is also in line with the requirement being proposed in the government's housing needs methodology consultation which gives a figure of 680 dwellings per annum for Breckland.

In respect of the above, the Local Plan Pre-Submission Publication cannot be considered to be positively prepared in its current form as it is not based on a strategy that seeks to meet the true objectively assessed need for new homes in the district. It is therefore unsound.

Recommendation: In order to make the plan sound we consider that an additional 10% uplift on household projections needs to be planned for (circa 1,391 dwellings). As is discussed further below, Land off Greenfields Road represents a uniquely sustainable opportunity to deliver an additional 65 dwellings towards this required uplift.

Stepped Housing Trajectory

The Council propose within Policy HOU 01 to use a stepped trajectory in relation to housing delivery in order to extend the period over which the back log in housing will be met. National Planning Practice Guidance (PPG) states that Local Planning Authorities should aim to deal with any undersupply within the first 5 year of the plan period where possible (ID: 3-035-20140306). The Local Plan Pre-Submission Publication indicates that the Council consider a stepped trajectory to be necessary to reflect the delivery times of the Sustainable Urban Extensions in Thetford and Attleborough. This approach is not considered to be justified, nor is it in line with national policy in the PPG as there is nothing to suggest that it wouldn't be possible for the Council to meet its backlog in the first 5 years of the plan.

Recommendation: The proposed stepped trajectory is not considered to be sound and we recommend that further sites should be allocated for delivery in the next five years to meet the Council's current undersupply between 2011 and 2016 of 669 dwellings⁴ and any undersupply resulting from the additional 10% uplift recommended above. Land off Greenfields Road is deliverable within 5 years and is considered to be a uniquely sustainable option to help the Council meet their backlog in housing delivery.

Policy HOU 02 - Level and Location of Growth

This policy is unsound as it sets an unjustified distribution of development that cannot deliver the required level of housing for the next five years.

Policy HOU 02 requires 50% of new homes over the plan period to be delivered in the Sustainable Urban Extensions (SUEs) at Attleborough and Thetford. The SUEs are not predicted to start delivering houses for several years and, as outlined above, the Council's over-reliance on them as a source of housing during the plan period has resulted in the proposal for an unjustified 'stepped' approach to housing delivery that is contrary to national policy. The proposed distribution of housing is therefore not considered to be an appropriate strategy and Policy HOU 02 is therefore unjustified and unsound.

To remedy this situation, we consider that additional allocations need to be identified outside of Thetford and Attleborough that are deliverable within the next 5 years. We consider that Dereham is the most sustainable location for these additional allocations. This is demonstrated by paragraph 3.115 of the Local Plan which states that Dereham had a population of 18,609 at the 2011 census and is currently the second largest town in Breckland after Thetford. In comparison, Attleborough had a population of just 10,482 at the 2011 census and yet paragraph 1.22 of the Local Plan states that Thetford and Attleborough are considered to be 'major towns', whereas Dereham is only a 'medium sized town'. It is clear from this that Dereham has been overlooked as a location for sustainable growth and that it can sustainably accommodate many more homes than currently proposed.

⁴ Statement of Five Year Housing Land Supply 2017, Breckland Council, July 2017

Recommendation: More development needs allocating outside of the SUEs to ensure the Council can meet its annual housing requirement for the first five years of the plan. As the district's second largest town we consider Dereham to be the most sustainable location for this growth.

HOU 07 - Affordable Housing

This Policy is largely considered sound, but the specific requirements regarding the distribution of affordable housing across a development (point v.) and viability testing (point vi.) are considered unjustified and therefore unsound.

We consider that points i-iv of Policy HOU 07 are sound:

- i. The threshold of 11 units or greater than 1,000 sqm GIA is considered sound as it is in line with national policy and it will ensure delivery of affordable housing on smaller schemes which previously would have avoided affordable provision. It is imperative that the Council is flexible in regards to the tenure on the smaller developments where potentially low number of rented units (e.g. under 5) may be unviable for the developer and/or inappropriate for an RP. In lieu, low cost home ownership products should be supported to ensure the delivery of some affordable housing;
- ii. The requirement for 25% of qualifying developments to be affordable housing is considered sound as it better reflects the viability of schemes in the district and should support the acceleration of delivery of all types of homes, avoiding lengthy delays arising from viability negotiations;
- iii. The requirement for the the mix of affordable housing to reflect the need of the local area at the time of consideration is agreed as sound.
- iv. Orbit Homes agree that affordable rented housing provision on site should be maintained as affordable housing in perpetuity, although suitable Mortgagee in Possession clauses are essential with the S106 agreement to enable RP's to borrow against these homes and generate future capacity for investment in new affordable homes.

We wish to raise concern regarding points v-vi of Policy HOU 07 which in their current form we do not consider to be sound:

- v. This part of the policy states that the council will seek for affordable housing to be distributed across the development as single units or small clusters. We consider that this policy should be amended to reflect the practicalities of "pepper-potting" to the suggested level of single units. This is in terms of both initial acquisition by the RP and longer term management. It would be practical, and not to the detriment of the sustainability of the community created within new development, to allow for clusters of affordable housing of say no more than 10. This aligns with policies in other neighbouring districts which have been successful in delivering affordable housing and ensuring tenure blind communities.

Recommendation: In its current form this policy does not reflect the most appropriate strategy and can therefore not be considered sound. We recommend the policy is amended to allow for small clusters of affordable housing up to a maximum of 10 properties.

- vi. This part of the policy requires an open book viability assessment where schemes do not meet the above policy requirements. In order to support the accelerated delivery of all housing tenures we would suggest that the Council withhold the ability to negotiate directly with the developer on the affordable housing delivery (either overall percentage or tenure split) in instances where the impact is marginal. Reverting in the first instance to the lengthy option of full viability is both costly to the developer and creates

unnecessary delays in which both impact on the initial viability of the scheme and overall the provision of affordable housing.

Recommendation: In its current form, this policy could affect the deliverability of the plan over its period by increasing delays in decision-making and therefore the delivery of affordable housing. This policy cannot therefore be considered effective and is unsound. We recommend that the policy is amended to give the Council greater flexibility in whether to request an open book viability assessment or not. For example: "The Council reserve the right to request an open book viability assessment where schemes do not meet the above policy requirements".

Policy HOU 10 - Technical Design Standards

This policy is unsound as it is not supported by sufficient evidence on viability and is therefore contrary to national planning policy.

Policy HOU 10 sets optional building regulation requirements and nationally described space standards for water efficiency, internal space and the accessibility of homes. It states that this is to ensure new homes provide quality living environments for residents both now and in the future and to help deliver sustainable communities.

Planning Practice Guidance states that local planning authorities should consider the impact of using these standards as part of their Local Plan viability assessment (ID: 56-003-20150327). There is a considerable cost impact relating to these higher standards and it is essential that they are assessed as part of the whole plan viability assessment. The Local Plan and CIL Viability Assessment 2017 does not appear to reference the optional standards for accessibility or water efficiency and while it does mention the nationally described space standards it states that "The Council has no current plans to introduce these standards, however has asked for an assessment of their introduction. On the whole the modelling is in line with these requirements". This statement suggests that an incomplete assessment may have been carried out, but no results of this assessment or conclusion is drawn regarding the impact of applying these standards on viability. The inclusion of these standards in HOU 10 is therefore contrary to national policy in the PPG and must be considered unsound. We note that the Council have mentioned that further supporting evidence is set out in the "Optional Technical Standards" Topic Paper however this has not been published under the Council's evidence base and it is therefore unclear if it addresses viability issues.

In addition to the above issues regarding the impact of the optional standards on the viability of developments, we consider that insufficient justification has been provided to demonstrate that there is a need to set specific space standards in the district over and above the design requirements of building regulations.

Recommendation: Delete this policy as insufficient evidence has been provided to justify applying the optional technical design standards.

COM 02 – Healthy Lifestyles

This policy is unsound as it is not justified or effective.

We recognise the importance of ensuring new development supports the wider aims of local authorities and their partners to improve the health and well-being of their residents and workforce. However, the requirement for all large and complex applications to undertake a Health Impact Assessment (HIA) and all applications to demonstrate how they have mitigated any potential negative effects on health is unnecessary and an additional burden on applicants. The PPG sets out that HIAs "*may be a useful tool to use where there is expected to be significant impacts*" but it also outlines the importance of the local plan in considering the wider health issues in an area and ensuring policies respond to these. As such Local Plans should already have considered the impact of development on the health and well-being of their communities and set out policies to address any concerns. Where a development is in line with policies in the local plan an HIA should not be necessary. Only where there is a departure from the plan should the Council consider requiring an HIA.

Recommendation: This policy should be amended to only require a Health Impact Assessment where there are expected to be significant impacts and there is a departure from the development plan.

Policy ENV 04 – Open Space, Sport & Recreation

This policy is unsound as it is unjustified in requiring a rural standard of outdoor playing space provision in urban areas.

Policy ENV 04 requires all new development to provide a contribution towards outdoor playing space equivalent to 2.56 hectares per 1,000 population, which equates to 25.6 sqm per person, broken down into 17.6 sqm of outdoor sport area and 8 sqm of children's play space.

The figure of 25.6 sqm per person represents an increase on current outdoor playing space standards contained at Core Strategy Policy DC11 which requires 24 sqm per person. The standards set out in both adopted Policy DC11 and emerging Policy ENV 04 are taken from guidelines set out by Fields in Trust (FIT), of which the latest guidelines are contained in their Guidance for Outdoor Sport and Play Beyond the 6 Acre Standard (2015), which are an update on previously more detailed guidelines in Planning and Design for Outdoor Sport and Play (2008).

The standards recommended by FIT are for 0.8ha of children's play space per 1,000 people and either 1.6ha of outdoor sports provision in urban areas or 1.76ha in rural areas per 1,000 people. These standards have not changed between the adoption of Policy DC11 and the development of emerging Policy ENV 04 and it is therefore unclear why the Council has chosen to use the rural standards over the urban standards in the new Local Plan.

The FIT guidelines suggest a higher level of provision should be provided in rural areas due to the distance between facilities on offer (i.e. the distance between villages), whereas in urban areas adjoining neighbourhood facilities are much closer to one another which means they are accessible by more people. It is clear from this that the 25.6 sqm standard should apply in Breckland's rural areas, but that requiring the same standard in Breckland's towns is unjustified.

Recommendation: This policy should be updated to require 24 sqm of outdoor playing space per person in urban areas of the district (e.g. the market towns).

Summary of Recommendations

This letter has demonstrated that the Local Plan's current housing requirement is unsound as the SHMA fails to sufficiently account for market signals in providing an uplift on household projections. On this basis, we recommend that the Council increase their housing target by a further 10% against household projects which would result in a need for an additional 1,391 homes over the plan period.

The Council's failure to plan for sufficient homes is compounded by the over-reliance on housing delivery from two SUEs at the expense of sites that are deliverable in the short term over the next five years. This decision has resulted in the Council attempting to justify a stepped trajectory with lower levels of delivery in the first five years of the plan. It is considered that there is no reasonable justification for this approach as it would be entirely possible for the Council to identify additional allocations to come forwards in the early years of the plan to meet their full annual housing requirement.

In the context of the above, we recommend that more development needs to be allocated outside of the SUEs to ensure the Council can meet its annual housing requirement for the first five years of the plan. As the district's second largest town we consider Dereham to be the most sustainable location for this growth and, as set-out below, we consider Land off Greenfields Road to be a uniquely sustainable option to deliver an additional 65 dwellings towards the increased requirement.

In addition to finding the housing requirement and distribution set by the Pre-Submission document to be unsound, this letter makes several recommendations to either amend or delete specific development management policies regarding outdoor playing space, affordable housing, optional technical design standards and Health Impact Assessments. Without these changes, we consider that the plan is unsound.

Land off Greenfields Road, Dereham

As outlined above, we wish to promote our client's site at Land off Greenfields Road, Dereham for re-allocation as a residential development site for 285 dwellings. The site is already allocated for 220 dwellings by Policy D2 of the Council's Site Specific Policies and Proposals Development Plan Document (2012), but we consider that a higher level of development would represent a more sustainable and efficient use of the site in the context of the Council's clear need to increase the number of homes allocated for delivery in the first 5 years of the plan.

The site's sustainability and deliverability for this higher level of development is demonstrated by the Orbit Homes' current planning application for 285 dwellings on the site (Ref: 3PL/2016/1397/F). This application was submitted in late 2016 and was recommended for approval by officers at committee in May 2017. At this meeting it was deferred by members to enable further details of outdoor playing space provision to be provided. This information is currently being collated and will be submitted to the Council in due course, at which point it is expected that the application will again be recommended for approval by officers.

It is clear therefore that officers consider the site to be appropriate for 285 dwellings. We are also pleased to confirm that the proposals are considered to be deliverable within 5 years as they are promoted by a housebuilder with a proven track record of delivery in the district. The Council cannot currently demonstrate a 5 year supply of housing and it is noted that their latest Statement of Five Year Housing Land Supply (July 2017) only identifies 135 dwellings as being delivered on the site in the next 5 years. We are pleased to confirm that, subject to planning approval, this figure could be increased significantly and we therefore respectfully request that the Council re-allocate our client's land for the increased figure of 285 dwellings. This allocation would provide the added security of an allocation and ensure that there are no delays in achieving planning consent on the site.

We trust that these comments will be given the due consideration and look forward to participating further as the Local Plan preparation progresses. Should you have any further queries or questions then please do not hesitate to contact me.

Yours faithfully

Geoff Armstrong
Director
Armstrong Rigg Planning

Comment

Consultee Ms Geraldine Sayers Cowper (1125802)

Email Address

Company / Organisation Banham Parish Council

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Banham Parish Council (Ms Geraldine Sayers Cowper)

Comment ID 223

Response Date 29/09/17 11:14

Consultation Point 3.16 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 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 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.

LP(003)012: Farmland behind Wayland Way: This is agricultural land outside the village boundary and not immediately adjacent to it, as required by Policy HOU 03, but next to a designated open space (LP(003)09). Building here will also contravene HOU 03 by failing to conserve or enhance the historic nature of the village, as it is part of the countryside which envelopes it.

LP(003)09: Open Space behind Wayland Way: Designated Open Space adjoining farmland. With LP(003)012 will create increased traffic movement and disruption in an area where many elderly and disabled people live. This land was previously turned down for development as needing a full archaeological survey.

LP(003)003: Land to the South of Greyhound Lane: Outside the village boundary and within the Banham Conservation Area. Risk of surface water flood and fluvial flood risk. Situated near a sharp bend on a single track lane with no visibility which is unsuitable and would be hazardous because of the amount of increased traffic generated. Banham has an elongated shape spread over 6.24 square miles and the Parish Council anticipates that most users of a play area at this location would not walk to the venue as being too far, as is the case with most children being driven to the Primary School in the centre of the village. The part of Greyhound Lane next to the proposed area has received many complaints about parking, especially from local farmers unable to access their fields because of obstruction. The point at 3.209 (p 94 of the pre-submission document) of a footpath link from the proposed new development with this site is of concern to the Parish Council, as it appears that this can only be achieved by crossing Greyhound Lane, which it considers to be dangerous, especially for any children who may wish to use the proposed facility. Once past the existing houses, there is no pedestrian refuge on either side of Greyhound Lane and no space to create one on the north side. Banham already has a fully equipped play area in two sections; an enclosed one for toddlers and one for older children up to 12, at the Community Centre, with access to a large car park.

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 Ms Geraldine Sayers Cowper (1125802)

Email Address

Company / Organisation Banham Parish Council

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Banham Parish Council (Ms Geraldine Sayers Cowper)

Comment ID 224

Response Date 29/09/17 11:18

Consultation Point GEN 1 - Sustainable Development in Breckland ([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 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 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.

- 1 **Public transport;** at present there is only one bus to Diss per week, on Saturday, leaving at 09.23 and returning at 12 noon. From Monday to Friday there are two buses to Norwich, leaving at 06.38, arriving at 08.14, and at 09.26 arriving at 10.35. The only public transport to service Banham are buses from Norwich to Banham at 13.15, 16.10 and 17.40, arriving in Banham at 14.15, 17.08 and 18.43 respectively. This hardly conforms with the criterion at 2.14 (p18 of

the pre-submission document) to consider the frequency of services and whether it is possible to reach destinations within normal working hours by public transport. Clearly this is not the case with Diss, where many local people work.

- 2 **Schools:** Banham Primary School has a list of 20 children waiting for reception places and have only 3 places across the other six groups. The school does not anticipate vacancies being available in the numbers most likely required by this development (and the one of 53 houses in Kenninghall Road, not yet built) unless they receive funding for more classrooms to be built and for extra teaching, catering, cleaning and admin staff and equipment. At present its capacity is for 109 pupils. Old Buckenham is the nearest place with a High School and has a primary school, which necessitates motor travel.
- 3 **Employment Opportunities:** Much has been made of the number of businesses in Banham, which is misleading. Most are singly operated with no opportunities for recruitment. Of the few which may have opportunities, Banham Zoo recruits seasonal workers in Summer, mostly at the minimum wage, the garage is mainly staffed by family and old retainers and Acorn Park School has limited contracts due to term times. A trawl of the internet reveals only 4 available posts, two are highly technical, the other two for care workers, one in mental health. Other employees, such as the shops, have well established, long serving staff with rare opportunities for job seekers.

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

<p>Breckland Local Plan Pre-Submission Publication Representation Form</p>

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: 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	Harling Housing Allocation 1
Paragraph	Policy text
Site	LP[042]001
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.

Since the site was included in the Local Plan the County has seen informal proposals on this site and has developed more comprehensive Highways views.

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 Harling Housing Allocation 1 provides insufficient criteria regarding access to the site and offsite highway safety matters. For these reasons the policy is ineffective and unsound. In order to make the plan sound the following criteria need to be addressed in the above Policy:

1. Under point 1 in the policy - make the point clear that the site requires two points of access one through the existing development (Mount Pleasant Drive) and a second new point of access onto Kenninghall Road.
2. New criterion - The development will need to address through an appropriate legal agreement the widening of Kenninghall Road and provision of a footway along the frontage of the site and west all the way to Mount Pleasant Drive.
3. New Criterion - Agreement will need to be sought for the extension of the 30mph speed limit on Kenninghall Road the entire site frontage.
4. New criterion – to address the need for the retention of the public right of way (Harling FP2).

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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.

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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)	✓
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Signature: Hannah Grimes	Date: 27.09.17
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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.



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

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Part 1: Your Contact Details

Name: <u>GILLIAN WINGROVE</u>	
Organisation:	
Address: <u>.....</u>	
Post code: <u>.....</u>	Telephone: <u>.....</u>
E-mail: <u>.....</u>	

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.

I had understood that Breckland Capita would be taking account of both the unprecedented number of written objections already made (400+) for a current proposal on this site and the numerous technical challenges presented by this site.

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

The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock /grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate.

Many of the 400+ local objectors to the current scheme proposed for the land have outlined the visual, landscape and amenity 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 small 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 both the existing and proposed 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.

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-**

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.**

The fields traditionally flood- it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that because the adjoining Shillings Lane is lower that flooding of the lane once a rare occurrence now occurs frequently- Development as proposed will further increase this flooding. 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 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.