

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

--

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

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

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

--

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

Notified of the Submission	x
Notified of the Inspectors Recommendations	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: 28/9/2017

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Comment

Consultee	Vincent Potter (1130636)
Email Address	
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Vincent Potter
Comment ID	235
Response Date	29/09/17 14:48
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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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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Notified of the Submission

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

Comment

Consultee Claire Gooch (1130644)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Claire Gooch

Comment ID 236

Response Date 29/09/17 14:53

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

Status Processed

Submission Type Letter

Version 0.3

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Comment

Consultee Mrs J. R. Howard (1130647)

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Mrs J. R. Howard

Comment ID 237

Response Date 29/09/17 14:56

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

Status Processed

Submission Type Letter

Version 0.3

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Comment

Consultee	Dean Goldspink (1130657)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Dean Goldspink
Comment ID	238
Response Date	29/09/17 15:03
Consultation Point	Dereham Housing Allocation 1 (View)
Status	Processed
Submission Type	Letter
Version	0.3

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Comment

Consultee	Jess Bannerman (1130661)
Email Address	jessica_bannerman@yahoo.co.uk
Address	Old School House North Tuddenham NR20 3DH
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Jess Bannerman
Comment ID	239
Response Date	29/09/17 15:05
Consultation Point	Dereham Housing Allocation 1 (View)
Status	Processed
Submission Type	Letter
Version	0.3

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Comment

Consultee	Marcus Admes (1130665)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Marcus Admes
Comment ID	240
Response Date	29/09/17 15:09
Consultation Point	Dereham Housing Allocation 1 (View)
Status	Processed
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Consultee	Danielle Buttes (1130673)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Danielle Buttes
Comment ID	241
Response Date	29/09/17 15:16
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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Land to the west of EtlingView (LP[025]007

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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.

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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Do you wish to be:

. Notified of the Submission

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

Comment

Consultee Morgana Hale (1130677)
Email Address .
Address

Event Name Local Plan Pre-Submission Publication Document
Comment by Morgana Hale
Comment ID 242
Response Date 29/09/17 15:19
Consultation Point Dereham Housing Allocation 1 ([View](#))
Status Processed
Submission Type Letter
Version 0.3

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- . Notified of the Adoption

Comment

Consultee	Jan Hawkins (1130681)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Jan Hawkins
Comment ID	243
Response Date	29/09/17 15:22
Consultation Point	Dereham Housing Allocation 1 (View)
Status	Processed
Submission Type	Letter
Version	0.3

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Comment

Consultee	P Doughty (1130683)
Address	- -
Event Name	Local Plan Pre-Submission Publication Document
Comment by	P Doughty
Comment ID	244
Response Date	29/09/17 15:27
Consultation Point	Dereham Housing Allocation 1 (View)
Status	Processed
Submission Type	Letter
Version	0.3

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Comment

Consultee	Angela Daley (1130686)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Angela Daley
Comment ID	245
Response Date	29/09/17 15:29
Consultation Point	Dereham Housing Allocation 1 (View)
Status	Processed
Submission Type	Letter
Version	0.3

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Comment

Consultee	Annette Barkowski (1130692)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Annette Barkowski
Comment ID	246
Response Date	29/09/17 15:32
Consultation Point	Dereham Housing Allocation 1 (View)
Status	Processed
Submission Type	Letter
Version	0.3

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Comment

Consultee	Blundell (1130696)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Blundell
Comment ID	247
Response Date	29/09/17 15:36
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 (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.

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	Mrs JJ Tinney (1130704)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Mrs JJ Tinney
Comment ID	248
Response Date	29/09/17 15:41
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

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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	Sarah Godsoe (1130708)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Sarah Godsoe
Comment ID	249
Response Date	29/09/17 15:44
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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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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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 Submission

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

Comment

Consultee Mr Pablo Dimoglou (1130821)
Email Address
Address

Event Name Local Plan Pre-Submission Publication Document
Comment by Mr Pablo Dimoglou
Comment ID 250
Response Date 01/10/17 08:35
Consultation Point Figure 1.1 Breckland Key Diagram ([View](#))
Status Processed
Submission Type Web
Version 0.4

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

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

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

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

As a District Councillor I raised this at The Local Plan Working Group meetings where the Local Service Centre designations were discussed. In particular my views represented a parish in my Ward, Yaxham.

I was not able to comment during a large part of the consultation as I had declared an interest.

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.

I believe the Council has ignored the basis it has itself set for determining what is or is not a Local Service Centre and therefore the map in 1.20 is incorrect and should be amended.

I feel that this was in order to appease a very dedicated, vociferous and aggressive Neighbourhood Plan Group. I do not believe it is for the Council to decide it is appropriate for a community to 'opt out' of being a Local Service Centre, just because they do not want further development.

Yaxham Parish Council had previously voted that Yaxham should be a Local Service Centre due to the plethora of services available within the Parish.

After additional sites were put forward as part of the process, and with pressure from the Neighbourhood Plan Group, Yaxham Parish Council again debated the LSC status and voted against it.

The representation made by officers to the Local Plan Working Group was incorrect.

I believe the question of Local Service Centre designation should be reconsidered within Breckland Council and the map amended to show Yaxham as a Local Service Centre.

Preventing a Parish from being deemed a Local Service Centre for no good reason is not in the spirit of the Local Plan - and it allows the negative NIMBY attitude to prosper, which is one of the reasons why Breckland Council has consistently fallen short of the five year housing land supply.

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.

I would prefer to be available to the Examiner in public.

I have been targeted personally by the Chairperson of The Neighbourhood Plan Group and I believe the examiner would want to draw out more of the background to the situation.

Do you wish to be:

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

Comment

Consultee	Mrs Hilary Clutten. Clerk to Old Bucken Council (1130852)
Email Address	
Company / Organisation	Old Buckenham Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Old Buckenham Parish Council (Mrs Hilary Clutten. Clerk to Old Bucken Council)
Comment ID	251
Response Date	01/10/17 12:50
Consultation Point	3.9 Paragraph (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 justified?
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.

OBPC believes that to apply a blanket 10% uplift in dwelling numbers across all Local Service Centres is unjustified, and fails to take into consideration local circumstances. During earlier rounds of consultation, some villages expressed a desire for greater than 10% growth. In the case of Old Buckenham, the Parish Council expressed concerns about the ability of the village's infrastructure and its physical constraints, to accommodate 10% growth. These concerns have been borne out by Breckland Council's inability to identify suitable sites to accommodate the proposed level of growth, despite two Calls for Sites during which a significant number of sites were put forward, but discounted for technical reasons such as highway safety.

To insist upon allocating 10% growth to all villages, regardless of their individual desire or ability to accommodate this level of growth is irrational and unsound. In instances where the Call for Sites process has not be able to identify suitable sites in a specific settlement, such as Old Buckenham, the level of growth for that settlement should be reduced, and the shortfall made up elsewhere, in locations where there are suitable sites and where the Parish has expressed a desire for greater than 10% growth.

Furthermore, based on the figures provided within the Draft Local Plan, the level of growth applied to Old Buckenham equates to 12.5% rather than 10%. Based on a population of 1270, and a household multiplier of 2.3 people per dwelling, a 10% increase in dwelling numbers would equate to 55 additional dwellings, and not the 69 proposed. This is of real significance for Old Buckenham, as a figure of 55 would result in a shortfall of only 3 dwellings, taking into account completions, commitments and the proposed allocation of 20 dwellings at St Andrew's Close.

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 a measure of the importance of our comments that we choose to attend the Examination In Public if a member of the Parish Council is available to attend on the appropriate date.

Do you wish to be:

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

Comment

Consultee	Mrs Hilary Clutton. Clerk to Old Bucken Council (1130852)
Email Address	
Company / Organisation	Old Buckenham Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Old Buckenham Parish Council (Mrs Hilary Clutton. Clerk to Old Bucken Council)
Comment ID	252
Response Date	01/10/17 12:54
Consultation Point	Policy HOU 02 - Level and Location of Growth (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)

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

Not raised before because this policy approach has not appeared in previous versions of the draft Local Plan

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

OBPC objects to Breckland Council's approach to the level and location of growth. Specifically, to allocate housing in settlements where no suitable sites have been identified is not sound. In the case of Old Buckenham, a significant number of sites were put forward by landowners in and around the

village during the initial Call for Sites and during the second targeted Call for Sites. With the exception of one, none of these were considered suitable for residential development for a variety of technical reasons such as highway safety or impact on the historic environment. The expectation, therefore, that suitable sites will come forward during the plan period, to accommodate 17 dwellings in the case of Old Buckenham, is unrealistic and does not represent a sound approach to distributing the District's housing growth. This approach gives no certainty that the necessary level of housing growth will be delivered within the District, and significantly threatens the Council's future ability to demonstrate an adequate 5-year housing land supply. In instances where the Call for Sites process has not been able to identify suitable sites in a specific settlement, the level of growth for that settlement should be reduced, and the shortfall made up elsewhere, in locations where there are suitable sites.

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 a measure of the importance of our comments that we choose to attend the Examination In Public if a member of the Parish Council is available to attend on the appropriate date.

Do you wish to be:

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

Comment

Consultee Mrs Hilary Clutten. Clerk to Old Bucken Council (1130852)

Email Address

Company / Organisation Old Buckenham Parish Council

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Old Buckenham Parish Council (Mrs Hilary Clutten. Clerk to Old Bucken Council)

Comment ID 253

Response Date 01/10/17 12:59

Consultation Point 3.295 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?

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 raised before because these figures have not appeared in previous versions of the draft Local Plan

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

OBPC believes that the figures quoted do not equate to 10% growth; Based on a population of 1270, and a household multiplier of 2.3 people per dwelling, a 10% increase in dwelling numbers would equate to 55 additional dwellings, and not the 69 proposed, which represents a 12.5% increase. If

the village's allocation were reduced to 10% i.e. 55, then taking into account completions and commitments, coupled with the proposed allocation of 20 dwellings at St Andrews Close, the shortfall to be made up under policy HOU03 would only be 3 dwellings.

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 a measure of the importance of our comments that we choose to attend the Examination In Public if a member of the Parish Council is available to attend on the appropriate date.

Do you wish to be:

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

Comment

Consultee Mrs Hilary Clutten. Clerk to Old Bucken Council (1130852)

Email Address

Company / Organisation Old Buckenham Parish Council

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Old Buckenham Parish Council (Mrs Hilary Clutten. Clerk to Old Bucken Council)

Comment ID 254

Response Date 01/10/17 13:02

Consultation Point Old Buckenham Residential Allocation 1 ([View](#))

Status Processed

Submission Type Web

Version 0.2

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

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

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

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

Not raised before because this wording has not appeared in previous versions of the draft Local Plan

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

OBPC supports the allocation of Land at St Andrew's Close for approximately 20 dwellings. This is a sustainable location for housing growth, and represents a logical extension to the village.

However, minor alterations to the proposed wording of the policy are requested. Specifically, criterion 2 of the draft policy refers to the "Appropriate use of height and scale to ensure the site's position as a key gateway to the settlement". The site does not occupy a 'gateway' position, and is accessible only via St Andrews Close, a cul-de-sac. The wording should therefore be revised to "The height and scale of development should reflect the site's location at the edge of the settlement, and respect the character of adjacent development".

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.

As stated in a previous comment.

Do you wish to be:

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

Comment

Consultee Mr Christopher Blow (963732)

Email Address

Company / Organisation Saham Toney Parish Council

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Saham Toney Parish Council (Mr Christopher Blow)

Comment ID 256

Response Date 01/10/17 14:40

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 justified?
. Is the plan effective?

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

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

This is a new policy

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

While the setting of an upper limit to development in rural settlements with boundaries is welcomed justification needs to be added for this criteria stated (5% of dwellings within the settlement boundary) specifically for each rural settlement, since the sustainability conditions in each will differ. While some may be able to support 5% growth others may not, or indeed, none may be able to do so.

When the Plan is adopted it must state the exact number of dwellings within the settlement boundary of each settlement so that the number is clear to all, rather than hidden in Breckland Council's database.

With regard to development "immediately adjacent to the settlement boundary", in the case of Saham Toney, and many of the other sixteen rural settlements, existing development, and hence the settlement boundary largely follows a ribbon pattern along side roads. Policy HOU 04 omits consideration of access to new development sites adjacent to the boundary. Criteria to guide what is and is not acceptable in this respect should be added.

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

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

Do you wish to be:

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

Comment

Consultee Mr Geoff Hinchliffe (1130870)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Mr Geoff Hinchliffe

Comment ID 257

Response Date 01/10/17 16:11

Consultation Point Shipdham Residential Allocation 2 ([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?

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 aware of the detail.

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

(1) The addition of another 55 houses , adjacent to the Old Coalyard site (already approved for approx 90 houses) exceeds the previously specified development total for the village, bearing in mind other ongoing developments.

(2) The Old Coalyard development , with proposed access onto the A1075 , opposite the Old School Playing Field site (Scheduled for development by Breckland's own agents) is going to create a major road and traffic bottleneck already. To add another 55 houses-worth of vehicles to that scenario is a contradiction of all the idealistic principles claimed for the Plan.

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

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

Do you wish to be:

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

Comment

Consultee Mr Pablo Dimoglou (1130821)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Mr Pablo Dimoglou

Comment ID 258

Response Date 01/10/17 20:08

Consultation Point 1.41 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 legally compliant?
. Is the plan positively prepared?
. Is the plan justified?
. Is the plan effective?
. Is the plan consistent with national policy?

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

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

As District Councillor, I did raise issues at the Local Plan Working Group meetings but was unable to comment for much of the proceedings due to having declared a personal interest.

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.

Breckland Council allowed Yaxham Parish Council and the subgroup of the Parish Council - The Neighbourhood Plan for Yaxham to rescind a previous decision which voted IN FAVOUR of the Local Service Centre designation. When the Extraordinary Parish Council Meeting was called, the reason given for reconsidering the Local Service Centre designation was not because of any shortfall in the

amount of services available to villagers - it was simply because members of the Parish Council and Neighbourhood Plan Group had become aware that several applications had been made by local landowners to bring sites forward as possible preferred sites.

It cannot be sound to let certain, or favoured local Parishes dictate the policy which will be applied to them instead of following the guidelines laid down in national guidance and in the own text of the Local Plan document.

The result of letting communities 'opt out' because they simply do not want more development in their backyard is to place an unfair burden on other communities and negates the efforts made by officers to ensure the Local Plan is fair, legal and consistent.

I believe that the Strategic Objectives 1, 2 and 3 are failed by the above.

As District Councillor in Breckland, Parish Councillor in Yaxham and having part owned by far the largest employer in Yaxham for ten years with a public facing business I came into contact virtually every day with young (and not so young) people who were unable to buy a house in their village as prices had been driven up by those commuting into Norwich or elsewhere and those choosing Yaxham for their retirement. These people may not turn up to Parish Meetings or take part in the Neighbourhood Plan meetings which I was told they felt were hostile - and I experienced this for myself - with the Chairperson on one part thanking me for help as a District Councillor and then denying me the opportunity of taking part in a meeting once it became apparent I was not going to go meekly along with what I say is there anti development objectives. I was threatened by the Vice Chairperson, that if I did not leave the meeting - he would call the police to make me leave.

I feel that the Local Plan process at Breckland Council has given succour to restrictive objectives of the Neighbourhood Plan group rather than meet the greatly needed local demand for houses.

Yaxham has a two shops - one currently closed due to the death of its owner and currently undergoing a major refurbishment with the aim of re-instating the Post Office service which existed in it previously and creating an additional shop. Despite Breckland Council issuing Business Rates Demands for the shop - when an officer made a presentation detailing the amount of services to the Local Plan Working Group - the second shop was completely ignored and this had a major effect on the determination of Breckland Council that they should allow Yaxham to be removed from the proposed Local Service Centres.

Yaxham also has an extremely regular bus service - running to and from Dereham, Mattishall, The Norfolk & Norwich University Hospital, The University of East Anglia and Norwich. The service provided to my ward by the bus companies is first class.

Yaxham has employment opportunities - with one single employer having circa 30 employees on the payroll on a permanent basis. In addition, according to the Yaxham Neighbourhood Plan there are an additional 40 or so businesses operating within Yaxham.

Yaxham has a pub, although it is currently closed due to the ill health of its owner - it is being marketed as a going concern. Like the second shop, Breckland Council was also led to believe that the pub had permanently closed in order for the Neighbourhood Plan group to side step the much needed and organic development being a Local Service Centre would bring

Yaxham has a cafe which opened in 2009 and had a major extension in 2015 - resulting in a 180 plus cover restaurant.

Yaxham has tourist opportunities.

Yaxham has a vibrant Village Hall - built in 1977 to celebrate Her Majesty's Silver Jubilee and having operated sustainably since that time.

Yaxham has a well attended and well loved Primary School

For such services to survive and thrive, the village must be able to grow in a sustainable way that enables our young people to stay in the villages rather than let them become retirement ghettos.

Yaxham Parish should clearly have been identified as a Local Service Centre which would have satisfied the Strategic Objectives of the Local Plan and would be in line with national guidance.

The Strategic Objective (4) is failed by the above. The right type of houses in the right place will not be built, and failure to support local services is likely to result in their reduction or withdrawal altogether.

By forcing our youngsters out of the villages - because their ability to afford housing stock of any type is outpaced by those working in the city with big jobs, or those retiring who are able to sell their house elsewhere and buy locally we cannot pretend we are meeting housing need. I see nothing in the Local Plan to suggest Breckland Council is seeking to resolve this anomaly and restricting development in certain favoured parishes only re-inforces the problems our young people have. Strategic objective (5) is failed.

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

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

Do you wish to be:

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

Comment

Consultee Mr Pablo Dimoglou (1130821)
Email Address
Address

Event Name Local Plan Pre-Submission Publication Document
Comment by Mr Pablo Dimoglou
Comment ID 259
Response Date 01/10/17 20:32
Consultation Point 2.4 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 legally compliant?
- . Is the plan positively prepared?
- . Is the plan justified?
- . Is the plan effective?
- . Is the plan consistent with national policy?

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

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

As District Councillor, I did raise issues at the Local Plan Working Group meetings but was unable to comment for much of the proceedings due to having declared a personal interest

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.

Much is made in the Local Plan about sustainable development, and the need to promote it. The Parish to which I refer, Yaxham has all the services needed to be deemed a Local Service Centre yet Breckland Council allowed Yaxham Parish Council and The Neighbourhood Plan Group change an earlier resolution of Yaxham Parish Council that Yaxham DID HAVE the services which would deem it a Local

Service Centre, and it should be classified so. Once it became apparent that additional landowners wanted to submit land under the call for sites process, the Parish Council were encouraged to call an Extraordinary Meeting and reverse the decision.

Other villages and communities - including the market towns have been encouraged or forced to take significant development. It is only fair and equitable that those who will benefit from sufficient services take a reasonable share of the burden.

We often hear, as in the case of Yaxham - that villages should be allowed to grow slowly - preferably within the settlement boundaries. Most villages have settlement boundaries which are tightly drawn around existing houses and leave virtually no room for growth. In some cases this may be appropriate - but where there are a plethora of local services it is only right that the same test be applied to one Parish as another.

The NPPF states that it is important for rural communities not to stagnate but instead meet the needs of all generations of their communities, particularly the needs of younger households and those on lower wages. Letting Yaxham Parish 'opt out' of being a Local Service Centre is contrary to these aims.

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

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

Do you wish to be:

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

Comment

Consultee Mr Pablo Dimoglou (1130821)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Mr Pablo Dimoglou

Comment ID 260

Response Date 01/10/17 20:40

Consultation Point 2.12 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 legally compliant?
. Is the plan positively prepared?
. Is the plan justified?
. Is the plan effective?
. Is the plan consistent with national policy?

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

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

As District Councillor, I did raise issues at the Local Plan Working Group meetings but was unable to comment for much of the proceedings due to having declared a personal interest

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.

I do not believe Breckland Council has applied consistent policies with regard to determining the Settlement Hierarchy. The same test which has resulted in some Parishes being determined Local Service Centres was not applied to Yaxham Parish. I believe a powerful and vocal - but small number

of people were able to dominate the Parish Council and Breckland Council so that they sidestepped the obvious truth of whether Yaxham should be a Local Service Centre.

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

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

Do you wish to be:

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

Comment

Consultee Mr Peter Bush (973437)
Email Address
Address

Event Name Local Plan Pre-Submission Publication Document
Comment by Mr Peter Bush
Comment ID 261
Response Date 01/10/17 21:18
Consultation Point Breckland Local Plan Pre-Submission Publication
([View](#))
Status Processed
Submission Type Web
Version 0.3

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

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

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

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

The consultation is extremely complicated to comment on, you need a degree in planning! Also no publicity to the public this consultation is being held, how are the public supposed to know. Something this important should have leaflet distribution to every household, local shops even do this to advertise their special offers! THIS CONSULTATION IS ALL GEARED TO RECEIVE AS FEW COMMENTS FROM THE PUBLIC AS POSSIBLE! NO WONDER THERE ARE SO FEW COMMENTS!!

The Toftwood site LP[025]030 received the most negative comments out of all the Dereham sites in previous consultation, will these comments be ignored!?

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

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

Do you wish to be:

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

Comment

Consultee Mr Peter Bush (973437)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Mr Peter Bush

Comment ID 262

Response Date 01/10/17 21:22

Consultation Point 1.15 Paragraph ([View](#))

Status Processed

Submission Type Web

Version 0.3

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

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

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

Toftwood site LP[025]030 slopes towards the river Tud with Badley Moor SSSI only a short distance downstream. Contaminated run-off from the site will enter the river, this then runs through the SSSI creating pollution risk. This site should not be considered suitable due to the close proximity of a river and SSSI. This site is located on the southern boundary of Dereham away from town centre and high schools.

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

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

Do you wish to be:

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

Comment

Consultee Mr Peter Bush (973437)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Mr Peter Bush

Comment ID 263

Response Date 01/10/17 21:29

Consultation Point Policy ENV 02 Sites of International, European, National & Local Nature Conservation Importance ([View](#))

Status Processed

Submission Type Web

Version 0.4

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

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

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

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.

Toftwood site LP[025]030 slopes towards the river Tud with Badley Moor SSSI (SAC) only a short distance downstream. Contaminated run-off from the site will enter the river, this then runs through the SSSI creating pollution risk. This site should not be considered suitable due to the close proximity of a river and SSSI.

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 Mark Mendham (976454)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Mark Mendham

Comment ID 264

Response Date 01/10/17 21:56

Consultation Point Breckland Local Plan Pre-Submission Publication
([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 legally compliant?
. Is the plan positively prepared?
. 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.

There has been no advertising by Breckland Council that this consultation exists, how are the public supposed to know? Dereham simply cannot cope with further large scale housing. Traffic at saturation point, sewerage system already at over capacity. Toftwood site LP[025]030 should not be considered as suitable as adjacent to river Tud with Badley Moor SAC only short distance downstream.

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

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

Do you wish to be:

Comment

Consultee Mark Mendham (976454)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Mark Mendham

Comment ID 265

Response Date 01/10/17 21:57

Consultation Point 1.15 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 legally compliant?
. Is the plan positively prepared?
. 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.

Toftwood site LP[025]030 is on a slope adjacent to river Tud. Any run-off contaminated water will enter the river which then flows through Badley Moor SAC a short distance away. This has not been fully considered.

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

Do you wish to be:

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

Comment

Consultee Mr Dick Barwick (1130929)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Mr Dick Barwick

Comment ID 266

Response Date 01/10/17 22:41

Consultation Point 1.15 Paragraph ([View](#))

Status Processed

Submission Type Web

Version 0.5

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

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

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

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

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

Only just heard from a colleague about consultation.

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.

Site in Toftwood LP[025]030 is next to to river tud in the tud valley. Landscape would be destroyed if developed with badley moor sac very close.

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

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

Do you wish to be:

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

Comment

Consultee Mr Dick Barwick (1130929)
Email Address
Address

Event Name Local Plan Pre-Submission Publication Document
Comment by Mr Dick Barwick
Comment ID 267
Response Date 01/10/17 22:47
Consultation Point Breckland Local Plan Pre-Submission Publication ([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 legally compliant?
- . Is the plan positively prepared?
- . Is the plan justified?
- . Is the plan effective?
- . Is the plan consistent with national policy?

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

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

Only just heard about it from work colleague.

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

No publicity given from council about this consultation. Something this important should have had a flyer to every house.

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

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

Do you wish to be:

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

Comment

Consultee Mr Paul Walmsley (1130940)
Email Address
Address

Event Name Local Plan Pre-Submission Publication Document
Comment by Mr Paul Walmsley
Comment ID 268
Response Date 02/10/17 07:09
Consultation Point Dereham Housing Allocation 1 ([View](#))
Status Processed
Submission Type Web
Version 0.2

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

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

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 025 007

The proposed site is 2 separate fields. The smaller field is bordered by both the Little Neatherd, The Neatherd and the medieval Shillings Lane. Any development on this small field would both be clearly visible to those areas and spoil their amenity and character -the small gain in housing would be wholly disproportionate to this loss of amenity. Furthermore 50% of this field regularly floods (I leased this field for 20 years and am prepared to state this on oath) any development on this field would further increase flooding to adjoining areas- in particular the already flood prone Shillings Lane. There are numerous other issues which have come to light through the current and ongoing (25 months) Taylor Wimpey application on this land- issues include' sewage, flooding, loss of hedges, loss of trees, loss of amenity, crime prevention, loss of habitat, incongruity with surroundings, effect on the adjoin County Wildlife site etc

The changes suggested are NO building whatsoever on the smaller field, it should remain as a buffer both for humans and wildlife and low density low rise (Bungalows) on the larger field

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.

Breckland Capita with Taylor Wimpey have for 2 years been trying to force an ill conceived, poorly planned development through on this site, they have at all stages been in total denial of the challenges this site presents (hence why they have felt unable to put it back to Committee for such a protracted time) Whatever the reason for Breckland Capitas determination to push this through at all costs it must be examined - I believe that having lived adjacent to the site for 30 years and rented it for 20 years that my knowledge and input would be helpful.

Do you wish to be:

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

Comment

Consultee mr chris Manning (969337)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by mr chris Manning

Comment ID 269

Response Date 02/10/17 07:48

Consultation Point Breckland Local Plan Pre-Submission Publication
([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 Issues and Options Stage (November 2014 - January 2015)

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

I think that this is the only way to meet the shortfall in housing and also to tackle the big problem of traffic congestion in the town which has mainly been caused by traffic coming towards the A47 from the north.

The Town proposal has the idiotic idea that by building lots of housing to the south will ease this problem which is certainly will not. This view is also backed by the local MP.

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

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

Do you wish to be:

. Notified of the Submission
. Notified of the Inspectors Recommendations

Comment

Consultee Mr Pablo Dimoglou (1130821)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Mr Pablo Dimoglou

Comment ID 270

Response Date 02/10/17 08:43

Consultation Point 2.12 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 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.

As District Councillor, I did raise issues at the Local Plan Working Group meetings but was unable to comment for much of the proceedings due to having declared a personal interest

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.

I understand that Breckland Council has set a figure to meet the amount of housing required in the district through the period. In my opinion, the target is much the same as is legally required. It is therefore entirely possible that the target could be missed. This danger is increased by the over reliance on major developments such as the one in Thetford. There is already a strong possibility that Thetford will not be able to deliver the amount of houses required due to infrastructure issues and lack of developer interest.

Therefore, it is critical that the rest of the district is able to shoulder an additional part of the burden should it become necessary.

An important contribution to the housing provision will be made by Local Service Centres.

A Parish within my ward as District Councillor, Yaxham has every service available to qualify as a Local Service Centre - and it was the recommendation of planning officers that it be classed so. Yaxham Parish Council voted in favour of the Local Service Centre designation (but overturned the decision at a later meeting when it was realised additional sites has been put forward for possible development).

In my opinion the Neighbourhood Plan for Yaxham group has at the heart of it - through the Chairperson an anti development stance. She has lobbied aggressively for Yaxham not to be a Local Service Centre.

On 21 May 2017 the Chairperson sent an email and letter to the Chairperson and Vice Chairperson of Yaxham Parish Council in what I, and other Parish Councillors see as a direct attempt to undermine local democracy in order to drive her own ambitions forward.

I have included a verbatim extract from the letter and am happy to provide the whole document.

"It is obvious that he (Pablo Dimoglou), Peter B (Peter Bennett - A parish councillor for some 50 years) nor David M (David Myhill - A parish councillor for some 50 years) and probably John H (John Harvey - Parish Councillor whose family have farmed Yaxham for generations) have any idea of the implications of the Plan when faced with Elm Close or Lanpro developers in the future."

"However, I have a proposal which you may consider:

David M and Peter B could be persuaded by you both as Chairman and Vice Chairman that it is in the best interest of the community at this particular time that they should resign as councillors."

"Ian (Martin - the Vice Chairperson of the Neighbourhood Plan Group) and I (Margaret Oechsle - Chairperson of the Neighbourhood Plan Group) could be co-opted by the PC to take their places, to guide the Parish Council to get the Neighbourhood Plan firmly embedded into councillor thinking."

"This could also be very beneficial in ensuring the departure of Pablo sooner rather than later as his allies would have gone from the table"

"I have no real wish to give up yet more Thursday evenings on the village's behalf, so it would only be temporary to get to the next election. I will not stand by and let all our hard work on the Plan fall by the wayside.

"If Tim Hay (my ex business partner) and Breckland (Council) can rid themselves of Pablo, I think we can too and this may be a solution to consider"

Breckland Council should not have let itself be harangued by The Neighbourhood Plan Group and should have stood firm on the Local Service Centre designation rather than be dominated by the wishes of a small section of the community.

I believe the consideration given to declassifying Yaxham as a Local Service Centre was more politically driven - with an eye for votes in future elections - rather than a simple factual exercise of whether Yaxham was a Local Service Centre or not.

To allow this to happen is to jeopardise the whole plan through under delivery - especially if this situation has been replicated elsewhere.

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

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

I feel the examiner may want to draw out more information on this issue which would be best presented in person.

Do you wish to be:

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

Comment

Consultee Mr Pablo Dimoglou (1130821)
Email Address
Address

Event Name Local Plan Pre-Submission Publication Document
Comment by Mr Pablo Dimoglou
Comment ID 271
Response Date 02/10/17 09:00
Consultation Point 2.15 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 legally compliant?
. Is the plan positively prepared?
. Is the plan justified?
. Is the plan effective?
. Is the plan consistent with national policy?

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

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

As District Councillor, I did raise issues at the Local Plan Working Group meetings but was unable to comment for much of the proceedings due to having declared a personal interest

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 presentation was made by an officer to The Local Plan Working Group in relation to the amount of services in Yaxham - and in particular it showed proximity of services by way of circles encompassing areas of the Parish - using any given service as a centre point.

This presentation totally ignored the fact that a shop exists in Yaxham Clint Green, and has done for over 50 years.

Recently, a Post Office service operated from the shop and it is entirely feasible that this could be re-instated.

The previous elderly owner died around two years ago, and the shop had naturally closed pending a probate sale. It was in a poor state of repair and had suffered through under investment.

I sold my retail business on 28 April 2017 and bought the shop on 25 August 2017. I am planning to re-open the shop, having advertised it in Daltons Weekly and online.

Despite Breckland Council issuing business rates demands for the shop (up to and beyond the present day) it was omitted from the presentation. This could have been an oversight - although I would expect officers to have thoroughly investigated the level of service and not just accepted what the Neighbourhood Plan Group told them.

This issue was critical to the decision for Yaxham not to be a Local Service Centre.

Similar applied to the pub, Yaxham Mill which is currently closed due to the ill health of the owner, but is currently for sale as a going concern on Fleuret's

Breckland Council should be required to re-examine the issue of whether Yaxham is a Local Service Centre. Failure to have a robust test, fairly applied brings the whole Local Plan into question if it cannot be resolved.

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 M Neave (1131017)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by M Neave

Comment ID 272

Response Date 29/09/17 09:12

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.

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 MRS KIRSTY HEATH (972215)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by MRS KIRSTY HEATH

Comment ID 273

Response Date 02/10/17 09:15

Consultation Point 3.115 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)

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 for the Dereham population needs to be updated this is several thousand out.

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

Do you wish to be: . Notified of the Submission
. Notified of the Inspectors Recommendations
. Notified of the Adoption

Comment

Consultee Mr Pablo Dimoglou (1130821)
Email Address
Address

Event Name Local Plan Pre-Submission Publication Document
Comment by Mr Pablo Dimoglou
Comment ID 274
Response Date 02/10/17 09:16
Consultation Point Policy HOU 01- Development Requirements (Minimum) ([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 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.

As District Councillor, I did raise issues at the Local Plan Working Group meetings but was unable to comment for much of the proceedings due to having declared a personal interest

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.

I feel that Breckland Council has determined the minimum housing allocation it can provide instead of building in some comfort to our residents that their housing needs will be met.

All too often the people engaged with Local Government and Neighbourhood Planning - the decision makers - have no real commitment to significantly increase housing supply as they have their houses, and their kids have moved away.

Shortly after I was elected as a District Councillor in 2015 I was walking through my village and a young man stopped me. He put his hand on my arm and said "We elected you. Well done, now what are you going to do so that me and my friends don't have to move out of the village to buy a house?"

The only way we can meet the often unheard voices - as above - is to deliver more houses where they are sustainable and where the infrastructure can cope or be improved.

We should be aiming high. This plan should be about providing the homes needed in our district - not just the minimum number the council thinks will suffice.

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 MRS KIRSTY HEATH (972215)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by MRS KIRSTY HEATH

Comment ID 275

Response Date 02/10/17 09:16

Consultation Point Dereham Housing Allocation 2 ([View](#))

Status Submitted

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).

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

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

This development is too close to the River Tud which is prone to flooding. Also exiting onto the main trunk road through Dereham where over 1000 cars use everyday.

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	MRS KIRSTY HEATH (972215)
Email Address	
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	MRS KIRSTY HEATH
Comment ID	276
Response Date	02/10/17 09:23
Consultation Point	Dereham Housing Allocation 5 (View)
Status	Submitted
Submission Type	Web
Version	0.1
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).

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

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

This development should not be considered due to the distance from the towns. Also near to the River Tud, prone to flooding and proximity to nearby SSSI's.

Traffic is also a major negative against this development, the proximity to the old railway bridge, the narrow lanes of Westfield and the boundary of Westfield itself should be considered.

The roads surrounding this land are gridlocked everyday at school times making residents life difficult.

Dereham doesn't have the doctors, dentists and school places for these extra houses, the 2 high schools are based in the north of the town making commuting from the south at peak times troublesome.

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

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

Do you wish to be:

. Notified of the Submission

. Notified of the Inspectors Recommendations

Comment

Consultee Mr Pablo Dimoglou (1130821)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Mr Pablo Dimoglou

Comment ID 277

Response Date 02/10/17 09:24

Consultation Point Policy HOU 04 - Rural Settlements With Boundaries
([View](#))

Status Processed

Submission Type Web

Version 0.1

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

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

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

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

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

As District Councillor, I did raise issues at the Local Plan Working Group meetings but was unable to comment for much of the proceedings due to having declared a personal interest

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.

I believe the Yaxham and Clint Green should be classified as a Local Service Centre.

Additionally - the two settlements of Yaxham and Yaxham Clint Green have always been seen as one village. There has been an aspiration locally to allow development between the two settlements, bringing them closer together. This policy seems to prevent that.

**

Further, in relation to other communities - if a settlement which is not a Local Service Centre due to the lack of services - is able to progress and attract beneficial services for its residents - such as schools, bus routes etc we must allow them to grow.

The policy HOU 4 is far too restrictive, and I feel will allow Nimbyism to strangle growth - even where growth is appropriate and needed.

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 MRS KIRSTY HEATH (972215)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by MRS KIRSTY HEATH

Comment ID 278

Response Date 02/10/17 09:27

Consultation Point 3.144 Paragraph ([View](#))

Status Submitted

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).

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.

Just because it is close to an employment area this does not mean there are actually any job vacancies.

This goes for the schools too, which are at capacity, with several classes in each year having over 30 pupils per class, which in this day and age is not acceptable.

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

Do you wish to be:

Comment

Consultee MRS KIRSTY HEATH (972215)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by MRS KIRSTY HEATH

Comment ID 279

Response Date 02/10/17 09:32

Consultation Point 3.145 Paragraph ([View](#))

Status Submitted

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).

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 may relieve the Tavern junction initially, but inevitably this traffic will adjoin the tavern junction if they require a trip into the town or to get north.

This would also seriously impact the 'Tesco' roundabout which at peak times is gridlocked, not only at weekends now, due to the nature of the new business parks popularity.

There are serious causes for concern having a junction onto Shipdham Road from such a large housing estate, on the brow of a hill with well over 1000 cars/hgvs using this road daily, making turning right extremely dangerous.

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

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

Do you wish to be:

Comment

Consultee MRS KIRSTY HEATH (972215)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by MRS KIRSTY HEATH

Comment ID 280

Response Date 02/10/17 09:35

Consultation Point 3.147 Paragraph ([View](#))

Status Submitted

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).

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

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

When this site was looked at in the 70's/80's there were concerns for the water treatment even back then, with talk of a multi million pound sewerage plant, hence why it didn't go ahead and things have got significantly worse since then around Dereham with the growth of the town therefore making it impossible to consider without a considerable upgrade to the Dereham water treatment works.

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

Do you wish to be:

Comment

Consultee	Lisa Boyle (1131040)
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Lisa Boyle
Comment ID	281
Response Date	29/09/17 09:34
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.

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 MRS KIRSTY HEATH (972215)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by MRS KIRSTY HEATH

Comment ID 282

Response Date 02/10/17 09:43

Consultation Point 4.4 Paragraph ([View](#))

Status Submitted

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).

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

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

The A47 surrounding Dereham desperately needs resurfacing and dualling due to increase in the number of accidents occurring resulting in the loss of lives.

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

Do you wish to be:

Comment

Consultee Mrs Jen Gaton (1131046)
Email Address
Address

Event Name Local Plan Pre-Submission Publication Document
Comment by Mrs Jen Gaton
Comment ID 283
Response Date 29/09/17 09:40
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)

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.

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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

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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

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

Comment

Consultee Mr Pablo Dimoglou (1130821)
Email Address
Address

Event Name Local Plan Pre-Submission Publication Document
Comment by Mr Pablo Dimoglou
Comment ID 284
Response Date 02/10/17 09:45
Consultation Point Policy COM 03 Protection of Amenity ([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?
. 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.

As District Councillor, I did raise issues at the Local Plan Working Group meetings but was unable to comment for much of the proceedings due to having declared a personal interest

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.

I believe the policy COM 03 has some merit, however it seeks to introduce further restrictions which will adversely affect the poorest in society.

For instance - point 4 - Overlooking private amenity space.

So, effectively - if a developer wants to build a terrace of 5 houses - my presumption is that each upstairs bedroom will over look the next door amenity space. Therefore, this policy could be used against the creation of new lower priced homes which are greatly needed in our district.

We cannot all afford to live in spacious detached houses and this policy is too prescriptive and restrictive.

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 285

Response Date 02/10/17 09:53

Consultation Point Policy HOU 10 - Technical Design Standards for New Homes ([View](#))

Status Processed

Submission Type Web

Version 0.3

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

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

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

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

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). The proposed higher standards would have significant cost implications and it is important that this is assessed as part of the whole plan viability assessment. The Council's CIL Viability Assessment 2017 does not address the optional standards for accessibility or water efficiency and whilst it mentions nationally described space standards it states that the Council has no current plans to introduce these standards. This would indicate that work in this regard is incomplete and the impact of applying these standards on viability not properly considered. In sufficient justification has been provided to demonstrate that there is a need to set specific space standards over and above the design requirements of Building Regulations. Policy HOU10 is therefore unsound as it is contrary to national policy set out in the PPG

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

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

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

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

Part 1: Your Contact Details

Name: <u>MR S YARHAM</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.

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.

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

--

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

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

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

--

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

Notified of the Submission	x
Notified of the Inspectors Recommendations	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: 24.9.17

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Comment

Consultee Mr Pablo Dimoglou (1130821)
Email Address
Address

Event Name Local Plan Pre-Submission Publication Document
Comment by Mr Pablo Dimoglou
Comment ID 287
Response Date 02/10/17 10:04
Consultation Point Map .17 Yaxham Settlement Boundary ([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 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.

As District Councillor, I did raise issues at the Local Plan Working Group meetings but was unable to comment for much of the proceedings due to having declared a personal interest

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 settlement boundary for Yaxham Parish is too restrictive, being basically drawn around what built form already exists. This does not provide opportunity to meet the needs of local people.

Further, the settlement boundary does not a granted outline planning permission 3PL/2014/0820/O for the construction of homes at the end of Elm Close which seems slightly bizarre.

This should be amended.

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

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

Do you wish to be:

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

Comment

Consultee Mr Pablo Dimoglou (1130821)
Email Address
Address

Event Name Local Plan Pre-Submission Publication Document
Comment by Mr Pablo Dimoglou
Comment ID 288
Response Date 02/10/17 10:16
Consultation Point 2.14 Paragraph ([View](#))
Status Processed
Submission Type Web
Version 0.6

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

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

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

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

As District Councillor, I did raise issues at the Local Plan Working Group meetings but was unable to comment for much of the proceedings due to having declared a personal interest

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.

I am a Parish Councillor in Yaxham and I am a District Councillor covering Yaxham as part of my ward.
The Local Plan identifies certain factors which, simply speaking, classify the settlement as a Local Service Centre.

Yaxham has:-

One shop currently open and with a thriving trade.

Another shop currently closed due to the death of the owner - which previously operated a Post Office service. This shop is currently being refurbished in preparation of re-opening in early 2018.

A vibrant primary school

A pub - currently closed due to the ill health of the owner but being marketed as a going concern.

A cafe - having been greatly expanded in 2015 and now seating circa 180 people.

Employment opportunities - with the largest employer in the Parish employing circa 30 people and approximately 40 businesses based in the Parish.

A train station (enthusiast line but with regular services to Dereham and Wymondham)

A village hall - built in 1977 and having operated commercially since that time

Sports and recreational facilities

A superb public transport service via bus. Services at a very minimum hourly but often much more frequent. Running to and from Dereham, Mattishall, The Norfolk & Norwich University Hospital, The University of East Anglia, Norwich

Despite the plethora of services, the village was not deemed a Local Service Centre due to political pressure from the Neighbourhood Plan for Yaxham Group.

I believe this was brought to bear because of an anti development agenda. This cannot be acceptable.

All communities must shoulder their fair share of development to meet the needs of local people.

A rule applied to one community should be applied to all. There should be consistency in the decision to award Local Service Centre status.

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

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

Do you wish to be:

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

Comment

Consultee Mr John Pitt (1131065)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Mr John Pitt

Comment ID 289

Response Date 29/09/17 10:08

Consultation Point Map 3.1 Summary of the Dereham Allocations. ([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).

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.

It looked a responsible plan for all areas within your mandate from government. Also you have avoided a massive housing estate 'on top of' grade II listed Green Farm Dumpling Green. Also you realised the amount of traffic from this build would be unsustainable for B1135, even if '4' cars were allowed access proposed site only one access as Dumpling Green Lane still only B1135 access.

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

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Representation Form**

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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>Kate Filby</i>	
Organisation:		<i>Harling Parish Council</i>	
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:			

BRECKLAND COUNCIL
27 SEP 2017
JUST ROOM

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	N/A
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.

We feel that comments made by the Parish Council at previous consultations
Have been listened to and we are happy with those listed in the pre
Submission publication

We would add that although the Parish Council do not wish to make representation
Against the preferred site at this stage, we cannot guarantee that objections will not be
Made against this application when it is put forward by the developer.

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

Declaration: I understand that the details included on this form will be available in the public domain. (please tick box)	
Signature	Date: 25/09/17

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Comment

Consultee R. N. Smith (1131085)
Email Address
Address

Event Name Local Plan Pre-Submission Publication Document
Comment by R. N. Smith
Comment ID 291
Response Date 02/10/17 10:26
Consultation Point Map .2 Beetley Settlement Boundary ([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).

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

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

We agree and support keeping the settlement boundary for Beetley as it is at present.

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:

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

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Part 1: Your Contact Details

Name: Paul Hewett, on behalf of the resident that I represent within Shipdham	
Organisation: Breckland District Councillor	
Address:	
Post code:	Telephone:
E-mail:	

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

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

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

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

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

Policy	X
Paragraph	
Site	X
Proposals Map	X
Settlement Boundary	
Other	X

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

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

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

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

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

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

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

I have been asked to comment by residents within Shipdham in my capacity as District Councillor on the following grounds:

1 – Preparation, effectiveness and compliance of the plan as presented: despite the time taken to reach this stage there are a number of errors, omissions, typos and inconsistencies that do not befit a plan of this significance, and suggest additional, more significant errors might be present. For example, The Millwright Arms is not in Shipdham – it is in a town a number of miles away. This has been pointed out in the past.

2 – Compliance and effectiveness of the plan as submitted: there are significant questions as to the current capacity of infrastructure (roads, power, water, sewerage) within Shipdham to cope with even current occupancy let alone additional building within the village. Lack of adequate drainage and sewerage in particular have been raised on all recent building projects in the village with current utility businesses failing to address, or (in some instances) even recognise existing shortcomings.

3 – Compliance and effectiveness with the plans as submitted: both with the current village road network and, more significantly, on the network either side of the village, there are significant concerns over road safety, traffic volumes and speed. Shipdham is a ribbon-development village on a major A road (the A1075) which is the only major route north/south through the district and is an emergency diversion should the A47 be closed. Current traffic levels on the A1075 struggle with village traffic, and will be negatively impacted in the centre of the village with a further 80 – 120 properties being built (preferred sites) before windfall sites in the current pipeline. Moreover, there are significant, major developments planned in Watton (5 miles south on the A1075) and Dereham (4 miles north) all of which will use the A1075 to access north or south of the District. The focus of much of these major developments is on traffic flow caused by the developments themselves (which constitute major challenge) but have not yet addressed the critical impact these will have on the major transport route that goes through Shipdham. Until there is a genuine attempt to address these critical strategic priorities the plan as it stands cannot be legally compliant, positively prepared, or effective.

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

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

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

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

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

Notified of the Submission	X
Notified of the Inspectors Recommendations	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: Paul Hewett	Date: 1 October 2017

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

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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: Ian Martin	
Organisation: Yaxham Parish Council	
Address:	
Post code:	Telephone: 0
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	GEN 03, GEN 05, HOU2, HOU3, HOU4, HOU5
Paragraph	SA Para 5.42, Para 19.3, Table 19.44
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.

**NP4Yaxham Working Group – Proposed Breckland Local Plan Pre-Submission Publication
Consultation Response**

The focus of the Yaxham response is on how the overall Plan affects the parish of Yaxham and whether in this context it is considered to meet the test of “Soundness”.

Yaxham is therefore pleased to note that in the settlement hierarchy the parish’s main settlements of Yaxham and Clint Green are expressly classed as within the third tier of the settlement boundary as “rural settlements have settlement boundaries” within General Policy GEN 03 and in Housing Policy HOU04 with Settlement Boundary Map 17 “Yaxham & Clint Green”.

In addition, the other settlement within this small rural parish is Brakefield Green and comes in below the third tier in the settlement hierarchy (Policy GEN 03) i.e. within “small villages and hamlets outside of settlement boundaries (Policy HOU 05).

This designation of the settlements within Yaxham Parish recognises their small village rural nature, the distributed nature of settlement within the parish and lack of local services capable of serving the whole community in a sustainable fashion. Yaxham has seen and continues to see small scale organic growth at a rate that is likely to meet or exceed the 7% growth designated for such villages (HOU 02). Indeed at present currently permitted properties equal almost 15% of the current settlement numbers. Each of its main settlements have some services, but are not “available... within the recognised acceptable walking distance – taken to be 800m.” – Sustainability Assessment Para 19.3 and Table 19.44. Indeed settlements within the Parish of Yaxham are 1km - 3km apart.

Yaxham welcomes the adoption by the emerging Local Plan of a policy element at the centre of the recently made Yaxham Neighbourhood Plan, namely supporting “development [that] avoids coalescence of settlements” – HOU 03 point 4., HOU 04 point 5., and with different wording HOU 05.

This is and was central to all the consultation feedback for the Yaxham Neighbourhood Plan.

Yaxham welcomes in policy GEN 05 addressing the role of settlement boundaries, which had been missing in earlier versions of the emerging Local Plan.

We are however concerned that the Sustainability Assessment has not been updated to include the Local Green Spaces designated in the Neighbourhood Plan (SA Para 5.42) although they are shown on the Policies Map for Yaxham.

On this basis it is considered that this element of the Plan as it affects the Parish of Yaxham meets the test of “soundness” in that it is:

- “positively made” in that it recognises the circumstances of such vulnerable small rural communities that support small-scale organic growth that will retain the character of the villages, enable services to be supported and maintained, but without imposing large-scale inappropriate development.
- “the plan justified” – yes, in that it is consistent with the consultation and policies of the Yaxham Neighbourhood Plan – “made” on 22nd June 2017, having passed at referendum with 92% voting “yes”, on a turnout of 58% i.e. 53% of the electorate voted “yes”.
- “the plan effective” – yes, in that it makes provision for small-scale organic growth, which in time can be substantial.
- “consistent with national policy” – yes as throughout the NPPF and NPPG there is a continual balance to be struck in rural areas of sustainable development that enhances and develops rural communities rather than undermines and destroys. The Yaxham Neighbourhood Plan was deemed to consistent with national policy, and it and the emerging Local Plan are consistent with each other.

As agreed by Yaxham Parish Council at its meeting on 21st September 2017

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: 1st October 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

Agent Mr Iain Hill (1032077)

Email Address

Address Ingleton Wood LLP

Consultee Mr Iain Hill (1130112)

Email Address

Company / Organisation Breckland Bridge

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Breckland Bridge (Mr Iain Hill)

Comment ID 297

Response Date 02/10/17 11:14

Consultation Point 3.255 Paragraph ([View](#))

Status Processed

Submission Type Web

Version 0.4

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

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

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

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

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

On behalf of Breckland Bridge Limited, we support the identification of Litcham as a Local Service Centre that will accommodate 22 residential units. It is evident from the text relating to Litcham at Paragraph 3.256 that the village provides a range of services which justifies its designation as a Local Service Centre. The village is therefore a sustainable location for modest growth. Accordingly, this aspect of the Local Plan is considered sound as it has been positively prepared

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.

Given the matter raised relates to a significant issue that will have implications for development within the village and delivery of the Council's housing target we wish to appear at the Hearing Sessions of the Examination in Public on behalf of Breckland Bridge Limited.

Do you wish to be:

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

Comment

Agent Mr Iain Hill (1032077)

Email Address

Address Ingleton Wood LLP

Consultee Mr Iain Hill (1130112)

Email Address

Company / Organisation Breckland Bridge

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Breckland Bridge (Mr Iain Hill)

Comment ID 298

Response Date 02/10/17 11:26

Consultation Point 3.25 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)

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.

On behalf of Breckland Bridge Limited, we disagree with the proposed designation of Colkirk as one of the 'Small Villages and Hamlets Outside of Settlement Boundaries', and consider that this proposal is unsound as it is unjustified.

Paragraph 3.25 of the draft Local Plan states that, "For those areas with 2 or fewer of the services / facilities, settlement boundaries have been removed." It is assumed that this refers to the services/facilities considered in the Local Service Centre Topic Paper, August 2017, which not only established which settlements met the required criteria for designation as a Local Service Centre, but also contained a Rural Parish Service Audit. The Topic Paper identifies that Colkirk has 3 of the listed services/facilities: a school, community facility, and employment. It is therefore unclear why a Settlement Boundary has not been proposed for the village.

Furthermore, it is apparent that the criteria for selecting which villages should have Settlement Boundaries has been inconsistently applied. For example, Shropham is proposed to have a Settlement Boundary, but the Rural Parish Service Audit in the August 2017 Topic Paper shows that it only has 2 of the 5 services/facilities required.

In addition, we dispute the Council's conclusion that Colkirk does not have access to Public Transport. There is a Shopper Bus Service which provides access to Fakenham (on a Tuesday) and Dereham (on a Friday). It is evident from reviewing the Services Audit in the August 2017 Topic Paper that various other villages, notably Lyng, Shropham, Thompson, Gressenhall and Mundford have no access to public transport, but are still considered to be sufficiently sustainable locations to justify Settlement Boundaries.

In addition, Colkirk is within close proximity (3 miles) of the extensive range of services and employment opportunities provided within Fakenham. Accordingly, whilst journeys by private car will be required, they will be limited in their distance. This situation has previously been acknowledged as acceptable by both Officers and Members of the Council, in the recent planning application at Herne Lane, Beeston, reference 3PL/2016/0269/O.

On this basis, we request that Colkirk is recognised as a Rural Settlement with a Boundary that is subject to proposed Policy HOU 04.

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.

Given the matter raised relates to a significant issue that will have implications for development within the village and delivery of the Council's housing target we wish to appear at the Hearing Sessions of the Examination in Public on behalf of Breckland Bridge Limited.

Do you wish to be:

Notified of the Submission

Comment

Agent Mr Iain Hill (1032077)

Email Address

Address Ingleton Wood LLP

Consultee Mr Iain Hill (1130112)

Email Address

Company / Organisation Breckland Bridge

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Breckland Bridge (Mr Iain Hill)

Comment ID 299

Response Date 02/10/17 11:33

Consultation Point Policy HOU 05 - Small Villages and Hamlets Outside of Settlement Boundaries ([View](#))

Status Processed

Submission Type Web

Version 0.1

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

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

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

On behalf of Breckland Bridge Limited, we strongly support the sentiments expressed in paragraph 3.25, specifically the recognition that in areas outside the identified Settlement Boundaries, there are living and working communities whose social and economic viability must be addressed. However, it is considered that proposed Policy HOU 05 includes elements that are unjustified, and consequently unsound.

Proposed Policy HOU 05 seeks to allow limited development in smaller villages and hamlets outside of defined settlement boundaries in exceptional circumstances, subject to being supported by other policies within the Local Plan and if all of five criteria are satisfied. These criteria include a restriction to a maximum of 3 dwellings. However, there is no justification or explanation as to why this level of development is deemed the appropriate limit. Limiting development to no more than 3 units in such locations may make development unviable, given the infrastructure costs often associated with new development. A greater number of units is far more likely to provide sufficient returns to enable a developer / landowner to make a scheme viable. In addition, this scale of development would make no contribution towards local infrastructure, and would not deliver affordable housing.

A further requirement of Policy HOU 05 is to secure Parish Council support. Again, this is considered unjustifiable, and consequently unsound. Residential developments in rural locations are often subject to local opposition, and if a planning application is able to demonstrate that it accords with the Adopted Development Plan, or material considerations exist to justify development, it should not be refused just because the Parish Council do not support it. Parish Council decisions are often based on issues which do not constitute material planning considerations, and to require a developer to secure support from the Parish Council in all circumstances cannot be justified.

It is therefore recommended that the restriction to 3 units is removed, as is the requirement to secure Parish Council support.

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.

Given the matter raised relates to a significant issue that will have implications for development within the village and delivery of the Council's housing target we wish to appear at the Hearing Sessions of the Examination in Public on behalf of Breckland Bridge Limited.

Do you wish to be:

Notified of the Submission

Comment

Agent Mrs Sarah Hornbrook (1126421)

Email Address

Company / Organisation Ingleton Wood

Address

Consultee (1126434)

Company / Organisation Breckland Bridge Ltd and G F Cole & Sons Ltd

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Breckland Bridge Ltd and G F Cole & Sons Ltd ()

Comment ID 300

Response Date 02/10/17 11:51

Consultation Point 3.200 Paragraph ([View](#))

Status Processed

Submission Type Web

Version 0.1

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.

On behalf of Breckland Bridge Ltd and G F Cole & Sons Ltd, we support the identification of Banham as a Local Service Centre that will accommodate at least 42 residential units. It is evident from the text relating to Banham at Paragraph 3.201 that the village provides a range of services which justifies its designation as a Local Service Centre. The village is therefore a sustainable location for modest growth. Accordingly, this aspect of the Local Plan is considered sound as it has been positively prepared.

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.

Given the matter raised relates to a significant issue that will have implications for development within the village and delivery of the Council's housing target we wish to appear at the Hearing Sessions of the Examination in Public on behalf of Breckland Bridge Limited.

Do you wish to be:

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

Comment

Agent Mrs Sarah Hornbrook (1126421)

Email Address

Company / Organisation Ingleton Wood

Address

Consultee (1126434)

Company / Organisation Breckland Bridge Ltd and G F Cole & Sons Ltd

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Breckland Bridge Ltd and G F Cole & Sons Ltd ()

Comment ID 301

Response Date 02/10/17 11:53

Consultation Point Banham Housing Allocation 1 ([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 justified?
 . Is the plan effective?

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

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

This is the first time that this specific policy wording has been proposed

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

Whilst Breckland Bridge Ltd and G F Cole & Sons Ltd strongly support the proposed allocation, as detailed in our response to Map 3.4, in order to ensure that the proposed allocation is sound, in terms of whether it is effective, justified and positively prepared, it is requested that alterations are made to the wording of the proposed Policy, as detailed below.

Point 1 of the Policy requires access to be taken from Wayland Way; whilst we are in agreement that the principal means of access should be from Wayland Way, we request that the word 'principal' is inserted into the Policy wording, to facilitate, where feasible, a secondary means of access to the site. It may be that in order to achieve the optimum development of the site, a number of units could also be accessed via Gaymer Close, or directly from Greyhound Lane. The inclusion of the word 'principal' would provide flexibility for the developer to consider a variety of options, including potential secondary points of access, subject to demonstrating that there would be no adverse impacts on highway safety, and no other adverse effects.

We also seek clarification on the quantum of Public Open Space to be provided, as there is currently some ambiguity; the first paragraph of the Policy requires a minimum of 1ha of open space, whereas point 7 refers to 0.75ha. The area of land currently designated as Open Space, immediately adjacent to Wayland Way and Gaymer Close, is approximately 0.75ha, and it is this space that is to be re-provided on the land to the south of Greyhound Lane. We would therefore request that the first paragraph of the Policy is corrected to read 'a minimum of 0.75ha of open space including a children's play facility...' and point 7 remains unaltered.

The significant qualitative improvements that are to be provided, including the provision of a Local Area of Play (LAP), mean that like-for-like replacement (in terms of the area of open space) will be more than sufficient to meet the needs of the new residents. The existing open space performs no real function and is of little amenity value; as detailed in our previous Representations, the site is laid to grass, and whilst members of the public are able to walk freely within the site, this is the only opportunity it affords for recreation. It does not provide any social function, and is not actively managed for recreation purposes; there is no seating provided, no litter bins, and no links in to any of the Public Rights of Way in the vicinity of the site. The proposals contained within the draft Policy will result in a significant enhancement to the open space provision, to the benefit of the whole village, and to require an increase in the area of the space, as well as the qualitative improvements, is not justified.

We would question whether the wording of point 3 of the proposed Policy is entirely appropriate; the site is not a 'gateway' site in that it is not directly situated on a key approach into the village. Whilst there is a possibility that some development will front onto Greyhound Lane, the majority of the land lies to the north of Greyhound Lane, and will not be read as part of Greyhound Lane. Consequently, it is suggested that the wording of point 3 is revised to read 'appropriate use of height and scale to reflect the site's edge of settlement location'.

For clarity, the proposed Policy is repeated below, with wording that we suggest is omitted crossed through, and new wording underlined.

Land adjacent to Gaymer Close and to the south of Greyhound Lane (LP[003]003, LP[003]009 & LP[003]012)

Land amounting to 3.2 ha is allocated for a residential development of at least 42 dwellings. A minimum of ~~1 ha~~ 0.75 ha of open space including a children's play facility will be provided on land to the south of Greyhound Lane (LP[003]003). Development will be subject to compliance with the following criteria:

1. *1. Principal access to residential development to be provided from Wayland Way including associated improvements to the local highway and footway provision to the satisfaction of Norfolk County Council as Highway Authority, including a footpath link from the housing development to Greyhound Lane;*
2. *2. Appropriate density to reflect and respect existing development;*
3. *3. Appropriate use of height and scale to ensure the site's position as a gateway to the settlement reflect the site's location at the edge of the village;*
4. *4. Retention of native hedgerow and trees on the site boundary, where appropriate, with further natural screening to be provided on the north west boundary of the residential site;*

- 5 5. *Development proposals should seek to protect and enhance the setting of Banham Conservation Area;*
- 6 6. *Appropriate sustainable surface water attenuation measures are provided, and where possible included as part of landscaping schemes;*
- 7 7. *Subject to provision of equivalent replacement new open space of a minimum of 0.75ha including a Local Area for Play (LAP) on land south of Greyhound Lane (LP[003]003). The risk of surface water flood and fluvial flood risk is required to be addressed in the planning application, and appropriate solutions implemented to improve drainage and ground conditions to enable the open space and LAP to be in use throughout the year; and*
- 8 8. *A pre-application enquiry with Anglian Water Services is required for this site in accordance with the Water Cycle Study to demonstrate that sufficient capacity is available to transfer wastewater for treatment. Where insufficient capacity within the wastewater network is identified, financial contributions may be sought.*

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.

Given that the matters raised relate to significant issues that will have implications for the development of the site and delivery of the Council's housing target we wish to appear at the Hearing Sessions of the Examination in Public on behalf of Breckland Bridge Ltd and G F Cole & Sons Ltd.

Do you wish to be:

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

Comment

Agent	Mrs Sarah Hornbrook (1126421)
Email Address	
Company / Organisation	Ingleton Wood
Address	
Consultee	(1129859)
Company / Organisation	Breckland Bridge Ltd
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Breckland Bridge Ltd ()
Comment ID	302
Response Date	02/10/17 11:55
Consultation Point	3.247 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.1

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

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

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

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

On behalf of Breckland Bridge Ltd, we support the identification of Kenninghall as a Local Service Centre that will accommodate 36 residential units. It is evident from the text relating to Kenninghall at Paragraph 3.248 that the village provides a range of services which justifies its designation as a

Local Service Centre. The village is therefore a sustainable location for modest growth. Accordingly, this aspect of the Local Plan is considered sound as it has been positively prepared.

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.

Given the matter raised relates to a significant issue that will have implications for development within the village and delivery of the Council's housing target we wish to appear at the Hearing Sessions of the Examination in Public on behalf of Breckland Bridge Limited.

Do you wish to be:

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

Comment

Agent Mrs Sarah Hornbrook (1126421)

Email Address

Company / Organisation Ingleton Wood

Address

Consultee (1126434)

Company / Organisation Breckland Bridge Ltd and G F Cole & Sons Ltd

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Breckland Bridge Ltd and G F Cole & Sons Ltd ()

Comment ID 303

Response Date 02/10/17 11:56

Consultation Point 3.208 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 positively prepared?
 . Is the plan justified?
 . Is the plan effective?

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

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

This is the first time that this paragraph has appeared in the draft document.

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.

Paragraph 3.208 states that the land to the south of Greyhound Lane is unsuitable for residential development because of constraints in terms of access, fluvial flood risk and surface water flood risk, as well as being adjacent to the Conservation Area. Whilst it is correct that development of this whole parcel of land for approximately 15 dwellings has been ruled out on this basis, it may be possible to secure a small amount of development in this location, away from the part of the site in Flood Zone 3, and at a quantum which would have no adverse highway safety impacts. Norfolk County Council's comments on the proposed allocation (Comment ID 88) indicate that development in this location could be acceptable, subject to highways improvements to Greyhound Lane. Furthermore, access to Church Hill to the north may be possible, as the landowner has retained a right of access in this location.

The wording of this paragraph should be revised, to avoid ruling out development of any scale in this location, as to do so would be unjustified.

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.

Given the matter raised relates to a significant issue that will have implications for development of the site and delivery of the Council's housing target we wish to appear at the Hearing Sessions of the Examination in Public on behalf of Breckland Bridge Ltd and G F Cole & Sons Ltd.

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>

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: Ian Martin	
Organisation: Yaxham Parish Council	
Address:	
Post code:	Telephone: 0
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	GEN 03, GEN 05, HOU2, HOU3, HOU4, HOU5
Paragraph	SA Para 5.42, Para 19.3, Table 19.44
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.

**NP4Yaxham Working Group – Proposed Breckland Local Plan Pre-Submission Publication
Consultation Response**

The focus of the Yaxham response is on how the overall Plan affects the parish of Yaxham and whether in this context it is considered to meet the test of “Soundness”.

Yaxham is therefore pleased to note that in the settlement hierarchy the parish’s main settlements of Yaxham and Clint Green are expressly classed as within the third tier of the settlement boundary as “rural settlements have settlement boundaries” within General Policy GEN 03 and in Housing Policy HOU04 with Settlement Boundary Map 17 “Yaxham & Clint Green”.

In addition, the other settlement within this small rural parish is Brakefield Green and comes in below the third tier in the settlement hierarchy (Policy GEN 03) i.e. within “small villages and hamlets outside of settlement boundaries (Policy HOU 05).

This designation of the settlements within Yaxham Parish recognises their small village rural nature, the distributed nature of settlement within the parish and lack of local services capable of serving the whole community in a sustainable fashion. Yaxham has seen and continues to see small scale organic growth at a rate that is likely to meet or exceed the 7% growth designated for such villages (HOU 02). Indeed at present currently permitted properties equal almost 15% of the current settlement numbers. Each of its main settlements have some services, but are not “available... within the recognised acceptable walking distance – taken to be 800m.” – Sustainability Assessment Para 19.3 and Table 19.44. Indeed settlements within the Parish of Yaxham are 1km - 3km apart.

Yaxham welcomes the adoption by the emerging Local Plan of a policy element at the centre of the recently made Yaxham Neighbourhood Plan, namely supporting “development [that] avoids coalescence of settlements” – HOU 03 point 4., HOU 04 point 5., and with different wording HOU 05.

This is and was central to all the consultation feedback for the Yaxham Neighbourhood Plan.

Yaxham welcomes in policy GEN 05 addressing the role of settlement boundaries, which had been missing in earlier versions of the emerging Local Plan.

We are however concerned that the Sustainability Assessment has not been updated to include the Local Green Spaces designated in the Neighbourhood Plan (SA Para 5.42) although they are shown on the Policies Map for Yaxham.

On this basis it is considered that this element of the Plan as it affects the Parish of Yaxham meets the test of “soundness” in that it is:

- “positively made” in that it recognises the circumstances of such vulnerable small rural communities that support small-scale organic growth that will retain the character of the villages, enable services to be supported and maintained, but without imposing large-scale inappropriate development.
- “the plan justified” – yes, in that it is consistent with the consultation and policies of the Yaxham Neighbourhood Plan – “made” on 22nd June 2017, having passed at referendum with 92% voting “yes”, on a turnout of 58% i.e. 53% of the electorate voted “yes”.
- “the plan effective” – yes, in that it makes provision for small-scale organic growth, which in time can be substantial.
- “consistent with national policy” – yes as throughout the NPPF and NPPG there is a continual balance to be struck in rural areas of sustainable development that enhances and develops rural communities rather than undermines and destroys. The Yaxham Neighbourhood Plan was deemed to consistent with national policy, and it and the emerging Local Plan are consistent with each other.

As agreed by Yaxham Parish Council at its meeting on 21st September 2017

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: 1st October 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

Agent Mrs Sarah Hornbrook (1126421)

Email Address

Company / Organisation Ingleton Wood

Address

Consultee (1129859)

Company / Organisation Breckland Bridge Ltd

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Breckland Bridge Ltd ()

Comment ID 305

Response Date 02/10/17 11:57

Consultation Point Kenninghall 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)
- . 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)

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

The proposed policy wording was not included in the previous version of the Local Plan

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

To ensure soundness, we request that the wording of the proposed Policy (or the supporting text) is expanded to clarify which 'designated heritage assets' are referred to in point 1, in addition to the Conservation Area, as this is not currently clear.

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

The site is considered to be entirely deliverable and capable of making an important contribution towards satisfying the Council's housing needs during the period up to 2036. The site, in accordance with the National Planning Policy Framework (NPPF), represents a suitable location for development, is available immediately and is viable, as demonstrated in our Representations at the Preferred Site Options and Settlement Boundaries Stage (Comment ID: 1106) and Preferred Directions Stage.

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.

Given the matter raised relates to a significant issue that will have implications for development within the village and delivery of the Council's housing target we wish to appear at the Hearing Sessions of the Examination in Public on behalf of Breckland Bridge Limited.

Do you wish to be:

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

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

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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: Ian Martin	
Organisation: Yaxham Parish Council	
Address:	
Post code:	Telephone: 0
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	GEN 03, GEN 05, HOU2, HOU3, HOU4, HOU5
Paragraph	SA Para 5.42, Para 19.3, Table 19.44
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.

NP4Yaxham Working Group – Proposed Breckland Local Plan Pre-Submission Publication Consultation Response

The focus of the Yaxham response is on how the overall Plan affects the parish of Yaxham and whether in this context it is considered to meet the test of “Soundness”.

Yaxham is therefore pleased to note that in the settlement hierarchy the parish’s main settlements of Yaxham and Clint Green are expressly classed as within the third tier of the settlement boundary as “rural settlements have settlement boundaries” within General Policy GEN 03 and in Housing Policy HOU04 with Settlement Boundary Map 17 “Yaxham & Clint Green”.

In addition, the other settlement within this small rural parish is Brakefield Green and comes in below the third tier in the settlement hierarchy (Policy GEN 03) i.e. within “small villages and hamlets outside of settlement boundaries (Policy HOU 05).

This designation of the settlements within Yaxham Parish recognises their small village rural nature, the distributed nature of settlement within the parish and lack of local services capable of serving the whole community in a sustainable fashion. Yaxham has seen and continues to see small scale organic growth at a rate that is likely to meet or exceed the 7% growth designated for such villages (HOU 02). Indeed at present currently permitted properties equal almost 15% of the current settlement numbers. Each of its main settlements have some services, but are not “available... within the recognised acceptable walking distance – taken to be 800m.” – Sustainability Assessment Para 19.3 and Table 19.44. Indeed settlements within the Parish of Yaxham are 1km - 3km apart.

Yaxham welcomes the adoption by the emerging Local Plan of a policy element at the centre of the recently made Yaxham Neighbourhood Plan, namely supporting “development [that] avoids coalescence of settlements” – HOU 03 point 4., HOU 04 point 5., and with different wording HOU 05.

This is and was central to all the consultation feedback for the Yaxham Neighbourhood Plan.

Yaxham welcomes in policy GEN 05 addressing the role of settlement boundaries, which had been missing in earlier versions of the emerging Local Plan.

We are however concerned that the Sustainability Assessment has not been updated to include the Local Green Spaces designated in the Neighbourhood Plan (SA Para 5.42) although they are shown on the Policies Map for Yaxham.

On this basis it is considered that this element of the Plan as it affects the Parish of Yaxham meets the test of “soundness” in that it is:

- “positively made” in that it recognises the circumstances of such vulnerable small rural communities that support small-scale organic growth that will retain the character of the villages, enable services to be supported and maintained, but without imposing large-scale inappropriate development.
- “the plan justified” – yes, in that it is consistent with the consultation and policies of the Yaxham Neighbourhood Plan – “made” on 22nd June 2017, having passed at referendum with 92% voting “yes”, on a turnout of 58% i.e. 53% of the electorate voted “yes”.
- “the plan effective” – yes, in that it makes provision for small-scale organic growth, which in time can be substantial.
- “consistent with national policy” – yes as throughout the NPPF and NPPG there is a continual balance to be struck in rural areas of sustainable development that enhances and develops rural communities rather than undermines and destroys. The Yaxham Neighbourhood Plan was deemed to consistent with national policy, and it and the emerging Local Plan are consistent with each other.

As agreed by Yaxham Parish Council at its meeting on 21st September 2017

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: 1st October 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

Agent	Mrs Sarah Hornbrook (1126421)
Email Address	
Company / Organisation	Ingleton Wood
Address	
Consultee	(1129859)
Company / Organisation	Breckland Bridge Ltd
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Breckland Bridge Ltd ()
Comment ID	307
Response Date	02/10/17 11:59
Consultation Point	Map 3.9 Summary of the Kenninghall Allocations. (View)
Status	Processed
Submission Type	Web
Version	0.1

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

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

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

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

The site is considered to be entirely deliverable and capable of making an important contribution towards satisfying the Council's housing needs during the period up to 2036. The site, in accordance

with the National Planning Policy Framework (NPPF), represents a suitable location for development, is available immediately and is viable, as demonstrated in our Representations at the Preferred Site Options and Settlement Boundaries Stage (Comment ID: 1106) and Preferred Directions Stage.

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.

Given the matter raised relates to a significant issue that will have implications for development within the village and delivery of the Council's housing target we wish to appear at the Hearing Sessions of the Examination in Public on behalf of Breckland Bridge Ltd.

Do you wish to be: . Notified of the Submission
. Notified of the Inspectors Recommendations
. Notified of the Adoption

Comment

Agent	Mrs Sarah Hornbrook (1126421)
Email Address	
Company / Organisation	Ingleton Wood
Address	
Consultee	(1129859)
Company / Organisation	Breckland Bridge Ltd
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Breckland Bridge Ltd ()
Comment ID	308
Response Date	02/10/17 12:00
Consultation Point	3.218 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.1

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

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

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

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

On behalf of Breckland Bridge Ltd, we support the identification of Garboldisham as a Local Service Centre that will accommodate 35 residential units. It is evident from the text relating to Garboldisham at Paragraph 3.219 that the village provides a range of services which justifies its designation as a

Local Service Centre. The village is therefore a sustainable location for modest growth. Accordingly, this aspect of the Local Plan is considered sound as it has been positively prepared.

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.

Given the matter raised relates to a significant issue that will have implications for development within the village and delivery of the Council's housing target we wish to appear at the Hearing Sessions of the Examination in Public on behalf of Breckland Bridge Ltd.

Do you wish to be:

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

Comment

Agent Mrs Patty Harris (1131206)

Email Address

Address

Consultee Mrs Patty Harris (1131212)

Email Address

Company / Organisation Shipdham Parish Council

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Shipdham Parish Council (Mrs Patty Harris)

Comment ID 309

Response Date 02/10/17 12:34

Consultation Point Breckland Local Plan Pre-Submission Publication
([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 legally compliant?
. Is the plan positively prepared?
. 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.

Following an Open Forum for the residents of Shipdham, the following comments have been agreed by the Parish Council:

1 – Preparation, effectiveness and compliance of the plan as presented: despite the time taken to reach this stage there are a number of errors, omissions, typos and inconsistencies that do not befit a plan of this significance, and suggest additional, more significant errors might be present. For example, The Millwright Arms is not in Shipdham – it is in a town a number of miles away. This has been pointed out in the past.

2 – Compliance and effectiveness of the plan as submitted: there are significant questions as to the current capacity of infrastructure (roads, power, water, sewerage) within Shipdham to cope with even current occupancy let alone additional building within the village. Lack of adequate drainage and sewerage in particular have been raised on all recent building projects in the village with current utility businesses failing to address, or (in some instances) even recognise existing shortcomings.

3 – Compliance and effectiveness with the plans as submitted: both with the current village road network and, more significantly, on the network either side of the village, there are significant concerns over road safety, traffic volumes and speed. Shipdham is a ribbon-development village on a major A road (the A1075) which is the only major route north/south through the district and is an emergency diversion should the A47 be closed. Current traffic levels on the A1075 struggle with village traffic, and will be negatively impacted in the centre of the village with a further 80 – 120 properties being built (preferred sites) before windfall sites in the current pipeline. Moreover, there are significant, major developments planned in Watton (5 miles south on the A1075) and Dereham (4 miles north) all of which will use the A1075 to access north or south of the District. The focus of much of these major developments is on traffic flow caused by the developments themselves (which constitute major challenge) but have not yet addressed the critical impact these will have on the major transport route that goes through Shipdham. Until there is a genuine attempt to address these critical strategic priorities the plan as it stands cannot be legally compliant, positively prepared, or effective.

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

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

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

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

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

Part 1: Your Contact Details

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

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

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

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

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

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

Policy	
Paragraph	
Site	
Proposals Map	
Settlement Boundary	East Tuddenham
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)

We would argue that East Tuddenham does have sufficient services to meet the standards necessary for it to have a settlement boundary. The village has:

A village hall which offers an extensive range of services and activities;

- Public transport is available in the village with the Konectbus services 4 (Dereham to Norwich) and 13A (Dereham to Easton College) which provide regular services;
- A church; and
- There are a small-scale employment opportunities.

We would argue that East Tuddenham does have sufficient services to justify retaining its settlement boundary.

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

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

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

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

--

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

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

Declaration: I understand that the details included on this form will be available in the public domain. (please tick box)	✓
Signature: Jane Crichton	Date: 29th September 2017

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Comment

Consultee Mr Andrew Thornton (975280)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Mr Andrew Thornton

Comment ID 311

Response Date 02/10/17 12:54

Consultation Point Policy EC 06 Farm Diversification ([View](#))

Status Processed

Submission Type Web

Version 0.2

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

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan effective?
. 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 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 site we submitted LP(086) 011 was incorrectly classified as for residential development rather than for leisure related activity and tourism. On the basis of Policy EC 06 I am surprised that it was not taken forward as a possible site for development. It fulfils the criteria in EC06 and at the same time promotes tourism and leisure activity within Breckland which is in keeping with Breckland Strategic Vision.

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

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

Do you wish to be:

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

Comment

Consultee Mr Andrew Thornton (975280)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Mr Andrew Thornton

Comment ID 312

Response Date 02/10/17 13:00

Consultation Point Policy EC 07 Tourism Related Development ([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 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 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 site we submitted LP(086) 011 was incorrectly classified as for residential development rather than for leisure related activity and tourism. O I am surprised that it was not taken forward as a possible site for development as it promotes tourism and leisure activity within The Brecks which is in keeping with Breckland Strategic Vision.

The possible sites should be reviewed.

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

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

Do you wish to be:

Breckland Local Plan Pre-Submission Publication Representation Form

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Part 1: Your Contact Details

Name:	
Organisation: Stapleford Group Thetford Ltd	
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: Andrew Astin	
Organisation: Indigo Planning	
Address: Toronto Square, Leeds,	
Post code: LS1 4EG	Telephone: 0113 380 0270
E-mail: andrew.astin@indigoplanning.com	

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	EC05
Paragraph	6.77 to 6.81
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.

Please refer to accompanying cover letter.

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 refer to accompanying cover letter.

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

Please refer to accompanying cover letter.

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.

Our client, the Stapleford Group Thetford Ltd are a key stakeholder and landowner in Thetford, and therefore have a strong interest in the emerging Local Plan and wish to appear at the Examination.

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: 02/10/2017

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Breckland District Council
 Elizabeth House
 Walpole Loke
 Dereham
 Norfolk
 NR19 1EE

By email

29 September 2017

let.001..CR.26060002

Dear Sir / Madam

REPRESENTATIONS TO EMERGING BRECKLAND LOCAL PLAN

We write on behalf of our client, The Stapleford Thetford Ltd, to submit representations in relation to the Pre-submission Breckland Local Plan which is currently out for consultation.

Indigo Planning have reviewed the findings of the Breckland Retail Study Addendum (BRSA) 2017, but have raised concerns regarding the findings of the BRSA which undermine its soundness as part of the evidence base for the emerging Local Plan, particularly Policy EC05 which relates to the Council's retail strategy. We outline our concerns below.

Paragraph 1.2 of the BRSA 2017 confirms that it has been prepared as a partial update to the Breckland Retail Study Update (BRSU) 2014, based on updated population and expenditure data.

The capacity figures identified by each of the studies at 2036 is outlined below.

2036	BRSU 2014 (sqm gross)		BRSA 2017 (sqm gross)		Difference (sqm gross)	
	Convenience	Comparison	Convenience	Comparison	Convenience	Comparison
Zone 1 Thetford	2,561	7,193	1,231	4,892	-1,330	-2,301
Zone 2 Dereham	2,284	4,366	2,786	6,960	502	2,594
Zone 3 Swaffham	-2,404	546	-2,407	1,073	-3	527
Zone 4 Watton	315	1,024	701	1,563	386	539
Zone 5 Attleborough	1,685	2,117	1,464	1,655	-221	-462
Zone 6 Other Breckland	126	92	202	123	76	31
Total	4,568	15,339	3,976	16,266	-592	927

The total capacity figures indicate a reduction in convenience capacity, but an increase in comparison capacity, across the Borough by 2036. Of particular relevance, however, the BRSA 2017 identifies significantly less capacity for convenience and comparison floorspace in both Thetford and Attleborough than the BRSU 2014. Save for the minor variation in convenience floorspace provision in Swaffham, all of the other zones have seen increases in retail capacity projections between the 2014 and 2017 studies, and most particularly in Dereham.

Our review indicates this is largely attributed to changes in the assumptions regarding the distribution of population growth between the two studies. Paragraph 2.5 of the BRSA 2017 identifies that there has been a revision to the distribution of population growth throughout the Study Area as follows:

Population Growth Distribution

	BRSU 2014	BRSA 2017
Attleborough	38%	25%
Thetford	57%	25%
Dereham	5%	10%
Swaffham		10%
Watton		10%
All other areas		20%

In short, it was previously estimated that 95% of the population growth would be directed to Thetford and Attleborough. The BRSA 2017 revises this to 50%, redistributing the remaining growth to other areas within the Borough (see paragraph 2.5). This has clearly had implications for the planning of the District (is it a District), and for the retail floorspace capacity estimates, particularly in Thetford and Attleborough.

No justification is provided as to why the population growth has been redistributed in the BRSA 2017 and in our view, the latest assumptions are not appropriate in the context of the policy basis of emerging Local Plan in respect of the local retail hierarchy and housing growth.

In particular:

- Emerging Policy EC 05 defines the local retail hierarchy including Thetford at the top of the hierarchy as the Key Centre for development and change. Attleborough is identified as a medium town centre, below Dereham.
- Emerging Policy GEN 03 outlines the settlement hierarchy, identifying Thetford and Attleborough as key settlements, both with proposed Strategic Urban Extensions.
- Emerging Policy HOU 02 identifies that 50% of new dwellings within the Borough (8,126 dwellings) are intended to be accommodated in Attleborough and Thetford. Less than 10% of new housing is to be accommodated in

Dereham.

In short, no evidence has been provided to justify the change to the assumptions regarding population growth distribution and the changes made are not in accordance with the policy intentions of the emerging Local Plan which clearly direct new housing growth to Thetford and Attleborough.

Furthermore, the updated retail study is still based on the household shopping survey from 2014 which is 3 years old, rather than any more recent survey.

We have further concerns regarding technical aspects of the BRSA 2017 which should be clarified, and the BRSA 2017 amended so as to ensure that the emerging Local Plan is sound.

- Paragraph 2.4 of the BRSA 2017 confirms that the population projections are sourced from ONS. It is, therefore, assumed that they do not take into account local housing targets. This should be clarified, and where necessary, amended to take account of local housing targets, in particular the sustainable urban extension planned for Thetford which has permission for an additional 5,000 dwellings (LPA Ref. 3PL/2011/0805/O) as well as the 350 consented houses on Norwich Road and 180 houses on Thetford Road. If allowance is made for these housing commitments will significantly increase the population of Thetford and subsequent total expenditure.
- The convenience expenditure per capita figures adopted in the BRSA 2017 are the same as those adopted in the BRSU 2014. However, the comparison expenditure per capita figures are lower (refer Table 2, Appendix 2 and 3, BRSU 2014 and BRSA 2017). It is not clear why this is the case. This should be clarified and amended where necessary.
- The net sales floorspace figures adopted in the benchmark turnover tables (Table 12, Appendix 2 and 3, BRSU 2014 and BRSA 2017) are higher in the BRSA 2017 by circa 2,000sqm (in total) for both convenience and comparison facilities. No explanation for the changes are provided and they are, for the large part, small increases across many facilities (rather than a single large increase which may be explained by, for example, a new extension). The increase in benchmark turnover reduces turnover (and therefore, floorspace) capacity. We consider that it is unlikely that the majority of facilities have increased their net sales floorspace figures over the 2.5yr period between the studies. Evidence for the increase in floorspace figures should be provided.
- The BRSA 2017 capacity assessment continues to take account of the previous commitment for new convenience and comparison retailing at Thetford Enterprise Park despite the fact that this permission has lapsed (refer Table 13, Appendix 2 and 3, BRSA 2017). This will have significant implications for retail capacity in Thetford, and the BRSA 2017 should be amended to reflect this.
- The BRSA 2017 assumes a constant market share for both convenience and comparison facilities over the plan period. Given that Thetford is identified as the Key Centre for development and change within the emerging Local Plan, it

would be an appropriate strategy to plan for an increase in market share in Thetford, particularly in light of the very significant leakage of expenditure from the Borough at present which is unsustainable. Retaining a constant market share conflicts with the overarching vision for Thetford of delivering sustainable growth and regeneration. At the very least, the Council should consider the quantum of floorspace that needs to be accommodated to enable Thetford to expand and strengthen its provision as the Key Centre within the Borough.

In summary, we have concerns regarding a number of technical aspects of the BRSA 2017. It is imperative that these are addressed to ensure that the emerging Local Plan is underpinned by an accurate and up-to-date evidence base and that the Sustainability Appraisal (SA) Report for the Plan addresses the evidence base. We consider that the issues that we have identified will have considerable implications for the overarching vision for Thetford, the capacity findings of the BRSA 2017 and emerging local plan policy.

On this basis the floorspace capacity figures in Draft Policy EC05 should either be removed or recalculated to take account of the concerns raised given they underestimate the level of retail capacity in Thetford. If these matters are not addressed the plan will not be sound.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Andrew Astin', written in a cursive style.

Andrew Astin

Enc: Representations Form

Comment

Agent Miss Nicol Perryman (1131089)

Email Address

Company / Organisation Ingleton Wood LLP

Address

Consultee Nicol Perryman (1131105)

Company / Organisation Great Hockham Estate

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Great Hockham Estate (Nicol Perryman)

Comment ID 314

Response Date 02/10/17 13:40

Consultation Point 3.17 Paragraph ([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)

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

On behalf of the Great Hockham Estate, we support the sentiments of paragraph 3.17, which seeks to allow growth outside of settlement boundaries of the existing rural settlements provided that a

sensitive approach to sustainable rural housing is followed, which is responsive to local circumstances. We agree that a sensitive level of growth would support local services and allow the vitality of rural communities to be maintained, in line with 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

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

Given the matter raised relates to a significant issue that will have implications for development within the village and delivery of the Council's housing target we wish to appear at the Hearing Sessions of the Examination in Public on behalf of the Great Hockham Estate.

Do you wish to be: . Notified of the Submission
 . Notified of the Inspectors Recommendations
 . Notified of the Adoption

Comment

Agent Miss Nicol Perryman (1131089)

Email Address

Company / Organisation Ingleton Wood LLP

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Event Name Local Plan Pre-Submission Publication Document

Comment by Great Hockham Estate (Nicol Perryman)

Comment ID 315

Response Date 02/10/17 13:40

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:

- . Sound (You support the document)
- . 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)

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.

On behalf of the Great Hockham Estate, we feel that part of the Policy is unsound. We do not support the general approach to housing growth for 'Villages with Boundaries'. The proposed allocation of 7% growth for 'Villages with Boundaries' is not justified or supported by any documents presented within the evidence base. It is therefore considered that this is an arbitrary allocation which does not take into consideration either the need for growth or the characteristics of individual rural settlements. The lack of any new allocation for co-ordinated growth in these areas demonstrates a lack of flexibility for local communities to adapt to change and provide the growth required to maintain their vitality, which is contrary to paragraph 14 of the NPPF. It is therefore considered that this 'blanket approach' would not promote sustainable development and this Policy is unsound.

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

On behalf of the Great Hockham Estate, we feel that part of the Policy is sound. We support the identification of Hockham within the 'Villages with Boundaries' tier of the settlement hierarchy. It is agreed that the village provides the range of services which justifies its designation in the 'Villages with Boundaries' tier. Accordingly, this aspect of the Local Plan is considered sound. However, we do not support the approach to housing growth in these settlements.

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.

Given the matter raised relates to a significant issue that will have implications for development within the village and delivery of the Council's housing target we wish to appear at the Hearing Sessions of the Examination in Public on behalf of the Great Hockham Estate.

Do you wish to be:

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

Comment

Agent Miss Nicol Perryman (1131089)

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Event Name Local Plan Pre-Submission Publication Document

Comment by Great Hockham Estate (Nicol Perryman)

Comment ID 316

Response Date 02/10/17 13:41

Consultation Point Policy HOU 04 - Rural Settlements With Boundaries
([View](#))

Status Processed

Submission Type Web

Version 0.1

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

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

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.

On behalf of the Great Hockham Estate, we support the sentiments expressed in paragraph 3.17, which constitutes the supporting text to Policy HOU 04. Paragraph 3.17 seeks to allow growth outside settlement boundaries of the existing rural settlements provided that a sensitive approach to sustainable rural housing is followed, which is responsive to local circumstances. We agree that a sensitive level of growth would support local services and allow the vitality of rural communities to be maintained, in line with the NPPF. However, it is considered that Policy HOU 04 is not consistent with the principles outlined in its supporting text, as the Policy itself includes elements that are not justified, not positively prepared and contrary to the NPPF. Consequently, the Policy is considered unsound.

Proposed Policy HOU 04 allows appropriate development immediately adjacent to the settlement boundary, subject to being supported by other policies within the Local Plan and where all of five criteria are satisfied. We support the principle of co-ordinated growth adjacent to the settlement boundary, however, it is considered that the proposed criteria is too prescriptive and ultimately would not promote sustainable development.

The first two criteria comprise restrictions on the quantum of development, requiring no more than 5 dwellings to be allowed on any site, and the cumulative total of new dwellings adjacent to any settlement not exceeding a 5% increase in the total number of dwellings at the date of Adoption of the Plan. It is considered that these restrictions are not justified and there is no clear explanation of why these levels of development are deemed the appropriate limits for rural settlements. Limiting development to no more than 5 units in such locations may make development unviable, given the infrastructure costs often associated with new development. A greater number of units would provide sufficient returns to enable a developer / landowner to make a scheme viable. In addition, this scale of development would make no contribution towards local infrastructure and would not deliver affordable housing. Compounded by the lack of site specific allocations for any of the 'rural settlements with a boundary', this Policy does not consider the different needs of rural settlements and the growth that they may individually require over the Plan period.

A further requirement of proposed Policy HOU 04 is to demonstrate that there will be a significant community benefit arising from the proposed development. This is considered wholly unjustifiable; residential developments in rural locations are often subject to local opposition, and if a planning application is able to demonstrate that it accords with the Adopted Development Plan, or material considerations exist to justify development, it should not be refused just because there is local opposition (or a lack of community support) which could be based entirely on issues which do not constitute material planning considerations. Community aspirations could easily be unattainable, and are often unquantifiable; a requirement to deliver such aspirations could render a scheme unviable.

Moreover, even if local support is gained for residential development, the level of growth is ultimately limited by the arbitrary criteria on quantum of development. This negates the ability for communities to strategically plan for their individual local needs. Consequently, this would render the neighbourhood planning process too restrictive for the local communities that wish to see growth beyond 5% and 5 dwellings. Accordingly, it is considered that this obstructive approach does not promote the core principles of neighbourhood planning set out in the NPPF.

Based on the foregoing, it is considered more appropriate to use the settlement boundary as a positive policy tool; enabling the identification of sites that are, in principle, suitable for development and which would provide a logical extension to the village, whilst also creating a clear defensible boundary. As well as providing a degree of control and certainty in respect of the future location of developments within rural settlements, the suggested approach of identifying site specific allocations or co-ordinated extensions to the settlement boundary has the potential to deliver wider community benefits. More specifically, a series of small scale developments around the settlement boundary, as envisaged by

the current proposed Policy, will result in developments avoiding the need to deliver affordable housing.

Furthermore, by virtue of their size, it is unlikely that any developments under this proposed Policy will generate sufficient financial obligations which could be used to enhance community facilities within the locality. In contrast, a larger, focussed development would potentially be able to contribute to both affordable housing, for which there is likely to be a local need, and the provision of enhanced community facilities. It is considered that this approach would be entirely in accordance with paragraph 157 of the NPPF, which states that Local Plans should 'plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this framework'.

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.

Given the matter raised relates to a significant issue that will have implications for development within the village and delivery of the Council's housing target we wish to appear at the Hearing Sessions of the Examination in Public on behalf of the Great Hockham Estate.

Do you wish to be:

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

Comment

Consultee mr les scott (971309)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by mr les scott

Comment ID 317

Response Date 02/10/17 13:54

Consultation Point 3.52 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 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 new affordable housing target wasn't available 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.

Having assessed the district target at 35.7% but recognised that it is not possible to achieve the target due to developer constraints, the target has been set at 25%. To conform to the requirements of the NPPF there needs to be a policy to address this shortfall.

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 Dr Nicky Grandy (1032053)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Dr Nicky Grandy

Comment ID 318

Response Date 02/10/17 13:54

Consultation Point 1.33 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 effective?

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

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

Have become more engaged in the process following involvement with the development of a Neighbourhood Plan.

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

As drafted, Chapter 1 and this section on Breckland's Spatial Vision does not refer to the role of Neighbourhood Plans and the relationship they have with the Local Plan. Also BDC should make a clear commitment to supporting Neighbourhood Plan development and utilisation as an important element in the planning process. Text addressing these points should be included.

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 Dr Nicky Grandy (1032053)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Dr Nicky Grandy

Comment ID 319

Response Date 02/10/17 14:00

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 effective?

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

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

Have become more engaged in the process since involvement with the development of a Neighbourhood Plan.

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

The last paragraph in this policy does not take account of any Neighbourhood Plan policies that might be relevant and that should be taken into account in decision-making. This absence should be addressed.

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 Dr Nicky Grandy (1032053)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Dr Nicky Grandy

Comment ID 320

Response Date 02/10/17 14:09

Consultation Point Policy ENV 01 Green Infrastructure ([View](#))

Status Processed

Submission Type Web

Version 0.2

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

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

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

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

New/revised text.

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

With respect to the second sentence in the last paragraph in policy ENV 01, if a development will have a detrimental effect on the quantity or function of existing green infrastructure, how can the green infrastructure network be enhanced as a result of the development? Some clarification of what is meant is needed here.

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 Dr Nicky Grandy (1032053)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Dr Nicky Grandy

Comment ID 321

Response Date 02/10/17 14:15

Consultation Point Policy ENV 02 Sites of International, European, National & Local Nature Conservation Importance ([View](#))

Status Processed

Submission Type Web

Version 0.3

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

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

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

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

New/revised text.

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

With respect to the first paragraph of ENV 02, I presume that this means that development will only be permitted where it can be demonstrated that there will be no adverse effect, including after mitigation measures are put in place. If so, this is not clear as currently written.

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

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

Do you wish to be:

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

Comment

Consultee Mr Trevor Wenman (Parish Clerk New PC) (1131261)

Email Address

Company / Organisation New Buckenham Parish Council

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by New Buckenham Parish Council (Mr Trevor Wenman (Parish Clerk New PC))

Comment ID 322

Response Date 02/10/17 14:18

Consultation Point Policy HOU 05 - Small Villages and Hamlets Outside of Settlement Boundaries ([View](#))

Status Processed

Submission Type Web

Version 0.1

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

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

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

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

The comments relate to how the different policies relate to one another, which did not become apparent until the consultation draft became available. It also refers to changes made to the wording since the consultation stage.

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 relationship between HOU4 and HOU5 is not clear. HOU4 says that permitted development should not increase the number of dwellings by more than 5% from the **date of the adoption of the**

Plan. No such limit is specified for HOU5 areas, leaving us with the ambiguity over whether the reference to possible permitted developments of “up to three dwellings” in HOU5 refers to any one development, or the total of new dwellings allowed over the plan period., or the total of new dwellings allowed from the date of adoption of the plan.

At the consultation stage it was proposed that villages with no settlement boundary would be permitted growth of 5% over the plan period – this no longer appears in HOU5. The 5% criterion appears now applies to settlements with a settlement boundary (HOU4) whereas at the consultation stage this figure was 10%.

In addition it is not clear how change of use applications which bring, for example, redundant agricultural buildings into residential use, would be treated in relation to any limits on development.

The intention of this HOU4 and HOU5 is clear, but its actual implementation leaves areas of doubt and uncertainty which may hamper local councils in seeking to interpret the rules in the future.

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 Dr Nicky Grandy (1032053)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Dr Nicky Grandy

Comment ID 323

Response Date 02/10/17 14:20

Consultation Point 5.44 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 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.

New/revised text.

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

The section on Local Green Space and paragraph 5.44 in particular fails to recognise the Local Green Spaces that have been and will be designated through the Neighbourhood Plan process. A sentence/paragraph acknowledging this should be added.

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	Mike Jones RSPB (462653)
Email Address	
Company / Organisation	RSPB
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	RSPB (Mike Jones RSPB)
Comment ID	324
Response Date	02/10/17 14:25
Consultation Point	Policy GEN 05 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 effective?

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

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

The issue refers to the specific wording in this draft.

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 policy text states that 'development outside the defined settlement boundaries will only be acceptable where it is compliant with one or more of the following policies' (our emphasis). This wording implies that, provided at least one of the policies is met, the remainder of the policies could be ignored. We recommend the wording is changed to the following, to ensure it is clear that all the relevant planning policies should be met – 'development outside the defined settlement boundaries

will only be acceptable where it is compliant with all relevant policies set out in the Local Plan, including but not necessarily restricted to:'.

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

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

Do you wish to be:

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

Comment

Consultee Dr Nicky Grandy (1032053)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Dr Nicky Grandy

Comment ID 325

Response Date 02/10/17 14:26

Consultation Point Policy ENV 05 Protection and Enhancement of the Landscape ([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 effective?

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

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

New/revised text.

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

Paragraph 2 of policy ENV 05 uses the phrase 'release of land'. Why is this phrase being used here when elsewhere reference is made to proposals/applications being permitted or not? There should be consistency across the document.

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

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

Do you wish to be:

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

Officer Response

Comment noted.

Comment

Consultee	Mike Jones RSPB (462653)
Email Address	
Company / Organisation	RSPB
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	RSPB (Mike Jones RSPB)
Comment ID	326
Response Date	02/10/17 14:49
Consultation Point	Policy ENV 03 The Brecks Protected Habitats & Species (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 legally compliant?
. Is the plan effective?

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

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

The issue refers to the text in the current draft.

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.

We strongly support the policy in principle but are concerned to note that there is not sufficient evidence in the plan to demonstrate that adverse effects on the Breckland SPA from increased visitor pressure from housing allocations will be avoided.

The supporting HRA for the plan correctly identifies that the nightjar and woodlark breeding populations of the Breckland SPA are vulnerable to the increases in recreational pressure that the plan will produce.

It refers to the need for monitoring and mitigation requirements which are necessary to ensure that the growing, cumulative recreational pressure on the Breckland SPA does not reach a level which produces an adverse effect. If the plan does not include sufficient measures to monitor visitor pressure and provide mitigation measures to prevent an adverse effect occurring, then the plan may result in an adverse effect on the Breckland SPA. In order for the plan to be legally compliant and sound it needs to demonstrate that it can avoid this adverse effect.

The existing adopted LDF includes policy support for this approach in the Site Allocation and Thetford Area Action Plan DPDs, in the form of an access monitoring and mitigation framework. Whilst there is a statement in the policy text in the submission plan that '*the council will work with partners to develop a framework of measures that manage and monitor access*', this alone does not provide any certainty that a framework will be developed in order to ensure that adverse effects on the Breckland SPA can be avoided. At present there is no information on what monitoring and mitigation measures the framework would consist of, who would be responsible, what partners the Council would aim to work with, what the timescales for delivery would be and how the work would be funded. Without the formal inclusion of a framework in the plan there can be no certainty that the monitoring and mitigation (if demonstrated to be necessary through the monitoring) would be delivered, leaving the plan unable to demonstrate it would meet the legal requirements of the Habitats Regulations, and therefore leaving it unsound.

The measures required to address this are simple, and replicable as they are currently in place in adopted Breckland planning policy, and similar policies exist in neighbouring local authorities plans. The issue is widely recognised and has led to a county wide visitor pressure baseline study (Panter et al, 2017 – referenced in the plan HRA) being produced, which can act as a useful baseline of visitor pressure against which to measure the impacts of the plan.

The RSPB has extensive experience of advising on these issues in the Brecks and in other areas of the country where sensitive wildlife sites are subject to increasing visitor pressure from housing allocations. We would be very happy to offer our help to the Council in preparation of such a framework and as a partner in the adopted framework.

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.

We wish to offer our experience in recreational pressure impacts on European Sites to any discussion on this matter.

Do you wish to be:

Comment

Consultee Mike Jones RSPB (462653)

Email Address

Company / Organisation RSPB

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by RSPB (Mike Jones RSPB)

Comment ID 327

Response Date 02/10/17 14:52

Consultation Point Policy ENV 03 The Brecks Protected Habitats & Species ([View](#))

Status Processed

Submission Type Web

Version 0.2

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

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

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

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

The issue refers to the text in the submission draft.

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.

We note in the supporting text, in paragraph 5.23 that '*no evidence of a negative impact of agricultural or commercial buildings*' was found in the 2013 research. It should be noted that this was in part due to the relatively small number of agricultural and commercial buildings that were found in the research. Whilst the proportion of existing agricultural and commercial buildings compared to residential buildings

is small and is likely to remain so, we request that the scale of this development in the buffer is monitored and detailed in the annual monitoring reports for future reference.

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

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

Do you wish to be:

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

Comment

Consultee Mr Robert Crone (1131328)
Email Address
Company / Organisation Crone's Cider
Address

Event Name Local Plan Pre-Submission Publication Document
Comment by Crone's Cider (Mr Robert Crone)
Comment ID 328
Response Date 01/10/17 16:18
Consultation Point Kenninghall Housing Allocation 1 ([View](#))
Status Processed
Submission Type Email
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 legally compliant?
. Is the plan positively prepared?
. Is the plan justified?

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

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

I have not previously been made aware that such a foolish scheme could be seriously considered by any planning authority

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.

Any additional dwellings at the chosen site will mean an increase in traffic at the time and at the very place where children access the Kenninghall primary school. In my view there are countless other and better places where Kenninghall could gain an extra 15 houses. For me the Fersfield Road out of Kenninghall would be an ideal place to build extra houses.

I would consider it recklessness on the part of Breckland District Council if it allows what will amount to a dramatic increase in traffic at this already congested point and so expose children to increased risk and the council would be failing in its duty of care.

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.

A number of bizarre recent planning decisions have blighted our village and I have no faith left whatsoever in either the competence or the integrity of the planners.

Do you wish to be:

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

Comment

Consultee	Ms Heidi Frary (874753)
Email Address	
Company / Organisation	Ovington Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Ovington Parish Council (Ms Heidi Frary)
Comment ID	329
Response Date	02/10/17 08:02
Consultation Point	Breckland Local Plan Pre-Submission Publication (View)
Status	Processed
Submission Type	Email
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?
 . Is the plan justified?
 . Is the plan effective?
 . Is the plan consistent with national policy?

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

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

Some comments were made as part of the 'Preferred Direction' consultation, but a greater level of understanding has developed.

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.

General Ambiguity

There are 120 occurrences of the word **in/appropriate/ly** throughout the document, with little, or in most case no explanation as to what it or is not considered appropriate.

This lack of clarity is an open invitation for policies to be challenged, especially by those with significant legal budgets.

All occurrences should be removed and where this is not possible a clear and concise definition be provided to avoid any ambiguity.

General Exceptions

Some policies have **exceptions** written in to them, either explicitly or by implication. A planning committee has the power to make an exception to any policy but if the possibility of an exception is written in to the policy then the applicant (if turned down) can ask the planning inspectorate to decide and appeal the committee decision.

No policy should have an exception.

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 two options presented do not cover all options. The Parish Council is minded that while this comment might be dealt with by representation, previous comments have not been answered adequately, if at all. Further while we do WISH to appear at the *Examination in Public*, Cllr T. Birt is will do so if necessary.

Do you wish to be:

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

Officer Response

Paragraphs 21, 50 and 157 of the NPPF makes it clear that policies should be flexible. Semantics allow for flexibility within the plan and ensure that the policies are not too prescriptive.

Comment

Consultee Ms Heidi Frary (874753)

Email Address

Company / Organisation Ovington Parish Council

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Ovington Parish Council (Ms Heidi Frary)

Comment ID 330

Response Date 02/10/17 08:02

Consultation Point Policy ENV 01 Green Infrastructure ([View](#))

Status Processed

Submission Type Email

Version 0.3

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

If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box). . Is the plan 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 Directions Stage (January - February 2016)

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

Some comments were made as part of the 'Preferred Direction' consultation, but a greater level of understanding has developed.

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 has **not been prepared positively** as it is contrary to paragraph 165 of the NPPF.

This policy is **not justified**, it has not based on sound and credible evidence. It is **not effective**, the wording of the policy will not have the stated effect of protecting green infrastructure.

The policy is very poorly worded. The concept in the Policy of valuing all Green Infrastructure ignores particular local GI strategies that assert that certain elements of Green Infrastructure do have greater value than others. A continuous hedge connecting a pond and a copse must have hugely greater value than a longer but isolated 'gappy' hedge.

In 5.8 Green Infrastructure is identified as all types of green space.

In 5.10 the Plan is proposing that the policy "recognises the value of all green infrastructure" which is fine, but the wording dilutes higher value assets.

The policy states that "the Network of Green infrastructure in the district ... should be safeguarded and retained". The policy only makes sense if the Green Infrastructure Network has been identified.

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
	.	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 two options presented do not cover all options. The Parish Council is minded that while this comment might be dealt with by written representation, previous comments have not been answered adequately, if at all. Further, while we do not WISH to appear at the *Examination in Public*, Cllr T. Birt is will do so if necessary.

Do you wish to be:	.	Notified of the Submission
	.	Notified of the Inspectors Recommendations
	.	Notified of the Adoption

Comment

Consultee Ms Heidi Frary (874753)

Email Address

Company / Organisation Ovington Parish Council

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Ovington Parish Council (Ms Heidi Frary)

Comment ID 331

Response Date 02/10/17 08:02

Consultation Point Policy ENV 05 Protection and Enhancement of the Landscape ([View](#))

Status Processed

Submission Type Email

Version 0.6

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

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

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

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

Some comments were made as part of the 'Preferred Direction' consultation, but a greater level of understanding has developed.

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

It is not effective, the wording of the policy is subjective.

As with many policies: "... for the sake of its own **intrinsic beauty**" is a highly subjective term.

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
. 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 two options presented do not cover all options. The Parish Council is minded that while this comment might be dealt with by written representation, previous comments have not been answered adequately, if at all. Further, while we do not WISH to appear at the *Examination in Public*, Cllr T. Birt is will do so if necessary.

Do you wish to be: . Notified of the Submission
. Notified of the Inspectors Recommendations
. Notified of the Adoption

Officer Response

Comment noted.

Comment

Consultee	Ms Heidi Frary (874753)
Email Address	
Company / Organisation	Ovington Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Ovington Parish Council (Ms Heidi Frary)
Comment ID	332
Response Date	02/10/17 08:02
Consultation Point	Policy ENV 06 Trees, Hedgerows and Development (View)
Status	Processed
Submission Type	Email
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 effective?

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

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

Some comments were made as part of the 'Preferred Direction' consultation, but a greater level of understanding has developed.

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 has been significantly weakened since the Preferred Directions consultation. The current wording reduced the protection this policy should provide for trees and hedgerows.

Second paragraph, the words "Development requiring loss of protected trees and hedgerows **will be resisted,**"

There is then an open parenthesis without a corresponding closed parenthesis. The remain paragraph should follow: "... including preserved trees, protected hedgerows (BS5837:2012) will only be permitted **in exceptional circumstances** where:"

Point (a) start the sentence "**it can be clearly demonstrated that** the removal of a tree..."

Point (b) this is a wholly subjective measure and because it is subjective provides no effective protection for protected trees and hedgerows. It should be removed as it is the case that there can be an exception to any policy if the planning committee permit it. The planning committee has the power to make exception to the policy as that power already exists.

The wording places little value on trees and even less on hedgerows. As written this policy allows for the removal of a mature standard oak tree as long as it is replacing with a bare rooted whip. Where hedgerows are removed they should be replaced native hedging.

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
	.	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 two options presented do not cover all options. The Parish Council is minded that while this comment might be dealt with by written representation, previous comments have not been answered adequately, if at all. Further, while we do not WISH to appear at the *Examination in Public*, Cllr T. Birt is will do so if necessary.

Do you wish to be:	.	Notified of the Submission
	.	Notified of the Inspectors Recommendations
	.	Notified of the Adoption

Officer Response

Comment noted.

Comment

Consultee Ms Heidi Frary (874753)

Email Address

Company / Organisation Ovington Parish Council

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Ovington Parish Council (Ms Heidi Frary)

Comment ID 333

Response Date 02/10/17 08:02

Consultation Point Policy ENV 09 Flood Risk & Surface Water Drainage
([View](#))

Status Processed

Submission Type Email

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?
. Is the plan effective?

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

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

The flooding of 23 June 2016 highlighted new issues around water management.

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

It is inadequate to simply maintain the run-off rate from any site. If this rate continues for longer the volume would increase and could overwhelm downstream resources. Developers should therefore be

required to either have storage or rehabilitate water courses off-site to ensure that these additional volumes can be accommodated.

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
. 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 two options presented do not cover all options. The Parish Council is minded that while this comment might be dealt with by written representation, previous comments have not been answered adequately, if at all. Further, while we do not WISH to appear at the *Examination in Public*, Cllr T. Birt is will do so if necessary.

Do you wish to be: . Notified of the Submission
. Notified of the Inspectors Recommendations
. Notified of the Adoption

Officer Response

Comment noted.

Comment

Consultee Ms Heidi Frary (874753)

Email Address

Company / Organisation Ovington Parish Council

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Ovington Parish Council (Ms Heidi Frary)

Comment ID 334

Response Date 02/10/17 08:02

Consultation Point Policy ENV 10 Renewable Energy Development ([View](#))

Status Processed

Submission Type Email

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) . Yes at Preferred Directions Stage (January - February 2016)

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

Some comments were made as part of the 'Preferred Direction' consultation, but a greater level of understanding has developed.

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

The Parish of Ovington has embraced renewable energy with an extremely high rate of solar PV and wind turbines installations per capita. This policy has not been positively prepared, nor is it justified, nor effective, nor does it comply with the NPPF

This is an aggressive negatively worded policy with multitudinous list of subjective reasons to reject a renewable energy development and no recognition of balancing benefits.

point (i) it is the difficult to quantify 'adverse impact' as these are highly subjective, whereas the benefits can be quantified in CO2 reduction or kWh produced.

point (ii) refers to "outlook" it was understood that in planning terms nobody is entitled to a view.

If 'outlook' is introduced in this policy, it should be consistently applied throughout all other polices.

This policy is a reads like a political campaign message.

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
	.	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 two options presented do not cover all options. The Parish Council is minded that while this comment might be dealt with by written representation, previous comments have not been answered adequately, if at all. Further, while we do not WISH to appear at the *Examination in Public*, Cllr T. Birt is will do so if necessary.

Do you wish to be:	.	Notified of the Submission
	.	Notified of the Inspectors Recommendations
	.	Notified of the Adoption

Officer Response

Comments noted.

Comment

Consultee Ms Heidi Frary (874753)

Email Address

Company / Organisation Ovington Parish Council

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Ovington Parish Council (Ms Heidi Frary)

Comment ID 335

Response Date 02/10/17 08:02

Consultation Point Policy HOU 01- Development Requirements (Minimum) ([View](#))

Status Processed

Submission Type Email

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?

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

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

Some comments were made as part of the 'Preferred Direction' consultation, but a greater level of understanding has developed.

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

In 'Preferred directions' document in section 2.2 (pg14) it was reported that population growth from 138233 to 153313 (ONS sub-national population prediction 2012-2037) a population increase of 15080.

In section 3.51 (pg 40) this was translated into a need for 15784 houses, more than 1 dwelling per person.

After repeated requests for clarification Breckland suggested the information was in the SHMA and was due to “changes to living habits” such as “divorce” and “those currently living with their parents and in need of a house of their own” (over crowding).

Consulting the SHMA (2013 was latest version available for download at the time), states that: “Overcrowding is at a low level across all tenures in Breckland”. This seems to go against the given reason for the mismatch. Councillors are concerned at the flippant justification as it clearly does not come anywhere near addressing the magnitude of the mismatch.

Councillors were generally disappointed in the SHMA as a key document feeding the LP as it presents data that has such a wide range (deviation) that no meaningful result can be reliably drawn. The SHMA repeatedly excused itself, indicating further assessment is required and overall Councillors felt it left more questions than it answered. In section 3.3 (pg31) of the pre-submission there has been a 2017 update “to reflect the most recent Government predictions”, with the population now predicted to rise to 153700. It misses the initial figure in the report, therefore making it less obvious that the population rise has only risen by a tiny fraction at 15467.

The plan now calls for no less than 15298 new homes, still about one dwelling for each new person.

A small survey of new houses built in Breckland suggests that they are not single person dwellings but on average suitable for circa 2½ persons per dwelling.

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 two options presented do not cover all options. The Parish Council is minded that while this comment might be dealt with by written representation, previous comments have not been answered adequately, if at all. Further, while we do not WISH to appear at the *Examination in Public*, Cllr T. Birt is will do so if necessary.

Do you wish to be:

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

Comment

Consultee Ms Heidi Frary (874753)

Email Address

Company / Organisation Ovington Parish Council

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Ovington Parish Council (Ms Heidi Frary)

Comment ID 336

Response Date 02/10/17 08:02

Consultation Point Policy HOU 05 - Small Villages and Hamlets Outside of Settlement Boundaries ([View](#))

Status Processed

Submission Type Email

Version 0.3

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

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

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

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

Some comments were made as part of the 'Preferred Direction' consultation, but a greater level of understanding has developed.

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 Criteria.

1) Development must comprise “sensitive infilling”, the use of an emotive and undefined term ‘sensitive’ leaves the policy unclear and open to challenge. The term “access to an existing highway” is odd because to be viable surely all properties must have access to an existing highway, either directly or via a new link. Is this clause attempting to do something else?

2) There is no limit on the total number of developments, it could encourage multiple applications for three units leading to an overall unsustainable development. Carefully crafted applications could leave future opportunity for further infill.

3) Yet another incorrect use of the word ‘appropriate’. After the Parish Council has formally considered an application there can only be two outcomes either ‘supported’ or ‘unsupported’.

(5) developments must not “harm or undermine a visually important gap”.

“visually important gap” is not defined and leaves this policy open to challenge.

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
	. 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 two options presented do not cover all options. The Parish Council is minded that while this comment might be dealt with by written representation, previous comments have not been answered adequately, if at all. Further, while we do not WISH to appear at the *Examination in Public*, Cllr T. Birt is will do so if necessary.

Do you wish to be:	. Notified of the Submission
	. Notified of the Inspectors Recommendations
	. Notified of the Adoption

Comment

Consultee Ms Heidi Frary (874753)

Email Address

Company / Organisation Ovington Parish Council

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Ovington Parish Council (Ms Heidi Frary)

Comment ID 337

Response Date 02/10/17 08:02

Consultation Point Policy TR 01 Sustainable Transport Network ([View](#))

Status Processed

Submission Type Email

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 effective?

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

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

Some comments were made as part of the 'Preferred Direction' consultation, but a greater level of understanding has developed.

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.

Ovington is a small parish and as such we are well aware of the cost of building new foot-ways and bus stops which has been a large draw on our resources.

This is a very weak and inadequate policy compared with the strong message in the NPPF. The Policy does not widen the choice or travel opportunities, the policy should better mirror the importance given to sustainable transport in the NPPF.

Point (b) Sustainable transport is far more than access to a “bus stops”. NPPF para 35 – stipulates developments should be located where there is access to “high quality public transport facilities”. Para 35 also states that plans should exploit opportunities for sustainable transport modes, the Local Plan policy does not exploit opportunities for cycling or walking.

Point (d) this is an outcome, the policy lacks action to deliver this outcome.

This policy would be deemed sound if it reflected the NPPF’s strong emphasis on maximising the use of sustainable transport NPPF 34.

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 two options presented do not cover all options. The Parish Council is minded that while this comment might be dealt with by written representation, previous comments have not been answered adequately, if at all. Further, while we do not WISH to appear at the *Examination in Public*, Cllr T. Birt is will do so if necessary.

Do you wish to be: . Notified of the Submission
. Notified of the Inspectors Recommendations
. Notified of the Adoption

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

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

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

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

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

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

Part 1: Your Contact Details

Name:	
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.

To ensure issues raised are adequately discussed.

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

Agent Mr John Long (1130556)

Email Address

Address

Consultee Attleborough Land Ltd (502323)

Address C/O Agent
C/O Agent
C/O Agent

Event Name Local Plan Pre-Submission Publication Document

Comment by Attleborough Land Ltd

Comment ID 342

Response Date 28/09/17 14:56

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 Email

Version 0.5

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

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

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

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

Attleborough Land Ltd support Policy GEN 4 – Development Requirements of Attleborough Strategic Urban Extension. To inform the Local Plan’s examination the following comments on the policy are relevant:

1. The planning application (ref: 2017/0966/O) forms the majority of the SUE. Some land identified within the SUE is outside of the control of the applications, but they are not fundamental to the delivery of the SUE, and compliance with the policy.

2. An indicative Phasing Plan is proposed with the application, and the masterplan has been developed to allow it to come forward in phases. There are around 5 phases in total ranging from 240 residential units to 1,130 residential units. The Local Plan target of 2,650 units over the plan period (up to 2036) equates to an average annual delivery rate of around 165 units a year. This is considered achievable. The expectation is that given its size, the site will be purchased and developed by a consortium of developers.

Assuming the industry standard of around 50-60 units per outlet per year, 3 developers would be needed to be deliver the trajectory. Experience elsewhere in Norfolk, such as at White House Farm, Sprowston, Norwich would suggest that a consortium of 3 developers are able to deliver around 150+ units per year.

3. The planning application does not propose a fixed housing mix, as it is in outline only but the expectation is that Reserved Matters applications will include a mix of house types, sizes and tenures.

6

4. The planning application proposes up to 4,000 sqm A1-A5 Uses in the Local Centre 2 x neighbourhood centres of up to 400 sqm of A1-A5 each. The planning application is supported by a Retail Statement which confirms the higher figure is appropriate to meet the needs of the SUE, and does not undermine the town centre. The planning application includes a considerable amount of open space and sports pitches; all accessible from the main town as well as the SUE. A Linear Park is proposed running through the site, with connectivity to existing and new residential areas.

5. Heritage Statements have been submitted with the application and discussions are ongoing with Historic England regarding the setting of the Scheduled Ancient Monument.

6. The planning application propose the retention of the majority of trees and hedgerows, which form the landscape framework around which the development parcels have been planned. New hedgerows and trees will be planted as part of the landscape strategy for the site.

7. As the planning application is in outline, it is anticipated that should the application be approved a condition will be attached requiring submission of a Travel Plan for each phase of the development.

8. The planning application is supported by a Foul Sewage Strategy which has been informed by a pre-application enquiry and discussions with Anglian Water Services. It confirms that there will be sufficient capacity at the WWTW, but the network requires reinforcement. Discussions are ongoing regarding a new pumping station.

It is suggested that the Local Plan Policy is amended to confirm that the WWTW will have sufficient capacity to accommodate the SUE, but that network reinforcement is necessary.

9. Discussions are ongoing with the Minerals and Waste Authority regarding the minerals resource. The expectation is that conditions will be attached to any outline consent requiring the implementation of investigations and measures to extract/use viable resources.

10. The planning application is supported by a Masterplan, Parameter Plans and Design and Access Statement. The Masterplan, Parameter Plans and Design and Access Statement demonstrate the indicative design, layout and phasing requirements for 4,000 homes. It includes the route of the Link Road, and demonstrates how it would be delivered in stages and completed by the 1200 dwelling. A new footbridge is proposed, at Leys Lane, to be opened by the 1200 dwelling and a new DDA compliant route to the Train Station/Town Centre is proposed to improve connectivity to the town centre and residential areas. Two new 2 FE primary schools are proposed and will be secured through a Section 106 agreement. Each school will include space for them to be extended to 3 FE schools. The application proposes a Local Centre and 2 neighbourhood centres. The Local Centre is intended to compliment the town centre and not compete with it. The masterplan has been informed by a Flood Risk Assessment, and the proposed Linear Park includes multi-use SUDs areas. The Linear Park forms the backbone of the development, and includes play areas, natural areas, footpath and cycling routes, as well as SUDS. It links the residential areas to the new sports pitches and primary schools. It also includes the easement for the gas pipeline that runs throughout the site. As the application is in outline, it will be refined each time Reserved Matters are submitted for the development phases. A Design Code was not included with the outline application as it is too early to prepare one and matters of

design are reserved. However, consideration is being given to preparing and submitting a 'Design Code Approach', to support the application which will establish a methodology and provide a template for the preparation of a Design Code. It is anticipated that a condition will be added to any outline planning consent requiring submission and approval of a Design Code prior to preparation and submission of the first reserved matters application.

It is suggested that the Local Plan policy is amended to clarify that the requirement for a Design Code will be a pre-cursor to the submission of the First Reserved Matters application, rather than a requirement of the outline application. i.e. "...Prior to the preparation and submission of the First Reserved Matters application a Design Code will be required to be submitted to the Council and approved.

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

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

Do you wish to be:

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

Officer Response

Support noted. The policy as worded states that "the applicant will be required to develop design codes to the satisfaction of the Council which will inform the detailed planning application for the SUE".

Comment

Agent	Mr John Long (1130556)
Email Address	
Address	
Consultee	Attleborough Land Ltd (502323)
Address	C/O Agent C/O Agent C/O Agent
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Attleborough Land Ltd
Comment ID	343
Response Date	28/09/17 14:56
Consultation Point	Policy HOU 10 - Technical Design Standards for New Homes (View)
Status	Processed
Submission Type	Email
Version	0.3
Do you consider the Pre-Submission Publication to be:	<input type="radio"/> Sound (You support the document)

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

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

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

Policy HOU 10 – Technical Design Standards

Policy HOU 10 seeks to impose additional design standards on dwellings (beyond Building Regulations). The policy should be caveated so that it only applies where it can be proven to be technically deliverable and economically viable to do so. ***It is suggested that the Policy should be amended to clarify that it will not be applied where meeting the requirement would not be technically deliverable or would render a proposal unviable.***

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

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

Do you wish to be:

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

Officer Response

Support noted.

Comment

Agent Mr John Long (1130556)

Email Address

Address

Consultee Attleborough Land Ltd (502323)

Address C/O Agent
C/O Agent
C/O Agent

Event Name Local Plan Pre-Submission Publication Document

Comment by Attleborough Land Ltd

Comment ID 344

Response Date 28/09/17 14:56

Consultation Point Policy COM 01 - Design ([View](#))

Status Processed

Submission Type Email

Version 0.3

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

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

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

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

Policy COM 01– Design

Policy COM 01 seeks to impose additional design requirements on scheme. The policy should be caveated so that it only applies where it can be proven to be technically deliverable and economically viable to do so. ***It is suggested that the Policy should be amended to clarify that it will not be applied where meeting the requirement would not be technically deliverable or would render a proposal unviable.***

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

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

Do you wish to be:

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

Officer Response

The NPPF states that planning should always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings as one of the 12 core planning principles. Policy COM01 seeks to implement this within the Local Plan. The policy itself does not set specific thresholds for incorporating different standards it also does not require set materials. It is therefore not considered necessary to amend the policy wording.

<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: Spaceward 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: The Exchange, Colworth Science Park, Sharnbrook, Bedford	
Post code: MK44 1LQ	Telephone: 01234 867135
E-mail: geoff.armstrong@arplanning.co.uk	

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
Paragraph	
Site	
Proposals Map	
Settlement Boundary	
Other	Land at Etling Green, Dereham should be allocated for 122 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)	X
---	----------

Yes at Preferred Directions Stage (January - February 2016)	X
Yes at Issues and Options Stage (November 2014 - January 2015)	X

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

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

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
<p>Signature: </p>	Date: 29/09/17

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.

Ref: GA/DJ/00316/L0005

Sent by email to planningpolicyteam@breckland.gov.uk

29 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 at Etling Green, Dereham
On behalf of Spaceward Limited**

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

Our representations, which are detailed in this letter and on the enclosed Representations Form, raise significant concerns regarding Policies HOU 01 – Development Requirements (Minimum) and Policy HOU 02 – Level and Location of Growth. We consider that these policies are 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) as the housing requirement they set is too low and the housing distribution is overly focussed on delivery in two Sustainable Urban Extensions (SUE) that means the Council are unable to deliver sufficient homes over the next five years.

In order to ensure that the plan is found sound at examination, we recommend that the Council seek to identify additional sites for allocation and particularly sites that are confirmed as deliverable within 5 years. In this respect, we are pleased to confirm that our clients land at Etling Green is considered to be a sustainable option for the delivery of 122 dwellings during the next five years.

Policy HOU 01- Development Requirements (Minimum)

The 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 for the affordability of housing in calculating an appropriate uplift on household projections; and
2. It fails to justify the use of a stepped trajectory

Market Signals

The Local Plan Expert Group's recommendations to central government published in March 2016¹, 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. The Central Norfolk Strategic Housing Market Assessment's (SHMA) only includes an uplift of 10% for Breckland based on market signals, despite the fact that the Office for National Statistics (ONS) latest data on the ratio of house price to work-place based earnings² (which is the government's recommended source for affordability data in the current consultation on housing needs methodology³) shows that median house prices in Breckland are 8.19 times higher than median earnings for jobs in the district. It is clear from this that there is a requirement for a further uplift of 10% against household projections which would result in a need for several hundred more homes to be allocated in the Local Plan.

A total uplift of 20% against household projections would also mean that the Council's housing requirement is more in line with the figure contained in the government's current consultation on the new housing needs methodology which would see the annual requirement rise by 11% to 680 dwellings per annum.

In respect of the above, the Local Plan Pre-Submission Publication cannot be considered sound 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 and it cannot therefore be considered to be positively prepared.

Recommendation: In order to make the plan sound we consider that the Council should increase its housing requirement by a further 10% against household projections.

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

¹ 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>

² 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>

³ 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

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. The policy cannot therefore be considered sound.

Recommendation: Additional sites should be allocated for delivery in the first five years of the plan to meet the Council's undersupply between 2011 and 2016 of 669 dwellings⁴ and any additional undersupply following the application of the additional 10% uplift recommended above.

Policy HOU 02- Level and Location of Growth

The 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 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 the most appropriate strategy and Policy HOU 02 is considered to be unjustified and unsound.

Recommendation: 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.

Land at Etling Green, Dereham

In respect of the above identified need to allocate additional sites for residential development during the next five years, we are pleased to confirm that our client's land at Etling Green, Dereham is considered to be a sustainable option for the delivery of 122 dwellings and is deliverable during the next five years.

We submitted previous representations to the Local Plan Issues and Options Consultation Document and Call for Sites (January 2015), to the Local Plan Preferred Directions Consultation (February 2016) and to the Local Plan Preferred Site Options and Settlement Boundaries Consultation (October 2016) in support of further housing growth in Dereham and specifically to promote land at Etling Green (as shown on the enclosed location plan for allocation) for up to 122 dwellings.

We were disappointed to note in the Preferred Site Options and Settlement Boundaries Consultation (October 2016) that the site (reference LP[025]025) had been categorised as an 'Unreasonable Option' by reason that:

"The site is visually detached from the Dereham settlement and comprises land associated with Etling Green. The site is remote from services and facilities within the town. The development of the site would lead to the coalescence of the settlements of Dereham and Etling Green which would be unfavourable in landscape terms."

In June 2016, a pre-application request was submitted to Breckland District Council (copy attached) in respect of a proposed residential development with possible commercial use on the site. A positive response to the pre-application request was received from James Tipping, Principal Development Management Planner on 27th July 2016 (copy attached). Fundamentally, this confirmed (my emphasis):

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

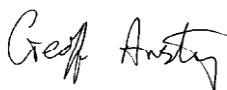
- Development of the site for residential use would be supported by the Council should a formal application be submitted;
- It is evident that the proposed development would be well related to any existing built form, albeit separated from the Norwich Road to the west of the site, on the Dereham side. However, the development would form the smaller cluster of existing residential buildings at Etling Green;
- The land is considered a greenfield site, though is bound by residential development to the east and west, with the A47 directly to the south and the B1147 to the north. The site would not therefore be considered development within the open countryside; and
- The site would have access to local services within Dereham, and could utilise the newly constructed footpath to the north of the B1147 to access such services by foot. In addition, there are other forms of sustainable modes of transport available (e.g. bus service) within Dereham that address certain sustainability matters. In these broad terms the proposal would represent a sustainable development as defined in the NPPF.

Other general advice was received in terms of the suggested density, design and mix for the housing and the need to provide noise mitigation. It was advised that there was no current need/demand for additional commercial floor space in this locality.

In light of the positive response by Officers in respect of the suitable and sustainable nature of the site outlined above, we consider Land at Etling Green to be particularly well-placed to help meet the currently unmet need for an additional several hundred new homes identified above. The attached pre-application submission demonstrates that there are no access, sewerage, landscape or flooding constraints to development coming forward on the site in the short term. Any noise impact from the adjacent A47 could be adequately mitigated by a landscape buffer and plot positioning. Furthermore, we are pleased to confirm that our client is committed to bringing forwards a planning application in the short-term and to deliver the full 122 homes on the site within 5 years.

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



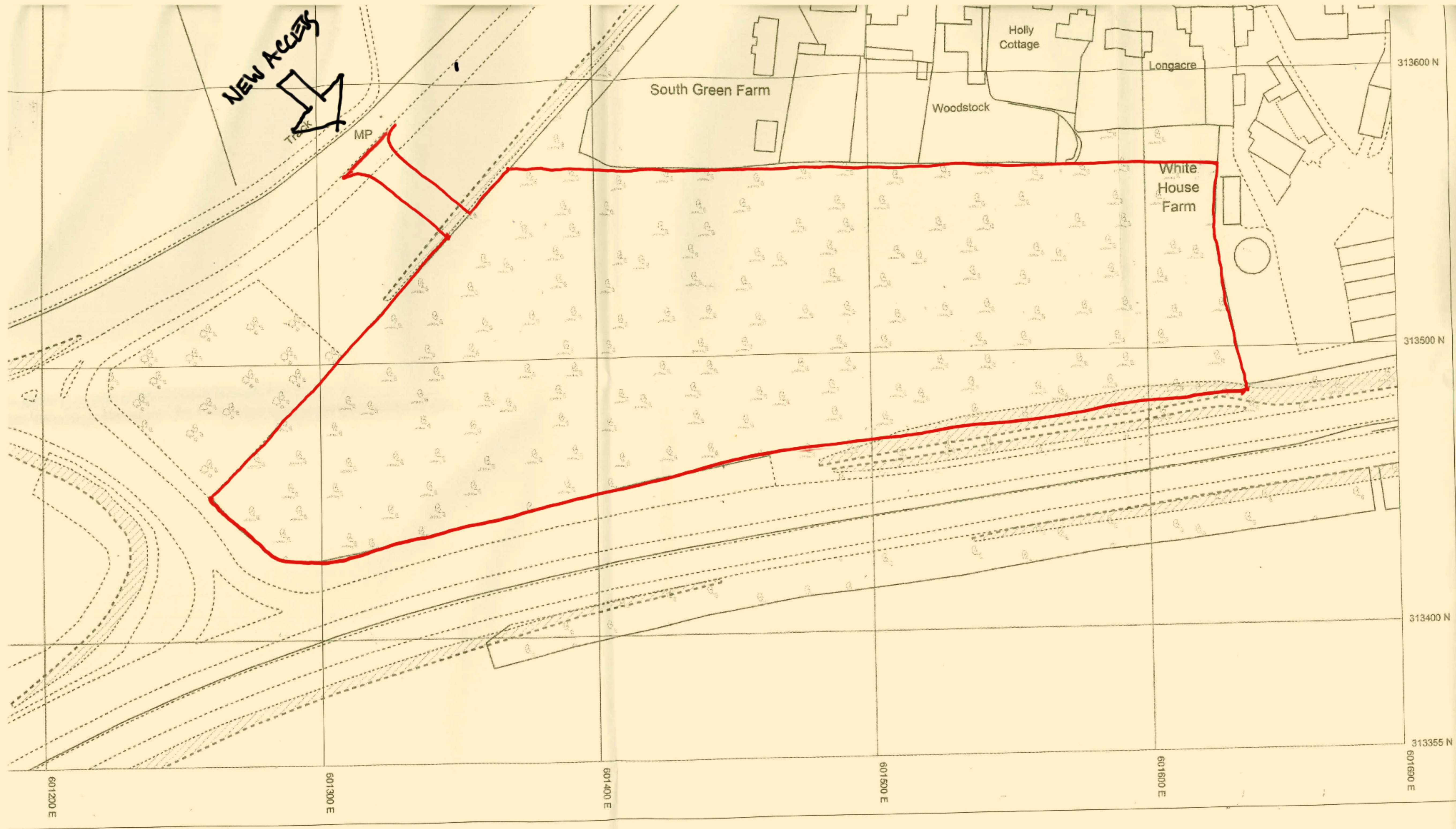
Geoff Armstrong (geoff.armstrong@arplanning.co.uk)

Director

Armstrong Rigg Planning

Direct Line: 01234 867130

Mobile No: 07710 883907



Scale 1:1250

Supplied By: **Hussey Knights Norwich**
Serial number: 001142458
Plot Centre Coordinates: 601403, 313495

Ref: GA/EW/00316/L0003

30th June 2016

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

Dear Sir or Madam

**Request for Pre-Application Advice
Proposed Development at Land at Etling Green, Dereham**

On behalf of our client, Spaceward Ltd, we write to request formal pre-application advice in connection with a proposed development at the above site. A red line site location plan and proposed masterplan (ref 6944 MP01) are enclosed.

Site Description

The 3.5ha site comprises agricultural land located to the east of Dereham between the A47 and B1147. The site lies entirely within Flood Zone 1, classified as having a low probability of flooding. It is not within a Conservation Area or within close proximity to any listed buildings. There are no Tree Preservation Orders or statutory or non-statutory designated ecological sites within the site. The site is well contained by existing roads and residential development.



Site Location

Background

The site was promoted through the Council's Local Plan Issues and Options Consultation Document and Call for Sites in January 2015 and more recently the Local Plan Preferred Directions Consultation (February 2016) for allocation for up to 122 dwellings.

The Council's 2011 Strategic Housing Land Availability Assessment (SHLAA) and the 2014 update discounted the site (ref D15), principally by reason that the suggested access off the A47 was considered unsuitable and unviable. The Preferred Directions Consultation Document assessed the site (reference LP[025]025) as being an Unreasonable Alternative as *'Access would be constrained by the A47 acting as a barrier between the site and the settlement.'* The site performed favourably otherwise in the Sustainability Assessment.

The recent representations made to the emerging Local Plan however confirmed that a solution has been devised to provide a suitable access to the site directly off the B1147 to the north using vacant land which is publically controlled by the Highways Agency. Our client has entered into formal correspondence with the Highways Agency and submitted a Land Enquiry Form. Matters have since progressed such that it has now been agreed that the land will be made surplus to requirements and can therefore be sold or reverted to the frontage owners of which our client's vendor is the only one along this part of the land. The red line plan includes all the land necessary to deliver an access off the A47 to enable housing development on the site.

Emerging Proposals

The accompanying Proposed Masterplan shows indicatively:

- Vehicular access off the B1147;
- A primary access road leading to a series of secondary roads and private drives;
- A series of development parcels containing residential development in a mix of sizes including bungalows, smaller properties, family homes including an affordable provision;
- The inclusion of feature buildings to add visual interest and aid legibility;
- An area at the site frontage for possible commercial use;
- Provision of public open space, the retention of existing trees and additional site wide planting; and
- Provision of bungalows to the southern boundary to face the existing screening to the A47 acting as a noise buffer

Planning Justification for the Proposed Development

Breckland District Council has historically experienced difficulties in maintaining a 5 year supply of deliverable housing land as required by paragraph 47 of the NPPF and as confirmed in the latest Supply Statement (July 2015), can only demonstrate a 3.72 year housing land supply with a 20% buffer. To rectify this, the Council has in their Housing Implementation Strategy identified that a departure from the adopted Development Plan, which normally which restricts residential development on sites outside settlement boundaries, will be necessary in order to consider applications for housing favourably where it can be demonstrated that sites are deliverable.

The emerging Local Plan Preferred Options document identifies in 'Preferred Policy Direction - PD 03 Locational Strategy' that most new development needs will be met through the sustainable settlement hierarchy which focuses growth at the Key Settlements of Attleborough and Thetford and the Market Towns which includes Dereham. 'PD 04 Level and Location of Growth' indicates that the Market Towns will be expected to deliver some 18% of the future growth with 158 new allocations required in Dereham.

Clearly there exists the opportunity to continue to promote the site through the emerging Local Plan process. However, in the context of a significant shortfall in the Council's 5 year housing land supply, the imperative to boost significantly the supply of housing, the categorisation of Dereham as a sustainable Market Town which is expected to accommodate housing growth over the emerging Plan period, the historic issues in delivering major residential development in the town and the sustainable location of the site, it is considered entirely justified and appropriate to bring it forward now under a planning application.

As detailed above, there are now no access constraints to development coming forward on the site. In terms of highways impact, it is understood that the Dereham Transport Study being prepared by Whyte Young Green (WYG) as an Evidence Base document for the emerging Local Plan is expected to identify the need for highway

improvements in the form of a roundabout at the Tavern Lane/Yaxham Road/A47 junction. However, as access to the site is achievable via the A47 in both directions, traffic would not be required to pass through Dereham and as such the impact on the town centre highways network would not be exacerbated by any development on the site. In terms of sewerage, it is understood that a new local pumping station is due to be installed by 2017 and accordingly sufficient capacity will exist by the time any development is likely to commence on the site.

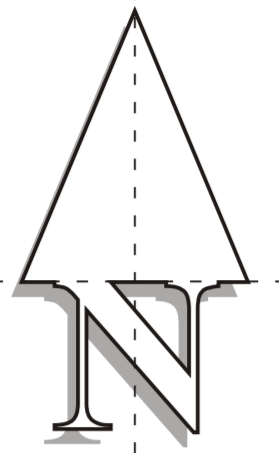
It is considered that there are no other constraints to development, for example flooding, landscape, contamination or pollution that would need to be overcome. Any noise impact from the adjacent A47 could be adequately mitigated by a landscape buffer.

The settlement boundary of Dereham has been extended significantly to the north west of the site by a recent Taylor Wimpey development. The site is located to the east of the town where development is being focused by reason of the close relationship and accessibility to the centre and its services and facilities. The site is one which is deliverable in accordance with the NPPF in that it is available now, offers a suitable location and is achievable with a realistic prospect that a viable housing scheme could be delivered within five years which would contribute towards achieving sustainable development.

We trust that this letter is sufficient to validate the request for formal pre-application advice and would very much welcome a meeting at this early stage to discuss the principle of residential development on the site. If you have any queries or require any further information, then please do not hesitate to contact me or my colleague Emily Warner.

Yours faithfully

Geoff Armstrong
Director
Armstrong Rigg Planning



ACCOMMODATION SCHEDULE						
	AREA	Beds	No.	sq ft	bed spaces	total
2 bed semi	688	2	10	6880	2	20
3 bed semi	763	3	10	7630	2.5	25
3 bed semi	855	3	10	8550	2.5	25
3 bed detached	933	3	8	7464	2.5	20
3 bed detached	979	3	9	8811	2.5	22.5
4 bed detached	1166	4	7	8162	3	21
4 bed detached	1186	4	6	7116	3	18
4 bed detached	1404	4	6	8424	3	18
4 bed detached	1431	4	6	8586	3	18
4 bed detached	1398	4	6	8388	3	18
Total			78			
1 bed Flats	500	1	8	4000	2	16
2 bed semi	774	2	8	6192	2	16
3 bed semi	912	3	8	7296	2.5	20
4 bed detached	1162	4	2	2324	3	6
Total			26			263.5
Total			104	99823 sq.ft		6324 Public open space required
Total Site Area	3.5	ha				
Public open space	0.6324	ha				
	2.8676	ha				
	7.085743	acres		14087.86724 sq. ft. per acre		

ACCOMMODATION SCHEDULE WITH COMMERCIAL AT ENTRANCE						
	AREA	Beds	No.	sq ft	bed spaces	total
2 bed semi	688	2	10	6880	2	20
3 bed semi	763	3	8	6104	2.5	20
3 bed semi	855	3	8	6840	2.5	20
3 bed detached	933	3	6	5598	2.5	15
3 bed detached	979	3	9	8811	2.5	22.5
4 bed detached	1166	4	6	6996	3	18
4 bed detached	1186	4	7	8302	3	21
4 bed detached	1404	4	6	8424	3	18
4 bed detached	1431	4	6	8586	3	18
4 bed detached	1398	4	6	8388	3	18
Total			72			
1 bed Flats	500	1	8	4000	2	16
2 bed semi	774	2	10	7740	2	20
3 bed semi	912	3	4	3648	2.5	10
4 bed detached	1162	4	2	2324	3	6
Total			24			242.5
Total			96	92641 sq.ft		5820 Public open space required
Total Site Area	3.23	ha				
Excl Commercial	0.582	ha				
Public open space						
	2.648	ha				
	6.543118	acres		14158.53954 sq. ft. per acre		

NOTES

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 Written dimensions must be used in preference to scaled.
 Contractors must check all dimensions on site.
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REVISIONS	
REV	DATE

CLIENT:
MOUSE DEVELOPMENTS

PROJECT:
PROPOSED DEVELOPMENT
ETLING GREEN
DEREHAM

DRAWING TITLE:
PROPOSED MASTERPLAN

SCALE - 1:1000 @ A2. DATE - JUNE 2016.

ASD ARCHITECTURE Ltd
 16A Bridge Street • Halesworth • Suffolk • IP19 8AQ
 Tel. (01986) 872250
 Fax. (01986) 872228
 enquiries@ASD-architecture.co.uk
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JOB NO. 6944	DWG NO. MP 01	REV. -
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drw loc: 6944 Mouse Dev, Etlng Green, Dereham / drawings / 6944 MP 01 v01.cdr.

MASTERPLAN.
1:1000 @ A2 SIZE

Emily Warner

From: Geoff Armstrong
Sent: 30 September 2016 16:35
To: Emily Warner
Subject: FW: Pre-applicaiton advice - proposed residential development at land at Etling Green, Dereham

From: Tipping, James [mailto:James.Tipping@breckland.gov.uk]
Sent: 27 July 2016 11:54
To: Geoff Armstrong <Geoff.Armstrong@arplanning.co.uk>
Subject: Pre-applicaiton advice - proposed residential development at land at Etling Green, Dereham

Dear Mr Armstrong,

I refer to your letter received dated 30 June 2016, concerning the above development proposal. Please accept my apologies for the delay in replying, which was due to the pressure of other work.

Having considered the information and draft proposals provided, I can advise that, in my view, the development of the site for residential use would be supported by the Council should a formal application be submitted. The site is not allocated for development and falls outside the defined Settlement Boundary. However, relevant local planning policies for the supply of housing can be given little weight as the Council is unable to demonstrate a 5 year supply of housing land. As you are aware, in this situation the NPPF says that proposals should be approved unless the adverse effects of so doing would significantly outweigh the benefits of development or specific policies in the NPPF indicate that development should be restricted.

In this context, it is evident that the proposed development would be well related to any existing built form, albeit separated from the Norwich Road to the west of the site, on the Dereham side. However, the development would form the smaller cluster of existing residential buildings at Etling Green. The land is considered a greenfield site, though is bound by residential development to the east and west, with the A47 directly to the south and the B1147 to the north. The site would not therefore be considered development within the open countryside. The site would have access to local services within Dereham, and could utilise the newly constructed footpath to the north of the B1147 to access such services by foot. In addition, there are other forms of sustainable modes of transport available (e.g. bus service) within Dereham that address certain sustainability matters. In these broad terms the proposal would represent a sustainable development as defined in the NPPF.

A number of matters of detail will require further assessment through the application process, including highway, drainage and ecological interests. I understand that you have sought advice from the Highway Authority, the EA and Natural England regarding the proposal. Accordingly, I would not wish to comment specifically on those matters where you have sought advice.

In respect of the indicative layout, the level of housing proposed is 104 units on 3.4 hectares of land, or 96 units on 3.23 hectares of land. This equates to 29.7 dwellings for both scenarios. This would be at the upper end of the DPH density identified within Policy DC2 of the Council's Core Strategy. Given the sites location and association with existing dwellings within Etling Green, the DPH that should achieved would be on the lower density, towards 22 DPH. The indicative mix of dwellings appears appropriate taking into consideration the Council's SHMA.

The layout also shows dwellings very close to the southern boundary adjacent to the A47. Given the noise generation from traffic along the A47, it would be preferable to have an increased buffer along the whole of the southern boundary. This buffer could incorporate the public open space. I don't consider that there is a current need/demand for additional commercial floor space in this locality, and certainly not adjacent to proposed

residential development. The form and appearance should reflect that of the local vernacular, specifically the type of dwellings at Etling Green.

As far as validation requirements are concerned, I would refer you in the first instance to the Council's Local List, which has recently been updated and is available to view online - http://www.breckland.gov.uk/sites/default/files/Uploads/planning_building_control/Local%20List%20July%202015%20%28Adopted%29.pdf. Please let me know if you require any further clarification on this matter.

I hope the foregoing is of some assistance. You will appreciate the views expressed are provided on an informal basis and are not necessarily binding on any decision of the Council should a formal application be submitted.

Please also note that I will be leaving CAPITA/Breckland Council this Friday. If you have any further queries beyond this date, please contact Nick Moys on 01632 656266.

Kind regards

James Tipping
Principal Development Management Planner

Breckland Council

working in partnership with

CAPITA

Tel: 01362 656873
DDI: 01362 656248
Fax: 01362 696771
Email: james.tipping@capita.co.uk
Elizabeth House, Walpole Loke, Dereham, Norfolk, NR19 1EE

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Comment

Agent Mr Geoff Armstrong (1130567)

Email Address

Company / Organisation Armstrong Rigg Planning

Address

Consultee Mountleigh Development Holdings (1131634)

Company / Organisation Mountleigh Development Holdings

Address -

-

-

Event Name Local Plan Pre-Submission Publication Document

Comment by Mountleigh Development Holdings (Mountleigh Development Holdings)

Comment ID 348

Response Date 29/09/17 08:25

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

Status Processed

Submission Type Email

Version 0.3

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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 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.

Dereham Housing Allocation 3 - Land off Swanton Road (LP[025]023)

As outlined above, we support the allocation of our client's land for residential development, but have a couple of concerns regarding the soundness of the Dereham Housing Allocation 3 policy that allocates the site for development.

The site has a resolution to grant outline planning permission for up to 216 dwellings (Ref: 3PL2015/1487/O). The committee report for this application clearly demonstrates that this level of development can be sustainably accommodated on the site. It is therefore unclear why the policy proposes only 210 dwellings. In this respect the policy is not considered to represent the most appropriate strategy for the site and must be considered unsound.

Recommendation: Amend policy wording to refer to approximately 216 dwellings.

In addition to the above we wish to raise concern regarding the policy criteria that "Development should provide a minimum of 2 Locally Equipped Areas for Play and an Outdoor Sport Area". This requirement is not worded as flexibly as emerging Policy ENV 04 – Open Space, Sport and Recreation, which recognises that "there may be cases where the direct provision of open space on-site is not the preferred option. It may be that open space does not represent an efficient use of land in the context of the site location or that there is a deliverable opportunity to secure a more meaningful area of open space that better serves the whole community in close proximity to the application site".

Recommendation: The policy wording should be amended to allow more flexibility in the provision open space in accordance with Policy ENV 04.

Conclusion

We wish to support the allocation of our client's land at Swanton Road, Dereham by policy Dereham Housing

Allocation 3 and consider the policy wording to be largely sound, subject to the minor amendments suggested regarding the level of proposed development and requirements for open space. In addition to these recommendations, we have concerns regarding the burden placed on developers by the proposed policies on

technical design standards, healthy lifestyles and open space provision. In each case we have made recommendations to either delete or amend the relevant policies in order to make the Local 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.

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Do you wish to be:

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Comment

Agent	Mr Geoff Armstrong (1130567)
Email Address	
Company / Organisation	Armstrong Rigg Planning
Address	
Consultee	Mountleigh Development Holdings (1131634)
Company / Organisation	Mountleigh Development Holdings
Address	- - -
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Mountleigh Development Holdings (Mountleigh Development Holdings)
Comment ID	349
Response Date	29/09/17 08:25
Consultation Point	Policy HOU 10 - Technical Design Standards for New Homes (View)
Status	Processed
Submission Type	Email
Version	0.4
Do you consider the Pre-Submission Publication to be:	<input type="checkbox"/> Unsound (You think the document needs changing)
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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) <input type="checkbox"/> 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.

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.

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:

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Officer Response

Comment noted- The Optional Technical Standards paper provides the evidence for the policy.

Comment

Agent Mr Geoff Armstrong (1130567)

Email Address

Company / Organisation Armstrong Rigg Planning

Address

Consultee Mountleigh Development Holdings (1131634)

Company / Organisation Mountleigh Development Holdings

Address
-
-
-

Event Name Local Plan Pre-Submission Publication Document

Comment by Mountleigh Development Holdings (Mountleigh Development Holdings)

Comment ID 350

Response Date 29/09/17 08:25

Consultation Point Policy COM 02 Healthy Lifestyles ([View](#))

Status Processed

Submission Type Email

Version 0.3

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Policy 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.

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

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Officer Response

Comment noted. The PPG states that there HIAs may be a useful tool to use where there is expected to be significant impacts. The policy itself only seeks Health Impact Assessments for large and complex proposals.

Comment

Agent	Mr Geoff Armstrong (1130567)
Email Address	
Company / Organisation	Armstrong Rigg Planning
Address	
Consultee	Mountleigh Development Holdings (1131634)
Company / Organisation	Mountleigh Development Holdings
Address	- - -
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Mountleigh Development Holdings (Mountleigh Development Holdings)
Comment ID	351
Response Date	29/09/17 08:25
Consultation Point	Policy ENV 04 Open Space, Sport & Recreation (View)
Status	Processed
Submission Type	Email
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 positively prepared? <input type="checkbox"/> Is the plan justified? <input type="checkbox"/> Is the plan effective? <input type="checkbox"/> Is the plan consistent with national policy?
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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).

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

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Comment

Agent Mr Geoff Armstrong (1130567)

Email Address

Company / Organisation Armstrong Rigg Planning

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Consultee Blue Oak Developments (1131636)

Company / Organisation Blue Oak Developments

Address -
-
-

Event Name Local Plan Pre-Submission Publication Document

Comment by Blue Oak Developments (Blue Oak Developments)

Comment ID 352

Response Date 29/09/17 08:40

Consultation Point Policy HOU 04 - Rural Settlements With Boundaries
([View](#))

Status Processed

Submission Type Email

Version 0.3

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

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Policy HOU 04 – Rural Settlements with Boundaries

Policy HOU 04 states that appropriate development will be allowed immediately adjacent to the settlement

boundary of the 'Rural Settlements with Boundaries', subject to being supported by other policies within the Local Plan (with the exception of Policy GEN 05 Settlement Boundaries) and where all of the following criteria are satisfied. We support criteria 4, **but consider criteria 1, 2, 3 and 5 to be unsound** as set out below:

1. It is minor development of an appropriate scale and design to the settlement of up to 5 dwellings:

No justification is given for why development of more than 5 dwellings would be inappropriate in the 'Rural Settlements with Boundaries'. We have reviewed the settlements in this category and note that the majority

of them are already characterised by suburban style estates of many more than 5 dwellings. It is therefore clear that developments at a scale greater than 5 dwellings are not by definition inappropriate in these settlements. This policy criteria is therefore considered to be too arbitrary a figure and it is not justified in that it would prevent larger schemes from being delivered that would provide more community benefits in terms of contributions to affordable housing and tariff style planning obligations (section 106 planning obligations), which Planning Practice Guidance states cannot be sought from developments of 10-units or less (ID: 23b-031-20161116). Emerging Policy HOU 07 is in accordance with this national guidance in requiring housing contributions from developments of 11 or more units.

In the context of the above, it is clear that there is no reasoned justification for restricting developments in the

'Rural Settlements with Boundaries' to no more than 5 dwellings and that this criteria would have a negative impact on securing community benefits from these developments. This fact is further compounded by the supporting text to the policy at Paragraph 3.16 which states that, while larger developments that could deliver affordable homes are not considered appropriate in these settlements, it is "highly likely that there will continue to be a need for the provision of affordable homes in these communities"

. This statement is clearly contradictory in that recognises a need for affordable homes, but supports a policy that will specifically restrict the potential for delivering affordable homes.

In recognising a need for affordable housing in the 'Rural Settlements with Boundaries', but not effectively planning for its delivery, this policy can clearly not be considered justified, effective or positively prepared. It is also considered to be contrary to national policy at NPPF Paragraph 54 which requires local planning authorities to plan for housing to reflect local needs and particularly affordable housing, where it states that authorities should consider allowing some market housing that would facilitate the provision of additional affordable housing to meet local needs.

Recommendation: Amend policy criteria to "It is development of an appropriate scale and design to the settlement".

2. It would not lead to the number of dwellings in the settlement increasing by more than 5% from the date of adoption of the Plan. The settlement refers to the number of dwellings inside the defined settlement boundary:

No justification or evidence is presented as to why it would be inappropriate for the 'Rural Settlements with Boundaries' to grow by more than 5%. Emerging Policy HOU 02 – Level and Location of Growth identifies that following the first 6 years of the plan period between 2011-2017 these settlements have either accommodated or have committed development totalling 902 dwellings. There are 17 'Rural Settlements with Boundaries' identified in the plan, which on average appear to have less than 500 dwellings each within the settlement boundary. This indicates that the total number of dwellings in the 'Rural Settlements with Boundaries' is somewhere around 8,500 (although this is likely to be an overestimate). 5% of 8,500 is just 425 dwellings, which is significantly lower than the 902 dwellings already completed or committed in the first 6 years of the plan period.

It is clear from the above that the 'Rural Settlements with Boundaries' have already been considered to be sustainable locations for growth of more than 10% in just 6 years of the plan period and yet they are to be restricted to just 5% more growth for the remaining 18 years of the plan. This is considered to be overly restrictive and unsound as it would be ineffective in meeting the ambition of this policy to flexibly allow for growth in rural areas to "support local services, balance residential needs and employment opportunities and seeks to enhance the rural economy, thereby helping to maintain the vitality of rural communities".

It is also true that the growth so far in the 'Rural Settlements with Boundaries' has not been equal, with some settlements having grown or due to grow substantially, while others have very little committed growth. This raises a question as to why it is considered acceptable for some 'Rural Settlements with Boundaries' to grow by over 10%, while others are restricted to just 5% growth.

If the Local Plan is committed to allowing growth to maintain the vitality of rural communities, this policy criteria needs amending to allow for more growth in settlements that have not already seen significant levels of growth.

It is also clear that the figure of 902 homes either completed or committed in the 'Rural Settlements with Boundaries' over the first 6 years of the plan period represents a not insignificant proportion of total growth. By restricting further growth in these communities, the Local Plan will effectively remove an important source of housing land supply at a time when the Council cannot demonstrate a 5 year supply of housing.

Recommendation: Amend policy criteria to "It would not lead to the number of dwellings in the settlement increasing significantly above that at the date the plan is adopted. Significance will be judged with reference to the sustainability of the settlement and the capacity of local services and infrastructure to accommodate new development. The settlement refers to the number of dwellings inside the defined settlement boundary".

3. Development provides a significant community benefit:

We consider that in its current form this requirement does not meet the requirements of NPPF Paragraph 204 which states that planning obligations should only be sought where they are fairly and reasonably related in scale and kind to the development. The policy currently restricts proposals to just 5 dwellings and yet requires "significant community benefits"

. This implies that the Council would seek planning obligations that are not fairly and reasonably related in scale and kind to the potential developments and suggest that planning permissions could essentially be bought by the highest bidder who is willing or able to make the biggest contribution.

In respect of the above, this policy criteria is not considered sound in its current form as it is contrary to national policy. This said, we do support some parts of the detailed justification for this policy contained at paragraphs 3.21-3.23 which set-out what will be considered to be a community benefit. This list includes demonstrations of conformity with aspirations identified in a neighbourhood plan; demonstrations of local social or economic needs; and provision of a community facility, asset or

financial contributions towards such facilities which meet an identified need established in documentation such as a Parish or Neighbourhood Plan. We would support these elements in so far as they are based on needs identified in a made neighbourhood plan or involve the objective assessment of local social or economic needs. However, the list also includes demonstrations of local support such as the views of the parish council or surveys of local opinion prepared independently. These elements are far too subjective and cannot be relied upon to ensure that sufficient growth comes forward to support local services and maintain the vitality of rural communities.

Recommendation: To ensure conformity with national policy, this criteria needs amending to avoid it being interpreted as requiring a level of contribution that is not fairly related to the size of proposed developments. We recommend the following revised wording: "The development meets identified residential, social and/or economic needs and would benefit the local community through supporting local services, facilities or assets".

4. The design contributes to preserving, and where possible enhancing, the historic nature and connectivity of communities:

We agree that this is an important consideration in promoting sustainable development in the 'Rural Settlements with Boundaries'.

5. The development avoids coalescence of settlements.

In order for this policy criteria to be considered sound, more information is needed to define what is meant by a settlement. It is noted from the settlement boundary maps for each of the 'Rural Settlements with Boundaries', that some of the settlements comprise more than one settlement boundary (as areas between two slightly separated built up areas have been excluded from the boundary). It is also noted that in some case, built up areas that are in close proximity to settlement boundaries have been excluded from them. We consider that further explanation is needed to define the term settlement and to clarify that no restriction should be placed on developments that would lead to the coalescence of two parts of the same settlement, unless other material considerations such as landscape or heritage indicate development should be restricted.

Recommendation: Include a definition of 'settlement' that specifies that 'Rural Settlements with Boundaries' can constitute more than one settlement boundary and/or built up area and that the coalescence of these areas is not restricted.

Conclusion

This letter has detailed our client's concerns regarding the specific policy criteria set by Policy HOU 04 – Rural Settlements with Boundaries and Policy HOU 05 – Small Villages and Hamlets Outside of Settlement Boundaries. We support the principle set out in these policies that these settlements should be considered suitable for appropriate development, but consider that the current criteria set-out to judge appropriateness do not meet the tests of soundness set out at National Planning Policy Framework (NPPF) Paragraph 182 (i.e. whether it is positively prepared, justified, effective and consistent with national policy). We have made several recommendations to amend the criteria set by these policies to ensure that the Local Plan can be considered sound.

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

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Comment

Agent Mr Geoff Armstrong (1130567)

Email Address

Company / Organisation Armstrong Rigg Planning

Address

Consultee Blue Oak Developments (1131636)

Company / Organisation Blue Oak Developments

Address -
-
-

Event Name Local Plan Pre-Submission Publication Document

Comment by Blue Oak Developments (Blue Oak Developments)

Comment ID 353

Response Date 29/09/17 08:40

Consultation Point Policy HOU 05 - Small Villages and Hamlets Outside of Settlement Boundaries ([View](#))

Status Processed

Submission Type Email

Version 0.3

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These policies were not included in draft versions of the plan and this is therefore the first time they have been consulted on.

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 05 - Small Villages and Hamlets Outside of Settlement Boundaries

Development in smaller villages and hamlets outside of defined settlement boundaries will be limited apart from in exceptional circumstances where planning permission may be granted subject to being supported by other policies within the Local Plan (with the exception of Policy GEN 05 Settlement Boundaries) and if all of the following criteria are satisfied. We support criteria 4, **but consider criteria 1, 2, 3 and 5 to be unsound** as set out below. We also consider that the reference to **'exceptional circumstances' is unsound.**

'Exceptional Circumstances':

The requirement for development to be limited apart from in exceptional circumstances is considered unsound as it would restrict the ability of the policy to ensure the continued economic and social viability of these rural settlements (which is set out as the aim of this policy at paragraph 3.25). The requirement for exceptional circumstances is therefore considered to impact on the effectiveness of this policy, rendering it unsound.

Recommendation: Amend policy wording to: "Development in smaller villages and hamlets outside of defined settlement boundaries will be limited, but planning permission would be granted subject to..."

Policy Criteria:

1. The development comprises of sensitive infilling and rounding off of a cluster of dwellings with access to an existing highway:

The supporting text to this policy criteria at paragraphs 3.28-

3.31 includes a definition of 'infill' development and of 'rounding off' development'. These definitions are, however, confusing in terms of what is allowed and what is not allowed (particularly in the case of 'rounding off' development) and potentially (depending on what the definitions actually intend) too restrictive. In order for this policy to be effective and to not prevent appropriate development from coming forwards, we consider that the requirement needs to be simplified.

Harborough District Council in Leicestershire are a similar rural authority to Breckland and are currently consulting on their Pre-Submission Local Plan. The document includes at Policy GD4 an allowance for new residential development on sites "which are within or physically and visually connected to settlements". We consider this approach to be more positive, flexible and to enable a wider variety of proposals to come forward that would then be judged on their merits as opposed to trying to meet an arbitrary definition of 'infill' or 'rounding off'.

Recommendation: Amend policy wording to: "The development site is within or physically and visually connected to the settlement".

2. It is minor development of an appropriate scale and design to the settlement of up to 3 units:

No justification is given for why development of more than 3 dwellings would be inappropriate. In many cases these small rural communities could benefit enormously from growth to support local facilities and services. Setting an arbitrary figure of 3 dwellings is therefore not considered to be a positive approach to meeting the needs of these communities and would also comprise the need for the district to boost significantly the supply of new homes in accordance with NPPF Paragraph 47. A more positive

approach would be to specify that development should be of an appropriate scale and design to the settlement, but not to set a maximum figure which would allow the authority greater flexibility in assessing individual proposals on their own merits.

Recommendation: Amend policy criteria to "It is development of an appropriate scale and design to the settlement".

3. It can be demonstrated that there is appropriate support by the parish council:

We consider that this requirement would severely restrict the delivery of new homes in rural villages and hamlets and would not represent an objective assessment of the planning merits of proposed developments. This criteria is therefore not considered to be effective or sound as it would prevent appropriate development from coming forwards and fail to ensure the continued economic and social viability of these rural settlements.

We agree that effective community consultation with Parish Councils should be encouraged, but Breckland Council are the Local Planning Authority and this policy would effectively grant powers to local parish councils to make planning decisions which would be contrary to national planning policy.

Recommendation: Amend policy to require effective consultation with parish councils, but remove reference to requiring their support.

4. The design contributes to enhancing the historic nature and connectivity of communities:

We agree that this is an important consideration in promoting sustainable development in these settlements.

5. The proposal does not harm or under-mine a visually important gap that contributes to the character and distinctiveness of the rural scene:

This criteria is open to interpretation regarding the definition of a visually important gap. We are not aware of any assessment that has been undertaken by the Council to identify specific gaps that should be protected and it is therefore not considered appropriate to require their protection as this criteria could effectively result in objections to any piece of land being development.

Recommendation: Revise policy criteria to: "The proposal contributes to the character and distinctiveness of the rural scene".

Conclusion

This letter has detailed our client's concerns regarding the specific policy criteria set by Policy HOU 04 – Rural Settlements with Boundaries and Policy HOU 05 – Small Villages and Hamlets Outside of Settlement Boundaries. We support the principle set out in these policies that these settlements should be considered suitable for appropriate development, but consider that the current criteria set-out to judge appropriateness do not meet the tests of soundness set out at National Planning Policy Framework (NPPF) Paragraph 182 (i.e. whether it is positively prepared, justified, effective and consistent with national policy). We have made several recommendations to amend the criteria set by these policies to ensure that the Local Plan can be considered 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.

To ensure issues raised are adequately discussed.

Do you wish to be:

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

Comment

Agent Mr Stuart Thomas (1132034)

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Company / Organisation Berrys

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Consultee De Merke Estates (1132036)

Company / Organisation De Merke Estates

Address -
-
-

Event Name Local Plan Pre-Submission Publication Document

Comment by De Merke Estates (De Merke Estates)

Comment ID 354

Response Date 29/09/17 08:59

Consultation Point Policy EC 01 Economic Development ([View](#))

Status Processed

Submission Type Email

Version 0.3

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

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

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

If you feel 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 EC01 is supported as it is considered that it enables an appropriate supply of employment land within the settlement of Swaffham over the Plan period (9ha.).

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

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

Do you wish to be:

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

Officer Response

Support noted.

Comment

Agent Mr Graeme Free (1132169)

Email Address

Company / Organisation DLP Planning Ltd

Address

Consultee Mr Daniel Hewett (1132181)

Email Address

Company / Organisation Taylor Wimpey UK Ltd

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Taylor Wimpey UK Ltd (Mr Daniel Hewett)

Comment ID 355

Response Date 29/09/17 12:47

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

Status Processed

Submission Type Email

Version 0.4

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

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

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

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

Policy HOU2 – Level and Location of Growth

2.4 For the purposes of this representation we do not intend to undertake a thorough analysis of the Council's Objective Assessment of Need (OAN). However we note the dwelling target included in the policy is broadly in accordance with the Government's recent consultation entitled 'Planning for the right homes in the right places' which sets out the Government's proposed standardised methodology for calculating housing needs.

6

needs.

2.5 In meeting its own OAN Breckland will also need to take into account any identified needs from other authorities within the Housing Market Area (HMA) where they can justify not meeting their own OAN. The emerging Local Plan should take this into account where there is a requirement to assist housing delivery in neighbouring authorities.

2.6 Whilst we have some reservations about the Council's reliance on a small number of large strategic sites to deliver the bulk of the housing requirement – a matter which the Inspector will no doubt wish to explore in more depth during the course of the examination - we generally support the aspiration to distribute growth towards the key the market towns, particularly Dereham, which is considered to be sustainable area for growth.

6

needs.

2.5 In meeting its own OAN Breckland will also need to take into account any identified needs from other authorities within the Housing Market Area (HMA) where they can justify not meeting their own OAN. The emerging Local Plan should take this into account where there is a requirement to assist housing delivery in neighbouring authorities.

2.6 Whilst we have some reservations about the Council's reliance on a small number of large strategic sites to deliver the bulk of the housing requirement – a matter which the Inspector will no doubt wish to explore in more depth during the course of the examination - we generally support the aspiration to distribute growth towards the key the market towns, particularly Dereham, which is considered to be sustainable area for growth.

2.7 As will be discussed later in this report, the proposed allocation of our client's land interests at Land West of Etling View, Dereham, which is a deliverable and developable site, would be consistent with the aims and objectives of this policy. It would also help to boost housing delivery, and provide flexibility of supply, particularly in the early years of the Plan.

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

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

Do you wish to be:

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

Officer Response

Support noted.

Comment

Agent Mr Graeme Free (1132169)

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Consultee Mr Daniel Hewett (1132181)

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Company / Organisation Taylor Wimpey UK Ltd

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Event Name Local Plan Pre-Submission Publication Document

Comment by Taylor Wimpey UK Ltd (Mr Daniel Hewett)

Comment ID 356

Response Date 29/09/17 12:47

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

Status Processed

Submission Type Email

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?

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 Issues and Options Stage (November 2014 - January 2015)

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

A site plan was previously submitted at both the Issues and Options stage and the Preferred Options stage that clearly included entire site extending to 3.78has. This has not been picked up at the pre-submission (regulation 19 stage).

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

The allocation site boundary excludes the northern part of the site that is within our client's ownership. This area is proposed to be used as public open space and surface water drainage attenuation as part of the planning application that is currently under considerations (LPA Ref: 3PL/2015/1045/O).

In order to be found sound the allocation boundary should be increased to mirror the application site boundary. This area of land is required to deliver the housing, public open space and drainage attenuation associated with development on this site.

Dereham Housing Allocation 1 – Land to the west of Etling View (LP[025]007)

2.8 We support the proposed allocation of land to the west of Etling View for residential development of approximately 60 dwellings as set out in Dereham Housing Allocation 1.

2.9 However, and notwithstanding our client's general support for Dereham Housing Allocation 1, as currently proposed the allocation site boundary excludes the northern part of the site. This area is proposed to be used as public open space and surface water drainage attenuation as part of the planning application that is currently under consideration (LPA Ref: 3PL/2015/1045/O). Therefore, as currently drafted this policy is considered to be unsound as it is not positively prepared or justified.

2.10 We would therefore request that **the allocation boundary is increased to mirror the application site boundary**. This area of land is required to deliver the housing required by the draft allocation policy and also that proposed by the pending application. Therefore, it should **be included within the allocation boundary** in order for this policy to be considered sound.

2.11 Land to the west of Etling View is a sustainable growth option that will deliver new housing on a site adjacent to an existing committed development site that is currently under construction, and with good access to the existing road network and key services and facilities. It is therefore considered to be justified as an allocation.

2.12 The site is located on the north-eastern edge of Dereham and is located to the west of a committed development area known as Etling View and which is now under construction. The site has mature hedges and tree belts to the northern and western boundaries and to the south are the gardens of existing residential properties located on Briar Close. As such, the site is very well contained.

2.13 The site is not subject to any significant constraints that would prevent development coming forward, and thus its allocation for residential development is fully supported.

2.14 Where possible existing native hedgerows and trees on the outer edge of the site boundary would be retained by any development proposal.

2.15 All the main utilities are available in the surrounding residential streets and can be connected to the development on the site.

2.16 The size of the site would allow for a range of house types to be delivered, including affordable homes, in accordance with prevailing policy.

2.17 The principal access to the site could be achieved through Etling View as required by the emerging policy. A pedestrian and cycle route could also be provided through the landscaped areas of the site away from the main vehicle routes.

2.18 It is anticipated that our client would make provision on site for open space requirements and local areas of play in any redevelopment scheme in line with the requirements of this policy.

2.19 The site is available now, suitable for development and is also deliverable. It would also make a material contribution to the Council's housing land supply. An application (Ref: 3PL/2015/1045/O) is currently under consideration by Breckland DC, having been submitted in August 2015. All technical matters in respect of this application have been resolved and it is likely to be reported to the Council's

Planning Committee, well before the outcome of the Local Plan examination process, with an officer recommendation for approval.

2.20 The proposed allocation of our client's land would enable the delivery of a deliverable and developable site in Dereham, which would enable a greater choice of housing in a sustainable location, which would help to boost housing delivery, particularly in the early years of the plan.

2.21 Based on the policy as worded, the Dereham Housing Allocation 1 is considered to be unsound. In order to be found sound the allocation boundary should be increased to mirror the application site boundary. The site could be delivered promptly by our client in compliance with the aspirations expressed in this policy.

2.22 My client is a nationally recognised housebuilder, who following the allocation of the land and grant of planning permission, will be seeking to build out the site without delay.

In this regard, the policy and allocation of land for development is highly deliverable and therefore 'effective' for the purposes of paragraph 182.

2.20 The proposed allocation of our client's land would enable the delivery of a deliverable and developable site in Dereham, which would enable a greater choice of housing in a sustainable location, which would help to boost housing delivery, particularly in the early years of the plan.

2.21 Based on the policy as worded, the Dereham Housing Allocation 1 is considered to be unsound. In order to be found sound the allocation boundary should be increased to mirror the application site boundary. The site could be delivered promptly by our client in compliance with the aspirations expressed in this policy.

2.22 My client is a nationally recognised house builder, who following the allocation of the land and grant of planning permission, will be seeking to build out the site without delay. **In this regard, the policy and allocation of land for development is highly deliverable and therefore 'effective' for the purposes of paragraph 182.**

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 Graeme Free (1132169)

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Company / Organisation DLP Planning Ltd

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Consultee Mr Daniel Hewett (1132181)

Email Address

Company / Organisation Taylor Wimpey UK Ltd

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Event Name Local Plan Pre-Submission Publication Document

Comment by Taylor Wimpey UK Ltd (Mr Daniel Hewett)

Comment ID 357

Response Date 29/09/17 12:47

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

Status Processed

Submission Type Email

Version 0.6

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?

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

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

Policy GEN1 – Sustainable Development in Breckland

2.1 Our client generally supports the aspirations set out in Policy GEN1, which is generally consistent with the Framework and the presumption in favour of sustainable development. On balance we feel that this policy can generally be considered sound for the purposes of paragraph 182 of the Framework.

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

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

Do you wish to be:

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

Officer Response

Support noted.

Comment

Agent Mr Graeme Free (1132169)

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Company / Organisation DLP Planning Ltd

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Consultee Mr Daniel Hewett (1132181)

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Company / Organisation Taylor Wimpey UK Ltd

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Event Name Local Plan Pre-Submission Publication Document

Comment by Taylor Wimpey UK Ltd (Mr Daniel Hewett)

Comment ID 358

Response Date 29/09/17 12:47

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

Status Processed

Submission Type Email

Version 0.4

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

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

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

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

Policy GEN3 – Settlement Hierarchy

2.2 We support the settlement hierarchy set out in policy GEN3 and specifically with regards to Dereham being identified as a Market Town and the focus of development in this area. The concentration of a greater amount of development in the more sustainable higher order settlements is consistent with national policy and is also justified.

2.3 In terms of the tests of soundness, the settlement hierarchy as set out in Policy GEN3 is considered to be the most appropriate strategy to deliver the proposed growth strategy as far as Dereham is concerned. It is also considered to be consistent with national policy as it would provide for new growth within one of the Districts main service centres, which would support the existing services and facilities in Dereham and also contribute towards improving the existing infrastructure in the area. On this basis, Policy GEN3 is considered to be positively prepared, justified, effective and consistent with national policy.

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

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

Do you wish to be:

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

Officer Response

Support noted.

Comment

Consultee Mr Robert Whittaker (1132269)

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Event Name Local Plan Pre-Submission Publication Document

Comment by Mr Robert Whittaker

Comment ID 359

Response Date 02/10/17 08:32

Consultation Point Policy HOU 07 - Affordable Housing ([View](#))

Status Processed

Submission Type Email

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?
. 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 believe that I have raised this issue on at least two previous occasions; once in a formal written consultation response, and once in person at an event in Watton. I am afraid that I do not recall the precise dates and stages of these representations.

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.

I believe that the proposal in policy HOU 7 (ii) to the Affordable Housing requirement at only 25% defies logic and makes this part of the Plan unsound. The value of 25% appears arbitrary and is significantly below the assessed need of 35.7% for Breckland. This need should be taken as a lower bound for any planning target, as it will not apply to all developments, the Thetford SUE (which will contribute a

large number of homes towards Breckland's targets) already has a lower affordable homes requirement set, and historically delivery has fallen far short of the requirement set in planning policy.

In particular, the proposal in HOU 7 (ii) to set the Affordable Housing requirement at 25% fails to meet any of the four "soundness" criteria:

- 1 This part of the plan has **not been positively prepared**, as the reduction in the affordable housing below the needs assessment on all sites is a negative reaction to the feasibility issue on some sites. A positive approach would be to only allow a reduction in the requirement on those sites where a higher percentage would be unviable, and to also look at other measures that could be employed to meet the affordable housing needs of the district. These could include, for example, insisting on a larger quota where this would be viable, and allowing developers in an unviable location to offset their requirement by supporting additional affordable housing elsewhere.
- 2 The reduced requirement is **not justified**, as (a) there is already a mechanism for developers to reduce the affordable housing requirement on developments where such provision would not be economically viable, and (b) there is no justification at all for reducing the requirement in cases where the provision would be viable.
- 3 This part of the plan is **not effective**, as it will all but guarantee that the affordable housing requirements for the District will not be met. Few, if any, significant developments will voluntarily go above the 25% requirement of the policy, and (judging by historical data) may will actually be permitted to deliver less on economic feasibility grounds.
- 4 This part of the plan is **not consistent with the NPPF** requirement to plan to meet the full objectively assessed needs for market and affordable housing in the District. As above, the reduced quota will all but guarantee that the affordable housing requirements for the District will not be met.

If the sites selected for development in the plan are unable to viably meet the District's needs for affordable housing when taken together, then that choice of sites is itself unsound. Other sites should then be considered in addition to or as a replacement for some of the existing earmarked sites. Any assessment of viability should take into account the fact that rigorously enforcing a higher affordable homes quota will increase house prices and reduce development land values, thus making it more viable to build a higher proportion of affordable homes.

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 Victoria Chase (1132273)

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Consultee Sainsbury's Supermarkets Ltd (12056)

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Event Name Local Plan Pre-Submission Publication Document

Comment by Sainsbury's Supermarkets Ltd

Comment ID 360

Response Date 29/09/17 13:26

Consultation Point Policy EC 05 Town Centre and Retail Strategy ([View](#))

Status Processed

Submission Type Email

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 consistent with national policy?

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

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

Policy EC 05 Town Centre and Retail Strategy

Policy EC 05 sets out the Council's approach to the sequential test and retail impact assessments for new developments within the borough. The policy includes locally set thresholds for proposals located

outside of the defined centres and requires all proposals on the edge of or outside a defined centre to demonstrate compliance with the retail tests.

The National Planning Policy Framework states that local planning authorities should promote competitive town centre environments and recognise town centres as the heart of their communities and pursue policies to support their viability and vitality. In drafting policies, local planning authorities should define the extent of town centres and primary shopping areas, and set policies that make clear which uses will be permitted in such locations.

Policy EC 05 states that an impact assessment for retail, leisure and/or office schemes will be required on schemes of 1,000 sqm gross and over in Thetford and Dereham, and 500 sqm gross and over in Attleborough, Swaffham and Watton. We consider that a more appropriate impact threshold for new retail development in out of centre locations is 750sqm across the borough wide.

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 Jane Crichton (1132250)

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Consultee Glavenhill Strategic Land (1132253)

Company / Organisation Glavenhill Strategic Land

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-
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Event Name Local Plan Pre-Submission Publication Document

Comment by Glavenhill Strategic Land (Glavenhill Strategic Land)

Comment ID 361

Response Date 29/09/17 13:14

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

Status Processed

Submission Type Email

Version 0.4

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

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

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

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

During the previous consultation periods the village was proposed to be designated as a Local Service Centre and my client's site was the preferred site LP[113]007. The declassification of the village and therefore the site happened in February 2017 outside of any formal consultation period.

We did make representation to the Local Plan Working Group in March 2017.

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.

Yaxham was previously designated to be a Local Service Centre (LSC) and this was consulted at the regulation 18 stage (Sep-Oct 2016). It was Breckland officer's professional opinion that Yaxham met the criteria as published in the preferred options consultation of the emerging Local Plan September 2016.

Yaxham was proposed to be a LSC within the Breckland Emerging Local Plan as it was considered by your officers to meet Breckland's criteria of having all 5 local services within 800m (10 min walk) which are:

- 1 . Public Transport
- 2 . Community Facility
- 3 . Employment
- 4 . Shop/Post Office
- 5 .School

This designation was informed by the Local Service Centre Topic Paper published in May 2015 and was prepared following the Issue and Options Consultation and included comments that had been received at that stage and provides an analysis and recommendation on the potential of LSC villages. Officers also confirmed this in their reports to the Local Plan Working Group (LPWG) dated 15th July 2016, 14th December 2016 and 3rd February 2017. At the meetings of the 15th July and 14th December 2016 this approach to Yaxham being a LSC was agreed and endorsed by the LPWG.

The site was proposed to be the preferred site for growth in Yaxham in the Regulation 18 preferred site options (September 2016) the site (ref: LP[113]007) is noted as (emphasis added): *"The site itself is within 800m (10 minutes walking distance) to most key services, meaning that the site is **sustainable** and will limit the use of personal car journeys. There is a footpath to the school at Clint Green. The site sits within the Wensum and Tud Settled Tributary Farmland. Development considerations in this area should seek to conserve the existing rural road pattern, resist upgrade/calming measures which could have an urbanising influence; ensuring that any new development reflects the existing material and stylistic vernacular within the settlements **No fundamental constraints** to the development of the site have been identified."*

In the accompanying Sustainability Appraisal (SA) Breckland offices conclude that *"The Preferred Site LP[113]007 scores positively against the SA objectives, particularly in regards to Land, Water and Soil Resources, Inclusive Communities and Population and Human Health."*

The site does receive a negative outcome for SA objective 1 as it is greenfield but it also acknowledges that all sites submitted are greenfield and therefore all sites proposed scored a negative outcome.

In the officer's report to the LPWG of 3rd February 2017 the officers confirm that further work had been undertaken on certain settlements proposed to be a LSC specifically in relation to employment and public transport. This further work shows that Yaxham does meet the criteria which has been applied and undertaken in a consistent manner across the District. In conclusion to Yaxham, officers write *"Overall it is considered that the services and facilities within the parish support the whole of the parish and LSC status will help to protect and maintain these facilities."* At that meeting members voted contrary to officer recommendation to make Yaxham a LSC due to Yaxham school being over 800m walking distance from the village.

Yaxham is now classified as being a "Village with Boundaries" and residential development is restricted to the principles set out in policy HOU4. It should be noted that the 'Guidelines for the Identification of Hazards and the Assessment of Risk of Walked Routes to School' (October 2000) confirms that in accordance with the 1996 Education Act, suitable walking distances to schools are 2 miles (3.2km) for children under 8, and 3 miles (4.8km) for 8 years of age and older children.

My client contends that the reasons for recommending that Yaxham be removed from the LSC list and now included within the list of settlements under Policy HOU4 are unclear. The assessment work by professional officers to-date is clear in that Yaxham meets the criteria for being a LSC.

It would appear that Yaxham is only included in the HOU4 settlements on the basis that the previously allocated site in the emerging Local Plan is some 1020m distance from Yaxham Primary School. This distance equates to a 12 ¾ minute walk time as opposed to the 800m/10 minute walk time that is the LSC test in the emerging Local Plan.

My client has serious concern that the 5-criteria tests for LSC's are not being applied consistently across all the emerging allocations within the LSC settlements. We have examined all the emerging allocations and can confirm that the emerging housing allocations in the Local Service Villages of Banham, Harling, Narborough, Mattishall, Old Buckenham, Shipdham and Sporle all fail at least one of the 800m/10 minute tests. In fact, the emerging allocations in Mattishall, Old Buckenham, Shipdham and Sporle all fail the 800m walk-distance to a Primary School test.

Given the obvious lack of clarity and consistency in the assessment of sites and villages proposed to accommodate planned housing growth demonstrated by the decision to deselect Yaxham as a LSC it seems only appropriate that all settlements proposed as a LSC should be reassessed to ensure a consistent approach is taken if strict enforcement of an 800m distance is to be applied. Failure to do so would lead to a lack of consistency in decision making going forwards and a Local Plan which may be found to be unsound at examination.

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 not considered to date the declassification of Yaxham as a LSC has been carried out in a consistent and transparent manner. Therefore, this matter should be done through the examination process.

Do you wish to be: . Notified of the Submission
. Notified of the Inspectors Recommendations
. Notified of the Adoption

Comment

Agent Jane Crichton (1132250)

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Consultee Glavenhill Strategic Land (1132253)

Company / Organisation Glavenhill Strategic Land

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Event Name Local Plan Pre-Submission Publication Document

Comment by Glavenhill Strategic Land (Glavenhill Strategic Land)

Comment ID 362

Response Date 29/09/17 13:14

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

Status Processed

Submission Type Email

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)

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

During the previous consultation periods the village was proposed to be designated as a Local Service Centre and my client's site was the preferred site LP[113]007. The declassification of the village and therefore the site happened in February 2017 outside of any formal consultation period.

We did make representation to the Local Plan Working Group in March 2017.

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.

Yaxham was previously designated to be a Local Service Centre (LSC) and this was consulted at the regulation 18 stage (Sep-Oct 2016). It was Breckland officer's professional opinion that Yaxham met the criteria as published in the preferred options consultation of the emerging Local Plan September 2016.

Yaxham was proposed to be a LSC within the Breckland Emerging Local Plan as it was considered by your officers to meet Breckland's criteria of having all 5 local services within 800m (10 min walk) which are:

- 1 . Public Transport
- 2 . Community Facility
- 3 . Employment
- 4 . Shop/Post Office
- 5 .School

This designation was informed by the Local Service Centre Topic Paper published in May 2015 and was prepared following the Issue and Options Consultation and included comments that had been received at that stage and provides an analysis and recommendation on the potential of LSC villages. Officers also confirmed this in their reports to the Local Plan Working Group (LPWG) dated 15th July 2016, 14th December 2016 and 3rd February 2017. At the meetings of the 15th July and 14th December 2016 this approach to Yaxham being a LSC was agreed and endorsed by the LPWG.

The site was proposed to be the preferred site for growth in Yaxham in the Regulation 18 preferred site options (September 2016) the site (ref: LP[113]007) is noted as (emphasis added): *"The site itself is within 800m (10 minutes walking distance) to most key services, meaning that the site is **sustainable** and will limit the use of personal car journeys. There is a footpath to the school at Clint Green. The site sits within the Wensum and Tud Settled Tributary Farmland. Development considerations in this area should seek to conserve the existing rural road pattern, resist upgrade/calming measures which could have an urbanising influence; ensuring that any new development reflects the existing material and stylistic vernacular within the settlements **No fundamental constraints** to the development of the site have been identified."*

In the accompanying Sustainability Appraisal (SA) Breckland offices conclude that *"The Preferred Site LP[113]007 scores positively against the SA objectives, particularly in regards to Land, Water and Soil Resources, Inclusive Communities and Population and Human Health."*

The site does receive a negative outcome for SA objective 1 as it is greenfield but it also acknowledges that all sites submitted are greenfield and therefore all sites proposed scored a negative outcome.

In the officer's report to the LPWG of 3rd February 2017 the officers confirm that further work had been undertaken on certain settlements proposed to be a LSC specifically in relation to employment and public transport. This further work shows that Yaxham does meet the criteria which has been applied and undertaken in a consistent manner across the District. In conclusion to Yaxham, officers write *"Overall it is considered that the services and facilities within the parish support the whole of the parish and LSC status will help to protect and maintain these facilities."* At that meeting members voted *contrary to officer recommendation to make Yaxham a LSC due to Yaxham school being over 800m walking distance from the village.*

Yaxham is now classified as being a "Village with Boundaries" and residential development is restricted to the principles set out in policy HOU4. It should be noted that the 'Guidelines for the Identification of Hazards and the Assessment of Risk of Walked Routes to School' (October 2000) confirms that in accordance with the 1996 Education Act, suitable walking distances to schools are 2 miles (3.2km) for children under 8, and 3 miles (4.8km) for 8 years of age and older children.

My client contends that the reasons for recommending that Yaxham be removed from the LSC list and now included within the list of settlements under Policy HOU4 are unclear. The assessment work by professional officers to-date is clear in that Yaxham meets the criteria for being a LSC.

It would appear that Yaxham is only included in the HOU4 settlements on the basis that the previously allocated site in the emerging Local Plan is some 1020m distance from Yaxham Primary School. This distance equates to a 12 ¾ minute walk time as opposed to the 800m/10 minute walk time that is the LSC test in the emerging Local Plan.

My client has serious concern that the 5-criteria tests for LSC's are not being applied consistently across all the emerging allocations within the LSC settlements. We have examined all the emerging allocations and can confirm that the emerging housing allocations in the Local Service Villages of Banham, Harling, Narborough, Mattishall, Old Buckenham, Shipdham and Sporle all fail at least one of the 800m/10 minute tests. In fact, the emerging allocations in Mattishall, Old Buckenham, Shipdham and Sporle all fail the 800m walk-distance to a Primary School test.

Given the obvious lack of clarity and consistency in the assessment of sites and villages proposed to accommodate planned housing growth demonstrated by the decision to deselect Yaxham as a LSC it seems only appropriate that all settlements proposed as a LSC should be reassessed to ensure a consistent approach is taken if strict enforcement of an 800m distance is to be applied. Failure to do so would lead to a lack of consistency in decision making going forwards and a Local Plan which may be found to be unsound at examination.

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 not considered to date the declassification of Yaxham as a LSC has been carried out in a consistent and transparent manner. Therefore, this matter should be done through the examination process.

Do you wish to be: . Notified of the Submission
. Notified of the Inspectors Recommendations
. Notified of the Adoption

Comment

Agent Jane Crichton (1132250)

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Event Name Local Plan Pre-Submission Publication Document

Comment by Glavenhill Strategic Land (Glavenhill Strategic Land)

Comment ID 363

Response Date 29/09/17 13:14

Consultation Point Policy HOU 04 - Rural Settlements With Boundaries
([View](#))

Status Processed

Submission Type Email

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)

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

During the previous consultation periods the village was proposed to be designated as a Local Service Centre and my client's site was the preferred site LP[113]007. The declassification of the village and therefore the site happened in February 2017 outside of any formal consultation period.

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- 3 . Employment
- 4 . Shop/Post Office
- 5 .School

This designation was informed by the Local Service Centre Topic Paper published in May 2015 and was prepared following the Issue and Options Consultation and included comments that had been received at that stage and provides an analysis and recommendation on the potential of LSC villages. Officers also confirmed this in their reports to the Local Plan Working Group (LPWG) dated 15th July 2016, 14th December 2016 and 3rd February 2017. At the meetings of the 15th July and 14th December 2016 this approach to Yaxham being a LSC was agreed and endorsed by the LPWG.

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In the accompanying Sustainability Appraisal (SA) Breckland offices conclude that "*The Preferred Site LP[113]007 scores positively against the SA objectives, particularly in regards to Land, Water and Soil Resources, Inclusive Communities and Population and Human Health.*"

The site does receive a negative outcome for SA objective 1 as it is greenfield but it also acknowledges that all sites submitted are greenfield and therefore all sites proposed scored a negative outcome.

In the officer's report to the LPWG of 3rd February 2017 the officers confirm that further work had been undertaken on certain settlements proposed to be a LSC specifically in relation to employment and public transport. This further work shows that Yaxham does meet the criteria which has been applied and undertaken in a consistent manner across the District. In conclusion to Yaxham, officers write "*Overall it is considered that the services and facilities within the parish support the whole of the parish and LSC status will help to protect and maintain these facilities.*" At that meeting members voted contrary to officer recommendation to make Yaxham a LSC due to Yaxham school being over 800m walking distance from the village.

Yaxham is now classified as being a "Village with Boundaries" and residential development is restricted to the principles set out in policy HOU4. It should be noted that the 'Guidelines for the Identification of Hazards and the Assessment of Risk of Walked Routes to School' (October 2000) confirms that in accordance with the 1996 Education Act, suitable walking distances to schools are 2 miles (3.2km) for children under 8, and 3 miles (4.8km) for 8 years of age and older children.

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

It is not considered to date the declassification of Yaxham as a LSC has been carried out in a consistent and transparent manner. Therefore, this matter should be done through the examination process.

Do you wish to be:

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

Comment

Agent Jane Crichton (1132250)

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Consultee Mr Matt Bartram (1132400)

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Company / Organisation Heritage Developments

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Event Name Local Plan Pre-Submission Publication Document

Comment by Heritage Developments (Mr Matt Bartram)

Comment ID 364

Response Date 29/09/17 13:14

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

Status Processed

Submission Type Email

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)

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

My client is supportive that Breckland Council have proposed this site as the residential allocation for Harling to deliver the required 85 dwellings up to 2036.

The landowner is a developer and is the same developer who built out the housing development to the south.

The owner is in the process of preparing a planning application. Following determination of the planning application, the site is available for delivery.

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	Jane Crichton (1132250)
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Consultee	Glavenhill Strategic Land (1132253)
Company / Organisation	Glavenhill Strategic Land
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Event Name	Local Plan Pre-Submission Publication Document
Comment by	Glavenhill Strategic Land (Glavenhill Strategic Land)
Comment ID	365
Response Date	29/09/17 13:16
Consultation Point	Dereham Housing Allocation 5 (View)
Status	Processed
Submission Type	Email
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)

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

My client is supportive that Breckland Council have proposed this site as one of the residential allocations for Dereham to deliver the required 750 dwellings up to 2036.

A planning application (3PL/2015/1490/O) is pending determination for development on site LP[025]030. The proposed development of the approximately 41.3 ha sit comprising a minimum of 291 dwellings with access details included and all other matters reserved. The application proposals meet all of the criteria listed under the Dereham Housing Allocation 5 policy.

Following determination of the planning application, which is imminent, the site is available for delivery.

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	Philip Atkinson (1132430)
Email Address	
Company / Organisation	Lanpro
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Consultee	Glavenhill Strategic Land (1132253)
Company / Organisation	Glavenhill Strategic Land
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Event Name	Local Plan Pre-Submission Publication Document
Comment by	Glavenhill Strategic Land (Glavenhill Strategic Land)
Comment ID	366
Response Date	29/09/17 13:18
Consultation Point	Dereham Housing Allocation 2 (View)
Status	Processed
Submission Type	Email
Version	0.2
Files	Glavenhill Map.pdf

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?

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

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

The same points were raised during the previous consultation and no changes were then made to DHA2. Failure to make the changes sought will block an important opportunity to deliver linked sustainable development and improve people's lives within Dereham. Similar representations have been made to the emerging Norfolk Strategic Framework document that seeks to guide planned development within the District to 2036.

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.

Glavenhill Strategic Land (GSL) supports the location of emerging Dereham Housing Allocation 2 (DHA2) to the west of Shipdham Road as indicated in the Pre submission version of the emerging Local Plan. My client does however object to the wording of Policy DHA2 as currently drafted on the basis it would make the emerging allocation unsound.

This is on the basis that land on the opposite site of Shipdham Road referred to as Dereham Housing Allocation 5 (DHA5) contains a planned section of new primary distributor road between Yaxham Road (B1135) and Shipdham Road (A1075). DHA2 makes no provision to extend this new route through the land to the west of Shipdham Road through to The Broadway. The new distributor road through the DHA2 and DHA5 sites could eventually facilitate a dedicated east to west vehicular route around Dereham to take the pressure off the Tavern Lane/Yaxham Road junctions that are nearing capacity.

GSL is currently in discussions with the land owners to the west of the DHA2 site back to the A47 trunk road to facilitate deliver of this southern route. The land being assembled is to the south of Hillcrest Avenue, north and east of Broadway Farm; and south, east and west of Brookfield to the west of Dereham. If the Council sees the merits in devising a long term growth strategy for Dereham to link Yaxham Road through to the A47 at Draytonhall Lane, it is important that this route is not sterilised by poorly planned development within the DHA2. To be very clear this infrastructure led strategic development opportunity will be lost if Policy DHA2 as drafted is not amended. As such DHA2 as currently drafted is not positively prepared and/or effective in the widest sense and this is the reason for my client's current objection.

Although this longer term spatial development strategy would need to be debated through future Local Plans it is important to recognise that this opportunity exists, especially given the early stage nature of the emerging Norfolk Strategic Framework. Therefore, to protect the opportunity going forwards we contend that the wording of the first criteria in Allocation DHA2 should be changed to "Provision of safe highways access from Shipdham Road should be provided. This access should link to an internal roadway through the site connecting to farmland south of Heidi Close to the west of the site. This internal roadway should be of sufficient width to accommodate a primary distributor road. In the short term, secondary access should be provided to Colleen Close."

GSL's view is that this would make allocation DHA2 sound.

To better explain the opportunity, a plan showing the route of the new southern primary distributor road that could be delivered between the Yaxham Road (B1135) and the A47 at Draytonhall Lane is attached to this representation.

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.

To fully explain the opportunity and the linked nature of sites DHA2 and DHA5 that delivers the section of primary distributor road is also controlled by GSL.

Do you wish to be:

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

Comment

Agent Anna Bend (1132456)

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Company / Organisation Amec Foster Wheeler

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Consultee Roland Bohn (1132458)

Company / Organisation Albanwise Limited

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Event Name Local Plan Pre-Submission Publication Document

Comment by Albanwise Limited (Roland Bohn)

Comment ID 367

Response Date 29/09/17 15:29

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

Status Processed

Submission Type Email

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 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.

Policy HOU3 indicates that development in the Local Service Centres would be permitted where it does not exceed the housing allocation for that village. The Council currently does not have a five year supply of deliverable housing sites, and as of April 2017 has less than four years supply. In addition, the housing target for the District has increased by 373 dwellings since the Preferred Sites and Settlement Boundaries consultation, and as such it is necessary for the council to find further sites to ensure that the District's housing requirements to 2036 can be met.

As the Council does not have a five year supply, in accordance with Paragraph 49 of the NPPF relevant housing supply policies should not be considered up-to-date. For the Local Plan to be found sound at Examination, and comply with the NPPF, the Council should not be restricting housing delivery where it exceeds the proposed allocation, where sustainable sites outside of the settlement boundary, such as Albanwise Limited's site at Bawdeswell, are available for development.

It is, therefore, considered that Policy HOU3 is too restrictive, and in the absence of a five year supply is in conflict with the NPPF. In addition, this policy does not allow sufficient flexibility to housing delivery, as it is evident that allocations may not come forward for development as expected, and there is significant reliance on the SUE's in delivering the District's housing needs.

Requested Change

It is suggested that criteria 2 of Policy HOU3 "**2. It would not lead to the number of dwellings in the settlement exceeding the housing target;**" is removed.

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 Anna Bend (1132456)

Email Address

Company / Organisation Amec Foster Wheeler

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Consultee Roland Bohn (1132458)

Company / Organisation Albanwise Limited

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Event Name Local Plan Pre-Submission Publication Document

Comment by Albanwise Limited (Roland Bohn)

Comment ID 368

Response Date 29/09/17 15:29

Consultation Point Map 3.5 Summary of Bawdeswell Allocations. ([View](#))

Status Processed

Submission Type Email

Version 0.3

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

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

In relation to growth at Bawdeswell, paragraph 3.211 states that the village will see a 10% growth by 2036. This is in conflict with Policy HOU2 which states that the Local Service Centres, including Bawdeswell, will see a 15% increase. It is not understood why this level of growth is not reflected in the remainder of the Local Plan. As such the Council is not planning for a sufficient level of growth at Bawdeswell, and it is recommended that the housing target is increased in line with Policy HOU2, and the revised distribution for the District.

Despite this error, it is considered that Bawdeswell is a sustainable location which can sufficiently accommodate a higher level of growth. Albanwise Limited's site LP[004]005 was included in the previous Local Plan consultation as a proposed alternative allocation. However, this has been removed from the Pre-submission draft, and the housing allocation for the village has not increased.

Restricting development at Local Service Centres where the allocated number of dwellings has been met is not an appropriate way to meet longer-term needs to 2036. As the Council has increased its housing requirements to 2036 in line with the latest SHMA update, and as it does not have a five year supply of housing, it is suggested that for the plan to be sound the Council needs to allocate additional sites to ensure that the District's housing requirements are fully delivered. If the Council cannot demonstrate a favourable five year supply position, it will render the Plan immediately out-of-date.

There is no technical justification for not allocating the site and no overriding constraints to development have been identified through the Plan preparation, as demonstrated by the inclusion of site LP[004]005 as an alternative housing site in previous stages of the Plan. The Highways Authority has not objected to the site's inclusion in the Local Plan.

On the basis of initial desktop analysis undertaken for site LP[004]005, which has included a review of highway access opportunities, it is not considered that there are likely to be any significant adverse impacts through development sufficient to outweigh the presumption in favour of sustainable development. The site is in a sustainable location adjacent to the village settlement and the recreation ground, and well related to facilities within the village, to support a residential development. The site is not covered by any environmental designations, and is not at risk of flooding with the area proposed for development is entirely within Flood Zone 1. It is considered that a residential development on the site would be visually acceptable being partially screened from the planting along Reephams Road and the sub-station. There is also an opportunity to improve the site's northern edge and provide an attractive approach into the village from the north which is sympathetic to the adjacent Conservation Area.

Amec Foster Wheeler has undertaken a review of access options and it is proposed that development of site LP[004]005 could facilitate significant improvements to the existing highway situation, including the provision of enhanced pedestrian linkages from the northern part of the village into the village centre for the benefit of existing and new residents. In addition, there is the opportunity to provide additional traffic calming measures along this section of Reephams Road improving road safety on the approach into the village. Therefore, it is considered that this site is highly suitable and sustainable for residential development, with no constraints to delivery within the early part of the Plan period, to assist the Council in boosting its supply of housing in accordance with the NPPF.

Requested Change

That the Council includes site LP[004]005 as a housing allocation to contribute towards the District's housing needs.

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 Anna Bend (1132456)

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Company / Organisation Albanwise Limited

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Event Name Local Plan Pre-Submission Publication Document

Comment by Albanwise Limited (Roland Bohn)

Comment ID 369

Response Date 29/09/17 15:29

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

Status Processed

Submission Type Email

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?
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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.

In relation to growth at Bawdeswell, paragraph 3.211 states that the village will see a 10% growth by 2036. This is in conflict with Policy HOU2 which states that the Local Service Centres, including Bawdeswell, will see a 15% increase. It is not understood why this level of growth is not reflected in the remainder of the Local Plan. As such the Council is not planning for a sufficient level of growth at Bawdeswell, and it is recommended that the housing target is increased in line with Policy HOU2, and the revised distribution for the District.

Despite this error, it is considered that Bawdeswell is a sustainable location which can sufficiently accommodate a higher level of growth. Albanwise Limited's site LP[004]005 was included in the previous Local Plan consultation as a proposed alternative allocation. However, this has been removed from the Pre-submission draft, and the housing allocation for the village has not increased.

Restricting development at Local Service Centres where the allocated number of dwellings has been met is not an appropriate way to meet longer-term needs to 2036. As the Council has increased its housing requirements to 2036 in line with the latest SHMA update, and as it does not have a five year supply of housing, it is suggested that for the plan to be sound the Council needs to allocate additional sites to ensure that the District's housing requirements are fully delivered. If the Council cannot demonstrate a favourable five year supply position, it will render the Plan immediately out-of-date.

There is no technical justification for not allocating the site and no overriding constraints to development have been identified through the Plan preparation, as demonstrated by the inclusion of site LP[004]005 as an alternative housing site in previous stages of the Plan. The Highways Authority has not objected to the site's inclusion in the Local Plan.

On the basis of initial desktop analysis undertaken for site LP[004]005, which has included a review of highway access opportunities, it is not considered that there are likely to be any significant adverse impacts through development sufficient to outweigh the presumption in favour of sustainable development. The site is in a sustainable location adjacent to the village settlement and the recreation ground, and well related to facilities within the village, to support a residential development. The site is not covered by any environmental designations, and is not at risk of flooding with the area proposed for development is entirely within Flood Zone 1. It is considered that a residential development on the site would be visually acceptable being partially screened from the planting along Reepham Road and the sub-station. There is also an opportunity to improve the site's northern edge and provide an attractive approach into the village from the north which is sympathetic to the adjacent Conservation Area.

Amec Foster Wheeler has undertaken a review of access options and it is proposed that development of site LP[004]005 could facilitate significant improvements to the existing highway situation, including the provision of enhanced pedestrian linkages from the northern part of the village into the village centre for the benefit of existing and new residents. In addition, there is the opportunity to provide additional traffic calming measures along this section of Reepham Road improving road safety on the approach into the village. Therefore, it is considered that this site is highly suitable and sustainable for residential development, with no constraints to delivery within the early part of the Plan period, to assist the Council in boosting its supply of housing in accordance with the NPPF.

Requested Change

That the Council includes site LP[004]005 as a housing allocation to contribute towards the District's housing needs.

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 Anna Bend (1132456)

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Company / Organisation Amec Foster Wheeler

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Consultee Roland Bohn (1132458)

Company / Organisation Albanwise Limited

Address -
-
-

Event Name Local Plan Pre-Submission Publication Document

Comment by Albanwise Limited (Roland Bohn)

Comment ID 370

Response Date 29/09/17 15:29

Consultation Point Policy HOU 01- Development Requirements (Minimum)
([View](#))

Status Processed

Submission Type Email

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 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.

The consultation document indicates that the Council will provide for no less than 15,298 new homes between 2011 and 2036, an average of 612 dwellings per annum. This increase from the 14,925 dwellings in the Preferred Site and Settlement Boundaries document is in line with the SHMA 2017 update, and is supported.

It is, however, considered that the Council is not effectively planning for a sufficient number of new homes to meet their housing requirements for the Plan period, as well as make up the shortfall for past under delivery.

As of April 2017 the Council had less than four years housing supply. The Council's housing supply has not been analysed. Therefore, it is unclear whether this position has changed, and whether the supply has further decreased due to the proposed increase in housing requirements for the Plan period. However, it is understood that the Council still does not have a five year supply of housing, as recognised in the Planning Officer's report to the 25 September 2017 Planning Committee.

Policy HOU1 states that the annualised level of new housing provision will increase during the plan period, from 584 per year from 2017/18 - 2021/22 to 622 per year from 2021/22. The Council's preference in using the Liverpool method is not considered to be suitable when there is a historic undersupply of housing.

The housing trajectory at Appendix 1 indicates that the Council has not met its five year requirement, having a shortfall of 403 dwellings within the last five years against the average annual requirement of 612 dwellings. Even when comparing past delivery to the lower annual requirement of 585 dwellings, the Council has under delivered by 263 dwellings in the past five years.

Whilst the Council is proposing to deliver a higher number housing in later years to make up for lower housing delivery in the early part of the Plan, as the Council does not have a five year supply of housing, it should be planning for a higher proportion of housing delivery within the short-term to meet existing housing needs, and make up the historic shortfall. If the Council cannot demonstrate a deliverable five year supply of housing, it will render the Local Plan immediately out-of-date.

It should also be noted that the Government's current consultation on calculating housing supply predicts an increase to Brecklands housing requirements to 680 dwellings per annum. It is, therefore, possible that the District's requirements may increase beyond what is currently being planned for, and as such will further decrease the Council's five year supply position.

Requested Change

For the Plan to be sound, the Council should be planning for a higher proportion of housing 4 delivery within the short-term to meet existing housing needs, and make up the historic shortfall. As such, the Council should allocate further sites, such as Albanwise Limited's site at Reepham Road (LP[004]005) to ensure that this housing shortfall and the annual housing requirements are sufficiently met 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

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Event Name Local Plan Pre-Submission Publication Document

Comment by Albanwise Limited (Roland Bohn)

Comment ID 371

Response Date 29/09/17 15:29

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

Status Processed

Submission Type Email

Version 0.3

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

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

In relation to the settlement hierarchy and distribution of growth, Policy HOU2 states that 15% growth will be in the Local Service Centres. However, Paragraph 3.9 and the sections within the Local Plan for each of the Local Service Centres has not been updated and indicate that only a 10% growth is to be allocated to these settlements. There is, therefore, inconsistency within the Plan, and as such the Council is not allocating a sufficient number of dwellings to these villages, the allocations for which should be increased to at least 15%.

Whilst the level of housing to be delivered to the Key Settlements has increased to 50%, the Council is relying on two major urban extensions at Attleborough and Thetford to deliver the majority of this growth, with 3,100 dwellings to be delivered beyond the Plan period. Therefore, it is appropriate for the housing numbers proposed at Attleborough and Thetford to be re-distributed within the remainder of the District, to ensure that the District's housing targets to 2036 are delivered in full, if the Local Plan is to be found sound at Examination. As such, the distribution of housing for the Key Settlements should be reduced to 47%, to relieve pressure and reliance on the SUE's, and allow other sustainable sites within the District to come forward for development in the short-term to ensure the Council can meet its five year supply requirements.

It is considered that the Council should include a higher proportion of growth to the Local Service Centres, which are more sustainable locations to support additional growth than the rural areas. These villages require steady growth to support and maintain the services within them. As such it is suggested that the Council should increase the housing allocation for the Local Service Centres, and reduce the level within the less sustainable rural areas.

In addition, the blanket 10% increase for the Local Service Centres is not considered to be an efficient way of planning for housing delivery, as growth of these villages should be based on sustainability and on an individual basis.

Requested Change

It is suggested that the housing distribution should be revised as follows:

Key Settlements - 47%

Market Towns - 28%

Local Service Centres - 23%

Rural Areas - 2%

As a minimum, the housing targets for the Local Service Centres should be increased to 15% in accordance with Policy HOU2 which currently conflicts with the proposed allocations for these villages.

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

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Company / Organisation De Merke Estates

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Event Name Local Plan Pre-Submission Publication Document

Comment by De Merke Estates (De Merke Estates)

Comment ID 372

Response Date 29/09/17 08:59

Consultation Point Map 6.3 Swaffham Saved Employment Allocations
([View](#))

Status Processed

Submission Type Email

Version 0.4

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

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

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

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

The Swaffham saved Employment Allocations as identified on map 6.3 are supported. Nonetheless, for clarity and consistency the map should identify the proposed settlement boundary as used on the Swaffham Policies Map.

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

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

Do you wish to be:

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

Officer Response

Support noted.

Comment

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Event Name Local Plan Pre-Submission Publication Document

Comment by De Merke Estates (De Merke Estates)

Comment ID 373

Response Date 29/09/17 08:59

Consultation Point Saved Policy - Policy SW2 Land to the North of the Eco-Tech Centre ([View](#))

Status Processed

Submission Type Email

Version 0.3

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

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

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

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

Saved Policy SW2 is supported in as much as the land to the North of the Eco-Tech Centre is an appropriate location for employment development to meet identified needs.

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

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

Do you wish to be:

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

Officer Response

Support noted.

Comment

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Event Name Local Plan Pre-Submission Publication Document

Comment by De Merke Estates (De Merke Estates)

Comment ID 374

Response Date 29/09/17 08:59

Consultation Point Saved Policy - Policy SW2 Land to the North of the Eco-Tech Centre ([View](#))

Status Processed

Submission Type Email

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 effective?

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

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

The issues was not apparent prior to the publication of the policies and proposals contained within the Pre-Submission Breckland Local Plan.

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

We wish to object to criterion c of Saved Policy SW2: Land to the North of the Eco-Tech Centre as this restricts development on the site until vacant, developable land in the existing Eco-Tech centre has been developed.

This restriction is considered inappropriate as it reduces the choice and range of employment sites available in the settlement and may therefore constrain employment development if the remaining sites on the Eco-Tech centre do not meet the requirements of potential future occupiers (requirements such as size and configuration).

It is therefore contended that criterion c of Saved Policy SW2 may result in the Plan failing to deliver sufficient land to meet economic development needs.

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 critical that the Plan provide a choice and range of sites in the settlement of Swaffham to meet employment needs during the Plan period.

As drafted the Plan constrains the supply of employment sites and may restrict appropriate economic development and we would request an opportunity to detail our concerns in this regard to the Inspector.

Do you wish to be:

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

Comment

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Event Name Local Plan Pre-Submission Publication Document

Comment by De Merke Estates (De Merke Estates)

Comment ID 375

Response Date 29/09/17 08:59

Consultation Point Map 3.2 Summary of the Swaffham Allocations.
([View](#))

Status Processed

Submission Type Email

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)

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

The identified 'settlement boundary' as identified on the Pre-Submission Policies Map for Swaffham is supported as it enables an appropriate level of housing and employment development growth in the settlement for the remainder of the Plan period.

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

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Event Name Local Plan Pre-Submission Publication Document

Comment by De Merke Estates (De Merke Estates)

Comment ID 376

Response Date 29/09/17 08:59

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

Status Processed

Submission Type Email

Version 0.3

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

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

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

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

This issue was not apparent prior to the publication of the policies and proposals contained within the Pre-Submission Breckland Local Plan.

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

The Plan is unclear, imprecise and inconsistent in respect to 'sites with planning permission for housing' identified on the 'Swaffham Policies Map - Pre-submission Publication Summer 2017'.

'Sites with planning permission for housing' contribute towards meeting Swaffham's housing growth requirement over the Plan period, as identified in policy HOU 02. However, these 'sites with planning permission for housing' lie both within, and outside of, the development boundary of Swaffham (where there is a presumption in favour of development). In addition, Table 3.3 Swaffham Proposed Site Allocations identifies that some of the proposed site 'allocations' identified benefit from planning permission and count as part of the completions and commitments. These site 'Allocations' are in effect also 'sites with planning permission for housing'.

There is, therefore, no consistency in how the Plan defines and deals with sites that benefit from planning permission and considerable uncertainty remains as to how new planning applications will be dealt with on such sites if the extant consent lapses.

Nonetheless, it is assumed that as Policy GEN 05 provides a general presumption in favour of development within settlement development boundaries, there is a presumption in favour of planning applications for housing on 'sites with planning permission for housing' identified within the settlement boundary. Whilst there is a presumption against future planning applications for housing on those 'sites with planning permission for housing' identified outside of the settlement boundary.

It is therefore contended that those 'sites with planning permission for housing' included within the settlement boundary on the 'Swaffham Policies Map - Pre-submission Publication Summer 2017' are also identified as housing 'Allocations' on the Map and within 'Table 3.3 Swaffham Proposed Site Allocations'.

This will provide a level of consistency and clarity, that is currently lacking in the Plan as drafted, on how the Council will view future applications on 'sites with planning permission for housing' and therefore how the Plan will deliver its housing land requirement and meet housing needs during the Plan period.

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 critical that the Plan provides certainty over how the housing requirement will be delivered during the Plan period. As drafted the Plan is unclear, imprecise and inconsistent in regard to how the Plan will meet the housing requirement and we would request an opportunity to detail our concerns in this regard to the Inspector.

Do you wish to be:

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

Comment

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Event Name Local Plan Pre-Submission Publication Document

Comment by De Merke Estates (De Merke Estates)

Comment ID 377

Response Date 29/09/17 08:59

Consultation Point Policy HOU 07 - Affordable Housing ([View](#))

Status Processed

Submission Type Email

Version 0.3

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

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

This issue was not apparent prior to the publication of the policies and proposals contained within the Pre-Submission Breckland Local Plan.

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

The Housing White Paper published earlier this year was clear that Local Authorities are expected to deliver starter homes as a mixed package of affordable housing. Rather than set a threshold, the Government announced Local Authorities will be required to promote starter homes and work with developers for their provision. The Plan should therefore refer to Starter Homes and encourage their inclusion in development proposals as part of the "Affordable provision".

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 critical that the Plan enabled all forms of affordable housing to meet identified needs, We would therefore request an opportunity to detail our concerns to the Inspector and explore this further as part of the Examination process.

Do you wish to be:

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

Comment

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Event Name Local Plan Pre-Submission Publication Document

Comment by De Merke Estates (De Merke Estates)

Comment ID 378

Response Date 29/09/17 08:59

Consultation Point Policy GEN 05 Settlement Boundaries ([View](#))

Status Processed

Submission Type Email

Version 0.3

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

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

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

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

Policy GEN05 is supported as it provides a presumption in favour of further development within the identified settlement boundary for Swaffham, which appropriately encompasses both residential allocations and sites with planning permission for housing.

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

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Event Name Local Plan Pre-Submission Publication Document

Comment by De Merke Estates (De Merke Estates)

Comment ID 379

Response Date 29/09/17 08:59

Consultation Point Table 3.3 Swaffham Proposed Site Allocations ([View](#))

Status Processed

Submission Type Email

Version 0.3

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

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

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

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

This issues was not apparent prior to the publication of the policies and proposals contained within the Pre-Submission Breckland Local Plan.

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

Table 3.3 Swaffham Proposed Site Allocations is supported in as much as it identifies site LP[097]013 as a site that will provide 130 dwellings in the plan period.

However, Table 3.3 identifies that some of the proposed site allocations benefit from planning permission and count as part of the completions and commitments. These site 'Allocations' are therefore also effectively 'sites with planning permission for housing'.

In addition, whilst 'sites with planning permission for housing' contribute towards meeting Swaffham's housing growth requirement over the Plan period (as identified in policy HOU 02), a number of these sites are not included within the development boundary of Swaffham (where there is a presumption in favour of development).

The Plan is therefore unclear, imprecise and inconsistent in respect to site 'allocations' identified in Table 3.3 and 'sites with planning permission for housing' identified on the 'Swaffham Policies Map - Pre-submission Publication Summer 2017'.

Considerable uncertainty also remains as to how new planning applications will be dealt with on 'sites with planning permission for housing' if an extant consent lapses. In this regards, it is assumed that, as Policy GEN 05 provides a general presumption in favour of development within settlement development boundaries, there is a presumption in favour of planning applications for housing on 'sites with planning permission for housing' identified within the settlement boundary. Whilst there is a presumption against future planning applications for housing on those 'sites with planning permission for housing' identified outside of the settlement boundary.

It is therefore contended that those 'site with planning permission for housing' included within the settlement boundary on the 'Swaffham Policies Map - Pre-submission Publication Summer 2017' are also identified as proposed housing allocations on the policies maps and within 'Table 3.3 Swaffham Proposed Site Allocations'.

This will provide a level of consistency and clarity, that is currently lacking in the Plan as drafted, on how the Council will view future applications on 'sites with planning permission for housing' and therefore how the Plan will deliver its housing land requirement and meet housing need during the Plan period.

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 critical that the Plan provides certainty over how the housing requirement will be delivered during the Plan period. As drafted the Plan is unclear, imprecise and inconsistent in regards to how the Plan will meet the housing requirement and we would request an opportunity to detail our concerns in the regards to the Inspector.

Do you wish to be:

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

Comment

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Event Name Local Plan Pre-Submission Publication Document

Comment by De Merke Estates (De Merke Estates)

Comment ID 380

Response Date 29/09/17 08:59

Consultation Point Swaffham Allocation 5 ([View](#))

Status Processed

Submission Type Email

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 effective?

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

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

The issue was not apparent prior to the publication of the policies and proposals contained within the Pre-Submission Breckland Local Plan.

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

It is noted that policy "Swaffham Allocation 5 - Land off Sporle Road (LP[097]013)" refers to a site capacity of "at least 78 dwellings". It is unclear how the figure of 78 dwellings was derived as the site benefits from Outline consent for 130 dwellings (recognised on Table 3.3 Swaffham Proposed Site Allocations).

Therefore, whilst the identification of a minimum site capacity does not restrict its subsequent development for 30 dwellings the statement is considered to be superfluous and does not assist in providing a level of consistency and clarity over how the Plan will deliver its housing requirement and meet housing needs during the Plan period.

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

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Consultee Martin Goymour (1132853)

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Event Name Local Plan Pre-Submission Publication Document

Comment by Goymour Properties (Martin Goymour)

Comment ID 381

Response Date 02/10/17 08:25

Consultation Point Policy HOU 01- Development Requirements (Minimum) ([View](#))

Status Processed

Submission Type Email

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)

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

My clients land holding was presented to a meeting with the Local Plan teams on the 6th February 2017. As requested the site was formally submitted to the Council for consideration in this local plan.

In addition, the representations also included a specific wording for the safeguarding of Banham Zoo and its specific development aspirations.

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 Council needs to have due regard to the current consultation "Planning for the right homes in the right places: consultation proposals" in particular the standard methodology for calculating housing need. If this methodology is introduced in its current form it could increase the housing requirement by 11.1% from the 612 dwellings per annum currently proposed to 680 dwellings per annum.

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

Agent Mr Jon Jennings (1132852)

Email Address

Company / Organisation Cheffins Planning

Address

Consultee Martin Goymour (1132853)

Company / Organisation Goymour Properties

Address
-
-
-

Event Name Local Plan Pre-Submission Publication Document

Comment by Goymour Properties (Martin Goymour)

Comment ID 382

Response Date 02/10/17 08:28

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

Status Processed

Submission Type Email

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)

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

My clients land holding was presented to a meeting with the Local Plan teams on the 6th February 2017. As requested the site was formally submitted to the Council for consideration in this local plan.

In addition, the representations also included a specific wording for the safeguarding of Banham Zoo and its specific development aspirations.

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

It is considered that the percentage of growth being directed to the Local Service Centres is too low. The plan does not propose an even distribution of growth with Attleborough taking 50% of the proposed growth, with no further allocations being proposed in Thetford. This uneven distribution of growth raises questions as to whether this growth can be delivered in the short terms, especially when the costs and delays associated with bringing infrastructure forward are taken into account.

The 15% being directed towards Local Service Centres in some instances does not appear to correspond to the scale of the village it is being directed towards and the employment opportunities available. For example, the Council recognises that Banham is a significant source of local employment, whereas the totality of growth being directed towards this village is very limited and is located a considerable from the zoo, reducing the potential for employees residing in this village to walk to this facility. In addition, there is a need for a wider range of house types to be provided which recognises the diverse range of housing required in connection with the zoo.

This policy is also inflexible and does not allow other more suitable sites to come forward to meet an identified need arising from the expansion of an existing employment facility such as Banham Zoo.

In view of the above it is contended that there needs to be a closer correlation between housing and existing employment.

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

Agent	Mr Jon Jennings (1132852)
Email Address	
Company / Organisation	Cheffins Planning
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Consultee	Martin Goymour (1132853)
Company / Organisation	Goymour Properties
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Event Name	Local Plan Pre-Submission Publication Document
Comment by	Goymour Properties (Martin Goymour)
Comment ID	383
Response Date	02/10/17 08:31
Consultation Point	Policy HOU 14 - Affordable Housing Exceptions (View)
Status	Processed
Submission Type	Email
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)

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

My clients land holding was presented to a meeting with the Local Plan teams on the 6th February 2017. As requested the site was formally submitted to the Council for consideration in this local plan.

In addition, the representations also included a specific wording for the safeguarding of Banham Zoo and its specific development aspirations.

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

The inclusion of an employment connection within the parish is supported and recognises the importance of employees in rural areas being able to live close to where they work.

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

Agent Mr Jon Jennings (1132852)

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Company / Organisation Goymour Properties

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Event Name Local Plan Pre-Submission Publication Document

Comment by Goymour Properties (Martin Goymour)

Comment ID 384

Response Date 02/10/17 08:41

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

Status Processed

Submission Type Email

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)

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

My clients land holding was presented to a meeting with the Local Plan teams on the 6th February 2017. As requested the site was formally submitted to the Council for consideration in this local plan.

In addition, the representations also included a specific wording for the safeguarding of Banham Zoo and its specific development aspirations.

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 comment that the site is within 800m of key services is incorrect with the supermarket and public house located on Kenninghall Road being approximately 1300m from the site. The facilities within 800m of this site are the school, post office and Church. The main areas of employment associated with Banham are located to the western end of the village which is in excess of 1300m from the proposed allocation.

As detailed at criterion 7 of Banham Housing Allocation 1 parts of this site fall within Flood Zone and the question has to be raised as to whether this is the most appropriate site for housing when there are other sites within Banham which are within Flood Zone 1 i.e. at the lowest risk of flooding.

It is advised that the site should be allocated for at least 42 dwellings whereas Policy HOU 2 is clear that the housing target for Banham is 111 of which 42 are housing allocations within the Local Plan. The policy needs to be clear as to the amount of development which is being proposed for this site. The density of development is also very low raising the question as to the extent of housing which will be affordable and of a size to meet local housing needs.

It is clear that the quantum of housing being proposed fails to recognise the range of existing employment and other facilities in Banham and understand how additional housing will not only provide accommodation for employees but also aid the vitality and viability of local services.

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.

This is to allow the opportunity for the Inspector to consider the benefits associated with alternative or additional housing allocations within Banham, which will more readily meet the needs of existing residents and employees.

Do you wish to be:

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

Comment

Agent	Mr William Lusty (512998)
Email Address	
Company / Organisation	Savills
Address	
Consultee	The Diocese of Norwich (1133000)
Company / Organisation	The Diocese of Norwich
Address	- - -
Event Name	Local Plan Pre-Submission Publication Document
Comment by	The Diocese of Norwich (The Diocese of Norwich)
Comment ID	385
Response Date	02/10/17 08:44
Consultation Point	Map 3.7 Great Ellingham Settlement Boundary (View)
Status	Processed
Submission Type	Email
Version	0.4
Files	Site Plan - Land at Glebe Meadow Great Ellingham.pdf
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?
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) <input type="checkbox"/> 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.

We consider that the Local Plan is unsound in that it fails to allocate land for housing development at Glebe Meadow, Great Ellingham, the boundary of which is edged red on the attached plan.

We can confirm that the site, which lies within the freehold ownership of our client, The Diocese of Norwich, is available now for housing development. In view of this single freehold ownership, we also consider that development of the site is achievable.

In terms of suitability, we note the Council's assessment of the site, as set out within the Breckland Local Plan Pre-Submission Sustainability Appraisal (Site LP[037]015). The summary of this assessment states that 'the site scores negatively against criteria 2 and 3 due to the site being situated within a zone 3 groundwater source protection zone'.

We have reviewed 'The Environment Agency's Approach to Groundwater Protection' guidance and document and this does not preclude housing development within Zone 3 Groundwater Protection Zones. Furthermore, we also note that housing development has recently taken place elsewhere in the village. Further information could be presented at the time of a planning application under the Environment Agency's risk based approach to demonstrate how any impacts of groundwater would be mitigated.

We also note that the Council is not proposing to allocate any land for housing development at Great Ellingham and 'has already exceed the numbers required over the plan period'. As we go on to note below, Great Ellingham is a sustainable location for development, as is recognised by the status of the village as a Local Service Centre. Under the National Planning Policy Framework, housing requirements should not be treated as a maxima requirements. Within this context and where suitable and sustainable opportunities for housing development are presented, these should be taken.

The site is well related to the village's excellent range of local services and facilities, which include a primary school, local shop/post office, village hall and public house. The village is well serviced by public transport including regular buses to Norwich, Attleborough and Watton. Attleborough's train station is located within 4.5km of the village. The settlement's proximity to Attleborough ensures access to higher level services and facilities including secondary schools, shops and tertiary services.

We therefore consider that the site is suitable for development, and with the site also being available for development, and in view that this would be achievable within 5 years, we consider that housing development is deliverable.

Against the above background, there is the opportunity to allocate the site for deliverable and sustainable housing development. Without doing so, we consider that the plan is not positively prepared and therefore contrary to paragraph 182 of the National Planning Policy Framework.

We therefore propose that the site is shown on the Great Ellingham Policies Map as a housing allocation and that an according Policy is added to the written part of the document, as follows:

Great Ellingham - Allocation 1

Land at Glebe Meadow, Great Ellingham (Site LP[037]015)

Land amounting to 0.46 hectares is allocated for residential development of up to 10 dwellings. Development will be permitted subject to compliance with adopted policies in the Local Plan.

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

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

Do you wish to be:

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

Comment

Agent	Mr William Lusty (512998)
Email Address	
Company / Organisation	Savills
Address	
Consultee	The Diocese of Norwich (1133000)
Company / Organisation	The Diocese of Norwich
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Event Name	Local Plan Pre-Submission Publication Document
Comment by	The Diocese of Norwich (The Diocese of Norwich)
Comment ID	386
Response Date	02/10/17 08:43
Consultation Point	Map 3.13 Summary of the Necton Allocations. (View)
Status	Processed
Submission Type	Email
Version	0.3
Files	Site Plan - School Road Necton.pdf
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?
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) <input type="checkbox"/> 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.

We consider that the Local Plan is unsound in that it fails to allocate land for housing development at School Road, Necton, the boundary of which is edged red on the attached plan.

We can confirm that the site, which lies within the freehold ownership of our client, The Diocese of Norwich, is available now for housing development. In view of this single freehold ownership, we also consider that development of the site is achievable.

In terms of suitability, we note the Council's assessment of the site, as set out within the Breckland Local Plan Pre-Submission Sustainability Appraisal (Site LP[067]004). The summary of this assessment states that 'the site scores negatively against criteria 6 due to flood risk'.

We note from the Council's Policies Map that the eastern part of the site is shown to lie within an area identified as 'Flood Zone 3b'. However, we have also viewed the Environment Agency's 'Flood Map for Planning' which is available on-line, and this shows the site to wholly lie within Flood Zone 1, within which housing development is acceptable. Owing to its national status, we consider it is upon the basis of flood map information made available by the Environment Agency that the site should be assessed in terms of flood risk.

Housing development of the site would continue the linear pattern of development fronting School Road and would not result in undue encroachment into the open countryside. Adjacent to the south of the site is existing residential development and thus residential development of this site would not be out of context.

The site is well related to the village's excellent range of local services and facilities, which include a primary school, satellite surgery, local shop, post office, village hall and a public house.

We therefore consider that the site is suitable for development, and with the site also being available for development, and in view that this would be achievable within 5 years, we consider that housing development is deliverable.

Against the above background, there is the opportunity to allocate the site for deliverable and sustainable housing development. Without doing so, we consider that the plan is not positively prepared and therefore contrary to paragraph 182 of the National Planning Policy Framework. We therefore propose that the site is shown on the Necton Policies Map as a housing allocation and that an according Policy is added to the written part of the document, as follows:

Necton Housing Allocation 1

Land at School Road, Necton (Site LP[067]004)

**Land amounting to 0.4 hectares is allocated for residential development of 5 dwellings.
Development will be permitted subject to compliance with adopted policies in the Local Plan.**

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

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

Do you wish to be:

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

Comment

Agent Mr David Barker (1133058)

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Company / Organisation Evolution Town Planning

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Consultee Stapleford Group Thetford Ltd (1131249)

Company / Organisation Stapleford Group Thetford Ltd

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Event Name Local Plan Pre-Submission Publication Document

Comment by Stapleford Group Thetford Ltd (Stapleford Group Thetford Ltd)

Comment ID 387

Response Date 02/10/17 08:47

Consultation Point Policy EC 03 General Employment Areas ([View](#))

Status Processed

Submission Type Email

Version 0.6

Files [Breckland Retail Park.pdf](#)

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.

Our client did not have an appropriate interest in the land at the time of the previous representations.

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. Policy EC03 states that sites identified as General Employment Areas on the Policies Map will be protected for employment uses. This includes the former Viking factory site which is currently subject to a pending planning application (LPA Ref. 3PL/2017/0949/F) for a retail development.

2. Draft Policy EC03 however permits proposals for mixed-use developments in identified employment areas where they:

- 1 Incorporate a significant employment element;
- 2 Are compatible with existing employment uses;
- 3 Support the improvement of an employment area that is in need of upgrading;
- 4 Do not constrain the operations of adjoining businesses; and
- 5 Are capable of reinstatement for business and industrial use.

3. Paragraph 6.67 of the draft Local Plan adds that:

"Appropriate proposals to diversify and ensure the long-term sustainability of existing employment areas will therefore be supported where they contain a significant employment element, contribute positively to the viability of the employment land and would not undermine, and are otherwise compatible with, existing employment uses."

4. Whilst it is recommended that the Viking site is omitted from the wider employment allocation at Caxton Way, and/or reallocated for economic development, if the Council are not agreeable to this it is recommended that draft Policy EC03 is amended to support employment generating uses such as retail on allocated employment sites for the following reasons.

5. NPPF uses a more appropriate term, 'economic development' to refer to uses which create jobs. Indeed, the NPPF moves away from previous policy approaches which sought to allocate land for Class B uses. Paragraph 22 of the NPPF provides flexibility for alternative uses of employment sites, highlighting that planning policies:

"should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities."

6. The NPPF also recognises that sustainable economic growth can be delivered through the provision of a range of economic uses, including retail. Paragraph 19 is instructive in the case, noting that the planning system should do *"everything it can to support sustainable economic growth. Planning should operate to engage and not act as an impediment to sustainable growth"*.

7. Whilst the Viking site has been allocated for employment since 1999 in the Local Plan, it has been vacant since 2009 when the factory closed. The former factory is long demolished and the site will never be developed for Class B uses as it will simply not be viable. Despite being actively marketed for employment purposes for eight years there has been limited interest from B1, B2 or B8 users as evidenced in the attached marketing report. As such the site, has remained vacant.

8. The site has however received interest from retailers including the current proposal and previously in 2013 which resulted in a planning application being submitted for a supermarket on the site (LPA Ref. 3PL/2012/0213/O). Whilst this application was refused by the council on retail impact grounds, despite being allocated for employment in the Local Plan, planning officers concluded in their committee report that the: *"site is not considered to be significant in employment land terms or to be of strategic importance."* The Committee Report continued, *"the demand for such sites in this locality appears to be rather limited."*

9. The Committee Reported added that: *"refusal of the application on loss of employment land grounds would not be justified given the available evidence on employment land supply in Thetford."*

10. This is supported by evidence in the Breckland Employment Growth Study (BEGS) form November 2013 which concluded that there is a good supply of employment land in Thetford. The BEGS also

notes that the quality of the employment at the Caxton Way Industrial Estate which included the Viking site is of a low quality in comparison to other sites in Thetford.

11. In short, the Council has recognised that the Viking site is no longer a viable employment site. This will not change in the future because the Caxton Way Industrial Estate is poorer quality than other sites in Thetford. Therefore, safeguarding the site for employment purposes is unnecessary and cannot be justified.

12. As such, the Council should support alternative employment generating uses such as retail on the site which is an economic wealth generator and employment creating land use. The re-use of the Viking site for another form of economic development will not have a harmful effect on Class B employment land supply within Breckland.

13. Higher value non-B uses, including retail will also provide for the efficient re-use of the site, and will deliver a wide range of economic and social benefits for the local community; including creating new jobs in accordance with the overall economic objectives of the Local Plan. The proposed retail scheme on the site will create up to 200 jobs. This is likely to be significantly more than would be created even if a Class B employment scheme was viable (and is not).

14. The importance of the retail sector to the national economy and the benefits of the employment opportunities provided are recognised in the King Sturge report entitled 'The Contribution of the Retail Sector to the Economy, Employment and Regeneration'. The document corroborates the benefits of retail employment and the value to the local economy.

15. Although retail proposals would have to pass the retail policy tests, it is important the Plan recognise that in an increasingly competitive world, the need to accommodate the new ways by which we earn our living and support a strong, responsive and competitive economy. This can only happen if policies and allocations are flexible and recognise that high value non-B Class uses can deliver significant social and economic benefits, including employment opportunities.

16. In summary, the Viking site is:

- 1 Currently cleared;
- 2 It has been unsuccessfully marketed for B Class uses;
- 3 Caxton Way Industrial Estate is of low quality;
- 4 The principle of non-B Class uses has been accepted; and
- 5 It is currently the subject of an application for economic development.

17. For these reasons, the Viking site must be excluded from the wider 'General Employment Area' allocation. It should either be unallocated (white) land, or it could be identified as an 'opportunity' site for economic development.

18. Alternatively, the wider General Employment Area site could be designated for Economic Development in accordance with the NPPF. On this basis we suggest that the first bullet point of Draft Policy EC05 is redrafted to state:

'Incorporate a significant element of economic development',

19. The third and fifth bullet points should be deleted as they are meaningless. This will ensure that the plan is positively prepared to take advantage of the opportunities for growth, is justified by being the most appropriate strategy, is effective by being sufficiently flexible to be deliverable and accords with National Planning Policy.

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.

To ensure that the Inspector understands our representations and so we can respond to comments and questions.

Do you wish to be:

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

Comment

Agent Ms Lydia Voyias (1032227)

Email Address

Company / Organisation Savills (UK) Ltd

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Consultee Lexham Estate (1133331)

Company / Organisation Lexham Estate

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Event Name Local Plan Pre-Submission Publication Document

Comment by Lexham Estate (Lexham Estate)

Comment ID 388

Response Date 02/10/17 09:35

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

Status Processed

Submission Type Email

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)

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

It is noted within Draft Policy HOU02 that there is a target to accommodate 22 additional dwellings within the Local Service Centre of Litcham. However it is noted that Housing Allocations are unable to meet Local Plan Housing Target. The Council has therefore proposed Draft Policy HOU03 to allow flexibility for sites beyond but adjacent to the settlement boundaries of Local Service Centres to come forward for residential development.

Support is given to Draft Policy HOU03 specifically in so far as it provides flexibility for appropriate sites. It however suggested that the wording of the policy is amended as follows:

'Where the Local Plan does not identify sufficient sites to achieve the housing target, then further development will be allowed subject to being supported by other policies within the Local Plan and meeting all of the following criteria:

- 1. It is immediately adjacent to the settlement boundary;*
- 2. The design contributes to conserving, and where possible enhancing, the historic nature and connectivity of communities; and*
- 3. The development avoids coalescence of individual settlements.*
- 4. Opportunities for self build dwellings which meet the criteria set out above will be considered in accordance with national guidance.'*

Criteria 2 seeks to limit the amount of housing considered acceptable through this policy. However it is noted at paragraph 3.11 of the Draft Local Plan clearly identifies that settlement housing targets are "minimum housing requirements". It is considered that development should not be limited in this way.

Criteria 4 is considered to be ambiguous in the context of Litcham and suggested wording is requested to provide clarity.

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.

In order to full consider the above representations it is requested that I am invited to the Examination in Public on behalf of the Lexham Estate.

Do you wish to be:

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

Comment

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Event Name Local Plan Pre-Submission Publication Document

Comment by Lexham Estate (Lexham Estate)

Comment ID 389

Response Date 02/10/17 09:35

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

Status Processed

Submission Type Email

Version 0.2

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

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

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

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

Proposals map has only been recently

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

It is specified within Policy HOU02 that there are 5 dwelling commitments / or completions in the period 2011 to September 2016. It is noted that the Council has identified a number of sites which benefit from Planning Permission for Housing. It is questioned why the Council has chosen to include this information. In some cases the draft proposal map refers to planning permission obtained well before the proposed plan period and where development appears to have been constructed.

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.

In order to full consider the above representations it is requested that I am invited to the Examination in Public on behalf of the Lexham Estate.

Do you wish to be:

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

Comment

Agent	Ms Lydia Voyias (1032227)
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Company / Organisation	Savills (UK) Ltd
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Consultee	Lexham Estate (1133331)
Company / Organisation	Lexham Estate
Address	- - -
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Lexham Estate (Lexham Estate)
Comment ID	390
Response Date	02/10/17 09:35
Consultation Point	Policy HOU 01- Development Requirements (Minimum) (View)
Status	Processed
Submission Type	Email
Version	0.3
Do you consider the Pre-Submission Publication to be:	. Unsound (You think the document needs changing)
If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).	. Is the plan 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)

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.

Breckland Council is currently in a position where it can not demonstrate a five year housing land supply. A recent appeal decision concludes that the area has experienced persistent under delivery of housing (PINS Ref: APP/F2605/W/16/3154813). It is within this context that it is requested that the Council seeks to plan for an adequate and steady supply of housing throughout the plan period.

It is noted at Draft Policy HOU 01 that Breckland Council is seeking to plan for the provision of a minimum of 15,298 new dwellings over the plan period 2011 to 2036. An average of 612 dwellings per annum.

On 14th September the Department for Communities and Local Government (DCLG) published a consultation document entitled 'Planning for the right homes in the right places'. This was accompanied by a spreadsheet which applies the proposed formula to calculate housing need. In respect of Breckland, it has been suggested by DCLG **680 dwelling per annum** over the period 2016 to 2026.

Notwithstanding the proposed transitional arrangements stated at Table 1 of the DCLG 'Planning for the right homes in the right places' consultation document, the Council could find itself in a position where it is not planning to meet the full objectively assessed need.

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.

In order to fully consider the above representations it is requested that I am invited to the Examination in Public on behalf of the Lexham Estate.

Do you wish to be:

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

Comment

Agent	Ms Lydia Voyias (1032227)
Email Address	
Company / Organisation	Savills (UK) Ltd
Address	
Consultee	Lexham Estate (1133331)
Company / Organisation	Lexham Estate
Address	- - -
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Lexham Estate (Lexham Estate)
Comment ID	391
Response Date	02/10/17 09:35
Consultation Point	Policy HOU 02 - Level and Location of Growth (View)
Status	Processed
Submission Type	Email
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)

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.

Notwithstanding the support for the Policy HOU 02 – Level and Location of Growth in terms of the distribution of growth throughout the District. Separate representation has been made in response to Draft Policy HOU 01 about the potential for the Council to fall short in meeting its full objectively assessed housing need which has a consequence for the individual minimum settlement targets.

Support is given to the proposed distribution of housing growth which seeks to direct 15% of growth to Local Service Centres, including Litcham.

It is however requested that the policy wording reiterates that the suggested housing targets for additional dwellings in the period are minimum targets.

Support is given to the footnote reference that Neighbourhood Plans can seek to exceed the stated housing targets.

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.

In order to full consider the above representations it is requested that I am invited to the Examination in Public on behalf of the Lexham Estate.

Do you wish to be:

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

Comment

Agent Ms Lydia Voyias (1032227)

Email Address

Company / Organisation Savills (UK) Ltd

Address

Consultee Lexham Estate (1133331)

Company / Organisation Lexham Estate

Address -
-
-

Event Name Local Plan Pre-Submission Publication Document

Comment by Lexham Estate (Lexham Estate)

Comment ID 392

Response Date 02/10/17 09:35

Consultation Point Map 3.10 Litcham Settlement Boundary. ([View](#))

Status Processed

Submission Type Email

Version 0.4

Files [Land west of Pound Lane. Litcham.pdf](#)
[Access Review \(Addendum\) March 2017.pdf](#)

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)

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.

Support is given to paragraph 3.255 which identifies Litcham as a Local Service Centre. This is justified by the supporting 'Breckland Local Service Centre Topic Paper' (July 2017).

Support is also given to the identification of 10% growth, equivalent to 27 new dwellings, over the plan period.

Whilst it is acknowledged at paragraph 3.255 that there are 3 dwelling commitments and 2 dwelling completions, there is a residual requirement for a minimum of 22 dwellings to be delivered up to 2036. The draft proposals map does not allocate any land for residential development throughout the plan period.

The Lexham Estate has submitted a number of sites to the Council to consider as possible locations for allocation including:

- 1 Land West of Pound Lane (LP[054]005 A)
- 2 Land north of the B1145 (East) (LP[054]005 B)
- 3 Land between Pound Lane and Back Lane (LP[054]006)

The Council's supporting Site Selection Topic Paper 'Breckland Local Plan: Approach to the Selection of Sites' (August 2017) states that Norfolk County Council Highways commented on each of these sites as follows:

- 1 Land West of Pound Lane (LP[054]005 A) - Not suitable for allocation as Pound Lane is unsuitable to cater for additional traffic and the local road network is narrow and inadequate. The Highway Authority would object to this site being in the Local Plan.
- 2 Land north of the B1145 (East) (LP[054]005 B) – Access looks unachievable onto the B1145 and that the Highway Authority would object to the site being in the Local Plan.
- 3 Land between Pound Lane and Back Lane (LP[054]006) – The site is not suitable for allocation as the local road network is narrow and inadequate. The Highway Authority would object to this site being in the Local Plan.

It is clear that despite being identified as a Local Service Centre, the local Highway Authority considers the existing local road network at Litcham to act as a constraint to development.

The Estate is promoting its land West of Pound Lane having regard to the above comments. In such a context, we enclose a report dated March 2017 "**Access Review (Addendum)**" prepared by Create Consulting Engineers. The Council's plan is contained at the very end of that report. This report considers the impact of development of approximately 20 dwellings with possible car park expansion for the adjacent Primary School and a Community Centre to benefit the wider community.

We would confirm that a more accurate plan promoting development at its preferred location at 'Land West of Pound Lane is shown on plan ' **CAPL 362887/A6/001/LV/B** which is enclosed with this representation.

Regarding the "**Access Review (Addendum)**" prepared by Create Consulting Engineers, the report concludes that there is a technically achievable solution from a highways perspective in respect to this land West of Pound Lane.

Safe and Secure Access – Drawing 1134/03/002 illustrates that it is possible to achieve a safe and secure access at the site in the form of a T-Junction. The requisite visibility splays for an estimated speed of 37 miles per hour can be achieved in reference to Manual for Streets 1 & 2. The inclusion of an overspill car park at the site offers an opportunity to reduce on street parking along this section of Pound Lane.

Potential Traffic Generation and Traffic Impact – It is explained at paragraph 3.9 that "...additional traffic generation arising from the proposed residential development are modest and would amount to less than 15 two-way vehicle trips in the morning and evening peak hours of activity."

Paragraph 3.10 continues "This level of additional traffic is not considered to give rise to any significant impact upon the highway road network."

Mitigation

Paragraph 3.10 proposes that "this section of Pound Lane could become designated as "Access Only" by means of a formal Traffic Regulation Order. In doing so, this should avoid development-generated

traffic impacting on this section of road and therefore, motorised traffic between the Site and the village centre would be assigned via the more substantial section of Pound Lane and Butt Lane.”

It is acknowledged at paragraph 3.11 that “Development-generated traffic would, therefore, impact to at least some degree on the existing Butt Lane/Church Street junction. Consequently, measures are proposed at this junction in connection with development scheme to improve visibility to/from the minor arm and attenuate traffic speed on the main road approaches (as shown on drawing 1134/03/003).“

Conclusion

The local Highway Authority should have no significant concerns with respect to the proposed allocation for residential development at Pound Lane, Litcham coming forward as part of the emerging Local Plan. The Estates preferred location is shown edged in red on the attached plan **CAPL 362887/A6/001/LV/BW**.

It is therefore requested that the Proposals Map for Litcham be amended to include that land as a housing allocation as identified on enclosed plan **CAPL 362887/A6/001/LV/BW** together with relevant text within the 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.

To examine in more detail the benefits arising from the development of the site and to more fully understand the Council's resistance to development coming forward in this location.

Do you wish to be:

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

Comment

Agent Mr Jon Jennings (1132852)

Email Address

Company / Organisation Cheffins Planning

Address

Consultee Martin Goymour (1132853)

Company / Organisation Goymour Properties

Address
-
-
-

Event Name Local Plan Pre-Submission Publication Document

Comment by Goymour Properties (Martin Goymour)

Comment ID 393

Response Date 02/10/17 10:12

Consultation Point Policy EC 07 Tourism Related Development ([View](#))

Status Processed

Submission Type Email

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?
. 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.

My clients land holding was presented to a meeting with the Local Plan teams on the 6th February 2017. As requested the site was formally submitted to the Council for consideration in this local plan.

In addition, the representations also included a specific wording for the safeguarding of Banham Zoo and its specific development aspirations.

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

Whilst the first two paragraphs of this policy are broadly supported there are concerns that leisure, tourism and cultural development and visitor accommodation attracting a significant number of visitor accommodation attracting a significant number of visitors should be located within, or be accessible to, the five market towns is too restrictive.

This policy fails to recognise that many of the major tourist attractions are located in the open countryside and that their continued expansion and enhancement is required to ensure that they remain viable. It is questioned whether this policy accords with paragraph 28 of the NPPF which state that "Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:

support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings;.....

support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres; "The policy also fails to acknowledge that paragraph 34 of the NPPF states that "Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. However this needs to take account of policies set out elsewhere in this Framework, particularly in rural areas".

In view of the above it is contended that this policy is amended to more closely accord with the advice contained within the NPPF, with greater recognition being given to the enhancement and expansion of existing large-scale tourist attractions in rural areas. In fact, due to the unique role of Banham Zoo it is recommended that this is dealt with by a specific policy for the zoo, although Policy EC 07 also needs to acknowledge the need to support the provision and expansion of tourist and visitor facilities and recognise that they are not always located in the most sustainable locations or readily accessible by alternative modes to the private car.

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.

As a consequence of the issues detailed above it is considered that the concerns raised in relation to Policy EC 07 can only be addressed by way of the Examination in Public. This will allow the Inspector to be fully acquainted with the operation of Banham Zoo and allow my client Goymour Properties the opportunity to explain how this policy as currently worded will restrict their operations and outline the measures required to make the policy sound and in a form which accords with the NPPF.

Do you wish to be:

Notified of the Submission
Notified of the Inspectors Recommendations

Comment

Agent	Emer Costello (1133456)
Email Address	
Company / Organisation	DLP Planning Ltd
Address	
Consultee	Justin Brookes (1133548)
Address	- - -
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Justin Brookes
Comment ID	394
Response Date	02/10/17 11:00
Consultation Point	Policy EC 01 Economic Development (View)
Status	Processed
Submission Type	Email
Version	0.3
Files	Breckland Local Plan Rep.pdf
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 legally compliant? <input type="checkbox"/> Is the plan positively prepared? <input type="checkbox"/> Is the plan justified? <input type="checkbox"/> Is the plan effective? <input type="checkbox"/> Is the plan consistent with national policy?
Have you raised this issue before during previous consultations? (Please tick the appropriate box)	<input type="checkbox"/> 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.

See attached.

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.

There are significant matters in relation to the correct balance between the safeguarding of adequate land for future employment and meeting the housing needs of the district which need to be rigorously explored in relation to the outdated data on which the employment policies appear to be based.

Moreover, there are a number of practical implications in relation to the suitability of the land for future employment use in relation to national policy and the protection of residential amenity that need appropriate consideration.

Do you wish to be:

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

Comment

Agent Emer Costello (1133456)

Email Address

Company / Organisation DLP Planning Ltd

Address

Consultee Justin Brookes (1133548)

Address -
-
-

Event Name Local Plan Pre-Submission Publication Document

Comment by Justin Brookes

Comment ID 395

Response Date 02/10/17 11:00

Consultation Point Policy EC 03 General Employment Areas ([View](#))

Status Processed

Submission Type Email

Version 0.2

Files [Breckland Local Plan Rep.pdf](#)

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

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

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

See attached.

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.

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Moreover, there are a number of practical implication sin relation to the suitability of the land for future employment use in relation to national policy and the protection of residential amenity that need appropriate consideration.

Do you wish to be:

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

Comment

Consultee Mr James Millard (1133624)

Email Address

Company / Organisation Millard Tuddenham

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Millard Tuddenham (Mr James Millard)

Comment ID 396

Response Date 02/10/17 10:18

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

Status Processed

Submission Type Email

Version 0.3

Files [Millard Tuddenham - Breckland Local Plan Pre Submission Version Consultation Housing Delivery SUBMISSION VERSION 02.10.17 \(2\).pdf](#)

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)

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 PSP as currently proposed is fundamentally flawed/unsound in that it has serious inconsistencies with local and national planning policy as well as fundamental errors with site and hierarchy of settlements selection process.

See attachment.

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.

To fully explore the issues set out in the representations.

Do you wish to be:

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

Comment

Consultee Mr James Millard (1133624)

Email Address

Company / Organisation Millard Tuddenham

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Millard Tuddenham (Mr James Millard)

Comment ID 397

Response Date 02/10/17 10:18

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

Status Processed

Submission Type Email

Version 0.3

Files [Millard Tuddenham - Breckland Local Plan Pre Submission Version Consultation SUBMISSION VERSION 02.10.17.pdf](#)

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)

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 PSP as currently proposed is fundamentally flawed/unsound in that it has serious inconsistencies with local and national planning policy as well as fundamental errors with site and hierarchy of settlements selection process.

See attached.

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.

To fully explore the issues set out in the representations.

Do you wish to be:

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

Comment

Consultee	Mr Robert Feakes (1133646)
Email Address	
Company / Organisation	Suffolk County Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Suffolk County Council (Mr Robert Feakes)
Comment ID	398
Response Date	02/10/17 11:01
Consultation Point	Breckland Local Plan Pre-Submission Publication (View)
Status	Processed
Submission Type	Email
Version	0.3
Files	Representation Form - Suffolk County Council.pdf

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

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

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

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

See attached letter.

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

Do you wish to be:

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

Comment

Consultee Mr Neil McShane (1133651)

Email Address

Company / Organisation Attleborough Academy Norwich

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Attleborough Academy Norwich (Mr Neil McShane)

Comment ID 399

Response Date 02/10/17 11:08

Consultation Point 2.22 Paragraph ([View](#))

Status Processed

Submission Type Email

Version 0.3

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

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

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

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

The Plan recognises the emerging Attleborough Neighbourhood Plan and the support of a new Indoor sports centre, located in the vicinity of Attleborough Academy, Norfolk to provide a joint academic and community facility.

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	Mandy Maguire (1133658)
Email Address	
Company / Organisation	Bridgham Parish Council
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Bridgham Parish Council (Mandy Maguire)
Comment ID	400
Response Date	02/10/17 13:20
Consultation Point	Policy HOU 05 - Small Villages and Hamlets Outside of Settlement Boundaries (View)
Status	Submitted
Submission Type	Email
Version	0.1

Do you consider the Pre-Submission Publication to be:

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)

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

Do you wish to be:

<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: Philip Raiswell	
Organisation: Sport England	
Address:	
Post code: LE11 3QF	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	ENV04
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?	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)	x

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

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

Sport England's view is that for a policy relating to the protection and provision of facilities for outdoor sport, it must be based on a robust and up to date evidence base. For playing pitches, this requires an assessment using Sport England's methodology 'Playing Pitch Strategy Guidance' (covering pitch sports) and 'Assessing Needs and Opportunities Guidance' (covering other outdoor and indoor sports facilities). These guidance documents are specified within the DCLG Planning Practice Guidance as the recommended guidance documents for such assessments:

<http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/open-space-sports-and-recreation-facilities/>

As far as I am aware the open space assessment carried out does not follow the above methodology, and therefore is not considered to be a robust evidence base on which to base policies relating to outdoor and indoor sports facility provision.

Sport England previously made these representations at the Issues and Options stage in January 2015.

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

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

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

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

--

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

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

Declaration: I understand that the details included on this form will be available in the public domain. (please tick box)	x
Signature: Philip Raiswell	Date:30.9.17

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 Laura Handford (1133949)

Email Address

Address

Consultee Orbit and Longhurst (1133952)

Company / Organisation Orbit and Longhurst (in capacity of Housing Associations)

Address -
-
-

Event Name Local Plan Pre-Submission Publication Document

Comment by Orbit and Longhurst (in capacity of Housing Associations) (Orbit and Longhurst)

Comment ID 402

Response Date 02/10/17 11:11

Consultation Point Policy HOU 07 - Affordable Housing ([View](#))

Status Processed

Submission Type Email

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)

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

We were not aware of these specific policies at an earlier time.

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.

HOU 07 – Affordable Housing

i. Agreed – this threshold ensures 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. Agreed – this percentage 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. Although the mix of affordable needs to reflect the need of the local area at the time of consideration, there are not any clear recommendations within the CNSHMA as to how this would be made up. A clear definition of the split between affordable rented and intermediate sale products is crucial within this policy. Without this developers will make assumptions during the pre-planning, land negotiation stages. These assumptions may not be as Breckland would be expecting to see which has the potential to lead to delays whilst the developer re-works their financial appraisals. A clear tenure split is typical of Local Plans and something we would welcome and expected to see. In terms of the types of homes required, again this is also key and something we would expect to see in this policy, as per other neighbouring Local Authorities, who provide a percentage for each of the house types per number of bedrooms, to be provided for example

1 beds – 35%

2 beds - 30%

3 beds – 30%

4 beds - 15%

Again this clarity will only help to support developers in achieving a viable scheme in the first instance which supports delivery in the district.

iv. Agreed – 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.

v. The first part of this policy needs 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 8. This aligns with policies in other neighbouring districts which have been successful in delivering affordable housing and ensuring tenure blind communities.

vi. 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.

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	Laura Handford (1133949)
Email Address	
Address	
Consultee	Orbit and Longhurst (1133952)
Company / Organisation	Orbit and Longhurst (in capacity of Housing Associations)
Address	- - -
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Orbit and Longhurst (in capacity of Housing Associations) (Orbit and Longhurst)
Comment ID	403
Response Date	02/10/17 11:11
Consultation Point	Policy HOU 10 - Technical Design Standards for New Homes (View)
Status	Processed
Submission Type	Letter
Version	0.2
Files	Representation Form - Orbit and Longhurst.pdf
Do you consider the Pre-Submission Publication to be:	<input type="checkbox"/> Unsound (You think the document needs changing)
If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).	<input type="checkbox"/> Is the plan justified? <input type="checkbox"/> Is the plan effective?
Have you raised this issue before during previous consultations? (Please tick the appropriate box)	

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

We were not aware of these specific policies at an earlier time.

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

See attached form.

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 Laura Handford (1133949)

Email Address

Address

Consultee Orbit and Longhurst (1133952)

Company / Organisation Orbit and Longhurst (in capacity of Housing Associations)

Address -
-
-

Event Name Local Plan Pre-Submission Publication Document

Comment by Orbit and Longhurst (in capacity of Housing Associations) (Orbit and Longhurst)

Comment ID 404

Response Date 02/10/17 11:11

Consultation Point Policy HOU 14 - Affordable Housing Exceptions
([View](#))

Status Processed

Submission Type Email

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)

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

We were not aware of these specific policies at an earlier time.

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.

HOU 14 – Affordable Housing Exceptions

The principle of this policy is sound and supported.

Point d) needs to exclude low cost home ownership, any restriction will severely effect the ability of potential purchasers to secure mortgages. It would be sensible to secure these homes in perpetuity by using the Rural Repurchase clause operated by the HCA. This allows individuals the ability to staircase to 100% (and thus widening the mortgage market) but ensures that the onwards sale of the property is back to the RP, for conversion back into a low cost home ownership property.

As per comments on HOU 07, point vi, the Council should retain the ability to negotiate with the RP on the viability of a scheme which includes Open Market units, rather than reverting to a third party viability in each case. The financial appraisal of affordable led exceptions sites would typically be freely shared between the RP and the Council. As it is in the RP's interest to maximise the affordable provision and not be seeking to maximise profits from the market dwellings, the financial appraisal should be easy to understand and unnecessarily withheld by the RP. Neighbouring authorities have an agreed ratio of market to affordable homes on exceptions site which may be a better solution for this point. As cross subsidy is typical of exceptions sites in Norfolk and Suffolk, locally operating RP's are sure to be able to provide example costings to support a suggested ratio. Determining this ratio within the policy enables the RP to confidently undertake initial site appraisals and land negotiations, in line with as per our earlier comments at HOU 07 iii.

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

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

Do you wish to be:

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. Notified of the Inspectors Recommendations
. Notified of the Adoption

Comment

Agent	Mrs Sarah Hornbrook (1126421)
Email Address	
Company / Organisation	Ingleton Wood
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Consultee	(1129859)
Company / Organisation	Breckland Bridge Ltd
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Breckland Bridge Ltd ()
Comment ID	405
Response Date	02/10/17 11:54
Consultation Point	Policy HOU 04 - Rural Settlements With Boundaries (View)
Status	Processed
Submission Type	Email
Version	0.4
Files	Land at Whissonsett Road Colkirk Aerial Photo.pdf
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)

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.

On behalf of Breckland Bridge Limited, we strongly support the sentiments expressed in paragraph 3.17, specifically the need to maintain the vitality of rural communities, support local services and enhance the rural economy. In addition, the general approach promoted in paragraph 3.17, whereby rather than seeking to restrict development to within existing Settlement Boundaries it will be possible to secure planning permission on appropriate sites outside the Settlement Boundary, to provide a sensitive approach to rural housing, which is responsive to local circumstances, is also supported. However, it is considered that proposed Policy HOU 04 includes elements that are unjustified, and consequently unsound.

Proposed Policy HOU 04 allows appropriate development immediately adjacent to the Settlement Boundary, subject to being supported by other policies within the Local Plan and where all of five criteria are satisfied. These include two restrictions on the quantum of development – no more than 5 dwellings will be allowed on any site, and the cumulative total of new dwellings adjacent to any particular settlement must not exceed a 5% increase in the total number of dwellings at the date of Adoption of the Plan. It is considered that these restrictions are not justified, and there is no clear explanation of why these levels of development are deemed the appropriate limits for rural settlements. Limiting development to no more than 5 units in such locations may make development unviable, given the infrastructure costs often associated with new development. A greater number of units is far more likely to provide sufficient returns to enable a developer / landowner to make a scheme viable. In addition, this scale of development would make no contribution towards local infrastructure, and would not deliver affordable housing.

A further requirement of proposed Policy HOU 04 is to demonstrate that there will be a significant community benefit arising from the proposed development. This is considered wholly unjustifiable; residential developments in rural locations are often subject to local opposition, and if a planning application is able to demonstrate that it accords with the Adopted Development Plan, or material considerations exist to justify development, it should not be refused just because there is local opposition (or a lack of community support) which could be based entirely on issues which do not constitute material planning considerations. Community aspirations could easily be unattainable, and are often unquantifiable; a requirement to deliver such aspirations could render a scheme unviable.

Based on the foregoing, it is considered more appropriate to use the Settlement Boundary as a positive policy tool; enabling the identification of sites that are, in principle, suitable for development and which would provide a logical extension to the village, whilst also creating a clear defensible boundary. As well as providing a degree of control and certainty in respect of the future location of developments within rural settlements, the suggested approach has the potential to deliver wider community benefits. More specifically, a series of small scale developments around the settlement boundary, as envisaged by the current proposed Policy, will result in developments avoiding the need to deliver affordable housing. Furthermore, by virtue of their size, it is unlikely that any developments will generate sufficient financial obligations which could be used to enhance community facilities within the locality. In contrast, a larger development would potentially be able to contribute to both affordable housing, for which there is likely to be a local need, and the provision of enhanced community facilities. It is considered that this approach would be entirely in accordance with paragraph 157 of the NPPF, which states that Local Plans should 'plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this framework'.

In light of the above, it is proposed that the settlement boundary of Colkirk should be extended slightly from that currently proposed, to include an area of land measuring approx. 0.95 hectares located to the west of Whissonsett Road (see attached plan with site outlined in red).

This proposal provides a logical extension to the village and allows any future development in the village during the plan period to be accommodated in a coordinated manner. The attached aerial view of the site shows that the site is clearly separated from the agricultural land to the south and east by a mature boundary hedge, and its development would balance the estate-style development on the opposite side of Whissonsett Road (Timperley Estate), providing a defensible boundary. Furthermore, the village facilities continue further south on Whissonsett Road, with both the allotments and playing fields located beyond the site.

An initial review of the highways and transportation issues affecting the site has previously been undertaken by Richard Jackson Engineering Consultants, and submitted in support of our

Representations on the Preferred Site Options and Settlement Boundaries Consultation (also appended to this Representation for clarity). This highlights that it is possible to provide a pedestrian footway along Whissonsett Road, to link in with the existing provision on School Road and provide a greatly improved and safer pedestrian link from the village to the playing fields and allotments south of the village.

The site is located within Flood Zone 1 (Low Risk) and there are no heritage assets in the immediate vicinity. As previously described, the site is enclosed by a mature hedge, which provides a defensible boundary, and would screen views of the development from the surrounding countryside. The site is, consequently, entirely deliverable, in accordance with the NPPF definition.

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.

Given the matter raised relates to a significant issue that will have implications for development within the village and delivery of the Council's housing target we wish to appear at the Hearing Sessions of the Examination in Public on behalf of Breckland Bridge Limited.

Do you wish to be:

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

Comment

Agent Mrs Sarah Hornbrook (1126421)

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Company / Organisation Ingleton Wood

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Company / Organisation Breckland Bridge Ltd and G F Cole & Sons Ltd

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Event Name Local Plan Pre-Submission Publication Document

Comment by Breckland Bridge Ltd and G F Cole & Sons Ltd ()

Comment ID 406

Response Date 02/10/17 12:13

Consultation Point Map 3.4 Summary of Banham Allocations. ([View](#))

Status Processed

Submission Type Email

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)

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 site is considered to be entirely deliverable and capable of making an important contribution towards satisfying the Council's housing needs during the period up to 2036. The site, in

accordance with the National Planning Policy Framework (NPPF), represents a suitable location for development, is available immediately and is viable, as demonstrated in our Representation at the Preferred Site Options and Settlement Boundaries Stage, which is appended to this form.

However, the Settlement Boundary has not been extended around site LP[003]003. As set out in our comments in relation to paragraph 3.208, the potential for some residential development on this part of the wider site should not be ruled out, as there is no justification to do so. It is therefore proposed that the Settlement Boundary is extended to include site LP[003]003.

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.

Given the matter raised relates to a significant issue that will have implications for development within the village and delivery of the Council's housing target we wish to appear at the Hearing Sessions of the Examination in Public on behalf of Breckland Bridge Ltd and G F Cole & Sons Ltd.

Do you wish to be:

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

Comment

Agent Mrs Sarah Hornbrook (1126421)

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Company / Organisation Ingleton Wood

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Consultee (1129859)

Company / Organisation Breckland Bridge Ltd

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Breckland Bridge Ltd ()

Comment ID 407

Response Date 02/10/17 12:15

Consultation Point Map 3.6 Summary of Garboldisham Allocations ([View](#))

Status Processed

Submission Type Email

Version 0.3

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

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

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.

On behalf of Breckland Bridge Ltd, we support the identification of Garboldisham as a Local Service Centre that will accommodate 35 residential units. It is evident from the text relating to Garboldisham at Paragraph 3.219 that the village provides a range of services which justifies its designation as a Local Service Centre. The village is therefore a sustainable location for modest growth. Accordingly, this aspect of the Local Plan is considered sound as it has been positively prepared.

However, we believe that there is doubt that the proposed allocation of land to west of Hopton Road is deliverable, as defined in the National Planning Policy Framework (NPPF). The two sites which make up the proposed allocation include land within Flood Zones 2 and 3, and it is evident from the Environment Agency's maps that the risk of flooding from surface water is significant. The Lead Local Flood Authority raised concerns about the 'heavy constraints' posed by the risk of fluvial flooding from the ordinary watercourse during the previous round of Public Consultation, on the Preferred Sites and Settlement Boundaries document published in Autumn 2016. These concerns were also borne out by comments from local residents, who referred to the sites being low lying, and prone to flooding/waterlogging. Indeed, Breckland Council's Report on Site Selection (August 2017) identifies that 30% of site LP[031]004 is subject to surface water flooding, and 25% of site LP[031]005. There is no evidence to suggest that this issue has been satisfactorily addressed, which calls into question the ability of the site to deliver the quantum of development proposed.

There is a requirement within the proposed allocation for highways improvements to visibility and the provision of a footway into the village. Whilst the Local Highway Authority have no objection to the development of the sites provided that these measures are implemented, there is no certainty that the necessary improvements can be either viably or practically be achieved.

In addition, Historic England raised concerns during the Preferred Sites and Settlement Boundaries consultation about the potential for development of these sites to erode the fen edge, which is highly sensitive in both heritage and landscape terms. Furthermore, the sites are located close to two County Wildlife Sites. The supporting text to the proposed allocation refers to shared complexities relating to site levels and landscape impact, and requires a Masterplan approach to ensure that both sites are delivered in tandem. This raises further concerns about the suitability and deliverability of the sites.

In light of the above, it is considered that the proposed allocation of land on Hopton Road to meet the full allocation is not justified, nor effective in terms of delivering the required level of growth in the village, and consequently unsound.

In order to make the proposed Plan sound, we suggest that land at Back Street, previously given the reference number LP[031]010, is allocated in preference to the sites on Hopton Road. In earlier Representations at both the Preferred Directions and Preferred Sites and Settlement Boundaries Stages (Representations appended for clarity) we have demonstrated that the site is suitable, available and viable, and therefore deliverable. The site was discounted at a previous stage of Plan preparation, due to alleged highways constraints; however, work undertaken by Richard Jackson, which has been submitted during previous rounds of consultation (and appended to this form for clarity), demonstrates that the reasons given for the site being identified as an Unreasonable Site are not substantiated or justified.

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 Garth Hanlon (11888)

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Company / Organisation Savills

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Consultee Mr Garth Hanlon (11968)

Email Address

Company / Organisation Abel Developments

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Abel Developments (Mr Garth Hanlon)

Comment ID 408

Response Date 02/10/17 12:20

Consultation Point Policy EC 05 Town Centre and Retail Strategy ([View](#))

Status Processed

Submission Type Email

Version 0.3

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

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

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.

In respect of Swaffham, draft Policy EC 05 Town Centre and Retail Strategy seeks to direct limited retail floorspace growth based upon the evidence of the 2017 Breckland Retail Study Addendum. Having regard to the figures contained in that Addendum, as it relates to the projections of new floorspace in Swaffham over the plan period up to 2036, the following are relevant to the town

- 1 Convenience retail floorspace 0 net sq m
- 2 Comparison retail floorspace 1073 net sq m
- 3 Gross food and beverage floorspace 220 sq m

The Council's evidence base is informed by population growth projections taking into account the proposed distribution of growth across throughout the District in accordance with proposed spatial strategy found at Draft Policy HOU 02.

In respect of Swaffham, as mentioned in separate representations, the Council is seeking to plan for a minimum of 1,612 new homes, of which it is stated at paragraph 3.148 that 1,007 have either already been completed or are committed, with a further 525 dwellings benefitting from a resolution to grant planning permission subject to S106 agreement. A large proportion of growth is coming forward to the south of the town.

The Retail Study considers growth at a high theoretical level. Abel Homes has however considered the existing distribution of retail, services and facilities within Swaffham in relation to the growth coming forward. It is considered that there is a need for additional facilities to the south of the town such as local shops, a doctors surgery, and a care home. The introduction of new facilities into the south of the town will assist in enhancing the sustainability credentials of the area.

It is considered that the District Council has missed an opportunity to allocate Land West of Brandon Road, Swaffham (LP[097]014). This site has the potential to accommodate approximately 200 dwellings, a care home, a Health Centre, and local shops. It is considered that this proposal has potential to deliver a wide range of public benefits to the surrounding area and contribute to an enhanced environment with the additional of new facilities

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.

In order to fully consider the details raised in this representation it is requested that we are invited to attend the Examination in Public on behalf of Abel Homes.

Do you wish to be:

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

Comment

Agent Mr Garth Hanlon (11888)

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Consultee Mr Garth Hanlon (11968)

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Company / Organisation Abel Developments

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Event Name Local Plan Pre-Submission Publication Document

Comment by Abel Developments (Mr Garth Hanlon)

Comment ID 409

Response Date 02/10/17 12:20

Consultation Point Policy HOU 01- Development Requirements (Minimum) ([View](#))

Status Submitted

Submission Type Email

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?

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.

Breckland Council is currently in a position where it can not demonstrate a five year housing land supply. A recent appeal decision concludes that the area has experienced persistent under delivery of housing (PINS Ref: APP/F2605/W/16/3154813). It is within this context that it is requested that the Council seeks to plan for an adequate and steady supply of housing throughout the plan period.

It is noted at Draft Policy HOU 01 that Breckland Council is seeking to plan for the provision of a minimum of 15,298 new dwellings over the plan period 2011 to 2036. An average of 612 dwellings per annum.

On 14th September 2017 the Department for Communities and Local Government (DCLG) published a consultation document entitled 'Planning for the right homes in the right places'. This was accompanied by a spreadsheet which applies the proposed formula to calculate housing need. In respect of Breckland, it has been suggested by DCLG **680 dwelling per annum** over the period 2016 to 2026.

Notwithstanding the proposed transitional arrangements stated at Table 1 of the DCLG 'Planning for the right homes in the right places' consultation document, the Council could find itself in a position where it is not planning to meet the full objectively assessed need. On the basis that the Council is now aware of these new figures, it is considered that the Authority should forward plan and to look to increase its housing numbers to this new OAN.

The effect of this would be to amend the wording to read:

"To enable the District to meet future housing needs the Local Plan will provide for no less 17,000 new homes between 2011 and 2036, an average of 680 dwellings per annum."

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

The Plan needs to make full provision for OAN.

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:

Comment

Agent Mr Garth Hanlon (11888)

Email Address

Company / Organisation Savills

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Consultee Mr Garth Hanlon (11968)

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Event Name Local Plan Pre-Submission Publication Document

Comment by Abel Developments (Mr Garth Hanlon)

Comment ID 410

Response Date 02/10/17 10:57

Consultation Point Watton Housing Allocation 2 ([View](#))

Status Processed

Submission Type Email

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 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)

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

Representations have been submitted on behalf of Abel Homes Limited to the 'Preferred Directions' and the 'Preferred Site Options and Settlement Boundaries' stages of the emerging Local Plan. In addition, submissions have been made in response to the 'Call for Sites'. Within all submissions a case has been made for the allocation of Land North of Norwich Road, Watton.

This Pre-Submission Draft of the plan is the first to have identified Land North of Norwich Road, Watton for allocation under draft Policy 'Watton Housing Allocation 2'. As such, details comments about the wording of the policy have not been submitted 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.

Strong support is given to the proposed allocation of Land north of Norwich Road, Watton for at least 45 dwellings and at least 60 bed care home at Watton Housing Allocation 2. It is however suggested that there are a number of minor amendments to the wording of this policy and therefore this representation is considered as an objection

It is acknowledged that draft policy wording requires any applications for development at the allocated site to meet the necessary technical standards. The Council proposes to reinforce this with a series of 10 criteria.

- 1 Criterion 1 seeks the provision of vehicular access via Norwich Road. It is acknowledged by Abel Homes that there will be a need for a new vehicular access at this site which will involve the stopping up of the existing lay-by.
- 2 In addition Criterion 2 seeks the "*implementation of transport mitigation measures to the satisfaction of Norfolk County Council Highways Authority.*"

The site is in a sustainable location and it is confirmed at paragraph 3.189 of the Pre-Submission Draft Local Plan that the Council considers development in this location to represent "*infill development*". The supporting 'Approach to the Selection of Sites' states that "*Norfolk County Council Highways have raised no concerns with the site*".

'The Interim Infrastructure Delivery Plan' (August 2017) states at paragraph 2.87 that "*opportunities to provide safe pedestrian crossing points across Norwich Road alongside wider transport and access improvements will require consideration as part of a transport assessment to support any planning application.*"

In order to be justified, the highways mitigation referenced at Criterion 2 should only be sought where it meets the following tests:

- 1 necessary to make the development acceptable in planning terms;
- 2 directly related to the development; and
- 3 fairly and reasonably related in scale and kind to the development.

Suggested solution:

Criterion 2 "*Implementation of necessary transport mitigation measures to the satisfaction of Norfolk County Council Highways Authority.*"

- 1 Criterion 5 currently states that "*A further landscaping buffer is required on the eastern boundary of the site to provide screening from the adjacent business park. Additional mitigation measures may be required to ensure the protection of residential amenity from the adjacent business park, in line with Policy COM 03;*" Supporting paragraph 3.190 reiterates that consideration of the existing uses adjacent the site to ensure there is no adverse impact on the amenity of new residents.

There is an existing row of mature trees along the eastern boundary of the site, it is questioned what justification there is for 'a further landscaping buffer'? In the detail review of the site and its surrounding context, an alternative approach to amenity mitigation maybe preferential.

Suggested solution:

"Necessary mitigation measures shall be incorporated into the development to ensure the protection of residential amenity from the adjacent business park, in line with Policy COM 03."

- 1 Criterion 8 currently states “A pre-application enquiry with Anglian Water Services is required for this site in accordance with the Water Cycle Study to demonstrate that sufficient capacity is available to transfer wastewater for treatment. Where insufficient capacity within the wastewater network is identified, financial contributions may be sought;”

Whilst it is considered good practice to identify capacity within the waste water network in the event of speculative application, it is however noted that this development is proposed to be allocated and therefore represents planned development. Paragraph 3.11 of the Pre-Submission Draft Breckland Local Plan specifically states that “The Local Plan, through providing individual settlement targets, gives providers and other infrastructure providers greater certainty in the areas for investment.” It is also acknowledged at the same paragraph that these figures are to be treated a “minimum housing requirements”.

Sewerage Undertakers, in this case Anglian Water, have statutory duties requiring them to ensure that its public sewerage and sewage disposal system continues to have the ability to receive and treat the foul flows from planned development.

It is considered that Anglian Water should be a statutory consultee in the determination of planning applications for planned development such as this. There should not be the obligation on the Applicant to pay for a pre-application enquiry to accompany an application for planned development in this location.

Notwithstanding the above, Anglian Water will respond to this consultation and specify whether any improvements to the network or capacity is required. Anglian Water is obliged to provide this infrastructure in a planned manner.

Suggested solution: remove proposed criteria 8

Criterion 10 currently states: “Submission of a project level Habitats Regulation Assessment to determine the impact of proposed development on Breckland SPA/SAC and to assess habitat suitability, the need for additional survey work and mitigation strategies where required.”

The Pre-Submission Draft Local Plan is accompanied by the ‘Breckland Local Plan Habitats Regulations Assessment at Publication Stage’ which has been prepared by Footprint Ecology. It is stated at page 80 of this document in respect of the proposed allocations at Watton that “Both allocations north of Norwich Road and therefore outside the 1500m buffer but within 1500m and 3km from the SPA where survey data is lacking.” It is explained that there is potential for ‘likely significant effects’ due to a lack of data and therefore a project level Habitat Regulations Assessment is requested.

Abel Homes is happy to commission and submit to the Council the necessary ecological survey data at the appropriate time.. It is however the requirement of the Council, as the Competent Authority, to complete the Habitats Regulation Assessment as necessary. Overall we support the policy but with the above comments

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 considered necessary to attend the Examination in Public to allow full and proper consideration of the matters raised about the detailed wording of the proposed policy allocation.

Do you wish to be:

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

Comment

Consultee Maggie Oechsle (1134348)

Email Address

Company / Organisation "NP4Yaxham" Yaxham Neighbourhood Plan Working Group

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by "NP4Yaxham" Yaxham Neighbourhood Plan Working Group (Maggie Oechsle)

Comment ID 412

Response Date 02/10/17 12:37

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

Status Processed

Submission Type Email

Version 0.5

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

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

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

Yaxham is therefore pleased to note that in the settlement hierarchy the parish's main settlements of Yaxham and Clint Green are expressly classed as within the third tier of the settlement boundary as "rural settlements have settlement boundaries" within General Policy GEN 03 and in Housing Policy HOU04 with Settlement Boundary Map 17 "Yaxham & Clint Green".

In addition, the other settlement within this small rural parish is Brakefield Green and comes in below the third tier in the settlement hierarchy (Policy GEN 03) i.e. within “small villages and hamlets outside of settlement boundaries (Policy HOU 05).

On this basis it is considered that this element of the Plan as it affects the Parish of Yaxham meets the test of “soundness” in that it is:

- “positively made” in that it recognises the circumstances of such vulnerable small rural communities that support small-scale organic growth that will retain the character of the villages, enable services to be supported and maintained, but without imposing large-scale inappropriate development.
- “the plan justified” – yes, in that it is consistent with the consultation and policies of the Yaxham Neighbourhood Plan – “made” on 22nd June 2017, having passed at referendum with 92% voting “yes”, on a turnout of 58% i.e. 53% of the electorate voted “yes”.
- “the plan effective” – yes, in that it makes provision for small-scale organic growth, which in time can be substantial.
- “consistent with national policy” – yes as throughout the NPPF and NPPG there is a continual balance to be struck in rural areas of sustainable development that enhances and develops rural communities rather than undermines and destroys. The Yaxham Neighbourhood Plan was deemed to consistent with national policy, and it and the emerging Local Plan are consistent with each other.

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

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

Whilst we believe that this representation can be dealt with by written representations we wish to reserve the right to speak if the small rural parish of Yaxham (some 360) becomes an item of discussion at the Examination in Public.

Do you wish to be:

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

Comment

Consultee Maggie Oechsle (1134348)

Email Address

Company / Organisation "NP4Yaxham" Yaxham Neighbourhood Plan Working Group

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by "NP4Yaxham" Yaxham Neighbourhood Plan Working Group (Maggie Oechsle)

Comment ID 413

Response Date 02/10/17 12:37

Consultation Point Policy GEN 05 Settlement Boundaries ([View](#))

Status Processed

Submission Type Email

Version 0.3

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

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

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

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

Yaxham welcomes in policy GEN 05 addressing the role of settlement boundaries, which had been missing in earlier versions of the emerging Local Plan.

On this basis it is considered that this element of the Plan as it affects the Parish of Yaxham meets the test of "soundness" in that it is:

- “positively made” in that it recognises the circumstances of such vulnerable small rural communities that support small-scale organic growth that will retain the character of the villages, enable services to be supported and maintained, but without imposing large-scale inappropriate development.

- “the plan justified” – yes, in that it is consistent with the consultation and policies of the Yaxham Neighbourhood Plan – “made” on 22nd June 2017, having passed at referendum with 92% voting “yes”, on a turnout of 58% i.e. 53% of the electorate voted “yes”.

- “the plan effective” – yes, in that it makes provision for small-scale organic growth, which in time can be substantial.

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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

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

Whilst we believe that this representation can be dealt with by written representations we wish to reserve the right to speak if the small rural parish of Yaxham (some 360 dwellings) becomes an item of discussion at the Examination in Public.

Do you wish to be:

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

Comment

Consultee Maggie Oechsle (1134348)

Email Address

Company / Organisation "NP4Yaxham" Yaxham Neighbourhood Plan Working Group

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by "NP4Yaxham" Yaxham Neighbourhood Plan Working Group (Maggie Oechsle)

Comment ID 414

Response Date 02/10/17 12:37

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

Status Processed

Submission Type Email

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.

This designation of the settlements within Yaxham Parish recognises their small village rural nature, the distributed nature of settlement within the parish and lack of local services capable of serving the whole community in a sustainable fashion. Yaxham has seen and continues to see small scale organic growth at a rate that is likely to meet or exceed the 7% growth designated for such villages (HOU 02). Indeed at present currently permitted properties equal almost 15% of the current settlement numbers. Each of its main settlements have some services, but are not "available... within the recognised

acceptable walking distance – taken to be 800m.” – Sustainability Assessment Para 19.3 and Table 19.44. Indeed settlements within the Parish of Yaxham are 1km - 3km apart.

On this basis it is considered that this element of the Plan as it affects the Parish of Yaxham meets the test of “soundness” in that it is:

- “positively made” in that it recognises the circumstances of such vulnerable small rural communities that support small-scale organic growth that will retain the character of the villages, enable services to be supported and maintained, but without imposing large-scale inappropriate development.

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- . Notified of the Submission
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Comment

Consultee Maggie Oechsle (1134348)

Email Address

Company / Organisation "NP4Yaxham" Yaxham Neighbourhood Plan Working Group

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by "NP4Yaxham" Yaxham Neighbourhood Plan Working Group (Maggie Oechsle)

Comment ID 415

Response Date 02/10/17 12:37

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

Status Processed

Submission Type Letter

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.

Yaxham welcomes the adoption by the emerging Local Plan of a policy element at the centre of the recently made Yaxham Neighbourhood Plan, namely supporting “development [that] avoids coalescence of settlements” – HOU 03 point 4., HOU 04 point 5., and with different wording HOU 05. On this basis it is considered that this element of the Plan as it affects the Parish of Yaxham meets the test of “soundness” in that it is:

- “positively made” in that it recognises the circumstances of such vulnerable small rural communities that support small-scale organic growth that will retain the character of the villages, enable services to be supported and maintained, but without imposing large-scale inappropriate development.

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Whilst we believe that this representation can be dealt with by written representations we wish to reserve the right to speak if the small rural parish of Yaxham (some 360 dwellings) becomes an item of discussion at the Examination in Public.

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Comment

Consultee Maggie Oechsle (1134348)

Email Address

Company / Organisation "NP4Yaxham" Yaxham Neighbourhood Plan Working Group

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by "NP4Yaxham" Yaxham Neighbourhood Plan Working Group (Maggie Oechsle)

Comment ID 416

Response Date 02/10/17 12:37

Consultation Point Policy HOU 04 - Rural Settlements With Boundaries ([View](#))

Status Processed

Submission Type Email

Version 0.3

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

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

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

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

Yaxham welcomes the adoption by the emerging Local Plan of a policy element at the centre of the recently made Yaxham Neighbourhood Plan, namely supporting “development [that] avoids coalescence of settlements” – HOU 03 point 4., HOU 04 point 5., and with different wording HOU 05. On this basis it is considered that this element of the Plan as it affects the Parish of Yaxham meets the test of “soundness” in that it is:

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Comment

Consultee Maggie Oechsle (1134348)

Email Address

Company / Organisation "NP4Yaxham" Yaxham Neighbourhood Plan Working Group

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by "NP4Yaxham" Yaxham Neighbourhood Plan Working Group (Maggie Oechsle)

Comment ID 417

Response Date 02/10/17 12:37

Consultation Point Policy HOU 05 - Small Villages and Hamlets Outside of Settlement Boundaries ([View](#))

Status Processed

Submission Type Email

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 focus of the Yaxham response is on how the overall Plan affects the parish of Yaxham and whether in this context it is considered to meet the test of "Soundness".

Yaxham is therefore pleased to note that in the settlement hierarchy the parish's main settlements of Yaxham and Clint Green are expressly classed as within the third tier of the settlement boundary as

“rural settlements have settlement boundaries” within General Policy GEN 03 and in Housing Policy HOU04 with Settlement Boundary Map 17 “Yaxham & Clint Green”.

In addition, the other settlement within this small rural parish is Brakefield Green and comes in below the third tier in the settlement hierarchy (Policy GEN 03) i.e. within “small villages and hamlets outside of settlement boundaries (Policy HOU 05).

Yaxham welcomes the adoption by the emerging Local Plan of a policy element at the centre of the recently made Yaxham Neighbourhood Plan, namely supporting “development [that] avoids coalescence of settlements” – HOU 03 point 4., HOU 04 point 5., and with different wording HOU 05. On this basis it is considered that this element of the Plan as it affects the Parish of Yaxham meets the test of “soundness” in that it is:

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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

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

Whilst we believe that this representation can be dealt with by written representations we wish to reserve the right to speak if the small parish of Yaxham (some 360 dwellings) becomes an item of discussion at the Examination in Public.

Do you wish to be:

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

Comment

Consultee Mr Tony Needham (1134647)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Mr Tony Needham

Comment ID 418

Response Date 02/10/17 09:00

Consultation Point 1.39 Paragraph ([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?

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.

The Plan has not been positively prepared, there is not a clear link between the vision, the objectives and the policies with regard to economic development in Dereham.

Third paragraph of the vision, while the A47 corridor is mentioned there are no significant policies to take advantage of the substantial Government investment committed to complete the dualing of the A47 between Dereham and Norwich. The A47 corridor in Breckland has not been identified as a growth area for employment.

The employment land study was completed prior to the announcement of the dualing of the A47 and needs to be updated to take account of this significant change, policies then need to be refined to reflect the revised study in order for the Plan to be sound.

In order to be sustainable there needs to be employment growth along with housing growth.

The emerging Dereham Neighbourhood Plan has a vision which would like to see a balanced approach taking advantage of the A47 improvements to deliver greater employment growth.

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

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

Do you wish to be:

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

Comment

Consultee Mr Tony Needham (1134647)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Mr Tony Needham

Comment ID 419

Response Date 02/10/17 09:00

Consultation Point Policy HOU 02 - Level and Location of Growth ([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 justified?
. Is the plan effective?

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

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

The issue was raised in October 2016 - a detailed report was submitted in January 2017. Issues relating to the transport study have been raised throughout the Local Plan Preparation and are well documented.

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 is not **Justified**, it is not based on sound and credible evidence, an additional housing allocation was added at a late stage of the plan development. The only justification was that there would be slow delivery rate in the far south of the district during the plan period, it was not a positive allocation on the basis of housing need in the north of the district. The planning authority have not developed a sufficient understanding of the road network in Dereham to fully understand the impact

of developments on congestion and the economic knock-on effect of the increased congestion. It has not identified a deliverable solution to the ongoing congestion problems.

Prior to January 2016 the Town Council were content with the level of growth proposed in Dereham. In February 2016 Breckland increased the allocation to Dereham with little justification. Following the Town Council's objections, justification for the increase was provided after the decision was made to increase the allocation.

The increase in allocation without an up to date employment land study or a more detailed understanding of the road network is not using sound evidence to justify the plan.

Effective.

The infrastructure delivery planning for Dereham, highways has not been demonstrated to be effective or deliverable.

Within the Infrastructure Study carried out by EDAW for the LDF it was recommended at para 13.26 that as a result of the growth in Dereham for the LDF, *"the impact needs further investigation in the form of detailed transport modelling to fully understand the impact placed on the transport infrastructure within the town and the A47 junctions."*

Because of the cost this detailed modelling was not carried out as part of the LDF and there has only been limited Transport Study in Dereham Breckland Council acknowledge that there are problems with congestion, but its scope are limited and the results are flawed. The transport study commissioned as evidence to support the local plan did not initially consider Saturdays. Following evidence supplied from the Town Council, a Saturday survey was commissioned. The conclusions of the data did not correspond with the observed conditions on the day of the survey. The Town Council asserts that the Transport study is not sufficiently detailed to form adequate conclusions as it only looked at individual junctions in isolation rather than a detailed traffic model of the town. It identified that a signalised roundabout would be required at Tavern Lane Junction but there is not any clear strategy for the delivery of the roundabout or an understanding what impact such a roundabout would have on the whole network.

Within the Infrastructure Delivery Plan (August 2017) much of the low cost interventions identified to improve junction capacity have been committed via separate funding from NCC. The cost of the signalised roundabout did not include land purchase, the total cost therefore is unlikely to be covered by developer contributions.

To be acceptable the detailed modelling of the road network would need to be carried out before allocation can be made in Dereham. The Town Council has commissioned a comprehensive set of survey data which could be used to develop detailed modelling of the highway network.

The merging Dereham Neighbourhood Plan has identified that locating development where it will either reduce or not contribute to congestion is high priority for residents.

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.

This is a very complex matter which would be difficult to detail in a written response.

Do you wish to be:

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

Officer Response

The Local Plan has been the subject of three regulation 18 consultations in advance of the regulation 19 pre-submission publication period. During the regulation 18 consultation the distribution of housing growth has changed in order to respond to comments received during these periods. A key element of the change has been further evidence being provided which has suggested that the delivery periods for the two sustainable urban extensions would continue beyond the end of the plan period. Therefore it has been necessary to reconsider the spatial distribution to reflect delivery rates and enable the whole OAN to be delivered over the plan period. The District predominantly falls within a single housing market area, influenced by Norwich, and the strategic housing market assessment has provided an OAN reflecting the District boundaries. On this basis the distribution of development across the District (rather than a north south split as suggested within the representation) is considered to be appropriate.

The issues and options consultation sought views on the overall distribution of housing growth across Breckland. At this stage a balanced distribution of growth was supported. It is considered that the approach reflects the presumption in favour of sustainable development as set out within paragraph 14 of the NPPF.

The Dereham Transport Study provides solutions to the evidence transport issues within the town. The housing allocations within the Local Plan make reference to the need to contribute towards highways improvements in line with the studies findings, this is therefore considered to mitigate the transport issues.

The Dereham neighbourhood plan is at an early stage in its formulation and has not been subject to either a regulation 14 or 16 consultation period, therefore it is considered to be at an early stage and no weight can be applied to it at present. However the Council has previously committed to working with the Town Council going forward on the neighbourhood plan.

No further changes proposed to the Local Plan in response to the representation.

Comment

Consultee Mr Tony Needham (1134647)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Mr Tony Needham

Comment ID 420

Response Date 02/10/17 09:00

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

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

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

This policy has been evolving and this is the first time it has been seen in this form, therefore this is the first time there has been an opportunity to comment on this precise form of wording.

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

Not Positively Prepared.

The policy does not adequately meet the objective. The wording needs to be amended to be considered Sound.

Policy Criteria.

1) Development must comprise "infilling" but at criteria (5) developments must not "harm or undermine a visually important gap." While infilling is defined in the supporting text, visually important gap is not defined. "Access to an existing highway" is unclear **and should be clarified.**

2) There does not seem to be any cap on the total amount of developments, which could lead to multiple applications for three units leading to unsustainable developments. **The policy needs to be clarified to prevent multiple applications.**

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

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- . Notified of the Inspectors Recommendations
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Officer Response

The policy seeks to allow limited development within existing hamlets, it refers to infilling, this has been included so as to ensure that it does not lead to the creation of isolated new dwellings within the countryside, which would be contrary to paragraph 55 of the NPPF. A cap on the number of applications has not been included. This is in part due to the complexities of assessing a defined settlement limit when there is no settlement boundary and there may be more than one hamlet or cluster of dwellings within a parish. The policy does however seek to embrace localism by requiring parish council support for an application. No further change is proposed to the policy.

Comment

Consultee Mr Tony Needham (1134647)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Mr Tony Needham

Comment ID 421

Response Date 02/10/17 09:00

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 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)

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.

Not Justified.

The evidence in the Dereham Green Infrastructure Strategy has not been used when developing this policy.

Point 3. The policy only stipulates that native hedging and trees on the outer edge of the site boundary should be retained. Given the high ecological value of this location, all hedging and trees should be retained.

Given the importance of this location adjacent to a county wildlife site and at a junction between the Eastern and Northern green corridors more emphasis should be placed on enhancing the wildlife value of the site making connections between wildlife corridors.

The wording of this policy should be amended so that there is the option to provide a single large LAP rather than two small LAPs - this would then be in accordance with ENV 04.

The emerging Dereham Neighbourhood Plan has identified that enhancing valued green corridors where developers need to identify additional environmental enhancements is a high priority for residents.

The Dereham Transport Study does not provide sound evidence to support allocation.

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

Do you wish to be: . Notified of the Submission
. Notified of the Inspectors Recommendations
. Notified of the Adoption

Officer Response

The representation states that the Dereham Transport Study does not provide sound evidence to support the allocation. It is difficult to respond further on this issue without explanation from Dereham Town Council as to the elements of the transport study which they specifically object to. Through the Local Plan consultations, Norfolk County Council highways have not objected to the development of the site.

Green infrastructure is included under Policy ENV01. This applies to all allocations and planning applications within the District, including this allocation.

The representation makes reference to the Dereham neighbourhood plan. This is at a very early stage of preparation and has not been subject to either its regulation 14 or 16 consultations yet. In this regard it is not considered appropriate to apply weight to the proposals within it.

Comment

Consultee Mr Tony Needham (1134647)
Email Address
Address

Event Name Local Plan Pre-Submission Publication Document
Comment by Mr Tony Needham
Comment ID 422
Response Date 02/10/17 09:00
Consultation Point Dereham Housing Allocation 2 ([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 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)

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

Most of these issues were raised as part of the Site Options consultation in 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.

Not Justified.

The LPA has not demonstrated that the chosen approach is the most appropriate given the alternatives.

The site's connectivity with the town centre in terms of sustainable transport has not been fully considered. Congestion issues have not been adequately dealt with because of the limitations of the Dereham Transport Study.

The site is poorly connected to the town centre being 2km away. The development will therefore be highly reliant on private cars for short journeys. The Dereham Transport study does not address the whole network and only deals with a few individual junctions rather than a model for the whole town.

Part of this site is currently an employment site its loss to housing would have a negative impact due to loss of employment on the town this has not been factored into the decision to allocate this site.

To be acceptable, allocation should be delayed until a greater understanding of the road network is established to identify the best location for new developments in terms of congestion.

Alternative employment allocation should be identified to compensate for the loss on this site because it is close to the Southern Green corridor greater emphasis is placed on enhancements to biodiversity.

The emerging Dereham Neighbourhood Plan has identified that enhancing valued green corridors where developers need to identify additional environmental enhancements is a high priority for residents. And identified that locating development where it will either reduce or not contribute to congestion is high priority for residents.

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

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

Do you wish to be:

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

Officer Response

All sites have been subject to sustainability appraisal, which has allowed for the appraisal of reasonable alternative options.

The site is not a designated general employment area, and contains a range of uses within the site, this includes greenfield agricultural land.

The representation states that the Dereham Transport Study does not provide sound evidence to support the allocation. It is difficult to respond further on this issue without explanation from Dereham Town Council as to the elements of the transport study which they specifically object to. Through the Local Plan consultations, Norfolk County Council highways have not objected to the development of the site.

The representation makes reference to the Dereham neighbourhood plan. Green infrastructure is included under Policy ENV01. This applies to all allocations and planning applications within the District, including this allocation. The neighbourhood plan is at a very early stage of preparation and has not been subject to either its regulation 14 or 16 consultations yet. In this regard it is not considered appropriate to apply weight to the proposals within it.

Comment

Consultee Mr Tony Needham (1134647)
Email Address
Address

Event Name Local Plan Pre-Submission Publication Document
Comment by Mr Tony Needham
Comment ID 423
Response Date 02/10/17 09:00
Consultation Point Dereham Housing Allocation 3 ([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 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)

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.

Not Justified.

The evidence in the Dereham Green Infrastructure Strategy has not been used while developing this policy.

This site is close to the town centre it therefore has significant potential to be highly sustainable. The developer should show clear linkages for walkers and cyclists to access the town centre. The site is adjacent to the central and Northern Green corridors as identified in the Dereham GI strategy, greater emphasis should be placed on improvements to biodiversity.

The emerging Dereham Neighbourhood Plan has identified that enhancing valued green corridors where developers need to identify additional environmental enhancements is a high priority for residents as is improvements to walking and cycling.

The Dereham Transport Study does not provide sound evidence to support this allocation.

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

Do you wish to be: . Notified of the Submission
. Notified of the Inspectors Recommendations
. Notified of the Adoption

Officer Response

The representation states that the Dereham Transport Study does not provide sound evidence to support the allocation. It is difficult to respond further on this issue without explanation from Dereham Town Council as to the elements of the transport study which they specifically object to. Through the Local Plan consultations, Norfolk County Council highways have not objected to the development of the site. Further to the above the site has been the subject of a planning application, through which the issues relating to highways have been further assessed. The site is currently the subject of a call in from the Secretary of State, however it has been recommended for approval by the Council's planning committee.

The representation makes reference to the Dereham neighbourhood plan. This is at a very early stage of preparation and has not been subject to either its regulation 14 or 16 consultations yet. In this regard it is not considered appropriate to apply weight to the proposals within it.

Comment

Consultee Mr Tony Needham (1134647)
Email Address
Address

Event Name Local Plan Pre-Submission Publication Document
Comment by Mr Tony Needham
Comment ID 424
Response Date 02/10/17 09:00
Consultation Point Policy HOU 04 - Rural Settlements With Boundaries
([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 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)

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.

Not Justified.

The evidence in the Dereham Green Infrastructure Strategy has not been used to develop this policy.

This site is adjacent to the central Green Corridor and close to the Northern Green corridor as identified in the Dereham GI strategy, to be acceptable greater emphasis should be placed on improvements to biodiversity, walking and cycling.

The wording of the policy should be amended so that there is the option to provide a single large LAP rather than two small LAPs - this would then be in accordance with ENV 04.

The Dereham Transport Study does not provide sound evidence to support this allocation.

The emerging Dereham Neighbourhood Plan has identified that enhancing valued green corridors where developers need to identify additional environmental enhancements is a high priority for residents. It has also identified that locating development where it will either reduce or not contribute to congestions and walking and cycling improvements are a high priority for residents.

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

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

Do you wish to be:

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

Comment

Consultee Mr Tony Needham (1134647)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Mr Tony Needham

Comment ID 425

Response Date 02/10/17 09:00

Consultation Point Dereham Housing Allocation 5 ([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 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)

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.

Not Justified.

The LPA has not demonstrated that the chosen approach is the most appropriate given the alternatives.

The sites connectivity with the town centre in terms of sustainable transport has not been fully considered. Impact of development in this location is not adequately understood.

A proper link road should be provided between Shipdham Road and Yaxham Road incorporating a twin carriageway road bridge over the railway. NCC own land on the eastern side of the existing bridge on the Southside of Westfield Lane which would accommodate a wider bridge and approach.

This site is adjacent to the Southern and central green corridors as identified in the Dereham Green infrastructure strategy, greater emphasis therefore should be placed on providing net gains in biodiversity.

To make the policy acceptable no development should be permitted unless a proper link road is created between Shipdham Road and Yaxham Road, the policy does not require a proper link road, the absence of a link road would have a detrimental impact on the road network.

Insufficient consideration has been given to the alternative site to the east of Yaxham Road, this site has potential to deliver housing earlier in the plan period because there is an existing detailed application pending and the developer would be willing to make land available for a future link road.

The emerging Dereham Neighbourhood Plan has identified that enhancing valued green corridors where developers need to identify additional environmental enhancements is a high priority for residents. An identified that locating development where it will either reduce or not contribute to congestion is high priority for residents. And identified that locating development where it will either reduce or not contribute to congestion is a high priority for residents.

Transport studies commissioned to support the NP may identify the need for a link for the site.

- 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

Officer Response

Alternative options for Dereham have all been assessed through the sustainability appraisal.

Norfolk County Council have been consulted on this as part of the preparation of the Local Plan and also through the planning application. No objections have been received from Norfolk County Council highways, and furthermore they have not requested that a full link road between Shipdham Road and Yaxham Road. Regulation 122 of the Community Infrastructure Levy regulations require planning obligations to only be sought where they are necessary to make the development acceptable in planning terms. Following the advice of Norfolk County Council, a link road is not considered to be necessary to make the development acceptable in planning terms.

The representation makes reference to the Dereham neighbourhood plan. This is at a very early stage of preparation and has not been subject to either its regulation 14 or 16 consultations yet. In this regard it is not considered appropriate to apply weight to the proposals within it.

Comment

Consultee Mr Tony Needham (1134647)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Mr Tony Needham

Comment ID 426

Response Date 02/10/17 09:00

Consultation Point Policy TR 01 Sustainable Transport Network ([View](#))

Status Processed

Submission Type Letter

Version 0.7

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) . 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.

This policy has not been Positively Prepared.

The policy does not adequately meet the objective. The wording needs to be amended to be considered Sound.

This is a very weak and inadequate policy compared with the strong message in the NPPF. The Policy does nothing to widen the choice or travel opportunities, the policy should better mirror the importance given to sustainable transport in the NPPF.

Point a) this is supported.

Point b) this should relate to public transport hubs rather than just bus stops. NPPF para 35 - stipulates developments should be located where there is access to "high quality public transport facilities" not

just "bus stops". Para 35 also states that plans should exploit opportunities for sustainable transport modes, the Local Plan policy does not exploit opportunities for cycling and public transport hubs.

Point d) this is an outcome not an action, what is lacking is the policy to deliver this outcome.

There are no studies to identify how a coherent cycle network could be developed in all communities experiencing growth. There needs to be a clear understanding of sustainable transport in the market towns so that sustainable modes of transport can be fully exploited.

This policy would be deemed sound if it reflected the NPPF's strong emphasis on maximising the use of sustainable transport in para 34 of the NPPF.

The emerging Dereham Neighbourhood Plan has identified that providing an improved walking and cycling network is a high priority for residents along with supporting long term improvements a rail service.

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

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

Do you wish to be:

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

Comment

Consultee Mr Tony Needham (1134647)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Mr Tony Needham

Comment ID 427

Response Date 02/10/17 09:00

Consultation Point Policy ENV 01 Green Infrastructure ([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?

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

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

In the preferred direction consultation the Dereham Green Infrastructure Strategy was mentioned, but its mention has now been omitted. At that time the draft policy made sense for Dereham because of the mention of the Dereham Green Infrastructure Strategy, now the mention of the Strategy has been omitted the policy does not make any sense.

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 not **Justified**, it is not based on sound and credible evidence. **It is not Effective**, the wording of the policy will not have the stated effect of protecting green infrastructure. It has not been prepared positively as it is contrary to paragraph 165 of the NPPF.

This policy, as it is, is poorly worded. The concept in the Policy of valuing all Green Infrastructure ignores the Dereham Green Infrastructure Strategy and other local GI strategies that assert that certain elements of Green Infrastructure do have greater value than others. In 5.8 Green Infrastructure is identified as all types of green space. In 5.10 the Plan is proposing that the policy "recognises the value of all green infrastructure". The policy only makes sense if a Network of Green Infrastructure has been identified. In Dereham's case it has been identified.

the policy should recognise that Green Infrastructure Strategies already exist, and that new strategies will come along. Norfolk County Council (partly funded by Breckland District Council) are currently producing a County wide GI plan showing priority green corridors.

Despite the Dereham Green Infrastructure Strategy being part of the evidence base for the Local Plan, none for the details of the strategy have been incorporated into the site allocation policies.

The emerging Dereham Neighbourhood Plan has identified Green Infrastructure as a high priority for residents and Town Council has commissioned work to update the Dereham Green Infrastructure Strategy and develop policies which support the connectivity of habitats.

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

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

Do you wish to be:

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

Comment

Consultee Mr Tony Needham (1134647)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Mr Tony Needham

Comment ID 428

Response Date 02/10/17 09:00

Consultation Point Policy ENV 04 Open Space, Sport & Recreation
([View](#))

Status Processed

Submission Type Letter

Version 0.6

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

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

Recent experience with current applications has resulted in developers trying to use all open space as a contribution to outdoor play space. Development control officers have not understood the difference between open space and outdoor play space, it was previously felt that the policy was sufficiently robust but recent experience suggest that the wording needs to be improved.

The desire to have additional open space in south of Dereham was raised as part of the Open Spaces Assessment consultation.

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.

Not Positively Prepared.

The policy does not adequately meet the objective. the wording needs to be amended to be considered Sound.

For existing provision.

Condition (a) - at the beginning of the sentence should be reworded to read ".... That where there is an excess of both recreation and amenity open space...." The justification for this is that there could be an excess of amenity space but a shortfall of recreation open space, but the excess of one type helps mitigate the shortfall in the other and should be protected. At the end of the sentence the wording should be changed to ".... will not result in a current or likely shortfall, of any particular type of open space, during the plan period." The reasoned justification for this is that if there is a shortfall in play space but an excess of amenity, the excess of one helps mitigate the shortfall in another.

There is evidence that developers are trying to incorporate any piece of open space as part of their contribution towards Outdoor Playing Space. It would be helpful if there was clarity built into this policy to prevent it being misinterpreted. Clarity should be given that outdoor play space is a particular type of open space and that they should be laid out specifically for the purpose of outdoor play and no other purpose.

Dereham along with many other settlements have a significant shortfall in outdoor play space, the policy does not help to address this shortfall.

The emerging Dereham Neighbourhood Plan has identified that the provision of open space is a high priority for residents.

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

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

Do you wish to be:

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

Comment

Consultee Mr Tony Needham (1134647)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Mr Tony Needham

Comment ID 429

Response Date 02/10/17 09:00

Consultation Point Policy ENV 06 Trees, Hedgerows and Development
([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?

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

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

The wording has significantly changed since the preferred direction consultation. The Town Council gave detailed comments on the wording of the proposed policy in the preferred direction version.

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 has not been Positively Prepared.

The policy does adequately meet the objective. The wording needs to be amended to be considered sound.

The wording of this policy has significantly changed since the Preferred Directions consultation. The new wording significantly weakens the protection this policy should provide for significant trees and hedgerows.

Second paragraph, the words "loss of protected trees and hedgerows will be resisted" should be included. At the end of the last sentence the words "only in exceptional circumstances" should be inserted between the words 'permitted' and 'where.'

Point a) insert the words "here it can be clearly demonstrated that" at the beginning of the sentence.

Point b) this is a wholly subjective measure and because it is subjective, provides no effective protection for protected trees and hedgerows. It should be removed as it is the case that there can be an exception to any policy if the planning committee permit it. The planning committee has the power to make exceptions to any policy there doesn't need to be a policy saying that there can be an exception to the policy as that power already exists.

Next paragraph - the wording in the LDF and the Preferred Directions consultation was more acceptable. The proposed wording places no value on the Trees and ignores hedgerows altogether. The policy allows for the removal of an 800 year old veteran oak tree by replacing it with a bare rooted whip. Where hedgerows are removed they should be replaced with native hedging.

The emerging Dereham Neighbourhood Plan has identified Green Infrastructure as a high priority for residents and the Town Council has commissioned work to update the Dereham Green Infrastructure Strategy and develop policies which support the connectivity of habitats.

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

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

Do you wish to be:

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

Comment

Consultee Mr Tony Needham (1134647)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Mr Tony Needham

Comment ID 430

Response Date 02/10/17 09:00

Consultation Point Policy ENV 09 Flood Risk & Surface Water Drainage
([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?

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.

Recent experience with developers have resulted in additional volumes of water being delivered to watercourses which have not needed to deal with these volumes previously causing flooding off site.

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.

Not Positively Prepared.

the policy does adequately meet the objective. The wording needs to be amended to be considered Sound.

While the run-off rate from any site may not increase, the overall volume would increase, developers should therefore be required to rehabilitate water courses off-site to ensure that these additional volumes can be accommodated.

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

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

Do you wish to be:

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

Comment

Consultee Mr Tony Needham (1134647)
Email Address
Address

Event Name Local Plan Pre-Submission Publication Document
Comment by Mr Tony Needham
Comment ID 431
Response Date 02/10/17 09:00
Consultation Point Policy EC 01 Economic Development ([View](#))
Status Processed
Submission Type Letter
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) . Yes at Preferred Directions Stage (January - February 2016)

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

As PD06 in preferred directions.

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.

Not Positively Prepared.

The policy does not adequately meet the objectives set out in Para 20, 21 of the NPPF.

Dereham Town Council has consistently looked for a balanced approach to development with Jobs growth balancing with housing growth. The Town has recently lost employment land off Westfield Road to residential development and housing allocation 2 will result in the loss of employment. The existing

employment sites are mostly built out and it cannot currently be demonstrated that allocation D5 is deliverable because of access and willingness of land owner to bring it forward for employment.

It is believed that an additional 3 Ha employment land for Dereham is insufficient to provide a variety of opportunities for potential employers or the level of jobs to account for the growth in Dereham over the plan period.

The employment land study completed in 2013 did not take account of Dereham's increased employment potential resulting from the announcement of the completion of the dualing of the A47 to Norwich.

Dereham, with better access to Norwich and receiving a larger housing growth, is allocated 3.1ha of employment land while Swaffham, which is more distant from Norwich will be given an allocation of 8.8ha of employment land. This mismatch does not seem to be based on sound evidence.

The emerging Dereham Neighbourhood Plan has a vision which would like to see a balanced approach taking advantage of the A47 improvements to deliver greater employment growth.

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

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

Do you wish to be:

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

Comment

Consultee Mr Tony Needham (1134647)
Email Address
Address

Event Name Local Plan Pre-Submission Publication Document
Comment by Mr Tony Needham
Comment ID 432
Response Date 02/10/17 09:00
Consultation Point Saved Policy - Policy D5 Land east of Dereham Business Park ([View](#))
Status Processed
Submission Type Letter
Version 0.2

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

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

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

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

This site as a saved policy was not consulted on.

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.

Not effective.

it has not been demonstrated that this land is deliverable during the plan period. It does not currently have access to the highway.

To be deemed sound the policy would need to take into account an up-to-date employment land study and allocate on the basis of this study.

There is no clear evidence that this land is deliverable .

- a) Provision should ne made for an eventual highways link to the A47 junction to the east of the site at the Mattishall Road.
- b) There should be a footway and cycle path link to the north as Cherry lane is claimed as a restricted byway and therefore can be used by cyclists.
- c) Stipulating noise attenuation seems a bit odd given its distance from residential properties
- d) The need for new structural landscaping seems a bit onerous.

The policy that working hours may be restricted is again a bit onerous and would make potential developers look elsewhere.

The conditions contained in the policy are too restrictive by comparison with allocation SW2&3 in Swaffham, these unnecessary restrictions will deter potential developers bringing employment to Dereham on these sites.

The emerging Dereham Neighbourhood Plan has identified that having a balanced development in Dereham which will support additional employment growth is a high priority for residents.

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

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

Do you wish to be:

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

Comment

Consultee Mr Tony Needham (1134647)
Email Address
Address

Event Name Local Plan Pre-Submission Publication Document
Comment by Mr Tony Needham
Comment ID 433
Response Date 02/10/17 09:00
Consultation Point Breckland Local Plan Pre-Submission Publication ([View](#))
Status Processed
Submission Type Letter
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 Council has developed a much greater technical understanding of the Town Centre which has been driven by the Neighbourhood Plan consultation identifying the a vibrant town centre as a high priority for residents of Dereham.

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.

Not Positively prepared.

The policy will not meet the objectives of maintaining a vibrant town centre.

Whilst the main text of the draft Local Plan outlines those saved employment allocations from the 2012 Site Specific Policies & Proposals DPD which as proposed to be taken forward in the new Local Plan, the main text appears to be silent on the saved town centre/retail allocation which is to be taken forward. This is despite the Town Centre Inset Proposals Map for Dereham showing the George Road/Cowper Road allocation (D6) as a 'saved retail allocation'.

Given the importance of identifying land to accommodate identified needs, the main text of the draft Local Plan needs to make specific reference to D6 including the range of land uses which are considered acceptable and the key issues for bringing forward redevelopment of the different parts of this area.

The Town Council considers that the Wrights Walk Phase II area should also be identified as a potential town centre redevelopment opportunity along with the further opportunities in the town centre which may also be identified via the Dereham Neighbourhood Plan.

These site allocations should be shown on the proposals maps and the main text in order that the Plan meets the expectations of paragraph 23 of the NPPF.

The emerging Dereham Neighbourhood Plan for Dereham has identified a vibrant town centre as high priority for residents.

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

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

Do you wish to be:

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

Comment

Consultee Mr Tony Needham (1134647)

Email Address

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Mr Tony Needham

Comment ID 434

Response Date 02/10/17 09:00

Consultation Point Policy EC 05 Town Centre and Retail Strategy ([View](#))

Status Processed

Submission Type Letter

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?

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.

Some comments were made as part of the Preferred Directions, but a greater level of understanding of town centre issues has been developed along with understanding that this is a big priority for residents and recent experience of the sequential test not being used effectively.

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.

Not Positively Prepared.

The policy does not adequately meets the objectives set out in Para 23-37 of the NPPF. **Not justified**, it has not based on sound and credible evidence.

The Town Council supports the move away from having policies relating to detailed restrictions on the amount of specific Classes of use within the town centre.

The Town Council supports the desired outcome of the policy to maintain a vibrant and viable town centre, the policy has insufficient clarity to provide this protection.

Words should be included so that there is clarity regarding the detail required in the sequential test, e.g. *a detailed assessment of whether there are any suitable and available sites/premises in sequentially preferable location to accommodate main town centre use proposals outside of primary shopping areas (taking into account the need for applicants to be flexible in scale and format).*

The words "except where it serves a local need" should be removed as it introduces a very low threshold, is vague and almost anybody could justify anything on the basis of serving a local need.

The justification for giving protection to rural shops and facilities on the basis of maintaining viability and vibrancy is sound. The wording should be changed however to make it clear that this policy relates to shops and services in all rural areas not only those in designated service centre.

It should also be extended to local facilities and services in the Market Towns. The Local Plan justifies allocations south of Dereham, even though they are 2km from the Town Centre, on the basis that there are local shops and other services in this location. If these shops and services are needed to make these allocation acceptable, then it makes sense that these local services and facilities are given protection in the planning system.

Policy EC05 and Table 6.3 indicate that the net convenience goods floorspace capacity for Dereham is 1,950sqm net between 2017-2036. This is taken from Breckland retail Study 2017 Addendum. However, following a review of the 2017 Addendum report, we are concerned that the convenience goods expenditure/floorspace capacity assessment does not take into account the recently developed ALDI store in Dereham. If this is the case then the floorspace capacity figure for Dereham in EC05 and Table 6.3 is an over-estimate. The small amount of comparison goods floorspace within the ALDI store will also affect the comparison goods floorspace figure in EC05 and Table 6.3.

In addition, the contents of EC05 and Table 6.3 just provide the total level of quantitative capacity/need for the period 2017-2036. In light of the reasonable comments in paragraph 6.2 of Retail Study 2017 Addendum (which repeat the contents of paragraph 7.54 of the 2014 Retail Study) it is considered that the levels of capacity/need for the different parts of the assessment period (i.e. 2017-2026 and 2026-2036) should be provided.

EC05 sets the threshold for the retail impact test in Dereham at 1,000sqm gross. It would appear that this is based upon advice on impact thresholds on the level of forecast capacity (at that time) and also, in relation to Dereham, that it is "capable of absorbing more trade diversion and impact." However, no justification is provided for this statement and it would appear that NLP's approach is contrary to the NPPG which asks for consideration of the following factors:

- 1 scale of proposals relative to town centres
- 2 the existing viability and vitality of town centres
- 3 cumulative effects of recent developments
- 4 whether local town centres are vulnerable
- 5 likely effects of development on any town centre strategy
- 6 impact on any other planned investment

These factors were not considered by NLP and the Town Council considers if these factors are taken into account then the threshold will need to be set much lower.

The Town Council considers that a much lower threshold is justified when the size of existing retail stores in Dereham town centre is considered. Out of centre retail proposals, particularly comparison goods proposals, in the size range 500-1,00sqm are likely to be particularly harmful to the health of the centre.

The emerging Dereham Neighbourhood Plan has identified that improving the vibrancy of the Town Centre is a big priority for residents. The Town Council has commissioned additional studies to look at the town centre, this may produce additional policies and action points to improve the vibrancy of the town centre.

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

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

Do you wish to be:

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

Comment

Consultee Mr John Carey Bennett (1135560)
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Event Name Local Plan Pre-Submission Publication Document
Comment by Mr John Carey Bennett
Comment ID 435
Response Date 02/10/17 12:44
Consultation Point 4 Transport ([View](#))
Status Inadmissible
Submission Type Email
Version 0.2

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

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

Have you raised this issue before during previous consultations? (Please tick the appropriate box) . 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 have not raised this issue before please use the following box to explain why.

My focus on previous plans has been on Local Issues - connected to Shipdham - we moved here from West Hertfordshire in November 2014.

Shipdham has 1000 vehicles a day passing though it and it will be detrimentally affected by the increase in traffic.

The Emerging Local Plan looks at the whole of Brecklands and therefore must take account of Commercial and Residential movements of people and goods as well as where they are situated. All the relevant factors must be included.

We lived in Hertfordshire for 8 years - **Herts Planning at Markyate PC, Dacorum District and County levels** taught me a lot about Road Infrastructure issues and Planning,

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 Emerging Local Plan 2011-2036 is unsound in one main respect:

- 1 There is a lack of consideration and an absence of analysis on the impact that the potential residential and commercial developments will have on the communications infrastructure that links these Breckland communities.

Traditionally this missing infrastructure analysis is about road traffic and the facilities supporting the road network for safe passage, refuelling and repair, incident alerts and management, repair and upkeep of surfaces, drainage, signage and control systems, adequate fast access for emergency services and increasingly, intelligent transport systems. Its importance as a planning factor is increasing as it is required to address social developments, health and safety, emergency planning and business profitability.

The Emerging Local Plan proposes developments in Brecklands that will more than double the traffic on the main routes (A47, A11 plus A1075, A1065 and A134) in the first 10 years of the period. In particular, the A1075 will be of increasing importance for a resurgence of Dereham, Thetford and Attleborough linking businesses, their workforces and the multiple new residential initiatives. The A1075 cuts through multiple villages and townships and is already a safety hazard in Shipdham. Surveys in Shipdham show that up to 1,000 vehicles of all types every day pass through the village. Alternative cross-county routes are on minor roads and are unsuitable for commercial and frequent personal use.

The lack of a plan for the road infrastructure as part of the Emerging Local Plan makes the Local Plan incomplete. By omitting key planning factors, when applied to people's private lives, working hours and recreation, the Plan becomes an unsound basis for decision-making and community development.

In order to complement the Emerging Local Plan, a full review of the Communication Infrastructure by the Highways Agency is necessary. It must address the changing patterns of transport caused by the introduction of hybrid and electric models for all new cars in the next 5 years and the phasing out of diesel and ICE vehicles in the next 15 years, all within the core timescale of the Emerging Local Plan. These factors will affect the traditional road infrastructure in ways that are as yet unforeseeable. Both Plans need to have contingency measures built into them to manage these uncertain outcomes.

Although these radical initiatives are driven by Urban and National Planning Authorities globally, they will impact Brecklands in the same time frame. The A47, A11 and A1075 provide vital road traffic links for Norfolk with East Anglia, the UK and Europe.

Road Transport is going to go through extraordinary changes by 2036 and these should be taken into consideration. Road Infrastructure is probably the only one topic which needs more than a few paragraphs. It needs a complete section in conjunction with Highways.

All in other aspects, the Emerging Local Plan is a good planning document.

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

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

Do you wish to be:

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

Comment

Agent	Mr Jamie Roberts (1032205)
Email Address	
Company / Organisation	Pegasus Group
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Consultee	(1032208)
Company / Organisation	Hans House Group of Companies
Address	C/O Agent - -
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Hans House Group of Companies ()
Comment ID	436
Response Date	02/10/17 12:57
Consultation Point	Policy HOU 02 - Level and Location of Growth (View)
Status	Processed
Submission Type	Email
Version	0.2
Files	CAM 1051 Attleborough Pre-Sub Reps 021017 Rev A.pdf
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?
Have you raised this issue before during previous consultations? (Please tick the appropriate box)	. Yes at Preferred Directions Stage (January - February 2016)

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

Further to policy GEN3, policy HOU2 directs development in the order of 2,650 additional dwellings to Attleborough over the Plan period (in addition to existing commitments). Yet the HOU2 figure appears simply to be a retrofitting of forecast delivery rates at the Attleborough SUE (policy GEN4, discussed below) rather than a reflection of its true capacity and potential to accommodate growth. We note that previous versions of the Plan (including the Preferred Directions version) sought to direct a higher level of growth of some 4,000 dwellings, to Attleborough. There is potential at Attleborough to deliver further housing commensurate with its status at the top of the settlement hierarchy and to make the most of its sustainability credentials. As such, policy HOU2 is not justified nor positively prepared and an increase in the amount of housing to be directed to Attleborough should be considered.

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 policy raises important issues over the strategy for Attleborough and the district which would benefit from exploration at an examination hearing.

Do you wish to be:

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

Comment

Agent Mr Jamie Roberts (1032205)

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Company / Organisation Pegasus Group

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Consultee (1032208)

Company / Organisation Hans House Group of Companies

Address C/O Agent
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Event Name Local Plan Pre-Submission Publication Document

Comment by Hans House Group of Companies ()

Comment ID 437

Response Date 02/10/17 12:57

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

Status Processed

Submission Type Email

Version 0.4

Files [CAM 1051 Attleborough Pre-Sub Reps 021017 Rev A.pdf](#)

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 Directions Stage (January - February 2016)

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

Policy GEN3 establishes a settlement hierarchy for Breckland which identifies Attleborough as one of the two Key Settlements at the top of the hierarchy. This approach is supported. Attleborough benefits from a wide range of local services and employment, and good public transport connections by local buses and regional railway services on the Breckland Line. Given this range of services, it is self-evidently a sustainable location for development and our client supports the prioritisation of Attleborough for growth.

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 policy raises important issues over the strategy for Attleborough and the district which would benefit from exploration at an examination hearing.

Do you wish to be:

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. Notified of the Adoption

Comment

Agent	Mr Jamie Roberts (1032205)
Email Address	
Company / Organisation	Pegasus Group
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Consultee	(1032208)
Company / Organisation	Hans House Group of Companies
Address	C/O Agent - -
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Hans House Group of Companies ()
Comment ID	438
Response Date	02/10/17 12:57
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	Email
Version	0.3
Files	CAM 1051 Attleborough Pre-Sub Reps 021017 Rev A.pdf
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 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 Attleborough SUE is anticipated to deliver approximately 4,000 dwellings of which 2,650 are to come forward within the LP period. A development of this significant scale will require the provision of substantial amounts of supporting infrastructure, including a link road to cross the railway. We are concerned that by pursuing policy GEN4 rather than allocating a range of smaller sites, the LPA is 'placing its eggs in one basket', so to speak. As such, we consider the LP is not justified and not effective.

Deliverability of the SUE

Paragraph 2.28 of the LP explains that the Attleborough SUE is the only allocated site for residential development in Attleborough. If the SUE fails to come forward in line with the forecast trajectory (in terms of both timescales and delivery rates), it means that there is little opportunity, apart from windfall schemes, to deliver housing in this sustainable settlement, and to deliver on the sustainability objectives set out in the SA. This could place pressure on other settlements lower down the settlement hierarchy and undermine the wider plan strategy. Conversely, the allocation of smaller sites in Attleborough would result in a wider choice of sites and development locations in the town, meaning delivery rates could be maintained and thereby making best use of the opportunities for sustainable development in Attleborough.

The Housing Trajectory envisages delivery at the site commencing in 2019/20. This is not realistic. Although a planning application was submitted for the site in August 2017 (LPA reference 3PL/2017/0996/O), it is subject to complex and unresolved issues which will need to be negotiated during the planning process. These include a holding objection from Highways England owing to insufficient information having been provided on potential impacts upon the A11 trunk road. There is also substantial local objection in respect of the impact the proposed SUE will have in terms of the amount of traffic to be routed through Hargham Road. If a resolution to grant permission is secured, it will be necessary to negotiate a Section 106 agreement. For a site of this scale, such an agreement will be extremely complex (taking into account deliverability, developer's cash flow, 'trigger points' for the provision of supporting infrastructure) and it is not unusual for such negotiations to be protracted. Other subsequent processes will include completion of necessary land transactions, the approval of reserved matters, the discharge of all relevant pre-commencement conditions, before construction can commence.

The Thetford SUE provides a recent local example of the complexity and length of this process. An application for the SUE was submitted in July 2011 (LPA reference 3PL/2011/0805/O); over three years elapsed before its presentation to Planning Committee in April 2014 and a further twenty months elapsed before the Section 106 agreement was signed in November 2015 and the permission granted. It is now October 2017 and the Housing Trajectory still envisages completions from 2019/20 onwards – a full eight years after the submission of the application.

Past experience in Breckland clearly shows that delivery of the Attleborough SUE will likely be subject to significant delay against the published housing trajectory. This will naturally have implications for the five year housing land supply in Breckland and the ability of the LPA to meet the planned housing delivery tests which are expected to be introduced by Government as part of the package of planning reforms set out in its Housing White Paper of 2017. With no other allocated sites, it will not be possible to deliver meaningful amounts of housing in Attleborough. This will increase pressure on the local housing market and may mean housing will need to come forward on a speculative basis in other locations in Breckland with comparatively fewer local services, employment opportunities or access to public transport. Meanwhile opportunities to deliver development in the sustainable location of Attleborough will simply be unable to be realised.

The potential of land at White House Lane

With the above in mind, we consider that the LP must take a different approach. Sustainable urban extensions are a valid way of meeting housing need but as we have identified, they are prone to lengthy lead-in times. In the meantime, there are sites which are able to come forward more promptly and as such, maintain the continuous rolling delivery of new homes in the district and the achievement of a five year housing land supply. The Local Plan should therefore take positive steps including allocation of additional sites.

Such sites include land at White House Lane, Attleborough. This particular site is being promoted by the Hans House Group of Companies and can accommodate approximately 300 dwellings and public open space. There is also potential to provide a new primary school at the site. The smaller scale of the site means that the planning process is likely to be less complex and the infrastructure burden will be considerably smaller.

It is noted that the 2014 SHLAA discounts the site (SHLAA reference A08) principally due to impact on the railway crossing. It otherwise notes that the site is suitable for development in all other respects. We consider that the reason for discounting the site is unfounded; the LPA evidently accepts there is capacity at the B1077 railway and within the local highway network crossing to accommodate 1,200 dwellings; that being the amount of development envisaged at the SUE under policy GEN4 before delivery of the link road is required. The figure of 1,200 is not reflective of the maximum capacity of the road network; the Transport Assessment supporting the planning application for the SUE (document reference 1409-42/TA/01, paragraph 4.27) models the impact of 1,650 dwellings prior to delivery of the link road and confirms there is adequate capacity within the local road network to accommodate that higher level of growth. Finally we note the SHLAA noted that the railway crossing would require automation; this has now been carried out by Network Rail as part of the modernisation and resignalling of the Breckland Line. As such, there is no substantiated or compelling reason why land at White House Lane could not come forward for development.

The site also offers the potential to deliver other local benefits, as discussed below.

Linear park

The Attleborough Neighbourhood Plan, which is at an advanced stage of preparation, proposes a 'linear park' around the eastern edge of Attleborough. The route includes White House Lane. By allocating land at White House Lane, there is potential to integrate the public open space of the scheme into the wider linear park, creating new opportunities for recreation and leisure (e.g. through the creation of continuous walking and cycling routes) within land which is currently inaccessible to the public and along a route which could be pleasant but which currently has no footway and few suitable locations for pedestrian refuge.

Link road alternatives

There is the potential to deliver a link road which takes an alternative alignment around the east of Attleborough (see Appendix 2). This would link the B1077 to the A11 at the limited access junction to the east of Attleborough which is grade-separated and free-flowing. This alternative route could be routed through another site north of the railway which is being promoted by Taylor Wimpey; it is noted that Taylor Wimpey carried out some initial feasibility work on the route of this during earlier stages of the Local Plan process. As part of an eastern link road, the A11 junction can be upgraded to an

'all-movements' junction and the Hans House Group of Companies has been in preliminary discussions with Highways England as the operator of the A11 to explore how this may be achieved.

Facilitating new development in Attleborough town centre

The delivery of a new school site would enable the relocation of existing school uses at the Attleborough Academy. The Hans House Group of Companies is promoting a town centre development scheme (see Appendix 3) which would deliver new retail and community floorspace to accommodate the needs of Attleborough and its hinterland as its population expands over the course of the Plan period. Such a scheme would secure the regeneration of the existing Queen's Square car park which adjoins the Attleborough Academy site.

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 policy raises important issues over the strategy for Attleborough and the district which would benefit from exploration at an examination hearing.

Do you wish to be:

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

Comment

Agent	Mrs Sarah Hornbrook (1126421)
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Address	
Consultee	(1129859)
Company / Organisation	Breckland Bridge Ltd
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Breckland Bridge Ltd ()
Comment ID	439
Response Date	02/10/17 13:09
Consultation Point	Map 3.10 Litcham Settlement Boundary. (View)
Status	Processed
Submission Type	Email
Version	0.4
Files	47182-PP-001.pdf 3627-8-100-Site Plan.pdf RJ Ltd - 47182 - Litcham ltr report - Sept 17.pdf
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)

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.

On behalf of Breckland Bridge Limited, we support the identification of Litcham as a Local Service Centre that will accommodate 22 residential units. It is evident from the text relating to Litcham at Paragraph 3.256 that the village provides a range of services which justifies its designation as a Local Service Centre. The village is therefore a sustainable location for modest growth. Accordingly, this aspect of the Local Plan is considered sound as it has been positively prepared.

However, notwithstanding an extensive Call for Sites process, the Local Plan does not allocate a site to accommodate the identified housing growth. The Council's strategy is to accommodate the identified growth through the application of Policy HOU 03 which facilitates residential development in locations such as Litcham, subject to the satisfaction of criteria relating to: proximity to Settlement Boundary, number of units in relation to forecast housing growth, design and prevention of coalescence of settlements.

The approach to accommodating forecast growth in Litcham is considered unsound given that a reasonable alternative exists. More specifically, whilst Paragraph 3.258 of the draft Local Plan states that no suitable sites have been identified. Land at Wellingham Road (Site Reference LP(054)002) is a site which is deliverable and capable of accommodating the identified 22 units, whilst providing substantial community benefits.

This site, which extends to circa 1.7 ha, is immediately adjacent to the existing Settlement Boundary, and as well as providing a logical extension to Litcham, is capable of accommodating the forecast housing growth for the village. In addition, due to the site being surrounded on two sides by existing residential development, it is possible for the site to, in principle, be developed to ensure that it would have limited impact on the landscape or heritage assets of the village and the surrounding area. Furthermore, this site would not result in the coalescence of settlements.

The site has previously been discounted by the Council on the basis that it would give rise to 'severe highways constraints'. However, as detailed in the representation submitted to the Preferred Site Options and Settlement Boundary Stage consultation, work undertaken by Richard Jackson Consulting Engineers demonstrated that highways constraints at the site are not severe and do not preclude development and delivery of this site for housing.

The work undertaken by Richard Jackson has been updated for the purposes of this representation and to reflect the proposed development of the site for approximately 22 dwellings. The work, which is attached to this representation, demonstrates that in terms of vehicular access, accessibility to services and other modes of transport, the site is entirely acceptable. The work also details how new pedestrian facilities and minor road widening can be provided within the locality to ensure appropriate access to the local highway network is facilitated. These works, which have been costed and are considered viable as part of the development, would provide community benefits, particularly the provision of a footpath from Weasenham Road to the primary school.

Based on the foregoing, it is evident both that the site is capable of satisfying the criteria detailed in Policy HOU 03 by which future proposals for development in Litcham would be assessed and that it would not give rise to severe highways constraints.

Representations demonstrating that the site is suitable, available and viable, and therefore deliverable in accordance with the NPPF definition, have been submitted to the Council at both the Preferred Direction Stage (January – February 2016) and the Preferred Site Options and Settlement Boundaries Stage (September to October 2016). For ease of reference, copies of those representations submitted in October are attached. It is, therefore, suggested that that to ensure that the Local Plan is justified, effective and provides certainty in terms of the delivery of housing requirements during the Plan period, the site is allocated for residential development.

The Pre-Submission Local Plan Policies Map for Litcham identifies this site as Open Space. Notwithstanding previous consultation documents, this is the first time that the site has been identified for Open Space. It is understood that the allocation is a result of the Council's 2015 Open Space Assessment in which the site is identified as natural / semi-natural green space. The primary purpose of such space is wildlife conservation, biodiversity and environmental education and awareness, and informal recreation. However, the site does not currently perform any of these functions. The site has limited wildlife value, being managed by Breckland Council on a regular basis, and its only recreational

use is for dog walking. It is, therefore, considered that the proposed allocation of this site as Open Space is not justified.

Notwithstanding the above, an opportunity exists to revise the Settlement Boundary as shown on Map 3.10 and allocate the site for both Open Space and residential development, which will satisfy the identified need for both uses. In terms of the former, the Council's 2015 Open Space Assessment states that there is no children's play space or sports/recreation provision within the village – a significant deficit. Given that the site extends to 1.7 hectares, the opportunity exists to develop approximately half of the site for residential development, with the remainder providing open space to meet the clear need for recreational facilities in the locality. An indicative plan detailing how the site could be developed is attached to this representation. As a result, the development would provide a significant benefit to the local community. This is recognised in previous representations submitted by the Parish Council (Comment ID: 145 and 305).

In summary, the amendments proposed would ensure that the Local Plan is sound. The allocation of the site for part residential / part open space and the extension of the Settlement Boundary as shown on Map 3.10, would mean that Litcham is capable of delivering its identified housing growth, whilst also providing infrastructure requirements, notably children's play space and highway improvements, for which there is a clear identified need.

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.

Given the matter raised relates to a significant issue that will have implications for development within the village and delivery of the Council's housing target we wish to appear at the Hearing Sessions of the Examination in Public on behalf of Breckland Bridge Limited.

Do you wish to be:

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

Comment

Agent Miss Nicol Perryman (1131089)

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Company / Organisation Great Hockham Estate

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Great Hockham Estate (Nicol Perryman)

Comment ID 440

Response Date 02/10/17 13:39

Consultation Point Map .7 Hockham Settlement Boundary ([View](#))

Status Processed

Submission Type Email

Version 0.3

Files [Hockham - Proposed Settlement Boundary.pdf](#)

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)

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.

On behalf of the Great Hockham Estate, we do not agree with the proposed approach to the settlement boundary for Hockham for reasons outlined as part of the Estate's response to Policy HOU 04 and at Regulation 18 consultation (see attached).

It is evident that a certain level of growth will be required in Hockham during the Plan period. As currently proposed, the settlement boundary for Hockham has not been revised to accommodate any land to accommodate the forecast growth. As it stands, future growth is to be accommodated through, amongst other things, developments of up to 5 units in locations adjacent to the settlement boundary, in accordance with Policy HOU 04. For the reasons outlined in our response to Policy HOU 04, it is considered that a more co-ordinated and sustainable approach to development would be to identify specific sites to enable the location of future development to be controlled and managed. It is noted, by virtue of the 'Preferred Settlement Boundary' presented by Hockham Parish Council at the Regulation 18 consultation, that the Parish Council support this approach. The Council's lack of consideration of the Parish Council's views is considered contrary to paragraph 155 of the NPPF.

On this basis, we would recommend that the following two areas of land are incorporated into the settlement boundary for Hockham to promote land for sustainable and co-ordinated development for the benefit of this community. The revised settlement boundary is detailed on the attached plan – Hockham – Proposed Settlement Boundary.

1. Land to the North of Wretham Road

The revision of the settlement boundary to include the site, which was, in part, supported by the Parish Council at the Regulation 18 consultation, would represent a logical extension to the village. The site is immediately adjacent to Wretham Road, providing ease of access to both the village and the A1075. It is square in shape and extends approximately 120 metres north of Wretham Road and 130 metres west of the existing settlement boundary. The site is well screened from public vantage points by mature landscaping, meaning that it has the potential to be accommodated with limited visual impact. The vegetation to the west of the site would also create a clear and defensible boundary for the village.

The suitability of the site was considered by the Council in the Strategic Housing Land Availability Addendum (SHLAA) (2015). The assessment, which also included land to the north, stated that 'This site is well related to existing services and facilities within Great Hockham. In addition the site is not within a groundwater source protection zone and it is not on a designated site and although it sits on grade 4 agricultural land, this is not the most versatile.' The SHLAA identified the site as a 'Reasonable Alternative'.

In summary, the extension of the settlement boundary to include the suggested site, as shown on the attached Hockham – Proposed Settlement Boundary, provides an opportunity to accommodate forecast growth in Hockham in a co-ordinated manner that will help ensure services and facilities remain viable. The site is available for development now, offers a suitable location and would be delivered within 5 years; it can therefore be considered to be deliverable in the context of the NPPF. The suggested amendment to the settlement boundary is, in general, in line with that put forward by the Parish Council, albeit, it has been extended slightly to the north to provide a continuous boundary with the settlement boundary to the east.

2. Manor Farm

As drafted the settlement boundary for Hockham straddles Manor Farm, which is located to the south of Vicarage Road. It is recommended that the settlement boundary is revised to ensure that it follows features on the ground and is, therefore, logical. This is an approach which the Council has adopted in other rural settlements, such as Gressenhall. The approach would also be consistent with policy PD05A, as drafted, in that it will constitute the infilling and rounding off of the settlement boundary, whilst also potentially facilitating the appropriate re-use of rural buildings; buildings which could, in principle, be converted to residential use under permitted development rights.

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.

Given the matter raised relates to a significant issue that will have implications for development within the village and delivery of the Council's housing target we wish to appear at the Hearing Sessions of the Examination in public on behalf of the Great Hockham Estate.

Do you wish to be:

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

Comment

Agent Mr Jon Jennings (1132852)

Email Address

Company / Organisation Cheffins Planning

Address

Consultee Martin Goymour (1132853)

Company / Organisation Goymour Properties

Address
-
-
-

Event Name Local Plan Pre-Submission Publication Document

Comment by Goymour Properties (Martin Goymour)

Comment ID 441

Response Date 02/10/17 14:02

Consultation Point 3.205 Paragraph ([View](#))

Status Processed

Submission Type Email

Version 0.4

Files [Appendix 1 Housing Scheme - Oct 2017.pdf](#)
[Appendix 1 Site Profoma - Land to the west of Grove Road Banham.pdf](#)
[Appendix 2 Banham Zoo ownership boundary - Oct 2017.pdf](#)

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)

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

My clients land holding was presented to a meeting with the Local Plans team on the 6th February 2017. As requested the site was formally submitted to the Council for consideration in this local plan. In addition, the representations also included a specific wording for the safeguarding of Banham Zoo and its specific development aspirations.

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

Whilst the Council acknowledges at paragraph 3.205 that Banham Zoo is both a significant tourist attraction and local employer. The location and level of growth within Banham does not reflect the importance of the zoo with a limited allocation for only 42 houses being proposed at the northern edge of Banham remote from the zoo. The zoo attracts in excess of 200,000 visitors per annum and an additional 100,000 visit the car boot sale and caravan site associated with this facility.

As can be seen from the documentation appended to this representation a proposed allocation for residential development was submitted to the Council for consideration which is located adjacent to the main retail area within the village and public house and is immediately to the north of the zoo (Appendix 1) It is also the landowners intention to seek to expand the shop and provide other retail facilities within the existing retail and community area, potentially including small scale craft businesses and a coffee shop.

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

Whilst the Council acknowledges at paragraph 3.205 that Banham Zoo is both a significant tourist attraction and local employer. The location and level of growth within Banham does not reflect the importance of the zoo with a limited allocation for only 42 houses being proposed at the northern edge of Banham remote from the zoo. The zoo attracts in excess of 200,000 visitors per annum and an additional 100,000 visit the car boot sale and caravan site associated with this facility.

As can be seen from the documentation appended to this representation a proposed allocation for residential development was submitted to the Council for consideration which is located adjacent to the main retail area within the village and public house and is immediately to the north of the zoo (Appendix 1) It is also the landowners intention to seek to expand the shop and provide other retail facilities within the existing retail and community area, potentially including small scale craft businesses and a coffee shop.

It is also contended that the zoo is very important at a local, regional and international scale. The comment at paragraph 3.205 that "Applications for non-operational 'enabling' development which supports the retention enhancement or expansion of these facilities will be considered in line with the relevant strategic policies in the plan" fails to give adequate support to the retention and expansion of this facility. It is contended that a specific policy should be formulated for the zoo.

The suggested wording for this policy is that

Breckland Council recognises the importance of Banham Zoo as a major visitor attraction and will support the growth of sustainable tourism at Banham Zoo in line with Policy EC07 of the Breckland Local Plan and where this does not conflict with other Local Plan policies.

The District Council will work with the trustees and operators of Banham Zoo to formulate a comprehensive masterplan and development brief which seeks to enhance and expand the existing zoo in a sensitive manner, to include:

- A new zoo entrance feature
- Incubation business units to complement the A11 Innovation Corridor and reinforce links between the zoo and the wider region

- Expansion of the holiday village using eco-lodges - with the emphasis on ecology and sustainability
- Germinal Habitat Dome – a spectacular tourist attraction with a unique combination of tropical environments and animal habitats
- Provision of retail improvements to provide viable long term local facilities for both residents, employees and visitors
- Provision of proportionate enabling development to assist in the funding of improvements to the zoo
- Key worker housing to address the needs of employees at the zoo and related businesses
- Formulation of a detailed access strategy, including measures to reduce reliance on the private car.

The objective of this policy is to not only make Banham Zoo a regional/national tourist attraction, particularly as a result of its links to London and other national zoos but also an important educational and business facility focused on the innovation associated with the Zoo's research and conservation operations"

The extent of the area to be covered by this policy is attached as Appendix 2 to this representation.

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.

This is to allow the opportunity for the Inspector to more fully understand the existing operations of Banham Zoo and its development ambitions to be both a tourist attraction but also to provide employment linked to research connected with the zoo and the wider A11 innovation corridor.

Whilst dealt with in separate representations, Policy EC07 fails to recognise the need to support well established tourist attractions which are not located close to existing towns.

Do you wish to be:

- Notified of the Submission
- Notified of the Inspectors Recommendations

Comment

Consultee	Mr Stewart Patience (1135889)
Email Address	
Company / Organisation	Anglian Water Services Ltd
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Anglian Water Services Ltd (Mr Stewart Patience)
Comment ID	442
Response Date	02/10/17 13:55
Consultation Point	8.1 Paragraph (View)
Status	Processed
Submission Type	Email
Version	0.5
Do you consider the Pre-Submission Publication to be:	<input type="checkbox"/> Unsound (You think the document needs changing)
If you consider the document to be UNSOUND, to which test of soundness does your representation apply to: (Please mark the appropriate box).	<input type="checkbox"/> Is the plan justified?
Have you raised this issue before during previous consultations? (Please tick the appropriate box)	<input type="checkbox"/> Yes at Preferred Directions Stage (January - February 2016)

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

Reference is made to the District Council potentially seeking developer contributions for utilities. Developers contribute directly to Anglian Water for the provision of water supply and wastewater network improvements via the provisions set out in the Water Industry Act 1991. Generally, we would not expect water supply or wastewater network improvements to be included in CIL.

Remove reference to utilities from the list of potential developer contributions set out in Para 8.1 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.

To represent Anglian Water's interest as sewerage undertaker.

Do you wish to be:

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

Comment

Agent Mr Paul Sutton (1029372)

Email Address

Address

Consultee Mr Chris Kennard (1032087)

Email Address

Company / Organisation The Shadwell Estate Company Ltd

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by The Shadwell Estate Company Ltd (Mr Chris Kennard)

Comment ID 443

Response Date 02/10/17 14:16

Consultation Point Policy GEN 05 Settlement Boundaries ([View](#))

Status Processed

Submission Type Email

Version 0.4

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

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

Policy GEN 05 Settlement Boundaries

The Plan has failed to include a suitable and deliverable site in one of its key settlements, Thetford. The allocation of our client's land east of Arlington Way has been put forward throughout the process of consultation, at each stage of the draft Plan.

The NPPF states that to be considered 'deliverable', sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until the permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example because they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.

The outline planning permission for the Thetford Sustainable Urban Extension remains extant, however no reserved matters applications have been submitted and delivery is not expected to commence for a further two years, with just 170 units within the next five years predicated. In contrast, 115 dwellings on our client's site could be built out in the short-term.

A revised planning application is currently being considered by the Council for our client's land (LPA Ref: 3PL/2017/058/O). All the main planning issues in respect of the development of the site have been overcome, with the exception of highways which is currently being addressed. While the County Council (as local highway authority) have given an 'in principle' objection to the proposed new access into the site, we note that the design of the access meets all the current technical and safety requirements and would considerably improve the existing dangerous access to the main road.

In the past, the Council's main objection to the inclusion of this site for residential development was because of its location within the SPA (stone curlew habitat). Natural England withdrew its objection to the proposals on the 5th June 2017, recommending that planning conditions would address its concerns. Officers have further stated that, subject to addressing highway concerns as far as is practicable, they would support the proposals particularly given the Council's position in respect of their 5 year housing land supply. It is anticipated that, given the housing land supply issues, a positive recommendation may be given by officers to the proposed development.

We therefore consider that the site should be allocated for housing and included within the settlement boundary, given the positive feedback in relation to the current planning application, sustainability of the location, and lack of a five-year housing land supply, which is likely to worsen given the Government's consultation on 'Planning for the right homes in the right places: consultation proposals', see below.

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.

In order to properly present our case to the Inspector.

Do you wish to be:

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

Comment

Agent Mr Paul Sutton (1029372)

Email Address

Address

Consultee Mr Chris Kennard (1032087)

Email Address

Company / Organisation The Shadwell Estate Company Ltd

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by The Shadwell Estate Company Ltd (Mr Chris Kennard)

Comment ID 444

Response Date 02/10/17 14:16

Consultation Point Policy HOU 01- Development Requirements (Minimum) ([View](#))

Status Processed

Submission Type Email

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?
. 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)

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Policy HOU 01 – Development Requirements (Minimum)

This policy has been updated to reflect the Council's most recent 'Statement of Five Year Housing Land Supply'. This sets out a need for 15,300 dwellings, averaging 612 per year. In the recent publication by the Department of Communities and Local Government of 'Planning for the right homes in the right places: consultation proposals' it is noted that an indicative assessment, using the proposed standard approach, would lead to a requirement of 680 dwellings per annum to be delivered. Over the plan period this equates to 17000 dwellings, an additional 1700. The document states at paragraph 6 that:

'Subject to the outcome of this consultation, and the responses received to the housing White Paper, the Government intends to publish a draft revised National Planning Policy Framework early in 2018. We intend to allow a short period of time for further consultation on the text of the Framework to make sure the wording is clear, consistent and well-understood. Our ambition is to publish a revised, updated Framework in Spring 2018.'

It is likely, therefore, that this revised approach will be adopted in advance of the Local Plan and should be considered by the Council, which needs to build flexibility into its housing figures.

Paragraph 47 of the NPPF challenges local planning authorities to 'boost significantly the supply of housing' and ensure that their local plan meets the full objectively assessed needs for market and affordable housing in the market area. It also requires local authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing, including the identification of key sites which are critical to the delivery of the housing strategy over the plan period.

The objectively assessed development needs (OAN) of the local plan period, between 2011 and 2036, includes 15,300 new homes (both market and affordable). However, it is important that this figure should not be seen as a target, rather the minimum base line number of homes which the local plan will deliver over the plan period, with sufficient flexibility to adapt to rapid changes and ensure that the plan significantly boosts the supply of housing. Therefore, the Plan's ambition should be to deliver significantly more than 15,298 homes, to ensure that any allocations which stall or are delayed do not adversely affect the District's rate of 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.

In order to properly present our case to the Inspector.

Do you wish to be:

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

Comment

Agent Mr Paul Sutton (1029372)

Email Address

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Consultee Mr Chris Kennard (1032087)

Email Address

Company / Organisation The Shadwell Estate Company Ltd

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Event Name Local Plan Pre-Submission Publication Document

Comment by The Shadwell Estate Company Ltd (Mr Chris Kennard)

Comment ID 445

Response Date 02/10/17 14:16

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

Status Processed

Submission Type Email

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?
. 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.

Policy HOU 02 – Level and Location of Growth

The Core Strategy and the Thetford Area Action Plan originally sought the provision of 6,500 dwellings to be allocated at Thetford. However, following the examination and adoption of the Thetford Area Action Plan, only 5,000 dwellings were allocated to Thetford in the form of a large sustainable urban extension to the north of Thetford.

This allocation has been promoted by Pigeon Developments and Breckland Council granted outline planning permission for up to 5,000 dwellings, 22.5ha of employment land, local centres, three primary schools, green infrastructure, playing fields, amenity area and means of access (subject to a S106 agreement), on 27th November 2015 (Application ref: 3PL/2011/0805/O). Phase 1 of the development (625 dwellings) was expected to commence in Autumn 2016 but this is now unlikely to happen until at least 2019, when a mere 20 houses may be delivered.

As a consequence, the Council's latest five-year housing land supply statement (published July 2017), estimates that the first houses on this site will not be completed until 2019-2020, and that the total number of dwellings will not be delivered during the Local Plan period – i.e. to 2036.

With this context in mind, we consider the plan will neither be effective at delivering housing, due to the very low numbers to be delivered in the next five-year period; nor is it consistent with national policy, which requires plans to significantly boost housing delivery.

The Council's Five-Year Housing Land Supply Assessment states at paragraph 4.4:

'The five-year land supply statement shows that the Council is unable to currently demonstrate a five year land supply. The Council recognises that steps need to be taken to remedy the situation. The emerging Local Plan is the key resolution of the current position, a number of allocations for housing development will be made on land that would not currently be considered suitable. On adoption these will form part of the Council's forward looking supply. In addition, the Council will consider favourably development on sustainable sites which fall immediately adjacent to settlement boundaries which meet the relevant requirements of the Development Plan in order to boost the supply of housing in the short term.' [emphasis added]

Thetford has been identified as a one of two 'Key Settlements', along with Attleborough which are to receive 50% of the District's growth. Despite this, Thetford is planned to receive no additional dwellings over and above the allocation at Thetford Sustainable urban extension, which is to provide 3668 dwellings through the existing Local Plan. The site has been granted outline planning permission. No reserved matters application have been submitted and the site is known to have significant issues in terms of delivering infrastructure required ahead of dwellings being occupied.

We consider that the Plan will not be effective in delivering the required housing growth. It is unclear from the Local Plan itself how the development strategy will actually deliver a consistent level of housing growth sites, which are developable with a reasonable prospect, that are available and could be viably developed, over the plan period. The plan places a significant reliance on two strategic sites, which are notoriously slow to deliver and face significant challenges in terms of their ability to frontload infrastructure. In its current form the development strategy will not deliver the Council's expectations. As such further allocations should be included and these should be focused on bringing forward more sites.

As identified, our client's land, east of Arlington Way, Thetford, is a sustainable site, adjacent to the settlement boundary of Thetford. It should be included as a housing allocation on the basis that it is capable of delivering housing within the short-term, unlike the strategic housing site allocated.

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.

In order to properly present out case to the Inspector.

Do you wish to be:

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

Comment

Agent Mr Paul Sutton (1029372)

Email Address

Address

Consultee Mr Chris Kennard (1032087)

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Company / Organisation The Shadwell Estate Company Ltd

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Event Name Local Plan Pre-Submission Publication Document

Comment by The Shadwell Estate Company Ltd (Mr Chris Kennard)

Comment ID 446

Response Date 11/10/17 14:16

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

Status Processed

Submission Type Email

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?
. 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.

Pre-submission Publication Policies Maps- Thetford

See comments in relation to Policy GEN 05 Settlement Boundaries and Policy HOU 02 – Level and Location of Growth, above.

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.

In order to properly present.

Do you wish to be:

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

Comment

Agent	Mr Ian Douglass (1136100)
Email Address	
Company / Organisation	Lanpro Services
Address	
Consultee	Eastern Attachments Limited (1136116)
Company / Organisation	Eastern Attachments Limited
Address	- - -
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Eastern Attachments Limited (Eastern Attachments Limited)
Comment ID	447
Response Date	02/10/17 14:24
Consultation Point	Policy EC 03 General Employment Areas (View)
Status	Processed
Submission Type	Email
Version	0.2
Files	Site Location Plan - Employment Land East of London Road, Attleborough.pdf

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

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

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

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

Note for Information: We act on behalf of Eastern Attachments (EA) who are a steel fabrication business currently based at Maurice Gaymer Road, Attleborough. EA are currently preparing a Reserved Matters Planning application in pursuance of planning permission 3PL/2016/0417/O, Land to the east of London Road, Attleborough. Consent was granted by Breckland Council on 8th July 2016 for 13,710 sq m of B1, B2 and B8 uses at the site.

The subject site sits within the General Employment Area off London Road, Attleborough as identified in the Pre-Submission local plan.

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

Our client is supportive of the identification of the site subject of planning permission 3PL/2016/0417/O, Land to the east of London Road, Attleborough as a General employment area in the emerging local plan.

Eastern Attachments produces material handling attachments for telehandlers and forklifts within the agricultural and construction industries. They are the foremost provider of these attachments for both the agricultural and construction markets with a predicted 80%-90% market share. They are a highly efficient business which has allowed it to invest in a local staffing structure rather than outsourcing to overseas locations.

Eastern Attachments currently employ circa 35 staff, but are now seeking to grow their business. Their objective for any new development on the London Road site will be to deliver a high-quality scheme with strong sustainability credentials (in terms of sustainable design, and energy & water efficiency).

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 Ian Douglass (1136100)
Email Address	
Company / Organisation	Lanpro Services
Address	
Consultee	Eastern Attachments Limited (1136116)
Company / Organisation	Eastern Attachments Limited
Address	- - -
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Eastern Attachments Limited (Eastern Attachments Limited)
Comment ID	448
Response Date	02/10/17 14:24
Consultation Point	Picture 6.1 Summary of Attleborough Allocation (View)
Status	Processed
Submission Type	Email
Version	0.3
Files	Site Location Plan - Employment Land East of London Road, Attleborough.pdf

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)

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Our client is supportive of the identification of the site subject of planning permission 3PL/2016/0417/O, Land to the east of London Road, Attleborough as a General employment area in the emerging local plan.

Eastern Attachments produces material handling attachments for telehandlers and forklifts within the agricultural and construction industries. They are the foremost provider of these attachments for both the agricultural and construction markets with a predicted 80%-90% market share. They are a highly efficient business which has allowed it to invest in a local staffing structure rather than outsourcing to overseas locations.

Eastern Attachments currently employ circa 35 staff, but are now seeking to grow their business. Their objective for any new development on the London Road site will be to deliver a high-quality scheme with strong sustainability credentials (in terms of sustainable design, and energy & water efficiency).

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 Thomas Darwall-Smith (1136182)

Email Address

Company / Organisation Keystone Planning Limited

Address

Consultee Mr Graeme Robertson (975295)

Email Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Mr Graeme Robertson

Comment ID 449

Response Date 02/10/17 14:59

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

Status Processed

Submission Type Email

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 legally compliant?
- 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.

Development of sites outside the boundaries of Local Service Centres that are addressed by draft Policy HOU 03 should remove the reference in bullet (2), the development should “not lead to the number of dwellings in the settlement exceeding the housing target”, since this is not consistent with the spirit of national policy that is set out in paragraph 50 of the National Planning Policy Framework that seeks to “boost significantly the supply of housing”.

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

Consultee Mr Stewart Patience (1135889)

Email Address

Company / Organisation Anglian Water Services Ltd

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Anglian Water Services Ltd (Mr Stewart Patience)

Comment ID 450

Response Date 02/10/17 13:51

Consultation Point Map 3.1 Summary of the Dereham Allocations.
([View](#))

Status Processed

Submission Type Email

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)

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

We welcome the reference made to the applicant obtaining pre-planning advice from Anglian Water to identify a feasible foul drainage strategy for the above sites and obtaining confirmation that there is sufficient wastewater treatment capacity for the sites identified at Dereham and Swaffham.

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

Do you wish to be: . Notified of the Submission

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

Comment

Consultee Mr Stewart Patience (1135889)

Email Address

Company / Organisation Anglian Water Services Ltd

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Anglian Water Services Ltd (Mr Stewart Patience)

Comment ID 451

Response Date 02/10/17 13:51

Consultation Point Map 3.2 Summary of the Swaffham Allocations.
([View](#))

Status Processed

Submission Type Email

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)

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

We welcome the reference made to the applicant obtaining pre-planning advice from Anglian Water to identify a feasible foul drainage strategy for the above sites and obtaining confirmation that there is sufficient wastewater treatment capacity for the sites identified at Dereham and Swaffham.

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

Do you wish to be: . Notified of the Submission

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

Comment

Consultee	Mr Stewart Patience (1135889)
Email Address	
Company / Organisation	Anglian Water Services Ltd
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Anglian Water Services Ltd (Mr Stewart Patience)
Comment ID	452
Response Date	02/10/17 13:51
Consultation Point	Picture 3.1 Summary of Watton Allocations (View)
Status	Processed
Submission Type	Email
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)

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

We welcome the reference made to the applicant obtaining pre-planning advice from Anglian Water to identify a feasible foul drainage strategy for the above sites and obtaining confirmation that there is sufficient wastewater treatment capacity for the sites identified at Dereham and Swaffham.

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

Do you wish to be: . Notified of the Submission
. Notified of the Inspectors Recommendations

. Notified of the Adoption

Comment

Consultee Mr Stewart Patience (1135889)

Email Address

Company / Organisation Anglian Water Services Ltd

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Anglian Water Services Ltd (Mr Stewart Patience)

Comment ID 453

Response Date 02/10/17 13:51

Consultation Point Map 3.3 Summary of Ashill Allocations ([View](#))

Status Processed

Submission Type Email

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)

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

We welcome the reference made to the applicant obtaining pre-planning advice from Anglian Water to identify a feasible foul drainage strategy for the above sites and obtaining confirmation that there is sufficient wastewater treatment capacity for the sites identified at Dereham and Swaffham.

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

Do you wish to be: . Notified of the Submission
. Notified of the Inspectors Recommendations

. Notified of the Adoption

Comment

Consultee Mr Stewart Patience (1135889)

Email Address

Company / Organisation Anglian Water Services Ltd

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Anglian Water Services Ltd (Mr Stewart Patience)

Comment ID 454

Response Date 02/10/17 13:51

Consultation Point Map 3.4 Summary of Banham Allocations. ([View](#))

Status Processed

Submission Type Email

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)

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

We welcome the reference made to the applicant obtaining pre-planning advice from Anglian Water to identify a feasible foul drainage strategy for the above sites and obtaining confirmation that there is sufficient wastewater treatment capacity for the sites identified at Dereham and Swaffham.

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

Do you wish to be: . Notified of the Submission
. Notified of the Inspectors Recommendations

. Notified of the Adoption

Comment

Consultee Mr Stewart Patience (1135889)

Email Address

Company / Organisation Anglian Water Services Ltd

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Anglian Water Services Ltd (Mr Stewart Patience)

Comment ID 455

Response Date 02/10/17 13:51

Consultation Point Map 3.8 Summary of the Hockering Allocations.
([View](#))

Status Processed

Submission Type Email

Version 0.3

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

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

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

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

We welcome the reference made to the applicant obtaining pre-planning advice from Anglian Water to identify a feasible foul drainage strategy for the above sites and obtaining confirmation that there is sufficient wastewater treatment capacity for the sites identified at Dereham and Swaffham.

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

Do you wish to be: . Notified of the Submission

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

Comment

Consultee Mr Stewart Patience (1135889)

Email Address

Company / Organisation Anglian Water Services Ltd

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Anglian Water Services Ltd (Mr Stewart Patience)

Comment ID 456

Response Date 02/10/17 13:51

Consultation Point Map 3.6 Summary of Garboldisham Allocations
([View](#))

Status Processed

Submission Type Email

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)

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

We welcome the reference made to the applicant obtaining pre-planning advice from Anglian Water to identify a feasible foul drainage strategy for the above sites and obtaining confirmation that there is sufficient wastewater treatment capacity for the sites identified at Dereham and Swaffham.

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

Do you wish to be: . Notified of the Submission

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

Comment

Consultee Mr Stewart Patience (1135889)

Email Address

Company / Organisation Anglian Water Services Ltd

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Anglian Water Services Ltd (Mr Stewart Patience)

Comment ID 457

Response Date 02/10/17 13:51

Consultation Point Map 3.9 Summary of the Kenninghall Allocations.
([View](#))

Status Processed

Submission Type Email

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)

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

We welcome the reference made to the applicant obtaining pre-planning advice from Anglian Water to identify a feasible foul drainage strategy for the above sites and obtaining confirmation that there is sufficient wastewater treatment capacity for the sites identified at Dereham and Swaffham.

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

Do you wish to be: . Notified of the Submission

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

Comment

Consultee Mr Stewart Patience (1135889)

Email Address

Company / Organisation Anglian Water Services Ltd

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Anglian Water Services Ltd (Mr Stewart Patience)

Comment ID 458

Response Date 02/10/17 13:51

Consultation Point Map 3.12 Summary of the Narborough Allocations.
([View](#))

Status Processed

Submission Type Email

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)

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

We welcome the reference made to the applicant obtaining pre-planning advice from Anglian Water to identify a feasible foul drainage strategy for the above sites and obtaining confirmation that there is sufficient wastewater treatment capacity for the sites identified at Dereham and Swaffham.

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

Do you wish to be: . Notified of the Submission

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

Comment

Consultee Mr Stewart Patience (1135889)

Email Address

Company / Organisation Anglian Water Services Ltd

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Anglian Water Services Ltd (Mr Stewart Patience)

Comment ID 459

Response Date 02/10/17 13:51

Consultation Point Map 3.13 Summary of the Necton Allocations.
([View](#))

Status Processed

Submission Type Email

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)

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

We welcome the reference made to the applicant obtaining pre-planning advice from Anglian Water to identify a feasible foul drainage strategy for the above sites and obtaining confirmation that there is sufficient wastewater treatment capacity for the sites identified at Dereham and Swaffham.

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

Do you wish to be: . Notified of the Submission

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

Comment

Consultee Mr Stewart Patience (1135889)

Email Address

Company / Organisation Anglian Water Services Ltd

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Anglian Water Services Ltd (Mr Stewart Patience)

Comment ID 460

Response Date 02/10/17 13:51

Consultation Point Map 3.14 Summary of the North Elmham Allocations. ([View](#))

Status Processed

Submission Type Email

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)

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

We welcome the reference made to the applicant obtaining pre-planning advice from Anglian Water to identify a feasible foul drainage strategy for the above sites and obtaining confirmation that there is sufficient wastewater treatment capacity for the sites identified at Dereham and Swaffham.

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

Do you wish to be: . Notified of the Submission

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

Comment

Consultee Mr Stewart Patience (1135889)

Email Address

Company / Organisation Anglian Water Services Ltd

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Anglian Water Services Ltd (Mr Stewart Patience)

Comment ID 461

Response Date 02/10/17 13:51

Consultation Point Map 3.15 Summary of the Old Buckenham Allocations. ([View](#))

Status Processed

Submission Type Email

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)

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

We welcome the reference made to the applicant obtaining pre-planning advice from Anglian Water to identify a feasible foul drainage strategy for the above sites and obtaining confirmation that there is sufficient wastewater treatment capacity for the sites identified at Dereham and Swaffham.

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

Do you wish to be: . Notified of the Submission

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

Comment

Consultee Mr Stewart Patience (1135889)

Email Address

Company / Organisation Anglian Water Services Ltd

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Anglian Water Services Ltd (Mr Stewart Patience)

Comment ID 462

Response Date 02/10/17 13:51

Consultation Point Map 3.16 Summary of the Shipdham Allocations.
([View](#))

Status Processed

Submission Type Email

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)

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

We welcome the reference made to the applicant obtaining pre-planning advice from Anglian Water to identify a feasible foul drainage strategy for the above sites and obtaining confirmation that there is sufficient wastewater treatment capacity for the sites identified at Dereham and Swaffham.

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

Do you wish to be: . Notified of the Submission

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

Comment

Consultee Mr Stewart Patience (1135889)

Email Address

Company / Organisation Anglian Water Services Ltd

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Anglian Water Services Ltd (Mr Stewart Patience)

Comment ID 463

Response Date 02/10/17 13:51

Consultation Point Map 3.17 Summary of the Sporle Allocations.
([View](#))

Status Processed

Submission Type Email

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)

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

We welcome the reference made to the applicant obtaining pre-planning advice from Anglian Water to identify a feasible foul drainage strategy for the above sites and obtaining confirmation that there is sufficient wastewater treatment capacity for the sites identified at Dereham and Swaffham.

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

Do you wish to be: . Notified of the Submission

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

Comment

Consultee Mr Stewart Patience (1135889)

Email Address

Company / Organisation Anglian Water Services Ltd

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Anglian Water Services Ltd (Mr Stewart Patience)

Comment ID 464

Response Date 02/10/17 13:51

Consultation Point Map 3.18 Summary of the Swanton Morley Allocations. ([View](#))

Status Processed

Submission Type Email

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)

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

We welcome the reference made to the applicant obtaining pre-planning advice from Anglian Water to identify a feasible foul drainage strategy for the above sites and obtaining confirmation that there is sufficient wastewater treatment capacity for the sites identified at Dereham and Swaffham.

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

Do you wish to be: . Notified of the Submission

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

Comment

Consultee	Mr Stewart Patience (1135889)
Email Address	
Company / Organisation	Anglian Water Services Ltd
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Anglian Water Services Ltd (Mr Stewart Patience)
Comment ID	465
Response Date	02/10/17 13:51
Consultation Point	Policy ENV 09 Flood Risk & Surface Water Drainage (View)
Status	Processed
Submission Type	Email
Version	0.3

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

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

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

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

The above policy refers to the application of SuDS principles to mitigate the potential for surface water flooding.

Anglian Water support the requirement for applicants to include the provision of Sustainable Drainage Systems (SuDS) so as not to increase flood risk and to reduce flood risk where possible. The use of SuDS would help to reduce the risk of surface water and sewer flooding.

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

Do you wish to be:

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

Comment

Consultee Mr Stewart Patience (1135889)

Email Address

Company / Organisation Anglian Water Services Ltd

Address

Event Name Local Plan Pre-Submission Publication Document

Comment by Anglian Water Services Ltd (Mr Stewart Patience)

Comment ID 466

Response Date 02/10/17 13:51

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 Email

Version 0.3

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

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

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

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

Submission Plan includes final wording relating to the above site.

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.

Anglian Water has no objection to the principle of residential development and associated retail and community uses on this site.

We welcome the reference made to the applicant obtaining pre-planning advice from Anglian to identify a feasible foul drainage strategy for this site.

Similarly we welcome the reference made to the need for on-going discussion between the Council, the developer and Anglian Water to determine an appropriate deliverable solution for wastewater treatment improvements for the above site.

Anglian Water has a statutory obligation to provide sewage treatment for all sites with the benefit of planning permission and any required improvements would be funded through our business plan. We are currently in the early stages of developing a Long Term Recycling Plan which will be used to inform further investment at existing water recycling centres (formerly wastewater treatment works) and relevant foul sewerage catchments. This will be used to inform the investment identified in our future business plans which are prepared once every 5 years.

However the wording of Policy GEN4 could be interpreted as meaning that any sewage treatment improvements would come forward only once the proposed homes have been constructed. The Council's Water Cycle Study Update (March 2017) states that there is capacity for some but not all of the growth proposed in the Dereham catchment. Reference is also made to figure of 1,800 homes but it is unclear how this relates to the phasing outlined in the wording of the first sentence of the policy.

It is therefore suggested that Policy GEN4 is amended as follows:

'Ongoing discussion between the Council, the developer and Anglian Water Services to determine an appropriate, deliverable solution for Wastewater Treatment Work (WwTW) improvements required in time to serve the development of 2,650 homes and the 1,350 homes proposed beyond the plan period.'

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.

To represent Anglian Water's interest as sewerage undertaker.

Do you wish to be:

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

Comment

Consultee	Mr Stewart Patience (1135889)
Email Address	
Company / Organisation	Anglian Water Services Ltd
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Anglian Water Services Ltd (Mr Stewart Patience)
Comment ID	467
Response Date	02/10/17 13:51
Consultation Point	Policy HOU 10 - Technical Design Standards for New Homes (View)
Status	Processed
Submission Type	Email
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)

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

Reference is made to all residential development within Breckland District meeting the optional higher water efficiency standard (110 litres/per person/per day).

The Anglian Water region is identified as an area of serious water stress in the Environment Agency's document entitled 'Water Stressed Areas Final Classification (2013)'.

In addition the Council's Water Cycle Study Update (March 2017) recommends the adoption of the optional higher water efficiency standard.

Research has also shown that the cost of the optional higher water efficiency standard and associated cost can be as low as £6-9 per dwelling . We therefore consider that this does not make the Local

Plan, or individual development proposals, unviable. Please refer to The Housing Standards Review Cost Impact report (2014) for further details.

For the reasons set out above we support the optional water efficiency standard being applied within the Breckland District Local Plan area.

Similarly reference is made to commercial developments meeting the 'good' BREEAM standard for water efficiency. Anglian Water is supportive of increased water efficiency measures to reduce the impact of new development on existing water resources.

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

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

Do you wish to be:

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

Comment

Consultee	Mr Stewart Patience (1135889)
Email Address	
Company / Organisation	Anglian Water Services Ltd
Address	
Event Name	Local Plan Pre-Submission Publication Document
Comment by	Anglian Water Services Ltd (Mr Stewart Patience)
Comment ID	468
Response Date	02/10/17 13:51
Consultation Point	Policy INF 02 Developer Contributions (View)
Status	Processed
Submission Type	Email
Version	0.2

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

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

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

If you 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.

Reference is made to the circumstances in which the District Council will consider whether there is a need for developer contributions to mitigate the impact of the development. However no reference is made to the phasing of development to ensure its aligned with the necessary infrastructure including that provided by Anglian Water.

It is therefore proposed that the following wording is added to Policy INF 02:

'Planning Permission will only be granted if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet all the necessary requirements arising from the proposed development. Development proposals must consider all of the infrastructure implications of a scheme; not just those on the site or its immediate vicinity.

Consideration must be given to the likely timing of infrastructure provision. As such, development may need to be phased either spatially or in time to ensure the provision of infrastructure in a timely manner. Conditions or a planning obligation may be used to secure this phasing arrangement.'

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

To represent Anglian Water's interest as sewerage undertaker.

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

<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: Katie Parsons	
Organisation: Historic England	
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: N/A	
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)

Unsound (You think the document needs changing)

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

Policy	Entire Plan
Paragraph	Entire Plan
Site	All
Proposals Map	All
Settlement Boundary	None specific
Other	Please see attached letter dated 2 nd Oct 2017

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

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

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

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

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

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

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

Please see attached letter dated 2nd October 2017 for full comments.

In summary there is insufficient evidence to support the SUE at Attleborough specifically the location of the link road and the policy wording itself does not adequately address the historic environment, in particular the nationally important archaeology of the site. Policy wording needs amended throughout to provide a positive strategy for the historic environment, site allocations need to have regard to the historic environment, the historic environment DM policy needs substantial revision to consider the future management of conservation areas, and there are no monitoring indicators in the Plan. These issues can be overcome with relatively minor changes as advised in our comments but the Plan is unsound as a result.

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	Yes (unless the examining Inspector feels otherwise)
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9. If you wish to appear at the Examination in Public, please outline why you consider this to be necessary.

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

Notified of the Submission	Yes
Notified of the Inspectors Recommendations	Yes
Notified of the Adoption	Yes

Declaration: I understand that the details included on this form will be available in the public domain. (please tick box)	
Signature: Katie Parsons	Date: 2nd Oct 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.

Alex Crusciak
Planning Policy Team
Breckland District Council
Elizabeth House
Walpole Lake
Dereham
Norfolk
NR19 1EE

Our ref: PL00039555
HD/P 5316/00
Telephone: 01223582717

02 October 2017

Dear Mr Chrusciak,

Re. Breckland Local Plan pre-submission publication (Reg. 19)

Thank you for consulting Historic England on Breckland's publication draft Local Plan. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore we welcome the opportunity to comment on the draft Plan. We have now had the opportunity to review the documents and can provide the following substantive comments.

General comments

Historic England has published a number of Good Practice Advice and Advice Notes which you may find useful in developing your local plan. In particular:

Good Practice Advice in Planning 1 - the historic environment in local plans:
[<https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>](https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/)

Good Practice Advice in Planning 3 - the setting of heritage assets:
[<https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/>](https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/)

Advice Note 3 - site allocations in local plans: [<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>](https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/).

We have made some brief comments on the Sustainability Appraisal Report. Please note that Historic England have produced advice entitled HE Advice Note 8 - Sustainability Appraisal and Strategic Environmental Assessment : <https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/> (01 Dec 2016)

For the avoidance of doubt, we have not considered archaeological issues in this brief, desk based assessment but would refer you to the HER who should be able to advise in this regard. We have also not identified non-designated assets.

Paragraph 126 of the NPPF requires Local Plans to set out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment. Ideally the strategy should offer a strategic overview including overarching heritage policies to deliver the conservation and enhancement of the environment.

A good strategy will offer a positive holistic approach throughout the whole plan whereby the historic environment is considered not just as a stand-alone topic but as an integral part of every aspect of the plan, being interwoven within the entire document. So policies for housing, retail, and transport for example may need to be tailored to achieve the positive improvements that paragraph 8 of the NPPF demands. Site allocations may need to refer to the historic environment, identifying opportunities to conserve and enhance the historic environment, avoid harming heritage assets and their settings and may also be able to positively address heritage assets at risk. The plan may need to include areas identified as being inappropriate for certain types of development due to the impact they would have on the historic environment.

A good strategy will also be spatially specific, unique to the area, describing the local characteristics of the borough and responding accordingly with policies that address the local situation. We would expect references to the historic environment in the local plan vision, the inclusion of a policy/ies for the historic environment and character of the landscape and built environment, and various other references to the historic environment through the plan relating to the unique characteristics of the area.

Further opportunity should be sought to address the historic environment in every aspect of the Plan and to make the strategy more spatially specific and unique to Breckland.

Comments on draft Local Plan

Chapter 1: Introduction

Paragraph 1.29 of the supporting text helpfully outlines the diverse nature of Breckland as a district and specifies heritage as being a contributing factor to that diversity. This paragraph goes on to list the number of listed buildings and conservation areas within the Breckland but omits to mention scheduled monuments, registered parks and gardens or heritage at risk. In order to present a robust and accurate picture of the district's historic

environment we would request that these are referred to alongside the assets already mentioned.

The Breckland Strategic Vision seeks to cherish the natural and built assets which the District unique. In terms of wording we would recommend that the text is amended to refer to the natural, built and historic environment rather than only “natural and built assets”. The same paragraph goes on to outline the specific character of Breckland’s towns and villages and the need to retain their characteristics. Whilst this is welcomed it would be more appropriate to outline a more comprehensive aspiration regarding the historic environment at this strategic vision level which includes the recognition that rural heritage has to play in determining the district’s character.

The vision refers to locating new development in locations that are co-ordinated with transport provision, good access to existing services, community facilities and open space. While this approach has a number of merits, care will need to be taken to ensure that specific locations avoid harming the significance of heritage assets, their settings, and the wider historic environment.

Leading on from the Strategic Vision are the Strategic Objectives. We welcome the inclusion of objective 12 which represents a good strategic consideration to aid the delivery of the conservation and enhancement of the historic environment. We would however advise the term “non-designated” rather than “un-designated” is used. This objective would be strengthened and the soundness of the plan improved if it also sought to address heritage at risk. A relatively large number of entries within the Heritage at Risk (HAR) register are located within Breckland so it would be beneficial to outline the Council’s overarching aspirations to address heritage at risk.

Chapter 2: General Policies

Strategic policies are a very important part of the plan, particularly given the need for Neighbourhood Plans to be in conformity with these policies. Paragraph 156 of the NPPF makes it clear that, ‘Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver conservation and enhancement of the natural and historic environment including landscape.’ Therefore we would strongly advise the inclusion of a strategic policy that addresses these matters.

Policy GEN1: Sustainable Development in Breckland

We welcome the Plan’s recognition of the protection and enhancement of the historic environment as a strand of sustainable development in paragraph 2.2 of the supporting text and again in bullet point 2 of the policy itself.

Policy GEN2: Promoting High Quality Design

We welcome the inclusion of a strategic level policy relating to high quality design. It is recommended that the policy makes specific reference to the historic environment and the development opportunities that there may be to enhance or better reveal its significance. Making reference to the historic environment at this point in the plan and

within a design policy would recognise that development can result in positive enhancements to the historic environment and that good design can reinforce the area's character. These changes will strengthen the Plan's conservation strategy. The production of a Supplementary Planning Document to support good design and to provide additional advice is encouraged.

Policy GEN4: Development Requirements of Attleborough Strategic Urban Extension (SUE)

We note that at a live planning application seeking outline permission for the strategic development at Attleborough has been submitted to the Council (ref. 3PL/2017/0996/0 submitted 31/07/2017 decision due 21/11/2017). We have provided separate comments in a letter dated 4th September 2017 on the specifics of this scheme. For the purposes of clarity, comments made as here as part of the reg. 19 Local Plan consultation will refer to the principle of the site allocation only and not to the specifics of an individual scheme.

Heritage assets

This site is located immediately adjacent to Bunn's Bank, a nationally important scheduled monument. The linear earthwork is an imposing feature within the landscape comprising of a high bank and ditch. Its significance relates to its survival as a well preserved earthwork and archaeological deposits which are of evidential and historic value. It is an important landscape feature and is indicative of further archaeological potential.

The site allocation would sit immediately next to the scheduled monument and could therefore impact upon its setting. The area within the site allocation boundary and to the west of Bunn's Bank is likely to contain high quality non-designated heritage assets in the form of significant archaeology of national importance as defined by paragraph 139 of the NPPF. The likely presence of the continuation of Bunn's Bank to the west is corroborated by the findings of The Historic Characterisation Study (March 2017) which indicates that the bank may extend further westwards into the site allocation boundary.

The northern section of the site allocation would be in close proximity to Bestrope Old Hall and Burgh Farmhouse, both of which are Grade II listed. As farmhouses their rural open surroundings contribute positively to their setting.

The historic cores of Attleborough to the north and the village Old Buckenham to the south are both conservation areas.

Impact on Heritage Assets

The site allocation involves the construction of a link road to serve the SUE. The indicative link road route, shown on pages 24 and 179 of the Plan would run through the exact area most likely to contain the western continuation of Bunn's Bank, which we consider could have major impacts on the scheduled earthwork of Bunn's Bank as well as potentially impact on archaeology along the route (including any continuation of the earthwork westwards). The positioning of the road is likely to harm any undesignated remains and would irreversibly alter the integrity of the earthwork by severing how it can

be read into the wider landscape. We also have concerns regarding the increased use of the existing road and the atmospheric effects of the proposed road and junction due to the adverse impact increased noise, traffic disturbances, and pollution, etc., would have on Bunn's Bank's setting. The Capita Symmonds Link Road Concepts Options Report (July 2013) does not appear to contain much assessment of historic environment impacts, with no survey work of potential heritage assets along the different route options. We therefore raise substantial objection to the indicative positioning of the proposed link road.

It is not clear how much the historic environment has featured in the identification of the preferred location and how it is justified, effective and consistent with national policy in terms of heritage impacts. In previous responses we have advocated further assessment of the historic landscape to the south of Attleborough to help with the identification of the preferred location, which would also help with subsequent masterplanning. Since then the Historic Characterisation Study (March 2017) has been produced.

The edge of the existing settlement of Attleborough which abuts the proposed site allocation is bordered by the railway line to the north and the southern edge of the settlement has a number of sites in factory and light industrial use. These developments buffer the historic core and conservation area from the proposed site allocation but development of the site will still need to be sensitive in terms of building heights to ensure the setting of the conservation area is preserved. There may be opportunities to improve or enhance the edge of the settlement. The draft policy is silent on these issues.

We recognise that the SUE is an important part of the region's housing allocation and so we accept the principle of the SUE and its concept but have serious concerns regarding the justification in terms of the historic environment to support the allocation. Whilst the site allocation may be acceptable in principle the plan is currently unsound to support its inclusion at this time. There is limited evidence, particularly with regards to archaeology, to support the allocation. What evidence there is, namely the 2017 Historic Characterisation Study, identifies the impact of development upon undesignated heritage assets as an issue a development scheme would need to address but this conclusion has not been translated into the policy. The policy makes no reference to the designated heritages adjacent to the site and makes no provision for the potential non-designated heritage assets within the site and so fails to secure the conservation or enhancement of the historic environment.

We acknowledge that paragraph 5 of policy GEN 4 requires development to consider the findings of the Historic Characterisation Study and to carry out further assessment work into the historic landscape to the satisfaction of the Council and Historic England. Whilst the submission of individual planning applications presents an opportunity for improved understanding of the historic environment, the Council still has a duty to assess historic environment issues as part of the Local Plan process and there is concern that the policy provision in paragraph 5 will not be effective. The policy provides no meaningful guidance to prospective applicants and decision makers as to what is expected with regards to the historic environment.

Careful master planning and the use buffer zones could ensure that open green space and landscaping is incorporated into the sensitive areas to the south of the site near

Bunn's Bank to protect its setting. The position of the link road will also be integral to the continued protection of the scheduled monument and the junction should be pushed further northwards. Robust archaeological investigation and preservation in situ or excavation and recording as appropriate could address the impacts upon any archaeological remains but the policy does not include these provisions and there does not appear to be any evidence within the Plan's supporting documentation to address archaeology. Careful consideration of densities will be key to the layout of this urban extension. There is concern for example that concentration of densities towards the southern end to the SUE would encourage coalescence with the village of Old Buckenham to the south whilst allowing for the concentration of town centre development near Bunn's Bank.

Attleborough summary

The Historic Characterisation Study for this site concludes that the site could be carried forward as an allocation subject to policy requirements and development consideration which would mitigate the harm to the historic environment but this conclusion has not been followed through into the policy itself. The site allocation is likely result in harm to the historic environment and unsupported by evidence, it is therefore considered to be unsound. Development proposals for the Attleborough SUE should conserve and enhance its historic environment and be underpinned by a robust evidence base.

The main issues with the allocation of this site are:

- The setting of the Bunn's Bank scheduled monument, and the Grade II listed buildings of Bestrope Old Hall and Burgh Famhouse;
- The link road position within sensitive areas of the site which are likely to damage undesignated heritage assets to the west of Bunn's Bank;
- The position of the link road and junction resulting in atmospheric conditions deriving from traffic congestion, noise, pollution etc. which would further impact the setting of Bunn's Bank to the detriment of its intangible experiential qualities;
- The lack of consideration for development densities which if concentrated around Bunn's Bank would compound the harm already identified;
- The lack of consideration in the policy and lack of information to demonstrably illustrate how archaeology has been considered in the identification of the site as a Local Plan allocation.

We wish to see policy wording to identify these assets and to outline specific mitigation measures such as open green space, landscaping, linear park etc. We also request that the plan includes a strategy diagram.

Site Allocations

We would make the following general comments on the site allocation process and also drafting of site specific policies before making a number of site specific comments

In assessing sites, we would advise that you refer to the advice in our Advice Note 3 - site allocations in local plans: <https://historicengland.org.uk/images->

[books/publications/historic-environment-and-site-allocations-in-local-plans/](#)>. This provides a helpful methodology for site selection.

This

In essence, it is important that you

- a) Identify any heritage assets that may be affected by the potential site allocation.
- b) Understand what contribution the site makes to the significance of the asset
- c) Identify what impact the allocation might have on that significance
- d) Consider maximising enhancements and avoiding harm
- e) Determine whether the proposed allocation is appropriate in light of the NPPFs tests of soundness

In assessing sites it is important to identify those sites which are inappropriate for development and also to assess the potential capacity of the site in the light of any historic environment (and other) factors.

If a site is allocated, we would expect to see reference in the policy and supporting text to the need to protect and enhance the on-site or nearby heritage assets and their setting, the need for high quality design and any other factors relevant to the historic environment and the site in question. Many of the sites will abut to join together with other proposed allocations, some of which already benefit from an extant permission. Therefore the cumulative impacts of the site allocations upon the historic environment must be considered. It is recommended that a plan is provided which shows site allocations which are clustered together along with any designated assets so the overall scope of development can be readily appreciated.

Paragraph 157 of the National Planning Policy Framework requires Local Plans to provide detail with site allocations where appropriate (fifth bullet point), with the Planning Practice Guidance stating “where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the ‘what, where, when and how’ questions)” (PPG Reference ID: 12-010-20140306 (last revised 06/03/2014)). Paragraph 154 of the NPPF also states that only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan. Conservation of the historic environment is a core planning principle (Paragraph 17) and Local Plans should set out a positive strategy in this respect (Paragraph 126).

Dereham

Reference to Dereham’s rich historic environment in paragraph 3.116 of the supporting text is welcomed.

LP(025)007: Land to west of Etling View

There are no known designated heritage assets within the site or nearby which could be affected development of this site. However, Dereham is associated with significant prehistoric activity as such the site may have archaeological potential which should be considered and it is recommended that the policy and supporting text is amended to require an archaeological assessment for development proposals within the site.

The proposed site is located on the edge of the existing settlement looking over open land, the relationship between any new development and the surrounding landscape should then be carefully considered. Paragraph 3.125 of the supporting text states that a historic characterisation study carried out in support of the allocation 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 appropriate design, this is welcomed but it does appear as a criterion in the policy itself. It is requested that policy is amended accordingly.

The proposed allocation is located immediately next to a site which already has permission for housing development. It is important that the cumulative impacts are therefore considered.

LP(025)011: Land west of Shipdham Road

There are no known designated heritage assets within the site or nearby which could be affected development of this site. However, Dereham is associated with significant prehistoric activity as such the site may have archaeological potential which should be considered and it is recommended that the policy and supporting text is amended to require an archaeological assessment for development proposals within the site.

The proposed site is located on the edge of the existing settlement looking over open land, the relationship between any new development and the surrounding landscape should then be carefully considered. In addition the site is also described as a gateway location and in a landscape sensitive to change. Paragraph 3.128 of the supporting text states that a historic characterisation study carried out in support of the allocation 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 appropriate design, this is welcomed but it does appear as a criterion in the policy itself. It is requested that policy is amended accordingly.

LP(025)023: Land off Swanton Road

There are no known designated heritage assets within the site or nearby which could be affected development of this site. However, Dereham is associated with significant prehistoric activity as such the site may have archaeological potential which should be considered and it is recommended that the policy and supporting text is amended to require an archaeological assessment for development proposals within the site.

The proposed site is located on the edge of the existing settlement looking over open land, the relationship between any new development and the surrounding landscape should then be carefully considered. Development of this site should not encourage coalescence with the neighbouring hamlet of Northall Green. Paragraph 3.135 of the

supporting text states that a historic characterisation study carried out in support of the allocation 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 appropriate design, this is welcomed but it does appear as a criterion in the policy itself. It is requested that the policy is amended accordingly.

LP(25)029: Land to the rear of Dereham Hospital

There are no known heritage assets within the site boundary but a Grade II listed water tower and the Dereham Conservation Area are located to the south west of the site. The watertower is an interesting piece of Victorian industrial heritage and is one of only two surviving town watertowers of its style and date (1881) in Norfolk. Any development of the site therefore has the potential to impact upon these heritage assets. It is important that any development of this site will need to preserve these heritage assets and their settings. These requirements should be included in the policy and supporting text of the Plan. Dereham is associated with significant prehistoric activity as such the site may have archaeological potential which should be considered and it is recommended that the policy and supporting text is amended to require an archaeological assessment for development proposals within the site.

The policy and supporting text both acknowledge the local interest of the hospital as a non-designated heritage asset and the provision at point 3 of the policy which requires development to have regard for the hospital building is welcomed.

Paragraph 3.141 of the supporting text states that a historic characterisation study carried out in support of the allocation 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 appropriate design, this is welcomed but it does appear as a criterion in the policy itself. It is requested that policy is amended accordingly.

LP(025)030: Land to east of Shipdham Road

There are no known designated heritage assets within the site or nearby which could be affected development of this site. However, Dereham is associated with significant prehistoric activity as such the site may have archaeological potential which should be considered and it is recommended that the policy and supporting text is amended to require an archaeological assessment for development proposals within the site.

The proposed site is located on the edge of the existing settlement looking over open land, the relationship between any new development and the surrounding landscape should then be carefully considered. The site allocation would form a substantial urban extension to Dereham and it is important that the edge condition of the town is appreciated within the wider context of the landscape, as such the relationship of the new development with the surrounding landscape should be considered. Part 5 of the policy states that development should avoid coalescence with Westfield which is welcomed but it is recommended to that this amended to also refer to Yaxham which also has site allocations proposed. Paragraph 3.146 of the supporting text states that a historic characterisation study carried out in support of the allocation 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 appropriate design, this is welcomed but it does appear as a criterion in the policy itself. It is requested that policy is amended accordingly.

The cumulative impact of the site allocations should also be considered and this is recognised in paragraph 3.145 which states that development should have regard to neighbouring allocation LP(25)011 but this is only in terms of access arrangement rather than in terms of landscape or townscape.

Swaffham

LP(097)006: Land off New Sporle Road (south)

There are no known designated heritage assets within the site or nearby which could be affected development of this site. The site is also bounded by existing development to the east, west and south and by the A47 to the north. We have no specific comments to make on this site.

LP(097)008: Land off New Sporle Road (North)

This site is located next to LP(097)006, similarly there are no known designated heritage assets within the site or nearby which could be affected development of this site. The site is also bounded by existing development to the east, west and south and by the A47 to the north. We have no specific comments to make on this site.

LP(097)009: Land to the east of Brandon Road

There are no known designated heritage assets within the site or nearby which could be affected development of this site. The proposed site allocation is located immediately adjacent to a larger site which already has planning permission to be developed. Together the sites would constitute a substantial urban extension to the Swaffham. As an edge of settlement site, its development should be informed by an assessment of relationship between Swaffham and the surrounding landscape. Point 4 of the policy does make a provision for layout and design but only in respect to existing built development and not with the open landscape to the south.

It is noted that point 4 makes reference to Norwich Road which lies much further north of the site; this is highlighted as a potential error in the plan.

LP(097)010: Land to the south of Norwich Road

To the north west of the site is the Church of St Peter & St Paul, which is Grade I listed and dates from the 14th century and the Grade II* listed Manor House dating from c1740. The site is outside the conservation area which lies to the west and is separated from the site by existing 20th century residential development. There are also several Grade II listed buildings which surround the site, including Crown Cottage and Wood Farmhouse. Any development of the site therefore has the potential to impact upon these heritage assets. It is important that any development of this site will need to preserve the listed buildings, and conserve or enhance the conservation area and its setting. These requirements should be included in the policy and supporting text of the Plan.

It is acknowledged that both the supporting text and policy make reference to the presence and proximity of designated heritage assets which is welcomed. However there should also be consideration for potential unknown or non-designated heritage assets. This could be achieved by amending point 4 to use the “*historic environment*” rather than “*designated heritage assets and conservation area ...*” It is also recommended that the policy require a Heritage Statement rather than an appraisal of significance which is required in any case by paragraph 129 of the NPPF.

LP(097)013: Land off Sporle Road

There are no known designated heritage assets within the site which could be affected its development. The Swaffham Conservation Area is located to the southwest of the site and covers the town centre of the settlement. Development of this site should seek to conserve or enhance the setting of the conservation area as the height of new development could impact upon the conservation area. Reference to the anticipated building height of two storeys in point 2 of the policy is therefore welcomed but its justification could be strengthened by referring back to the need to conserve the setting of the conservation area. Additionally, as an edge of settlement site, its development should be informed by an assessment of relationship between Swaffham and the surrounding landscape. These requirements should be included in the policy and supporting text of the Plan.

LP(097)018: Land to the north of Norwich Road

This site allocation would see the development of 165 new dwellings on an area of open land to the east of the grade II* listed Swaffham Manor House. The Grade II listed Gradys Hotle and the Swaffham Conservation Area are also located to the west of the site. The currently open site forms part of the setting of this Grade II* listed building. The Manor House dates from around 1740 and presents a formal facade to the west, towards Swaffham town centre. The rear of the House features a series of 19th century service ranges and beyond this outbuildings set in a linear arrangement. On its north side this range faces an access trackway which continues past the buildings towards the field beyond. The Manor House is set in agricultural land on the outskirts of Swaffham, but having the outbuildings in this arrangement gives the Manor House an additional link to the landscape. The field at the end of the outbuilding range is a relatively small one and borders the application site to the east of the Manor. Although there is planting on the field edge the application site plays a role in the rural setting of the Manor House an building a housing development on the site could diminishes the contribution it makes to the significance of the listed building. Any development of this site would therefore have the potential to impact upon the setting of the conservation area.

Any development of this site will need to preserve or enhance these heritage assets and their settings. This might be achieved through mitigation measures such as appropriate design, location of open space, landscaping/planting and massing of the development. Additionally, as an edge of settlement site, its development should be informed by an assessment of relationship between Swaffham and the surrounding landscape.

It is noted that part 3 of the policy refers to need to preserve or enhance special interest of designated and non-designated heritage assets but makes no reference to setting. We request the policy is amended accordingly. The policy is written as if a scheme has already been submitted and whilst that may be the case the policy should work as separate entity and should be written in isolation to any prospective scheme. The need to provide a statement of significance is welcomed but is slightly superfluous as this is required by the NPPF in any case. It is noted that the supporting text erroneously refers to the Manor House as being Grade II listed when it is in fact Grade II* listed, as such any future decision should be made in consultation with Historic England.

Watton

LP(104)008 and LP(104)019: Land off Saham Road

There are no known designated heritage assets within the site which could be affected its development. The Watton Conservation Area is however located to the south of the site. Any development of this site will need to preserve or enhance this designated heritage asset and its setting. This might be achieved through mitigation measures such as appropriate design, location of open space, landscaping/planting and massing of the development. Additionally, as an edge of settlement site, its development should be informed by an assessment of relationship between Watton and the surrounding landscape. We note that point 3 outlines appropriate densities to reflect his which is welcomed. These requirements should be included in the policy and supporting text of the Plan.

Paragraph 3.186 of the supporting text makes reference to the conservation and other nearby non-designated heritage assets but this is not referred to in the policy itself. This paragraph also states that development proposals at this site must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken in order to inform an appropriate design response but again this requirement does not transfer through into the policy itself. It is recommended that the policy is amended accordingly to include these requirements.

LP(104)015: Land north of Norwich Road, Watton

There are no known designated heritage assets within the site which could be affected its development. However, the Grade II listed Rokeles Hall is located to the immediate northeast of the site. The open setting of the surrounding landscape contributes positively to the setting of this designated heritage asset. We note that point 9 of the policy refers to the need for development to protect or enhance the setting of Rokeles Hall and requires a design scheme to be informed by a detailed appraisal of the assets' significance which is welcomed. The policy would be strengthened if the supporting text outlines more precisely the nature of the Rokeles Hall to the surrounding landscape.

Ashill

LP(001)009: Land between Church Street and Hale Road

There are no known designated heritage assets within the site which could be affected by its development. However, the Grade I listed Church of St Nicholas is located to the southwest of the site. Any development of this site will need to preserve or enhance this designated heritage asset and its setting. This might be achieved through mitigation measures such as appropriate design, location of open space, landscaping/planting and massing of the development. These requirements should be included in the policy and supporting text of the Plan.

It is noted that paragraph 3.199 of the supporting text refers to the Grade I listed building and identifies a nearby C19 school as a non-designated heritage asset of local importance. Whilst this is welcomed there is no mention of these in the policy itself. The supporting text refers to the need to protect views to the Church and whilst this is important it is requested that the text is amended to also refer to the setting of the Grade I listed building as setting is a distinct concept to views. The supporting text also requires a design scheme for development of the site to be informed by a detailed appraisal of the asset's significance but again this does not appear as a requirement in the policy itself. It is recommended the policy is amended accordingly.

Banham

The reference to Banham's rich historic environment and description of designated heritage assets in paragraph 3.202 of the opening text is helpful in outlining the defining aspects of Banham.

LP(003)003, LP(003)009 and LP(003)012: Land adjacent to Gaymer Close and to the south of Greyhound Lane

There are no known designated heritage assets within this collection of sites which could be affected their development. The sites however, partially fall within the Banham Conservation Area and are located to the north of a cluster of Grade II listed buildings and structures. Any development of this site will need to preserve or enhance these designated heritage assets and their settings. This might be achieved through mitigation measures such as appropriate design, location of open space, landscaping/planting and massing of the development. These requirements should be included in the policy and supporting text of the Plan.

Point 5 of the policy requires development to protect or enhance the setting of the Banham Conservation Area and this is welcomed. As an edge of settlement this collection of the cumulative impact of all three sites must be considered, the policy requirements referring to height, scale, and density are therefore welcomed but justification for their inclusion would be strengthened if linked back to the role these requirements have to play in maintaining the character of the settlement.

Bawdeswell

The reference to Bawdeswell's rich historic environment and description of designated heritage assets in paragraph 3.213 of the opening text is helpful in outlining the defining aspects of Bawdeswell.

LP(004)008: Land off Hall Road

There are no known designated heritage assets within the site which could be affected its development. The Bawdeswell Conservation Area and a cluster of Grade II listed buildings and structures are however situated to the north of the site. Any development of this site will need to preserve or enhance these designated heritage assets and their settings. This might be achieved through mitigation measures such as appropriate design, location of open space, landscaping/planting and massing of the development. These requirements should be included in the policy and supporting text of the Plan. At present neither the supporting text nor the policy mention the presence of nearby heritage assets and contains no provision for their protection or enhancement. It is recommended that the policy is amended accordingly.

Garboldisham

The reference to Garboldisham's rich historic environment and description of designated heritage assets in paragraph 3.220 of the opening text is helpful in outlining the defining aspects of Garboldisham.

LP(031)004 and LP(031)005: Land to the west of Hopton Road

There are no known designated heritage assets within the site which could be affected its development. However, the Grade II listed Compton Pear Tree Cottage is located to the north east of the site and the Gorboldisham Conservation Area lies to the north. The site occupies currently open land and has a relationship to the The Brecks which lie to the northeast. Development at this site could erode the historic relationship with the fen edge. There are a number of scheduled monuments and a Roman Road to the east of the site; these include Devil's Ditch and Garboldisham Heath Round Barrow. It is therefore likely that this site will have archaeological potential. Development of this site should not encourage or result in coalescence with the nearby settlement of Smallworth which although in close proximity to Garboldisham retains a discernible separation. At present neither the policy or the supporting text mentions these issues. Any development of this site will need to preserve or enhance these designated heritage assets and their settings. This might be achieved through mitigation measures such as appropriate design, location of open space, landscaping/planting and massing of the development. The text and the policy should also refer to potential archaeological remains and require an archaeological assessment to be submitted upon application. These requirements should be included in the policy and supporting text of the Plan. At present neither the supporting text nor the policy mention the presence of nearby heritage assets and contains no provision for their protection or enhancement. It is recommended that the policy is amended accordingly.

Harling

LP(042)001: Land off Kenninghall Road

There are no known designated heritage assets within the site which could be affected its development. A Grade II listed windmill is located to the south of the site and the East Harling Conservation Area is located to the east. Any development of this site will need to preserve or enhance these designated heritage assets and their settings. This might be

achieved through mitigation measures such as appropriate design, location of open space, landscaping/planting and massing of the development. The text and the policy should also refer to potential archaeological remains and require an archaeological assessment to be submitted upon application. These requirements should be included in the policy and supporting text of the Plan.

Hockering

LP(044)005: Land to east of Heath Road

There are no known designated heritage assets within the site which could be affected by its development. Paragraph 3.243 of the supporting text states that planning approvals have recently been granted for sites on land to the west of Heath Road, it is therefore important for development of the proposed site allocation to have consideration for the cumulative impacts of development in this area. Reference in the policy to the need for development to reflect existing development in terms of density, height and scale is welcomed.

Kenninghall

The reference to Kenninghall's rich historic environment and description of designated heritage assets in paragraph 3.249 of the opening text is helpful in outlining the defining aspects of Kenninghall.

LP(051)003: Land off Powell Close

There are no known designated heritage assets within the site which could be affected by its development. However, the site is located immediately adjacent to the Kenninghall Conservation which lies to the east of the site and which contains a number listed buildings and structures. This relatively small site is proposed for allocation to provide 15 dwellings. The site is set away from the listed buildings and it is unlikely that they would be affected. Point 1 of the policy requires development to have regard to these heritage assets but the wording does refer only to the special interest of the designated heritage assets. We would recommend that the wording is amended to require development to preserve or enhance these heritage assets and their settings. It is also recommended that the supporting text is expanded to refer to the conservation area and to define some of its characteristics so that the policy is more locally specific.

Narborough

LP(065)008: Land to south of Chalk Lane

It is noted that this inset map within the plan is not orientated to north; it is recommended that this is amended for clarity. There are no known designated heritage assets within the site which could be affected its development. The Campbell scheduled monument is located to the north of the site on the far side of the existing settlement which itself has Saxon origins. Therefore the proposed site allocation may have archaeological potential and so it is recommended that the policy is amended to require an archaeological assessment to be submitted upon application. This requirement should be included in the policy and supporting text of the Plan.

Necton

LP(067)010: Land off North Pickenham Road

Whilst there are no designated heritage assets within the proposed site allocation boundary the site contains Erne Farm and its associated barn which date from 1817 and are considered to be of local importance. The policy and supporting text both outline the non-designated heritage assets within the site stating that they are worthy of retention and requiring development to preserve or enhance these non-designated assets which is welcomed.

LP(067)011: Land between North Pickenham Road and Masons Drive

There are no known designated heritage assets within or near to the site which could be affected by its development. Point 3 of the policy refers to the need to protect and enhance existing non-designated assets but the supporting text provides no information to outline what these non-designated assets are or where they are located. Development of this site could impact upon the setting of the non-designated Erne Farm and barn discussed in the site allocation above but so point 3 may be intended to reflect that but clarity is required if this policy inclusion is to be fully comprehended and justified.

North Elmham

The reference to North Elmham's rich historic environment and description of designated heritage assets in paragraph 3.287 of the opening text is helpful in outlining the defining aspects of North Elmham.

LP(070)001: Land at Holt Road

Whilst there are no known designated assets within the site boundary of the proposed allocation the site is surrounded by a number of highly significant heritage assets. These include the Grade I listed Church of St Mary which lies to the north of the site along with an Episcopal chapel and fortified manor house and site of Angle-Saxon cathedral scheduled monument along with the North Elmham Conservation Area. The Elmham Park Registered Park and Garden is located to the west of the site on the far side of Holt Road along with a number of Grade II listed structures within the settlement centre also to the west of the site. Any development of this site will need to preserve or enhance these designated heritage assets and their settings. It is noted that point for of the policy requires development to have regard for nearby heritage assets. The text and the policy should also refer to potential archaeological remains and require an archaeological assessment to be submitted upon application. These requirements should be included in the policy and supporting text of the Plan.

LP(070)007: Land to north of Eastgate Street

The site is located within the North Elmham Conservation Area and sits opposite the Old Hall Farm Barn and Farmhouse, both of which are Grade II listed. To the north of the site lies the Episcopal chapel and fortified manor house and site of Angle-Saxon cathedral scheduled monument. Points 1, 2 and 3 of the policy require development to have regard to these heritage assets but the wording could be improved. With regards to the

conservation area development should preserve or enhance its character or appearance. The policy regarding conservation areas at present only refers to views and landscape character and whilst this is important it does not adhere to the statutory obligations required for the management of conservation areas under the 1990 Act. Point 3 which relates to the setting of listed building is welcomed but it would be better is simply used the term heritage assets rather than listed buildings, this term would cover impacts upon the setting of the scheduled monument and conservation area as well as the listed buildings. The need for an archaeological assessment is welcomed.

Old Buckenham

LP(074)014: Land off St. Andrew's Close

It is noted that this inset map within the plan is not orientated to north; it is recommended that this is amended for clarity. The site lies to the south of the Old Buckenham Conservation Area and the Grade II listed Manor House. Any development of this site will need to preserve or enhance these designated heritage assets and their settings. Whilst the policy and supporting text refer to the need for development to use appropriate heights, scale and densities neither the policy nor the text refer to the heritage assets identified. These requirements should be included in the policy and supporting text of the Plan. Paragraph 3.303 states that development should demonstrate that full analysis of the immediate and wider context has been undertaken to inform a design response but this not appear as a requirement within the policy itself.

Shipdham

The reference to Shipdham's rich historic environment and description of designated heritage assets in paragraph 3.306 of the opening text is helpful in outlining the defining aspects of Shipdham.

LP(085)002: Old Nursery, land behind Old Post Office Street

There are no known designated heritage assets within the site boundary which could be affected by development of this site. The Shipdham Conservation Area is located east of the site but on the far side of Watton Road. Development of this site should still have regard for the setting of the conservation area and its setting will be vulnerable to building heights within the site allocation. The site is currently open land and so development should also have considered.

LP(085)006: Land west of Brick Kiln Lane

There are no known designated heritage assets within the site boundary which could be affected by development of this site. The Shipdham Conservation Area is however located to the immediate southwest of the site. Any development of this site will need to

preserve or enhance this designated heritage asset and its setting. Whilst the policy and supporting text refer to the need for development to use appropriate of appropriate design and densities neither the policy nor the text refer to the conservation area. These requirements should be included in the policy and supporting text of the Plan.

Sporle

LP(092)005: Land to the north of Essex Farm

There are no known designated heritage assets within the site boundary which could be affected by development of this site. A Roman Road lies to the west of the site which increases the likelihood of archaeological potential, as such we request that the policy is amended to require development proposals on this site to be accompanied by an archaeological assessment. Wolferton Hall, a Grade II listed building sits to the southeast of the site. We welcome the inclusion of point 5 in the policy which requires development to preserve and enhance the special interest of this heritage asset. We do however request that the policy is amended so that it also makes specific reference to its setting.

Swanton Morley

We welcome the supporting text at paragraph 3.326 which states the need to avoid coalescence of Swanton Morley and the hamlet of Woodgate to the southeast.

LP(098)013: Land off Rectory Road

The proposed site allocation consists of currently open land to the north of Swanton Morley. To the east of the site sits the grade I listed parish church of All Saints. The church remains decisively separated from the settlement and the open fields to the north and west of the village make a particular contribution to the church's significance. The character of its immediate surroundings serves to symbolise the historic status and authority of the church in the community, reflects its historical place in an agricultural community and economy and gives it greater presence in the landscape. It is also a suitable setting for such an ancient and spiritual place which contributes to its significance and to an understanding of its importance. Alarming the draft policy makes no reference to the presence of this Grade I listed building and as such contains no provision to ensure that its special historic or architectural significance and its setting are protected. We request that the policy be amended to reflect this.

Paragraph 3.328 of the supporting text states that the proposed site allocation would be an extension of an existing site which is under construction to provide 52 dwellings. The site layout shows that open space has been designed to site towards the end of the north site nearest the Church. We would expect then that the policy would refer to the cumulative impacts of any future development and the impacts that it would have upon the setting of the church and upon the relationship of the existing settlement and the adjoining open landscape. Open space should be orientated toward the northern end of

the proposed site allocation to preserve the setting of the church similar to that negotiated at the adjoining site.

We would also question the wording of point 4 of the policy which requires new development to reflect existing densities. As the site is currently open land surrounded by sparse development any proposed site allocation for 85 dwellings could not realistically achieve a density level comparable with what exists, if this is intended to mean that the site should only accommodate low densities then the wording of the policy should be changed to say that.

Chapter 4: Transport

There are a number of major transport infrastructure projects on-going or upcoming within Norfolk. We support a cross boundary strategic level consideration of transport infrastructure and look forward to being involved in specific proposals as they progress. All proposed transport infrastructure schemes and route options should take into consideration their impacts on heritage assets and their setting alongside archaeological potential.

Chapter 5: Environment

We recommend that paragraph 5.1 of the supporting text is amended to refer to the historic environment alongside the natural and built environment.

There is concern with paragraph 5.7 which starts by stating that *“the planned levels of growth could impact upon the District’s natural and historic environment”*. Whilst it is appreciated that development management policies can help regulate the implementation of development proposals and manage change on a case by case basis there is concern that the fundamental growth planned within the Local Plan will not be sustainable if it cannot be delivered without harming the historic environment. Crucially, the NPPF identifies the protection and enhancement of the historic environment as being a key strand in what it defines sustainable development (paragraph 7). The inclusion of this sentence implies that the plan is unsound in its most fundamental form as the growth planned cannot be sustainable if it cannot protect or enhance the historic environment. We request that this sentence is omitted from the Plan.

Policy ENV01: Green Infrastructure

Landscape, parks and open space often have heritage interest, and it would be helpful to highlight this. It is important not to consider ‘multi-functional’ spaces only in terms of the natural environment, health and recreation. It may be helpful to make reference in the text to the role GI can have to play in enhancing and conserving the historic environment. It can be used to improve the setting of heritage assets and to improve access to it, likewise heritage assets can help contribute to the quality of green spaces by helping to create a sense of place and a tangible link with local history. Opportunities can be taken to link GI networks into already existing green spaces in town or existing historic spaces such as

church yards to improve the setting of historic buildings or historic townscape. Maintenance of GI networks and spaces should also be considered so that they continue to serve as high quality places which remain beneficial in the long term.

Policy ENV07: Designated Heritage Assets

The supporting text at paragraphs 5.55 and 5.63 recognises that the historic environment is a finite and irreplaceable resource and is welcomed. The supporting text is also locally specific and makes reference to the district's rich and diverse heritage and the role that that the area's geology has played in providing diverse building materials. The supporting text however makes no reference to heritage at risk.

The policy is made up of paragraphs but these are not numbered, we recommend that the policy points are labelled with numbers or letters to aid identification.

The wording of the first sentence requires clarification as it could be interpreted to mean that the settings of only listed buildings and conservation areas need to be considered whereas the settings for registered parks and gardens, and scheduled monuments do not. This is rectified in the second paragraph which compounds the incongruity of the wording in the first paragraph. This paragraph refers to "archaeological sites" which are not a designated asset equivalent to scheduled monuments and there is no clarification as to what is meant by an archaeological site in this context.

It is requested that the word "and" in the phrase "conserve and enhance" is changed to read "conserve or enhance". The use of the word "and" is a more stringent test beyond that outlined by the statutory obligation of the 1990 Act.

The second paragraph ends by stating that, "*where a proposed development will affect the character or setting of a listed building, particular regard will need to be given to the protection, conservation and potential enhancement of any features historic or architectural interest; **this includes internal features, floor plans and spaces or any object or structure within the curtilage of a listed building that predates 1st July 1948***" (emphasis added). The intention to outline the fact that a listed building's interest often goes beyond its list description and includes its interior is understandable. Nevertheless it is inadvisable to compile a list of features considered by the Council to have historical or architectural interest as such a list could not be exhaustive given the range and varied nature of listed buildings and therefore could be read to imply that absence from the list equates to absence of interest.

The third paragraph of the policy is effectively a policy provision for enabling development. By definition in the NPPF, enabling development is development that is not otherwise in accordance with adopted policy and is therefore not a necessary component of a local plan document. A stand-alone policy on enabling development is not necessary as it covered entirely by paragraph 140 the NPPF and should be applied on a case by case basis depending on the merits of a particular proposal rather than as part of the Plan. A local plan should adequately set out a positive strategy for the historic environment without the need to include such a policy. There is also concern about what is meant by a building with "*particular architectural or historic interest*", if this is meant to

refer to listed buildings or locally listed buildings then that should be stated, at present it could be interpreted to exclude certain types of listed building which are of architectural or historic interest i.e. listed, but not of “*particular*” interest. It is unclear how this distinction is to be interpreted.

The fourth paragraph of the policy relates to archaeology. The desire to ensure that archaeological remains are left in situ is welcomed. It is recommended that the “*can*” is replaced “*should*” in the second sentence to read “*where appropriate, archaeological remains should be left in situ ...*”. Where archaeological remains cannot be left in situ the policy requires satisfactory excavation and recording to be carried out before the development is begun. It may be helpful to outline how this will be secured in order to outline expectations to prospective applicants, for example via a condition or in some cases a legal agreement. This will help provide certainty from the outset so that applicants can then plan effectively which should reduce pressure for development to start before the archaeology can be properly excavated and recorded.

Conservation areas

We encourage that the local plan process provides a basis for the continued update and management of Conservation Management Plans, identifying each conservation area’s local identity and distinctiveness. These should identify features that typify and contribute to this special distinctiveness as well as allow for less tangible judgments of character, quality of place and special distinctiveness. The plan will be more robust where it directs future development to take account of the special and distinctive character of Conservation Areas, emphasising that this is a cumulative result of built form, materials, spaces and street patterns, uses and relationships to surrounding features such as the surviving historic buildings and street patterns.

Breckland has 51 conservation areas, 2 of which are on the Heritage at Risk Register (HAR), and none of which benefit from a conservation area appraisal or management plan. This was highlighted as a major point of concern by us in earlier consultations. Since then further work has been carried out to produce a Historic Characterisation Study (dated March 2017). This work was focused on supporting the site allocations process and falls short of being a true characterisation study. Instead it reads more as a series of short Heritage Impact Assessments which is a useful tool and helpful in for assessing the site allocations put forward in the Plan. Whilst the Historic Characterisation Study helps understand and support the site allocations it is inadequate to provide guidance to prospective applicants and decision makers on the continued management of conservation areas.

We request that policy ENV07 is amended to include a commitment to undertake a programme of work to develop conservation area appraisals. With 51 conservation areas and limited Council resources we appreciate that this will be a long term project but a commitment should be made to begin producing these within the Local Plan starting with those most likely to experience development pressures and those on the HAR register. It would be useful if the production of conservation area appraisals/management plans appeared as a monitoring indicator, for example the production of five per year.

We would also welcome provision for any future designation of conservation areas within cities, districts and boroughs as well as specific provision for the landscape setting of different parts of the area.

Policy ENV08: Non-Designated Heritage Assets

We very much welcome the inclusion of a standalone policy which addresses non-designated heritage assets. Robust provision for these heritage assets will increase the soundness of your forthcoming plan.

Policy ENV10: Renewable Energy Development

We support the inclusion of a specific policy relating to renewable energy technologies. A sustainable approach should secure a balance between the benefits that such development delivers and the environmental costs it incurs. We welcome point (i) of the policy which seeks to limit and mitigate any such cost to the historic environment.

Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance. Special considerations under Part L are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture.

In developing policy covering this area you may find the Historic England guidance *Energy Efficiency and Historic Buildings – Application of Part L of the Building Regulations to historically and traditionally constructed buildings* <https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/> to be helpful in understanding these special considerations.

Chapter 6: Economy and Employment

Employment site allocations:

Attleborough Employment Allocation 1:

LP(002)029 and LP(002)007: Land to the west of London Road

The Grade II White Lodge Inn sits immediately to the west of this site. It is a low rise building which sits in open land, buildings in this area sit alone and are separated out from each other. Development at this site must therefore be sensitive to the setting of the listed building. Any development of this site will need to preserve or enhance this designated heritage asset and its settings. The text and the policy should also refer to potential archaeological remains and require an archaeological assessment to be submitted upon application. These requirements should be included in the policy and supporting text of the Plan.

Snetterton Heath Employment Allocation 1:

LP(087)010A: Land to the northwest of the General Employment Area

The Grade I listed Church of All Saints and Grade II listed Old Rectory lie to the northwest of the proposed site allocation. Although set a distance away from the site the land separating them is open and so the setting of these of heritage assets could be affected by the height of the development of the site. Any development of this site will need to preserve or enhance these designated heritage assets and their settings. These requirements should be included in the policy and supporting text of the Plan.

Snetterton Heath Employment Allocation 2:

LP(087)009: Land to the east of the General Employment Area

There are no known designated heritage assets within the proposed site allocation boundary and none nearby which would be affected. The Grade II listed remains of a C15 stone cross lie at a crossroad to north of the site and given its nature and distance of separation from the site is unlikely to be affected by its development. Closer to the site is Gallows Hill Tumulus, a scheduled monument to the south of the site. The scheduled monument is screened from the site by existing development, so development of the proposed site allocation is unlikely to result in an impact upon the setting of the scheduled monument beyond that which already exists. The presence of the scheduled monument does however increase the potential for other archaeological remains of interest to be present. The text and the policy should refer to potential archaeological remains and require an archaeological assessment to be submitted upon application. This requirement should be included in the policy and supporting text of the Plan.

Policy EC02: Snetterton Heath

We welcome the inclusion of point 4 of the policy which requires development to have a minimal impact upon the surrounding landscape. We recommend that the policy is expanded at this point to ensure that development has regard to the protection or enhancement of the historic environment.

Saved Employment Allocations:

Saved Policy D5: Land east of Dereham Business Park

There are no known designated heritage assets within this site allocation boundary, however the Grade II listed Borrow Hall lies to the south of the site separated by a stretch of relatively open land. Although set a distance away from the site the land separating the site from the listed building is open and so the setting of this heritage asset could be affected by the height of the development of the site. Any development of this site will need to preserve or enhance these designated heritage assets and their settings. These requirements should be included in the policy and supporting text of the Plan. Point (e) of the policy seeks to minimise the appearance of any development by using landscape screening which is welcomed.

Saved policy SW2: Land to the north of the Eco-Tech Centre, Swaffham

This site would be bounded by the A47 to the north and an existing employment area to the south. The development of this site is unlikely to impact upon the historic environment given how developed the surrounding land is and how enclosed it is by larger, more intensive development. There are no known designated heritage assets within the site or nearby which could be affected.

Saved policy SW3: Land to the west of the Eco-Tech Centre, Swaffham

As with site SW2 above the site is located in bordered by existing development, namely West Acre Road to the west and Breckland Park School to the east. There are no known designated heritage assets within the site or nearby which could be affected.

Policy EC4: Employment Development Outside General Employment Areas

Part (d) of the policy seeks to protect traditional buildings of clear architectural or historic interest from being removed. It is not clear what the policy means by the term “traditional” in this sense and if a building of clear architectural or historic interest refers to a listed building. If so, a listed building as a designated heritage asset should not be considered for demolition without consideration of the proper tests embodied within paragraphs 132-134 of the NPPF. The policy implies that demolition and replacement will be acceptable if the criteria of the policy are met and so does not conform with national policy.

The policy contains no provision to ensure that development preserves or enhances nearby heritage assets and their settings.

Policy EC05: Town Centre and Retail Strategy

The conservation and enhancement of the historic environment can improve the quality of local places and reinforce local character and distinctiveness. This can help create attractive and pleasant places that people want to visit. It is therefore recommended that the historic environment is mentioned in the third bullet point at the end of the policy so that it reads, “*Deliver improvements to the built and historic environment*”. This will recognise the role the historic environment has to play in helping establish local identity and sense of place whilst seeking its enhancement.

Policy EC06 Farm Diversification:

This policy requires development to have regard to residential amenity, biodiversity, the natural environment and landscape character. We request that the historic environment is recognised as well. Retaining, maintaining and conserving our rural heritage in all its various forms not only enhance the appearance and character of the countryside, it also brings considerable benefits to local economies and communities. The adaptive reuse of some traditional farm buildings can help secure beneficial uses for vacant or derelict historic buildings and places.

Policy EC07: Tourism Related Development

Local distinctiveness and a sense of place are important in shaping the identities of rural communities, and also underpin many tourism activities. The impact of change on historic character should be carefully considered when decisions on future development are being made. The policy should recognise that there is an opportunity for development

to help enhance historic context or significance and can in, some instances, improve public access to historic environment.

Policy EC08: Advertising and Signs

We welcome reference to the need for development to have particular regard to the historic character of frontages.

Chapter 7: Communities

Policy COM 01: Design

We very much welcome point (a) of the policy which seeks to preserve or enhance the special character of the historic environment and heritage assets.

It is noted that the plan does not contain any policies which relate to the shopfronts. The retention of original/historic or significant shopfronts elements are often integral to the character of these buildings and that of the wider street scene. Therefore a development management policy should be place in order to manage their change successfully. It is considered the policies should highlight the importance of retaining or restoring historic shopfront features both in terms of the positive contribution historic shopfronts make to the character of an area but also the economic benefit of providing traditional and bespoke shopping units to shopowners. A good example of how historic shopfronts can positively contribute to an area both aesthetically and economically is where Derby City Council teamed up with English Heritage (now Historic England) to help restore an area of Victorian and Edwardian shops, the Strand. The restoration of a number of shops within the area has meant that a previously underused section of the city provides bespoke shopping, now sees a much larger footfall and is considered to be a National success. The council have also seen a ripple effect of surrounding properties being restored. As well as including conservation and design issues within these policies the Council could consider additional advice within a Supplementary Planning Guide on Historic Shopfronts, especially given the importance and contribution the Historic shopping areas within the settlements of Suffolk make to the wider area.

Policy COM02: Healthy Lifestyles

The continued protection or enhancement of the historic environment can contribute to the provision of high quality places in both rural areas and towns/villages which can impact upon wellbeing. Parks and gardens often have historic links which can be help improve the experience of the place for those visiting or using it. We recommend that the historic environment is listed alongside natural green spaces and high quality open spaces on bullet point 5 of paragraph 7.11 of the supporting text. The use of historic spaces for recreational or leisure purposes may encourage people to visit and thus help promote knowledge of local historic places.

Chapter 8: Infrastructure and Delivery

Policy INF01: Telecommunications

Advanced, high quality telecommunications infrastructure is essential for sustainable growth. The development of high speed broadband technology and other communications networks also play a vital role in enhancing provision of local community facilities and services. However, the siting and location of telecommunications equipment can affect the appearance of the public realm, streetscene, the historic environment and wider landscapes. The consideration of their positioning is therefore important, particularly in conservation areas. We suggest that you refer to the following guidance which you may find helpful:

Cabinet Siting and Pole Siting Code of Practice:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/205744/Final_Cabinet_and_Pole_Siting_COP_Issue_1_2_.pdf

We request that the policy is amended to require development to have regard to the need to protect or enhance the historic environment to ensure that applicants properly consider the siting, design and positioning of equipment in this context.

Monitoring

The Plan does not include any monitoring indicators. We recommend the inclusion of indicators to measure how successful historic environment policies are. These can include preparation of a local list, completion of conservation area action plans and management plans, reduction in the number of assets that are classified as heritage at risk.

As mentioned earlier in this letter, it would be helpful to include a monitoring indicator to reflect to the production of conservation area appraisals or management plans.

Glossary

We are pleased to see that a glossary has been provided. Glossaries should include consistent definitions for all heritage assets mentioned in the local plan. The glossary at present is missing definitions for:

Scheduled Monuments

Registered Parks and Gardens

Designated heritage assets

Non-designated heritage assets / Local Heritage Assets / Locally Listed Heritage Assets /
Locally Listed Buildings

Mapping

We recommend that designated heritage assets are marked on maps, especially in relation to site allocation maps.

Comments on Sustainability Appraisal

We welcome the inclusion of objective SA10 which addresses the historic environment. However there is concern that the wording of SA10 falls short of providing a positive strategy for the historic environment given that it states “*conserve and where appropriate enhance the historic environment*”. We request that the words “*where appropriate*” are omitted.

In the corresponding key question we request that the term “*historic environment*” is used rather than “*heritage assets*” as it is more all-encompassing term which reflects the varied and sometimes intangible nature of cultural heritage.

Concluding thoughts

In preparation of the forthcoming Local Plan, we encourage you to draw on the knowledge of local conservation officers, the county archaeologist and local heritage groups.

Please note that absence of a comment on an allocation or document in this letter does not mean that Historic England is content that the allocation or document forms part of a positive strategy for the conservation and enjoyment of the historic environment or is devoid of historic environment issues. Where there are various options proposed for a settlement, identification of heritage issues for a particular allocation does not automatically correspond to the support for inclusion of the alternative sites, given we have not been able to assess all of the sites.

Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.

Yours sincerely,

Katie Parsons
Historic Environment Planning Advisor
katie.parsons@historicengland.org.uk



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: Richard Crosthwaite	
Organisation: Gladman Developments Limited	
Address:	
Post code:	Telephone:
E-mail:	

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

Please see attached document

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)

Gladman have submitted representations on a range of matters and issues in response to consultations held during the Council's plan preparation process.

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.

Please see attached document

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 attached document

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

Please see attached document

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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.

Gladman wish to be invited to attend the Examination Hearings to address the matters and issues that we have raised in the attached document.

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: R Crosthwaite	Date: 2/10/17

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.

Breckland Council
Local Plan
Pre-submission consultation



October 2017

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Appendix 1: Gladman response to the Norfolk Strategic Framework Consultation, 2017

Appendix 2: Letter from Local Lead Flood Authority (LLFA) to Breckland Council (BC), 31 May 2017

Appendix 3: Lichfields Review of Central Norfolk SHMA, September 2017

Appendix 4: Location Plan and Framework Plan for Land off Dereham Road, Mattishall

1 INTRODUCTION

1.1 Background

1.1.1 These representations are made by Gladman Developments Ltd. (hereafter referred to as “Gladman”). Gladman specialise in the promotion of strategic land for residential development with associated community infrastructure and has land interests in Breckland.

1.1.2 Gladman has considerable experience in the development industry across a number of sectors, including residential and employment development. From that experience, we understand the need for the planning system to provide local communities with the homes and jobs that are needed to ensure residents have access to the homes and employment opportunities that are required to meet future development needs of the area and contribute towards sustainable economic development.

1.1.3 Gladman has been involved in contributing to the plan preparation process across England and through the submission of written representations and participation at local plan public examinations. It is on the basis of that experience that these representations have been prepared.

1.2 Previous submissions

1.2.1 Gladman has made submissions for the following consultations in relation to the Breckland Local Plan (BLP):

- Issues and Options (including Call for Sites), 2015
- Local Plan Preferred Directions, 2016
- Local Plan Preferred Sites and Settlement Boundaries Interim Consultation, 2016

1.2.2 In addition, Gladman have also submitted representations on a number of neighbourhood plans that are being progressed within the Breckland Council (BC) area.

1.3 Structure of Representations

1.3.1 These representations are structured to follow the consultation document and will cover the following key topic areas:

- Housing White Paper
- Legal Compliance
- Duty to Cooperate
- Sustainability Appraisal
- Objectively Assessed Needs and Housing Target

- Spatial Strategy
- Site Allocations

1.4 Plan Making

1.4.1 The Framework sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

1.4.2 A summary of the main issues and concerns raised in relation to the BLP are summarised in Table 1 below. Gladman request that it is given the opportunity to discuss these representations further at the Examination in Public:

Table 1 – Summary of issues and concerns

Policy / issue	Sound/Unsound	Test of Soundness	Reason	Evidence
Sustainability Appraisal	N/A	Justified	The sustainability appraisal does not include the consideration of all reasonable alternatives in identifying the most appropriate sites for allocation	Pre-submission Draft Plan Sustainability Appraisal Site Selection Topic Paper
Policy HOU 02	Unsound	Positively Prepared Effective Consistent with National Policy	Insufficient land is identified through the proposed allocations for Breckland to ensure that the minimum local plan requirement will be achieved whilst maintaining a	Pre-submission Draft Plan NPPF Site Selection Topic Paper

			five year housing land supply	
Policies HOU 03, 04 and 05	Unsound	Positively Prepared Effective Consistent with National Policy	Insufficient land is identified through the proposed allocations to ensure that the minimum local plan requirement will be achieved whilst maintaining a five year housing land supply	NPPF
Policy HOU 10	Unsound	Positively Prepared Effective Consistent with National Policy	Lack of evidence to support technical standards and limited information on development viability	Viability Assessment NPPF
Policy ENV 05	Unsound	Consistent with National Policy	Fails to reflect the requirements of national policy	NPPF
Section 7 Implementation and Monitoring	Unsound	Positively Prepared Effective Consistent with National Policy	A clear monitoring and review mechanism is required to ensure that development needs are met in full over the plan period	Pre-submission Draft Plan

2 NATIONAL PLANNING POLICY AND GUIDANCE

2.1 National Planning Policy Framework

2.1.1 The National Planning Policy Framework (the Framework) makes clear that the purpose of the planning system is to contribute to the achievement of sustainable development and that Local Plans should meet full objectively assessed needs (OAN) for housing.

2.1.2 The Framework has been with us now for over five years and the development industry has experience with its application and the fundamental changes it has brought about in relation to the way the planning system functions. Crucially, the Framework sets out the Government's commitment to 'significantly boosting the supply of housing' and how this should be reflected through the preparation of Local Plans, it is imperative that the emerging BLP is formulated on the basis of meeting this requirement. In this regard, §47 of the Framework sets out specific guidance that local planning authorities should take into account when identifying and meeting their objectively assessed housing needs and states:

To boost significantly the supply of housing, local planning authorities should:

- *Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;*
- *Identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements...*
- *Identify a supply of specific, developable sites or broad locations for growth, for years 6-10, and where possible for years 11-15.'*

2.1.3 The starting point of identifying objectively assessed housing needs is set out in §159 of the Framework, which requires local planning authorities to prepare a Strategic Housing Market Assessment, working with neighbouring authorities where housing market areas cross administrative boundaries. It is clear from the Framework that the objective assessment of housing needs should take full account of up-to-date and relevant evidence about the economic and social characteristics and prospects for the area, with local planning authorities ensuring that their assessment of and strategies for housing and employment are integrated and take full account of relevant market and economic signals (§158).

2.1.4 Once a local planning authority has identified its objectively assessed needs for housing these needs should be met in full, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so (§14). Local planning authorities should seek to achieve each of the economic, social and environmental dimensions of sustainable development, resulting in net gains across all three. Adverse impacts on any of these dimensions should be avoided. Where

adverse impacts are unavoidable, mitigation or compensatory measures may be appropriate (§152).

2.1.5 To be considered sound at Examination the emerging BLP will need to meet all four of the soundness tests set out in §182 of the Framework. Paragraph 182 states:

“A local planning authority should submit a Plan for Examination which they consider is ‘sound’ – namely that it is:

- **Positively prepared** – *the plan should be prepared based on a strategy which seeks to meet the objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;*
- **Justified** – *the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;*
- **Effective** – *the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities; and*
- **Consistent with national policy** – *the plan should enable the delivery of sustainable development in accordance with policies in the Framework.”*

2.2 Planning Practice Guidance

2.2.1 As the Council will be aware the Government published its final suite of Planning Practice Guidance (PPG) on 6th March 2014, clarifying how specific elements of the Framework should be interpreted when preparing Local Plans with further updates to the PPG having been made in the intervening period. The PPG on Housing and Economic Development Needs in particular provides a clear indication of how the Government expects local planning authorities to take account the requirements of the Framework when identifying their objectively assessed housing needs. In summary the Housing and Economic Development Needs chapter of the PPG states:

- Plan makers **should not apply constraints** to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, infrastructure or environmental constraints.
- Household projections published by the Department for Communities and Local Government should provide the **starting point** estimate of overall housing need.
- Household projection based estimates of housing need may need adjusting to reflect factors affecting local demography and household formation rates which are not captured by past trends, for example historic suppression by under supply and worsening affordability of housing. The assessment will need to reflect the consequences of past under delivery and the extent to which household formation rates have been constrained by supply.
- Where the supply of working age population that is economically active is less than the projected job growth, this could result in unsustainable commuting patterns and could reduce the resilience of local businesses. In such circumstances, plan makers will need to consider how

much the location of new housing or infrastructure development could help address these problems.

- If the historic rate of development shows that actual supply falls below planned supply, future supply should be increased to reflect the likelihood of under-delivery of a plan.
- Plan makers should take account of concealed households.
- Housing needs indicated by household projections should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings. Appropriate comparisons of indicators (such as land prices, house prices etc.) should be made – with longer term trends in the HMA, similar demographic and economic areas, and nationally. Divergence under any of these circumstances will require upward adjustment to planned housing numbers.
- The more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (e.g. the differential between land prices), the larger the improvement in affordability needed, and the larger the additional supply response should be.
- Market signals are affected by a number of economic factors. Plan makers should increase planned supply by an amount that, on reasonable assumptions and consistent with principles of sustainable development, could be expected to improve affordability.

3 FIXING OUR BROKEN HOUSING MARKET – WHITE PAPER FEBRUARY 2017

3.1 Overview

- 3.1.1 The Government is in no doubt that the housing market in Britain is broken which, according to the Prime Minister, is one of the greatest barriers to progress in the country today.
- 3.1.2 Average house prices are almost eight times average earnings which is an all-time record and soaring prices and rising rents caused by a shortage of the right homes in the right places has slammed the door of the housing market in the face of a whole generation. In the context of Breckland, the affordability ratio is consistent with the national average at 8.19 demonstrating the need for significant action to be taken to address housing provision.
- 3.1.3 The reason for this crisis is that the country is simply not building enough homes and has not done so for far too long. The consensus is that we need from 225,000 to 275,000 or more homes per year to keep up with population growth and to start to tackle years of under-supply.
- 3.1.4 Everyone involved in politics and the housing industry therefore has a moral duty to tackle this issue head on. The White Paper states quite unequivocally that *'the housing shortage isn't a looming crisis, a distant threat that will become a problem if we fail to act. We are already living in it.'*
- 3.1.5 Tackling the housing shortage is not easy. It will inevitably require some tough decisions. But the alternative, according to the White Paper, is a divided nation, with an unbridgeable and ever-widening gap between the property haves and have-nots.
- 3.1.6 The challenge of increasing supply cannot be met by Government alone. It is vital to have local leadership and commitment from a wide range of stakeholders, including local authorities, private developers, housing associations, lenders and local communities.
- 3.1.7 The starting point is building more homes. This will slow the rise in housing costs so that more ordinary working families can afford to buy a home and it will also bring the cost of renting down. We need more land for homes where people want to live. All areas therefore need a plan to deal with the housing pressures they face.
- 3.1.8 Local planning authorities have a responsibility to do all that they can to meet their housing requirements, and this allocations document represents an important policy tool to ensure local needs are met in full.
- 3.1.9 Plans should be reviewed regularly, and are likely to require updating in whole or in part at least every five years. An authority will also need to update its plan if its existing housing target can no longer be justified against its objectively assessed housing requirement.
- 3.1.10 Policies in Local Plans should also allow a good mix of sites to come forward for development, so that there is choice for consumers, places can grow in ways that are sustainable, and there are

opportunities for a diverse construction sector including opportunities for SME housebuilders to deliver much needed housing.

- 3.1.11 In terms of rural areas, the Government expects local planning authorities to identify opportunities for villages to thrive, especially where this would support services and help meet the need to provide homes for local people who currently find it hard to afford to live where they grew up. It is clear that improving the availability and affordability of homes in rural areas is vital for sustaining rural communities, alongside action to support jobs and services. There are opportunities to go further to support a good mix of sites and meet rural housing needs, especially where scope exists to expand settlements in a way which is sustainable and helps provide homes for local people. This is especially important in those rural areas where a high demand for homes makes the cost of housing a particular challenge for local people.
- 3.1.12 Finally, the Government has made it clear through the White Paper that local planning authorities are expected to have clear policies for addressing the housing requirements of groups with particular needs, such as older and disabled people.
- 3.1.13 The White Paper is the cornerstone of future Government policy on fixing the broken housing market. It provides the direction of travel the Government is intending to take and is a clear statement of intent that this Government is serious about the provision of the right number of houses in the right places. Local plans therefore need to consider these policy intentions now in order to ensure that it fulfils the Government's agenda and provides the homes that its local communities need.

4 LEGAL COMPLIANCE

4.1 Duty to Cooperate

- 4.1.1 The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2012 Coventry Core Strategy Examination and the 2013 Mid Sussex Core Strategy Examination, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.
- 4.1.2 Whilst Gladman recognises that the Duty to Cooperate is a process of ongoing engagement and collaboration¹ as set out in the PPG, it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, BC must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross boundary strategic issues. This is not simply an issue of consultation but a question of effective cooperation.
- 4.1.3 Gladman note that the authorities in the Norfolk Housing Market Area (HMA) have recently consulted on the draft Norfolk Strategic Framework (NSF) which sets out agreements across the HMA to address cross boundary strategic issues. However, through our response to the NSF Gladman highlighted a series of concerns with the approach taken (see Appendix 1 of this submission) in its role to provide an effective mechanism for ensuring housing needs are met in full should any authority be unable to meet their own housing needs.
- 4.1.4 The Framework is clear that Local Plans should meet the housing needs of the HMA in full. As currently proposed, the BLP provides limited information of the HMA's objectively housing needs (OAN) and how these needs will be delivered in full. The BLP is therefore not an effective plan and as a result of failing to meet the test outlined in paragraph 182 of the Framework.
- 4.1.5 The approach taken by the HMA results in a lack of cross boundary strategic planning to ensure housing needs are delivered in full. Indeed, there is no policy contained in the BLP which provides a strong policy mechanism to demonstrate that any unmet housing needs arising from any of the relevant authorities in the HMA and those with a clear functional relationship will be met over the duration of the plan period. It is considered that the approach taken in the NSF is fundamentally flawed by the virtue of the fact that should one authority be unable to meet its needs in full then there is no effective mechanism in place to ensure that the remaining authorities in collaboration will take any corrective action.

¹ PPG Reference ID. 9-011-2014036

4.2 Sustainability Appraisal

4.2.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in local plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations), SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.

4.2.2 The Local Plan should ensure that the results of the SA process clearly justify its policy choices, including the proposed site allocations and the approach taken to new growth when judged against 'all reasonable alternatives'. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. The Council's decision making and scoring should be robust, justified and transparent and should be undertaken through a comparative and equal assessment of each reasonable alternative. Too often the SA process flags up the negative aspects of development whilst not fully considering the positive aspects which can be brought about through new opportunities for housing development and how these can influence landscape issues, social concerns and the economy.

4.2.3 In accordance with the SEA Regulations, the Council must take account of all reasonable alternatives when assessing and selecting their preferred policy choice. It is integral that each reasonable alternative is assessed to the same degree of detail as the authority's preferred option, and should only be rejected after a fair and comparable assessment of its sustainability credentials and needs to be undertaken in a clear and transparent manner.

4.2.4 Gladman has significant issues with the SA which fails to justify the policy choices. Gladman submit that the assessment is not robust in terms of its assessment of scale of housing. In consideration of 'Policy HOU01 – Development Requirements' it assesses the following options:

- Preferred Option: 612 dwellings per annum
- Alternative Option 1: Economic Baseline – 634 dwellings per annum
- Alternative Option 2: Demographic Led – 699 dwellings per annum
- Alternative Option 3: Economic Growth – 770 dwellings per annum

4.2.5 It then states that:

'Due to the limited quantum of previously developed land within Breckland, the majority of new housing growth is likely to be on greenfield sites. The higher level of housing development, the greater the quantum of new housing development which will occur on undeveloped land. The impact on a number of objectives is currently unclear, and will be dependent upon the location of the developed sites.

The preferred direction is for the lowest level of housing per annum. This is in accordance with the findings of the Central Norfolk Strategic Housing Market Assessment. A higher level of housing, would be greater than the recognised housing

need within the District. Furthermore, the larger land take it would require to deliver the additional houses is likely to score poorly against other sustainability objectives.’
(emphasis added)

4.2.6 It appears that the Council has diminished the possibility of development of a higher level of need on the sole basis weighted towards the loss of greenfield sites, despite the acknowledgment that there is limited previously developed land available within Breckland. Gladman submit that the conclusion is unfounded in its consideration that the delivery of a higher requirement would score poorly against other sustainability objectives as there is no evidence to support this claim when development proposals have the potential to mitigate any potential adverse impacts of development.

4.2.7 The requirement to assess reasonable alternatives has been subject to significant litigation. The principles having been summarised by Hickinbottom J in *R(RLT Built Environment Ltd) v Cornwall Council* [2016] EWHC 2817 (Admin) at paragraph 40:

“In *R (Friends of the Earth England, Wales and Northern Ireland Limited) v The Welsh Ministers* [2015] EWHC 776 (Admin) at [88], after considering the relevant authorities (including *Heard v Broadland District Council* [2012] EWHC 344 (Admin), and *Ashdown Forest Economic Development LLP v Secretary of State for Communities and Local Government* [2014] EWHC 406 (Admin)), I set out a number of propositions with regard to “reasonable alternatives” in this context. That case concerned the law in Wales, but it is derived from the same SEA Directive and the regulations that apply in Wales are substantially the same as the SEA Regulations. The propositions, so far as relevant to this case, are as follows:

(i) The authority’s focus will be on the substantive plan, which will seek to attain particular policy objectives. The EIA Directive [i.e. Council Directive 85/337/EC] ensures that any particular project is subjected to an appropriate environmental assessment. The SEA Directive ensures that potentially environmentally-preferable options that will or may attain those policy objectives are not discarded as a result of earlier strategic decisions in respect of plans of which the development forms part. It does so by imposing process obligations upon the authority prior to the adoption of a particular plan.

(ii) The focus of the SEA process is therefore upon a particular plan – i.e. the authority’s preferred plan – although that may have various options within it. A plan will be “preferred” because, in the judgment of the authority, it best meets the objectives it seeks to attain. In the sorts of plan falling within the scope of the SEA Directive, the objectives will be policy-based and almost certainly multi-stranded, reflecting different policies that are sought to be pursued. Those policies may well not all pull in the same direction. The choice of objectives, and the weight to be given to each, are essentially a matter for the authority subject to (a) a particular factor being afforded

particular enhanced weight by statute or policy, and (b) challenge on conventional public law grounds.

(iii) In addition to the preferred plan, “reasonable alternatives” have to be identified, described and evaluated in the SEA Report; because, without this, there cannot be a proper environmental evaluation of the preferred plan.

(iv) “Reasonable alternatives” does not include all possible alternatives: the use of the word “reasonable” clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds.

(v) Article 5(1) refers to “reasonable alternatives taking into account the objectives... of the plan or programme...”. “Reasonableness” in this context is informed by the objectives sought to be achieved. An option which does not achieve the objectives, even if it can properly be called an “alternative” to the preferred plan, is not a “reasonable alternative”. An option which will, or sensibly may, achieve the objectives is a “reasonable alternative”. The SEA Directive admits to the possibility of there being no such alternatives in a particular case: if only one option is assessed as meeting the objectives, there will be no “reasonable alternatives” to it.

(vi) The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives that option is not a reasonable alternative and it does not have to be included in the SEA Report or process.”

4.2.8 Further, in *Ashdown Forest Economic Development LLP v Secretary of State for Communities and Local Government* [2015] EWCA Civ 681 it was said:

“In *Heard v Broadland District Council* (cited above), at paragraphs 66-71, Ouseley J held that where a preferred option – in that case, a preferred option for the location of development – emerges in the course of the plan-making process, the reasons for selecting it must be given. He held that the failure to give reasons for the selection of the preferred option was in reality a failure to give reasons why no other alternative sites were selected for assessment or comparable assessment at the relevant stage, and that this represented a breach of the SEA Directive on its express terms. He also held that although there is a case for the examination of the preferred option in greater detail, the aim of the Directive is more obviously met by, and it is best interpreted as requiring, an equal examination of the alternatives which it is

reasonable to select for examination alongside whatever may be the preferred option.”²

- 4.2.9 The SA is obliged to give adequate reasons for selection particular options as “reasonable alternatives”, and reasons for rejecting those options it did reject. The current SA does not do so in consideration of the current preferred options. The SA in its current form fails to explain why land off Dereham Road has now been deleted as a proposed allocation. In the case of R(Stonegate) v Horsham [2016] EWHC 2512 (Admin) which concerns a claim to challenge the decision to make the Henfield Neighbourhood Plan, due to the failure to correctly carry out a proper SA, Patterson J noted that while the:

“Office of the Deputy Prime Minister’s Practical Guide to Strategic Environmental Assessment Directive advises that predictions do not have to be expressed in quantitative terms as qualification is not always practicable and qualitative predictions can be equally valid and appropriate it goes on to say in paragraph 5.b.11:

“However, qualitative does not mean ‘guessed’. Predictions need to be supported by evidence, such as references to any research, discussions or consultation which helped those carrying out the SEA to reach their conclusions.”³ (emphasis added)

Site Assessment

- 4.2.10 It is essential that local plans are accompanied by a clear audit trail to set out how the assessment of potential sites for allocation has been undertaken. Any such process must be explicit, transparent and robustly justified within the Council’s proportionate evidence base. This evidence must clearly set out what common factors have been considered and the resultant outcome for each site in reaching a robust planning judgment on site selection. It is essential that interested parties are able to fully understand why certain sites are proposed for allocation and why others are not.
- 4.2.11 In this regard, we would highlight the Inspector’s note to Telford & Wrekin Council during the Examination of its Local Plan⁴. Here, the Inspector made reference to the requirements of a site selection process:

“10. Clearly, the detailed selection of sites for allocation involves an element of planning judgment. However, that judgment needs to be both explicit and transparent. In short, there needs to be a clear ‘audit trail’ that shows how the final decisions were arrived at, and what factors were taken into account in making such decisions.”

² Ashdown Forest Economic Development LLP v Secretary of State for Communities and Local Government [2015] EWCA Civ 681 - Paragraph 10

³ R(Stonegate) v Horsham [2016] EWHC 2512 (Admin) – Paragraph 73

⁴ Examination of the Telford & Wrekin Local Plan (2011-2031) Inspector’s Note to Telford & Wrekin Council Council– 30 March 2017

4.2.12 In Telford & Wrekin the Inspector raised several specific concerns relating to the site selection methodology that had been undertaken before highlighting that it appears likely that he will reach a finding that the exercise underpinning the proposed allocations was flawed.

4.2.13 It is noted that the Site Selection Topic Paper (SSTP) supporting the Local Plan states at paragraph 3.15:

“Whilst the SA is a high level assessment of sites this process is invaluable in informing the site selection process. Each of the sites submitted as part of the Local Plan process has been subject to assessment through the Sustainability Appraisal (SA).”

4.2.14 The decision by the Council to change the conclusions reached within its SA between the preferred options stage and the pre-submission stage cannot be considered to be reasonable or justified. The latest version of the SA is considered to be flawed in that its scoring has been altered for some sites that had previously been considered suitable for allocation and in a number of circumstances suggests that previous positive benefits against the SA objectives have now become negative.

4.2.15 A specific example can be seen in relation to Land off Dereham Road (ref: LP[061]019). Here, the commentary that is provided within the SA supporting the Preferred Sites Plan asserted that the site scores well against a number of SA objectives, but suggested that ‘development upon greenfield land in an area of moderate/high landscape sensitivity, the impacts of which would have to be mitigated against during the design phase of development.’ Gladman do not consider the site would have an impact on landscape sensitivity, notwithstanding this, the statement acknowledges that mitigation measures can be incorporated to make a site acceptable in planning terms. **The site was then identified as a housing allocation.**

4.2.16 However, the SA supporting the Pre-submission Plan contradicts the original assessment by reversing earlier scoring and identifying negative criteria regarding water flooding on the site; and, distance from public open space, services and facilities. In this regard, the revised assessment fails to consider mitigation measures based on all of the evidence that is available to the Council. An outline planning application (reference: 3PL/2015/0498/O) for a scheme of up to 50 dwellings has been submitted to the Council and this proposal would provide: new public open space to the benefit of existing and future residents; the scheme is not the subject of any objections on flood grounds following detailed consultations that have been undertaken with the LLFA; and, the site is located within walking distance of facilities within Mattishall as well as local bus connections. Yet the revised SA fails to take any of this proposed mitigation into account.

4.2.17 The site assessments contained in the latest iteration of the SA are therefore considered flawed because they go against the PPG (ID 11-018) whereby:

“The sustainability appraisal should identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them.

*The sustainability appraisal must consider all reasonable alternatives and assess them in the **same level of detail** as the option the plan-maker proposes to take forward in the Local Plan (the preferred approach.” (Our emphasis)*

4.2.18 Mitigation for any impacts must be taken into account through the SA process and this failure to do so has resulted in an SA that cannot be considered to be robust.

4.2.19 In relation to the SSTP the assessment of the site states:

“This site scores neutrally when assessed against the Sustainability Appraisal criteria. The site itself is within walking distance to key services, meaning that the site is sustainable and will limit the use of personal car journeys. There is existing development to the north and east of the site meaning there will be little implications on the natural landscape. The Breckland Settlement Fringe Landscape Assessment shows that the site is situated within the Mattishall Hall Small Scale Plateau character area which is of moderate to high landscape sensitivity. The site scores negatively against criteria 6 of the Sustainability Appraisal criteria due to the levels of surface water flooding on the site. The site is also distant from public open space. There are also several Grade II listed buildings nearby which potential development of this site will need to consider. The site is currently subject to a planning application for 65 dwellings.

Norfolk County Council Highways commented that subject to a safe access and adequate visibility, they would not object if this site were identified as a strategic housing site.

The Historic Characterisation Study states that this site will have limited impact on the historic environment.

Due to the site being subject to surface water flooding and the potential impact upon the wider landscape it is considered that the site is unsuitable for allocation through the Local Plan.” (Emphasis added)

4.2.20 The SSTP appears to contradict the statement made in the latest SA which indicates that the site is distant from services and facilities when it is clear from the above that the Council acknowledge that it is within walking distance to local facilities. In relating to surface water flooding, the letter from the LLFA to BC dated 31st May 2017 (see Appendix 2), which pre-dates the SSTP, makes clear that they have removed their previous objection due to changes to the proposed development area and the mitigation measures proposed.

4.2.21 In terms of the assessment of Gladman’s land interest, it can be concluded that the site has been unfairly assessed through the Pre-submission SA. In reaching this view Gladman has considered the previous SA which supported the allocation of Land off Dereham Road (ref: LP[061]019) at the Preferred Option Stage against the Pre-submission SA. Figure 1, which can be seen overleaf, provides a comparison table.

Site Reference: LP[061]019	SA Objectives																			Summary
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	
Preferred Sites	-	-	-	o	-	+	o	o	-	o	o	o	+	+	+	+	+	o	+	Preferred Sites LP(061)019 and LP(061)016 and Alternative Sites LP(061)022 and LP(061)025 score well against the SA objectives, particularly criteria regarding Inclusive Communities and Economic Activity. However, sites L[061]019, 022 and 025 are situated upon greenfield land in an area of moderate/high landscape sensitivity, the impacts of which would have to mitigated against during the design phase of development. ⁵
Pre-submission	-	-	-	o	o	-	o	o	-	+	o	o	-	+	o	+	-	o	o	The site scores negatively against criteria 6 due to the levels of surface water flooding on the site. The site scores negatively against criteria 13 due to being distant from public open space. Although the site scores neutrally against criteria 5 and 11 the site is distant from key services and facilities

Figure 1 - Comparison of SA scoring for Land off Dereham Road, Mattishall

⁵ *No site specific commentary included at preferred sites consultation

5 OBJECTIVELY ASSESSED NEED

5.1 Background

5.1.1 The process of undertaking an OAN is clearly set out in the Framework principally in §14, §47, §152 and §159 and should be undertaken in a systematic and transparent way to ensure that the plan is based on a robust evidence base.

5.1.2 The starting point for this assessment requires local planning authorities to have a clear understanding of housing needs in their area. This involves the preparation of a Strategic Housing Market Assessment (SHMA) working with neighbouring authorities where housing market areas cross administrative areas as detailed in §159 of the Framework. The Framework goes on to set out the factors that should be included in a SHMA including identifying:

“The scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:

- *Meets household and population projections taking account of migration and demographic change;*
- *Addresses the need for all types of housing including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and*
- *Caters for housing demand and the scale of housing supply necessary to meet this demand.”*

5.1.3 Key points that are worth noting from the above is that the objective assessment should identify the full need for housing before the Council consider undertaking any process of assessing the ability to deliver this figure. In addition, §159 specifically relates to catering for both housing need and housing demand within the authority area. It is worth pointing out that any assessment of housing need and demand within a SHMA must also consider the following factors; falling household formation rates, net inward migration, the need to address the under provision of housing from the previous local plan period, the results of the Census 2011, housing vacancy rates including the need to factor in a 3% housing vacancy rate for churn in the housing market, economic factors to ensure that the economic forecasts for an area are supported by sufficient housing to deliver economic growth, off-setting a falling working age population by providing enough housing to ensure retiring workers can be replaced by incoming residents, addressing affordability and delivering the full need for affordable housing in an area.

5.1.4 The need to identify the full OAN before considering any issues with the ability of a Local Planning Authority to accommodate that level of development has also been confirmed in the High Court.

The implications of OAN following the High Court Judgment in *Solihull Metropolitan Borough Council v (1) Gallagher Homes Limited (2) Lioncourt Homes Limited* where it was considered that arriving at a housing requirement was a two stage process and that first the unconstrained OAN must be arrived at. In the judgement it was stated:

“The NPPF indeed effected a radical change. It consisted in the two-step approach which paragraph 47 enjoined. The previous policy’s methodology was essentially the striking of a balance. By contrast paragraph 47 required the OAN [objectively assessed need] to be made first, and to be given effect in the Local Plan save only to the extent that that would be inconsistent with other NPPF policies... The two-step approach is by no means barren or technical. It means that housing need is clearly and cleanly ascertained. And as the judge said at paragraph 94, “Here, numbers matter; because the larger the need, the more pressure will or might be applied to infringe on other inconsistent policies”.

5.1.5 Therefore following the exercise to identify the full OAN for housing in an area,

“Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate.” (NPPF §152)

5.1.6 This statement clearly sets out that local planning authorities should seek to deliver the full OAN and that this should be tested through the evidence base. Only where the evidence shows that this is not achievable should they then test other options to see if any significant adverse impacts could be reduced or eliminated by pursuing these options. If this is not possible then they should test if the significant adverse impacts could be mitigated and where this is not possible, where compensatory measures may be appropriate.

5.1.7 The final stage of the process is outlined in §14 and involves a planning judgement as to whether, following all of the stages of the process outlined above,

“Local Plans should meet OAN, with sufficient flexibility to adapt to rapid change, unless:

- *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole; or*
- *specific policies in this Framework indicate development should be restricted.”*

5.1.8 It is also worth noting that the final part of this sentence refers to footnote 9 of the Framework which sets out the types of policies that the Government consider to be restrictive. These include:

“sites protected under the Birds and Habitat Directive (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion”.

- 5.1.9 Although this list is not exhaustive it is clear that local landscape designations, intrinsic value of the countryside, the character of areas, green gaps etc. are not specifically mentioned as constraints by the Framework.
- 5.1.10 The PPG contains guidance to support local authorities in objectively assessing and evidencing development needs for housing (both market and affordable) and economic development. This document supports and provides further guidance on the process of undertaking such assessments, in addition to what is set out in the Framework.

5.2 Central Norfolk Strategic Housing Market Assessment

- 5.2.1 The Central Norfolk Strategic Housing Market Assessment (SHMA) 2017 prepared by Opinion Research Services (ORS) identifies what the Council considers to be its full OAN. It identifies the Central Norfolk’s housing need to be 60,350 dwellings over a 21 year period 2015 – 2036. This is equivalent to an average of 2,873 dwellings per annum.
- 5.2.2 Following a review of the SHMA, Gladman has several concerns regarding the OAN which has informed the preparation of the pre-submission version of the BLP, Gladman commissioned Lichfields to prepare a review of the Council’s OAN evidence in support of Gladman’s response to the recent NSF consultation. The Lichfields Report identifies several significant shortcomings of the assessment and covers key aspects of the OAN evidence. A full copy of the Lichfields Report can be found at Appendix 3 of these representations. For brevity, the issues of particular concern are that the SHMA:
- Fails to evidence that the scale of market signals uplift proposed could be expected to improve affordability. Our analysis supports a higher uplift, and based on a whole range of approaches we conclude that an uplift for the HMA of 25% could be expected to improve affordability, whilst also being a scale which, as required by the PPG could *“reasonably be expected to occur”*;
 - Fails to include the needs associated with the City Deal within OAHN, despite this being an approach that the SHMA previously advocated. Whilst we note that a separate agreement within the Strategic Framework addresses these additional needs, including them as part of the OAHN would cement their position; and
 - Significantly under-estimates the scale of affordable housing needs by using an approach which does not follow the stages set out in the PPG, and uses the criteria of housing benefit (which is not recognised within the NPPF or PPG) which fails to appropriately assess all households which are not able to afford market housing. This approach also inherently

assumes the continued role of the private rented sector – an approach which has been rejected by Inspectors and does not fall within the NPPF definition of affordable housing.

5.3 Standardised Objectively Assessed Needs Methodology

5.3.1 As highlighted earlier in this response, the Housing White Paper proposes to introduce a standardised methodology for calculating OAN for housing. The proposed standardised methodology is set out in 'Planning for the right homes in the right places: consultation proposals' which was published by the Department for Communities and Local Government in September 2017. The proposal are currently the subject to a consultation exercise and it is therefore uncertain whether any changes will be implemented to the proposed methodology prior to it being produced. Accordingly, only limited weight can be given to the standardised OAN methodology until the outcome of the current consultation is known. Notwithstanding this, the standardised approach does provide us with the Government's current thinking and we therefore reserve the right to comment upon the standardised methodology when greater clarity is provided by Government on the finalised format. Indeed, it is important to note that the new methodology will likely have significant implications on plan preparation across the HMA and would appear to generate a housing need figure in excess of the SHMA's OAN, and the requirement including the City Deal, at just over 3,200 dwellings per annum. Given current plan progression across Central Norfolk, this methodology would likely apply to most authorities if endorsed by Government in its current form and reinforces the need for an effective policy mechanism to deal with any unmet housing need which may arise.

6 BRECKLAND LOCAL PLAN PRE-SUBMISSION DRAFT

6.1 Context

6.1.1 This section of the representations is made in response to the policy options currently being promoted by the Council in the pre-submission draft Local Plan. Gladman have reviewed the consultation documents and continue to have a series of significant concerns regarding a number of policies being promoted which results in a plan that cannot be considered sound.

6.2 GEN 1 – Sustainable Development in Breckland

6.2.1 In principle, Gladman are fully supportive of the direction taken in GEN 1, which takes a localised approach to the presumption in favour of sustainable development and affirms BC's commitment to making local planning decisions based on the delivery of sustainable development. This should provide assurance of a local approach to planning that will actively seek to improve the social, environmental and economic wellbeing of the area by ensuring that development demonstrably contributes to the specific strategic and local vision and objectives of the BLP. The ethos of achieving the delivery of sustainable development is key to assessing planning proposals and also should be reflected in the policy wording as it is the golden thread running through the Framework.

6.3 GEN 03 – Settlement Hierarchy

6.3.1 The settlement hierarchy and associated policies (including the wider spatial strategy) should be formulated on a strategy that seeks to fully support the future housing needs of each settlement and the needs of those communities in terms of the availability of local services and facilities in both quality and quantity. Careful consideration will also need to be given to the role that each of the settlements can play in supporting the delivery of housing needs of the local plan area as a whole.

6.3.2 Whilst it is supported that the Sustainable Urban Extensions (SUEs) can play a key role in the accommodation of future development within the district, this should not be at the expense of ensuring that the housing and employment needs of other sustainable settlements are met. Indeed, paragraph 55 of the Framework makes clear that "housing should be located where it will enhance or maintain the vitality of rural communities." This statement highlights need for a strategy to promote sustainable development in rural areas and locate housing where it will enhance and maintain the vitality of rural communities.

6.3.3 The Local Plan must avoid the creation of a sustainability trap whereby rural communities are considered as unsustainable in principle beyond the growth that they should be seeking to accommodate. The Plan must contain mechanisms by which a settlement that is assumed to function at a lower level within the hierarchy can migrate up the sustainability ladder and in doing so improve the ability of the population to easily access quality facilities, retail, employment and housing.

6.4 Policy HOU 01 – Development Requirements (Minimum)

- 6.4.1 Gladman support the Plan’s acknowledgment that the overall housing figure contained in the Plan is to be seen as a minimum. This is consistent with the approach taken by the Framework which makes clear that development which is sustainable should go ahead without delay. The use of a minimum housing target should also be reflected in associated policies in the Local Plan in relation to development in lower order settlements and that the figure identified for each settlement should not be seen as a cap but rather the minima required to be achieved.
- 6.4.2 Notwithstanding the comments made above, we consider the identified housing target required to be delivered is flawed as it fails to take adequate considerations of market signals as outlined in section 5 of these representations. Gladman do not consider the housing requirement which seeks to deliver the lowest figure of housing need identified through the SHMA to be soundly based. The proposed housing target can therefore not be considered to be effective, justified or appropriate until the evidence has been updated in accordance with a Framework and PPG assessment of needs to inform the level of housing that is needed to be provided. Further, the significant affordability pressures currently facing the district are unlikely to be fulfilled without planning for uplift to the total housing provision.
- 6.4.3 In addition, the Plan provides no robust justification for the use of a phased housing trajectory in relation to housing delivery apart from the indication that the stepped trajectory is necessary to reflect the anticipated timescales of SUEs delivering. It is Gladman’s position that the allocation of further housing land is required to provide assurance that housing needs will be met and to ensure that the Council can demonstrate a robust housing land supply upon adoption of the Plan. Indeed, approximately 50% of the current population live in one of the five market towns of the District with the remaining population dispersed across the remaining 112 towns and parishes. This reinforces the need for the allocation of smaller housing sites which will assist in delivering full objectively assessed needs and will act as contingency in the likely event that the SUEs fail to come forward as anticipated.
- 6.4.4 The Council’s intention to phase the delivery of housing over the plan period will act to artificially suppress the delivery of development in the early years of the plan period. Gladman consider that this element of the policy is also unsound. The Framework is clear in its intention to boost significantly the supply of housing and the advice contained in the PPG that requires local authorities to meet the backlog within a five year period. The proposed phased trajectory therefore appears at odds with the requirements of national policy which seeks to meet any unmet housing need in full on an annual basis as oppose to back loading housing supply over a longer period into the future with no guarantee that it will be delivered.

6.5 Policy HOU 02 – Level and Location of Growth

- 6.5.1 This policy identifies the levels of growth which are expected to be delivered across the settlement hierarchy over the plan period. It identifies that 50% of growth will be distributed to Attleborough and Thetford with the majority of development being accommodated through two SUEs, 28% of

growth directed towards the Market Towns, 15% of growth direct towards Local Service Centres and 7% of growth directed to villages with boundaries. However, Gladman believe that the level and location of growth is not appropriate in its current form and additional allocations are required to ensure housing needs are delivered in full. This is further discussed below.

Sustainable Urban Extensions

- 6.5.2 Gladman still consider that the Plan is overly reliant on large strategic housing sites to deliver a significant percentage of the overall housing target. The delivery of SUEs are often complex sites and require a significant amount of up front work and negotiations prior to any homes being delivered on the ground. The delivery of SUEs are often associated with long lead in times and overall timescales associated with bringing these types of sites forward with some of the main reasons for causing delays including section 106 negotiation, infrastructure requirements and issues regarding multiple ownerships.
- 6.5.3 It is important that the Council is able demonstrate realistic delivery assumptions for the SUEs over the duration of the plan period. As far as we are aware, up-to-date delivery assumptions for the SUEs over the plan period are not available. This is a significant concern given the Council's previous delivery assumptions regarding the two SUEs as illustrated in the Council's previous Housing Land Supply assessments. By way of example see figures 2 and 3 below.

Figure 2: Thetford

5YHLS Statement	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22
2015	0	368	368	368	368	-	-
March 2016	-	0	0	0	100	150	-
September 2016	-	0	50	75	100	100	-
July 2017	-	-	0	0	20	50	100

Figure 3: Attleborough

5YHLS Statement	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22
2015	0	0	0	0	0	-	-
March 2016	-	0	0	0	100	150	-

September 2016	-	0	0	0	100	150	-
July 2017	-	-	0	0	25	50	80

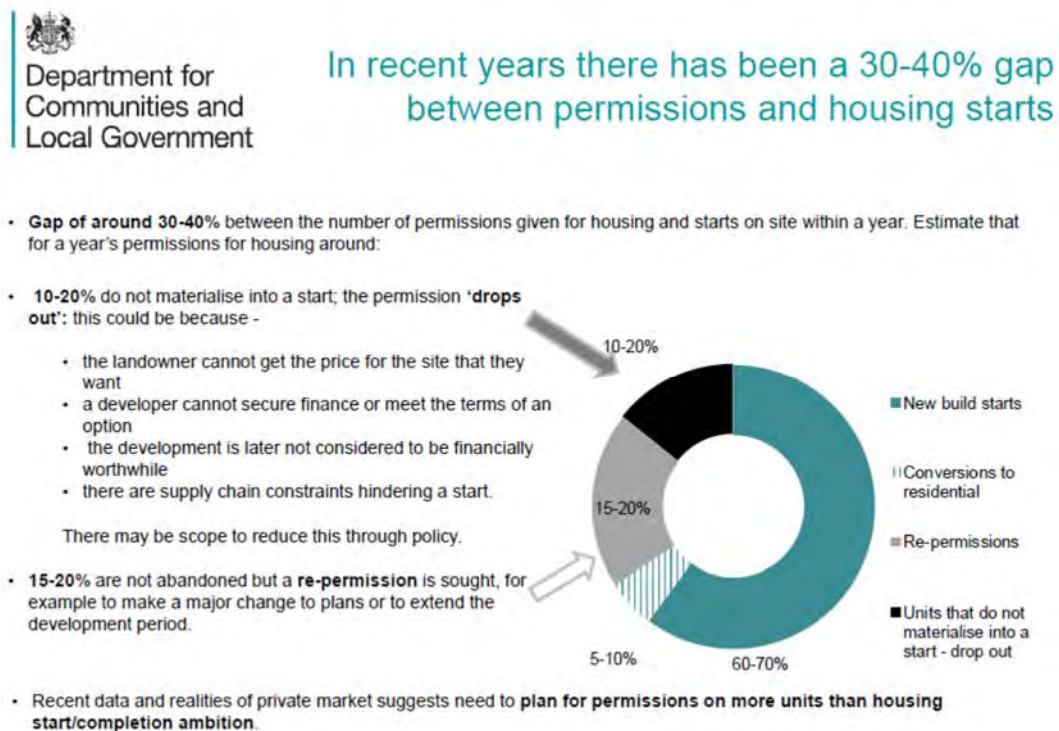
- 6.5.4 As can be seen from the above, there has been no consistency through previous monitoring assessments to provide any degree of certainty that these sites will deliver over the plan period as the Council anticipates. In this regard, should the rates not be achieved, a significant shortfall will soon arise. The fact that the delivery of both SUEs continue to deliver beyond the end of the plan period leaves no room for slippage and should this happen provides no opportunity for the Council to react to ensure that alternative sites can be brought forward to ensure the District's housing needs set out in the Plan are met in full.

Local Service Centres

- 6.5.1 It is noted at paragraph 3.9 of the BLP that Local Service Centres will each see new allocations at a level broadly equivalent to 10% of the estimated number of households from a base date of 2011. This figure has been derived from 2011 Census data and applying a householder multiple figure which assumed 2.3 people per household. This is considered to be a fairly rudimentary approach and should only be considered to be a starting point as opposed to a 'fixed' figure of 10% increase in dwellings. It is further noted at paragraph 3.11 that "for communities that are either progressing or considering developing a neighbourhood plan, providing new homes targets in each of the settlements in the settlement hierarchy gives certainty on their minimum housing requirements' (emphasis added). However, the minimum housing requirements for individual settlements are not reflected in the relevant policies of the Plan i.e. policy HOU 02. Given that the housing requirement is considered to be a minimum then there is no justification in the Plan why the more sustainable settlements of the district are considered to be 'approximate' dwelling targets. Such an approach would be contrary to need for flexibility advocated by the Framework and would stymie sustainable development opportunities which are required to ensure a flexible and responsive supply of housing land can be maintained over the duration of the plan period.
- 6.5.2 The Local Plan should have instead recognised how each of the District's settlements will have its own housing needs that should be met. The amount of growth deemed acceptable in each settlement should be on the ability to achieve sustainable development, including the availability of services, infrastructure and the role that new housing development could have in ensuring their continued vitality of settlements identified in the settlement hierarchy.
- 6.5.3 In order to secure the deliverability of the Plan's housing needs in full, Gladman consider that BC must take the following steps. The spatial strategy must allow for additional flexibility so that sites that have not been allocated through the Plan are capable of coming forward to accommodate any slippage which may occur in respect of the SUEs. This will also aid the Council in delivering additional housing towards sustainable locations across the market towns, key service centres and the rural areas, both in the mix and location of sites proposed.

6.5.4 In light of the above, Gladman would also like to highlight the presentation given by the Director of Planning at DCLG at the Home Builders Federation Planning Conference in 2015. Figure 4 below shows that 10-20% of permissions do not materialise into a start on site and that the permission ‘drops out’. It provides multiple reasons for this occurring and highlights a clear need to plan for the granting of permissions on more units than are required to be completed to meet housing needs. In this regard, it is recommended that the allocations within the Plan provide a clear contingency in order to increase the prospect of the minimum requirement being achieved over the plan period.

Figure 4 – Home Builders Federation Slide:-



6.5.5 Gladman would also highlight the findings in the Inspector’s report into the Stratford-on-Avon Core Strategy, published in June 2016. In that Report, at paragraph 71, the Inspector finds that to ensure the plan is positively prepared in line with the NPPF, the 10% reserve for housing sites should be increased to 20%. Similarly, the emerging plan for Redcar and Cleveland, published in May 2016, at policy H1 seeks to identify a buffer of around 20% additional housing land on top of the net minimum requirement in order to:

“promote a continuous supply of housing land in line with national policy, and to reduce the risk of under-delivery...”

6.6 Policy HOU 03 – Development outside of the Boundaries of Local Service Centres

- 6.6.1 This policy states that ‘development outside of the boundaries of the Local Service Centres will normally be resisted where the Local Plan housing target (as set in Policy HOU 02) is provided for unless supported by other policies within the Local Plan. Policy HOU 03 also states that in circumstances where the Local Plan does not identify sufficient sites to achieve the housing target in Local Service Centres, further development will be allowed subject to being supported by other policies of the Local Plan and meeting specific criteria. Although this criteria would not actively restrict development outside settlement boundaries as a matter of principle, it seeks to impose a limit on the number of dwellings that can be delivered in each Local Service Centre as a result. I.e. Policy HOU 03 seeks to restrict development in Local Service Centres to the respective housing target that applies to each settlement.
- 6.6.2 This approach is considered unsound. The Council acknowledge that the overall housing requirement should be considered as the **minimum** to be achieved. Gladman therefore question the justification behind the approach taken in policy HOU 03 which would frustrate the delivery of sustainable development opportunities being delivered to meet a minimum housing target. Notwithstanding this, the use of ‘normally be resisted’ is not considered a positive approach to growth and is likely to lead to inconsistencies being made through the decision making process. Accordingly, this policy is contrary to the requirements of the Framework which makes clear that only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan⁶. This policy is therefore not considered to be positively prepared, effective or consistent with national policy.

6.7 Policy HOU 04 – Rural Settlements with Boundaries

- 6.7.1 Whilst recognising that these settlements are lower down the settlement hierarchy, we consider that the proposed approach is not consistent with the national policy for reasons as outlined in response to Policy HOU 03. However, this policy also adds an additional restrictive policy stance than Policy HOU 03 were it seeks to limit the development to up to 5 dwellings and the number of dwellings in the settlement increasing by 5% from the adoption of the Plan. The intentions of this policy will lead to having an adverse impact on the ability of these areas to grow sustainability and will limit their ability to deliver affordable housing given that Policy HOU 07 only seeks affordable housing contributions from sites of 11 or more dwellings.
- 6.7.2 Gladman would also question the approach taken in the supporting text which indicates that development will only be allowed should there be a demonstration of local support. This is not a land use issue, as such, it should form no basis in the decision making process. Indeed, of particular concern is the method of measuring the level of support. A Town/Parish Council is not representative of everyone in a particular community and not all members of the local community

⁶ NPPF – Paragraph 154

would have input into the parish council consultation responses to planning applications. Similarly, participation through a neighbourhood planning exercise will vary and it would likely be those who are opposed to developments to participate in such exercises rather than those who are in support. Notwithstanding this, no criteria is provided on what level of support is required to demonstrate this. As such, this is not considered consistent with the presumption in favour of sustainable development or paragraph 154 of the Framework. A development proposal could be considered acceptable and sustainable on all matters, but could still be refused on the basis of lack of community support that may not have been based on planning matters.

6.8 Policy HOU 05 – Small Villages and Hamlets Outside of Settlement Boundaries

6.8.1 The policy states development in smaller villages and hamlets outside of defined settlement boundaries will be limited apart from in exceptional circumstances. Gladman do not approve of the exceptional circumstances test contained in HOU 05. The Framework only seeks to prevent development in areas of high national importance. Paragraph 116 of the Framework makes clear that major developments in these areas should be refused unless exceptional circumstances are demonstrated. There is nowhere in the Framework where the exceptional circumstances test relates to development in the open countryside. Gladman contend that this element of the policy is unjustified and should be deleted.

6.9 Policy HOU 10 – Technical Design Standards for New Homes

6.9.1 The above policy seeks to impose the optional technical standards for new homes as set out in the 2015 Written Ministerial Statement. Gladman does not consider this policy is supported by robust evidence as no consideration has been given to the implementation of the optional technical standards and whether this is actually achievable across the entire plan area. Indeed, the impact on viability has not been considered through the latest Viability Assessment (2017) as no reference is made to the Optional Technical Standards within this document. In addition, the Council has failed to assess the impacts on viability of the Plan as a whole in terms of delivering the above policy and what effects it may have on other policies such as the provision of affordable housing. The inclusion of this policy is therefore unjustified.

6.10 Policy ENV 05: Protection and Enhancement of the Landscape

6.10.1 This policy states:

“The landscape of the District will be protected for the sake of its own intrinsic beauty, its benefit to the rural character and in the interests of biodiversity, geodiversity and historic conservation....”

6.10.2 The policy as currently worded is not consistent with the approach required by paragraph 113 of the Framework which refers to the need for criteria based policies in relation to proposals affecting protected wildlife or geodiversity sites or landscape areas, and that protection should be commensurate with their status and gives the appropriate weight to their importance and

contribution to wider networks. As currently drafted, Gladman does not consider that this policy aligns with the requirements of the Framework given that it seeks to protect the District's landscape for the sake of its own intrinsic beauty. Opinions on landscape are highly subjective and this policy as currently worded will likely lead to inconsistencies being made through the decision making process.

- 6.10.3 Further where adverse impacts are unavoidable mitigation measures should be considered before a development proposal would be rejected. A blanket landscape restriction on development such as the one proposed does not accord with the approach taken in national policy. Further, it is not enough to simply seek to protect a landscape of view across a nice field, it must exhibit some demonstrable physical attributes which elevates its importance above simply being an area of under developed countryside.
- 6.10.4 This policy is not considered to be consistent with national policy and should be revisited.

6.11 Site Allocations: Mattishall

- 6.11.1 The BLP identifies Mattishall as a Local Service Centre which will see 10% growth over the plan period, providing for an additional 141 dwellings over the plan period to 2036, taking account of existing commitments there is a remainder for the Local Plan to provide 42 dwellings over the plan period.
- 6.11.2 It is clear from the Council's own evidence that Mattishall is a sustainable settlement due to the range of services and facilities it has to offer. These include: Mattishall Primary School, Post Office, two shops, butchers, pharmacy, village hall, pub, fish and chip shop, Mattishall Sports and Social club as well as public transportation services to the surrounding area. Despite this it appears that Mattishall does not appear to receive enough credit for its ability to deliver additional sustainable growth opportunities.
- 6.11.3 The Preferred Sites Local Plan previously allocated land to meet Mattishall's housing needs, this included Gladman's land interests off Dereham Road. Paragraph 3.264 of the Local Plan states:
- "As part of the preparation of the Local Plan, earlier iterations have assessed sites for inclusion within the settlement boundary. There are no suitable sites which have been put forward. As such no allocation is included within the Local Plan, but the need is to be met through a criteria based policy, HOU 03." (Emphasis added)
- 6.11.4 As already stated, BC through its Local Plan Preferred Sites and Settlement Boundaries consultation did indeed identify Gladman's land interest at Dereham Road as its preferred option to meet Mattishall's housing needs yet no information is provided as to why the Council no longer consider the site to be suitable, Gladman therefore question the statement above given the fact the site was previously promoted for development by the Council.
- 6.11.1 There is a need for the BLP to be flexible to allow for changes in circumstances which include sites not coming forward as anticipated or delivering fewer units than expected. Typically, Inspectors are seeking an additional 20% above the housing requirement to ensure that the Local Plan meets or

hopefully surpasses the housing requirement over the Plan period. In the case of Breckland, the OAN supporting the housing targets does not reflect a Framework and PPG compliant assessment of housing need. Furthermore, a wide number of sustainable opportunities exist across the authority, such as Mattishall, demonstrated by the Council's previous stance in allocating the site as a preferred option. However, the Council's decision to delete this allocation is not supported by any reasonable justification nor has the Council provided evidence as to why it considers the site would have impacts on the baseline objectives as discussed in section 4.2 of this response given its previous support of the site.

- 6.11.2 Therefore, in order to account for all of the above factors, it is considered that the site selection process must be re-visited and that through this process, additional allocations made Plan to deliver housing over the remainder of the plan period, including the re-allocation of Dereham Road, to meet development needs in full and support the delivery of the vision and objectives of the Plan. This approach will contribute to securing the Council's 5-year housing land supply and allow a wider range of housebuilders (including those that are Small and Medium Sized) the opportunity to deliver sites across Breckland thereby increasing the range of products available and speeding up delivery in the district. It will also ensure a Plan that positively responds to the imperative to plan for thriving rural communities.

7 GENERAL MATTERS

7.1 Implementation and Monitoring

7.1.1 Paragraph 8.20 of the BLP provides details of how the Council intends to manage and monitor the implementation of its Local Plan. As discussed elsewhere throughout this response, it is the view of Gladman that further flexibility and contingency is required within the Plan in order to ensure that development needs can be met in full over the plan period. It is considered necessary for any such approach to include a clear monitoring and review mechanism within policy wording to ensure that the Local Plan is fully responsive to changes in circumstance relating to the development needs of the area and the maintenance of a five year housing land supply.

7.2 Housing Land Supply

7.2.1 The latest five year housing land supply (HLS) assessment (July 2017) concludes that the Council can at best demonstrate a HLS position of 4.6 years.

7.2.2 Gladman agree that a 20% buffer should be applied in response previous housing delivery. However, we do not agree with the approach taken by the Council in seeking to use the Liverpool methodology for calculating its HLS. This is not considered a positive or proactive approach to ensuring that housing needs are delivered in full. Indeed, the use of the Liverpool method effectively means that the shortfall will not be delivered until much later in the plan period.

7.2.3 Gladman consider that the Sedgefield approach is appropriate in this instance and is the most common approach advocated by the Planning Inspectorate, as it is more closely aligned with the Framework's approach to significantly boost the supply of housing, by attempting to deal with any historic shortfall within the first five years. This approach is also directly endorsed within paragraph 3-035-20140306 which states:

"Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the 'Duty to Cooperate'."

7.2.4 This must be considered the more preferable approach whereby the unmet demand arising from any shortfall is met as quickly as possible. Further, the question is not Liverpool or Sedgefield, but Sedgefield and where this cannot be met then it should be considered in the context of its redistribution under the Duty to Cooperate.

7.2.5 The Framework is clear of the need to significantly boost the supply of housing, and the Council's use of the Liverpool method would therefore seem at odds with that approach. The intention to spread current housing shortfalls over the plan period and introduce a stepped trajectory would represent a failure to address the housing needs of the area that exist today. The approach to delay delivery of much needed new housing is a significant sustainability concern and offers no guarantee

that the development required to meet the housing needs of local people will ever be achieved in full in the manner advised through national policy.

- 7.2.6 The lack of a five year housing land supply upon the adoption of the Plan is a significant concern and reinforces the need to identify further opportunities for development to ensure the Council is able to demonstrate a flexible and responsive supply of housing land to meet identified needs.

7.3 Mattishall Neighbourhood Plan

- 7.3.1 Gladman has actively participated throughout the preparation of the emerging Mattishall Neighbourhood Plan (MNP). This included responses to:

- Application for Area Designation, 2015
- Mattishall Neighbourhood Plan: Pre-submission consultation, 2016
- Mattishall Neighbourhood Plan: Submission consultation, 2017

- 7.3.2 A referendum relating to the making of the Mattishall Neighbourhood Plan was held on 28th September 2017. At the time of writing, the outcome of the referendum is unknown.

- 7.3.3 The MNP does not allocate sites for residential growth. During the consultation on the MNP submission version, BC had made clear its intention to allocate land off Dereham Road as a preferred option for residential growth to meet Mattishall's housing needs. This allocation was not reflected in the submission draft neighbourhood plan. The Examiner's Report to the MNP makes clear at paragraph 7.50 that:

“In response to my clarification note the Parish Council indicates that its approach has been not to identify and allocate housing sites in the submitted Plan. To this extent, it has relied on BDC to identify any allocated sites in its emerging Local Plan.” (Emphasis added)

- 7.3.4 The Examiner's Report then states at paragraph 7.51:

“...As submitted I find that the submitted policy fails to meet the basic conditions due both to its lack of clarity and its restrictive approach. I recommend modifications to the policy rather than its deletion. This reflects the importance of housing delivery in the Plan area and its role as a Local Service Centre. However, I am satisfied that the relationship between the submitted Plan and the emerging Local Plan takes account of recent guidance in Planning Policy Guidance 41-009-20160211. Whilst the Plan may have taken a different approach to how the growth is delivered it does not seek to challenge the overall level of growth required.

In recommending modifications to the policy I have focused on its need to have regard to national policy and to be both in general conformity with the strategic policies of the development plan and to take account of the emerging Local Plan. These matters are addressed in recommending a positive approach to delivery and one which would provide a context to deliver a minimum strategic target of 141

dwellings. I recommend consequential modifications to the Introduction to the Plan where this matter is also addressed.

Replace the policy with:

“The neighbourhood area will deliver a minimum of 141 dwellings in the period up to 2036.”

7.3.5 Proposals for new dwellings within or adjacent to the village will be supported subject to the following criteria:

- They are of a scale that is appropriate to the size of the village and its rural setting;
- Where appropriate they create an attractive and well-landscaped interface with the surrounding countryside;
- Their design and layout has regard to their immediate surroundings; and
- They are in accordance with Policy ENV1 of this Plan” (Emphasis added)

7.3.6 The supporting text to the above policy has also been modified as follows:

“The Plan area has been identified to accommodate a minimum of 141 dwellings within the emerging Breckland Local Plan. That plan has an operational effect from 2011 to 2036. This Plan does not identify any specific housing sites or allocations. The Parish Council has concluded with Breckland Council that in **all** the circumstances the Local Plan is the best place for this activity to take place. The Plan reached its Preferred Site Options and Settlement boundaries stage in October 2016 and identified two preferred housing sites. One is at the western end of the village off Dereham Road and the other is a site on Norwich Road to the east of All Saints Church.” (Emphasis added).

7.3.7 It is therefore clear, that the Examiner concluded his modifications on the basis that the Local Plan would be best placed to allocate land for Mattishall’s housing needs. The change in circumstances from allocating land to meet development needs to a criteria based approach is therefore unsupported by any evidence or justification.

8 SITE SUBMISSION

8.1 Land off Dereham Road

- 8.1.1 The site known as land South of Dereham Road, Mattishall, has been submitted to BC during the formal call for sites and through previous rounds of consultation on the emerging Local Plan. Following the aforementioned work carried out to overcome the concerns of the LLFA in respect of surface water flooding issues, the boundary of the site has been amended to that which has previously been submitted to BC. The revised Location Plan for the Dereham Road site and the proposed Framework Plan can be viewed at Appendix 4.
- 8.1.2 The revised site boundary formed part of the revised submission in relation to planning application 3PL/2015/0498/O, which sought outline permission for the development of up to 50 dwellings with associated infrastructure. The resubmission was made in May 2017 and so the Council were fully aware of the revised site boundary and how it addressed issues relating to flooding at the time it sought to remove the site as a preferred allocation in the emerging Local Plan. In respect of the revised application, notwithstanding a positive recommendation from the case officer, the application was refused permission at a Planning Committee Meeting in July 2017.
- 8.1.3 It is noted that previous concerns relating to surface water flood risk have now been overcome to the satisfaction of the LLFA and that this issue did not form part of the reasons for refusal. In this respect, a single reason for refusal was issued relating to the potential impact of the development on the character and appearance of the area.
- 8.1.4 Gladman strongly contest that the development of the Dereham Road site would result in a material impact upon the character and appearance of the area. In this context, and as previously noted in section 4.2 above, the Dereham Road site has been considered by BC to be suitable, achievable and sustainable and capable of accommodating sustainable growth to meet housing needs, as made apparent by its decision to include the site as a “Preferred” option in the September 2016 Preferred Sites and Settlement Boundaries consultation document. As previously discussed, the site was not carried forward as a preferred site in the Pre-submission draft of the Plan with no objective reasoning given for this change.
- 8.1.5 Gladman consider that the site is the most logical option to deliver sustainable growth in Mattishall to support the Council in meeting its housing needs for market and affordable housing in full. The delivery of the proposed development at land off Dereham Road will bring a number of positive benefits to the local community, including:
- The delivery of market and affordable housing in a sustainable location to meet identified minimum housing needs in Mattishall. This will enable members of the local community to access the housing market locally rather than being forced to move away due to a lack of available housing.

- The provision of new public open space that is not currently available to residents along with more informal recreational space and landscaping to meet the needs of existing and future residents.
- The creation of new community allotments and an orchard, available for the use of both new and existing residents.
- The creation of new permissive footpaths, linking the site and the wider urban area with the countryside.
- The creation of a high quality residential development which provides enhanced permeability within the local area, through the creation of footpath and cycle links whilst respecting the character of the surrounding area.
- The delivery of this scheme will result in significant benefits for the local community and the surrounding area including the provision of New Homes Bonus payments, increasing the economic activity of the area through the construction phase and increased patronage to local services and facilities. This will help ensure that the operational capacity of the services and facilities in Mattishall contributing to the overall viability and vitality of the local area for future generations.

8.1.6 The above outlines only some of the key benefits that development in this location will provide. We therefore request that the LPA gives full consideration to the evidence before it, including planning application submissions and its own evidence base on the suitability of the site for housing development and reconsider its decision to remove the proposed allocation of the site from the emerging Local Plan.

9 CONCLUSIONS

- 9.1.1 Gladman have highlighted a number of concerns through these representations with regards to the manner in which the Council has identified its proposed local plan target for housing. This includes the process by which the full objectively assessed needs have been identified for the Housing Market Area both in terms of the Duty to Cooperate and the lack of an effective policy mechanism to deal with any potential unmet housing need and the setting of the local plan housing target itself.
- 9.1.2 The Council should also have ensured that the results of its SA process clearly justify any policy choices. In meeting the development needs of the area, it should be clear from the results of this assessment why some policy options have progressed, and others have been rejected. The SA fails to justify its policy choices with regards to deletion of land off Dereham Road as a preferred location for housing in Mattishall.
- 9.1.3 Gladman believe that further allocations are required to assist in meeting full OAN and that an appropriate trigger mechanism is required to ensure that remedial action will be taken should monitoring show that the Plan is not enabling the level of development that is required to meet the needs of the area.
- 9.1.4 The Plan should also be more ambitious in seeking to achieve higher levels of economic growth and in supporting the delivery of affordable housing to meet identified needs.
- 9.1.5 In allocating sites, the Council should be mindful that to maximise the housing supply, the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. New homes should be distributed in a way that enables the full OAN of the district to be met, rather than based too rigidly on quotas allocated to each town and village given that the overall housing requirement is considered as a minima and not a ceiling to be achieved. Limiting growth within several of the district's most sustainable settlements is not a positive or effective response to the national policy imperative to plan to deliver market and affordable housing needs in full.
- 9.1.6 Gladman request that we are afforded the opportunity to participate at the public hearing sessions at the Examination in Public to discuss the issues raise

APPENDIX 1:-

Gladman response to the Norfolk Strategic Framework Consultation, 2017

Re: Norfolk Strategic Framework Statement

By email: NSF@norfolk.gov.uk

Dear Sir / Madam,

Gladman Developments Ltd. (hereafter referred to as "Gladman") specialise in the promotion of strategic land for residential development with associated community infrastructure. This letter is in response to the above consultation and provides Gladmans' representations on the draft Norfolk Strategic Framework Statement.

Duty to Cooperate

The Duty to Cooperate (DtC) is a legal requirement established through Section 33(A) of the planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. The DtC requires local planning authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues through the process of Plan preparation. As demonstrated through the outcome of the 2012 Coventry Core Strategy Examination and the 2013 Mid Sussex Core Strategy Examination, if a Council fails to satisfactorily discharge its DtC a Planning Inspector must recommend non-adoption of a Local Plan. This matter cannot be rectified through modifications.

The Planning Practice Guidance (PPG) provides guidance upon compliance with the DtC which makes clear that local planning authorities should explore all available options of delivering the planning strategy within their own area, and should approach other authorities with whom it would be sensible to seek to work to deliver the planning strategy¹. This should be achieved through co-operation between local planning authorities, county councils and other public bodies to produce effective policies relating to strategic cross boundary matters².

Whilst there is no definitive list of actions that constitutes effective cooperation under the duty, cooperation should produce effective policies relating to cross boundary matters and may involve local planning authorities and public bodies entering into agreements on joint approaches, which may involve joint evidence and strategies to define the scope of Local Plans across the Housing Market Area (HMA).

It is clear that the Central Norfolk HMA is affected by the influence of a dynamic market area with an emphasis on meeting the HMA's economic growth ambitions. It is therefore important that the authorities contained in the HMA do not lose sight of this objective and that the DtC is a process of ongoing engagement and collaboration and that it is intended to produce effective policies on cross boundary strategic matters³. Accordingly, the Councils will need to continue to engage and work with each other to satisfactorily address any cross boundary strategic issues.

¹ PPG Reference ID: 9-003-20140306

² PPG Reference ID: 9-010-20140306

³ PPG Reference ID: 9-011-20140306

Any issues of unmet housing need arising from the relevant authorities in the HMA must be fully considered through the preparation of Local Plans, working under the requirements of the DtC. To achieve this, it is vital that this matter is carefully explored through joint working with all local planning authorities within the HMA, together with any other relevant local authorities that the HMA has a clear functional relationship with. Where necessary, a strong policy mechanism will be required within each Local Plan to demonstrate that unmet housing needs arising from any relevant authorities and those with a clear functional relationship will be met during the plan period.

The need to tackle any issues of unmet housing need through the plan making process was highlighted in an appeal decision at Land off Watery Lane, Curborough, Lichfield which was recovered by the Secretary of State (SoS) and determined in a letter dated 13th February 2017. At paragraph 40 of the SoS's decision letter, the distinct possibility of Lichfield having to provide for a proportion of Birmingham's unmet housing need through the local plan making process is highlighted:

"... while there is a distinct possibility of Lichfield having to provide for some of Birmingham's housing need, there is a mechanism for a review in the Local Plan and it would be inappropriate now to speculate on any contribution by Lichfield. As such the Secretary of State agrees that this should not be considered when assessing the merits of this appeal scheme."

Although it was considered inappropriate to speculate on any contribution towards Birmingham's unmet needs within Lichfield in the context of an appeal made under Section 78 of the Town and Country Planning Act 1990, this decision makes it clear that any issues of unmet development needs must be addressed through the local plan making process. Accordingly, it is important that the Strategic Framework sets out a clear approach to dealing with any unmet housing needs which may occur over the plan period. The Strategic Framework should include an agreement setting out a clear mechanism of how growth will be apportioned and how each authority should include a policy within each Local Plan in the HMA should any authority be unable to meet its housing needs in full.

Agreement 10 - Housing needs and Supply

Whilst this consultation does not set out the level of housing needs being proposed as these are to be dealt with through the emerging Local Plans process, Gladman have nonetheless considered the OAN prepared for the Central Norfolk HMA and are concerned that the assessment does not correctly identify a Framework and PPG compliant assessment of housing need. Gladman has commissioned Lichfields to undertake a critique of the HMA's latest assessment of housing needs (see appendix 1) and believe that this consultation provides the forum to voice these concerns so that the authorities in the HMA can consider this evidence and update its OAN prior to progressing Local Plans based on incorrect assumptions.

For brevity, the Lichfield report identifies a number of significant shortcomings. These include:

- The failure to evidence that the scale of market signals uplift proposed could be expected to improve affordability. The Lichfield analysis supports the need for a higher uplift, and based on a whole range of approaches concludes that an uplift for the HMA of 25% could be expected to improve affordability.
- Failing to include the needs associated with the City Deal within OAN assessment, despite this being an approach that the SHMA previously advocated.
- The significant under-estimation of the scale of affordable housing needs by using an approach which does not follow the stages as set out in the PPG, and uses the criteria of housing benefit which is not recognised in either national policy or practice guidance. Accordingly, the assessment fails to appropriately assess all households which are not able to afford market housing. The Central Norfolk SHMA also inherently assumes the continued role of the Private Rented Sector (PRS), an approach which has been rejected by Inspectors and does not fall within the Framework's definition of affordable housing.

The Central Norfolk authorities should consider the contents of the OAN critique and undertake the necessary work to ensure a NPPF/PPG compliant assessment of need is undertaken to inform the housing policies contained in each of the Local Plans currently being progressed.

Furthermore, the HMA should consider the implications of the proposed changes to the current methodology for calculating OAN. Whilst the standardised OAN methodology is currently subject to consultation, we consider this will likely have implications on plan preparing across the HMA. Indeed, the methodology (as currently proposed) would appear to generate a housing need figure in excess of the SHMA's OAN, and the requirement including the City Deal, at just over 3,200 dwellings per annum. Given current plan progression across Central Norfolk, this methodology would likely apply to most authorities if adopted.

Agreement 16 – 10% buffer

Notwithstanding the comments made on housing needs above, Gladman consider that the proposed buffer equal to not less than 10% of the OAN requirement should be applied is a positive approach to plan making. However, we would question the basis on which the 10% figure has been selected.

In this regard Gladman would note the findings in the Inspectors Report to the Stratford-on-Avon Core Strategy, published in June 2016⁴. In that report, at paragraph 71, the Inspector finds that to ensure the plan is positively prepared in line with the Framework, the 10% reserve for housing sites should be increased to 20%. Similarly, the emerging Redcar and Cleveland Local Plan, currently subject to examination, at policy H1 also considers a buffer of an additional 20% of housing land on top of requirement to be needed in order to:-

"...promote a continuous supply of housing land in line with national policy, and to reduce the risk of under-delivery..."

It is important, therefore, that the authorities in the HMA, carefully consider their ability to apply a sufficient buffer through the Sustainability Appraisal process to ensure an adequate supply of housing land to act as a contingency should any development sites fail to come forward as anticipated. Accordingly, the buffer selected should be commensurate with the level of growth being planned for i.e. the higher the level of growth that is planned for, the larger the buffer should be.

Conclusions

Gladman welcome this initial opportunity to comment on the draft Norfolk Strategic Framework Statement and hope that these comments are found to be constructive. Gladman would like to remain on the consultation database and kept informed of any further stages of consultation.

Yours faithfully,

John Fleming
Gladman Developments Ltd.

⁴ https://www.ipswich.gov.uk/sites/default/files/issues_and_options_for_the_ipswich_local_plan_review_part_1v2.pdf

APPENDIX 2:-

**Letter from Local Lead Flood Authority (LLFA) to Breckland Council (BC), 31
May 2017**

via e-mail

Chris Hobson
Planning Section
Breckland Council
Elizabeth House
Walpole Loke
Derham
NR19 1EE

Your Ref: 3PL/2015/0498/O
Date: 31 May 2017

My Ref: FWP/17/3/4648
Tel No.: 0344 800 8020
Email: llfa@norfolk.gov.uk

Dear Chris,

Town and County Planning (Development Management Procedure) (England) Order 2015

**Erection of up to 50 residential dwellings with associated infrastructure.
Land South of Dereham Road, Mattishall**

Thank you for your further consultation on the above site, received on 11 May 2017. We have reviewed the application as submitted and wish to make the following comments.

The applicant has provided an updated Flood Risk Assessment (FRA) including a Drainage Strategy for the proposed development. Subsequent to our previous formal response to Breckland Council dated 17 July 2015 (Our Ref FWP/15/3/1667) the Applicant has engaged Enzygo to undertake site specific flood modelling to identify the flood risk to this development including a 1 in 100 year plus climate change event.

I note from the Breckland Council Website that the Hydraulic Modelling Report (Reference SHF.1132.066.HY.R.001.A dated Nov 2016) and subsequent addendum report (Reference SHF.1132.068.HY.L001.A Dated 17th January 2017) have not been included in the list of documents. I therefore attach those documents to this response so that they can be now be added.

Our previous objection was based on the lack of information regarding the risk to the development from flooding originating off site and the ability of the development to attenuate additional runoff up until the 1 in 100 plus climate change event due to loss of storage.

The hydraulic modelling mentioned above confirmed that subject to the installation of a perimeter drain to prevent surface water encroaching north there is suitable flood free land in a 1 in 100 year plus climate change event available for development. Please note it was

also important for the modelling to confirm that there was not additional flood risk to adjacent properties as a result of any mitigation proposed to enable the flood free land for the housing and attenuation requirements.

We are therefore able to **remove our objection subject to conditions being attached to any consent** if this application is approved. We recognise that the Local Planning Authority is the determining authority, however to assist, we suggest the following wording:

Condition:

Prior to commencement of development, in accordance with the submitted Enzygo FRA Reference SHF.1132.066.HY.R.001.B and drawing Reference SHF.1132.066.HY.D.008, detailed designs of a surface water drainage scheme incorporating the following measures shall be submitted to and agreed with the Local Planning Authority in consultation with the Lead Local Flood Authority. The approved scheme will be implemented prior to the first occupation of the development. The scheme shall address the following matters:

- I. Surface water runoff rates from the developed site will be attenuated to 5 l/s as stated within section 5.9.14 of the FRA / Drainage Strategy.
- II. Provision of surface water attenuation storage in flood free land, sized and designed to accommodate the volume of water generated in all rainfall events up to and including the critical storm duration for the 1 in 100 year return period, including allowances for climate change, flood event. A minimum storage volume of 804m³ will be provided in line with section 5.9.14 of the submitted FRA.
- III. Detailed designs, modelling calculations and plans of the of the drainage conveyance network in the:
 - 1 in 30 year critical rainfall event to show no above ground flooding on any part of the site.
 - 1 in 100 year critical rainfall plus climate change event to show, if any, the depth, volume and storage location of any above ground flooding from the drainage network ensuring that flooding does not occur in any part of a building or any utility plant susceptible to water (e.g. pumping station or electricity substation) within the development.
- IV. The design of the attenuation basin will incorporate an emergency spillway and any drainage structures include appropriate freeboard allowances. Plans to be submitted showing the routes for the management of exceedance surface water flow routes that minimise the risk to people and property during rainfall events in excess of 1 in 100 year return period. This will include surface water which may enter the site from elsewhere.
- V. Finished ground floor levels of properties are a minimum of 300mm above expected flood levels of all sources of flooding.
- VI. Details of how all surface water management features to be designed in accordance with The SuDS Manual (CIRIA C753, 2015), including appropriate treatment stages for water quality prior to discharge.

- VII. A maintenance and management plan detailing the activities required and details of who will adopt and maintain the all the surface water drainage features for the lifetime of the development.
- VIII. A maintenance and management plan for the existing ordinary watercourses (and any structures such as culverts), sewers and surface water management systems within and adjacent to the proposed development should be submitted, and approved in writing, by the Local Planning Authority to ensure that during the construction phase of the development flood risk is not increased onsite or elsewhere.

Reason:

To prevent flooding in accordance with National Planning Policy Framework paragraph 103 and 109 by ensuring the satisfactory management of local sources of flooding surface water flow paths, storage and disposal of surface water from the site in a range of rainfall events and ensuring the surface water drainage system operates as designed for the lifetime of the development.

Further detailed comments can be found in the attached Annex.

If you, the Local Planning Authority review and wish to determine this application against our advice you should notify us, the Lead Local Flood Authority, by email at llfa@norfolk.gov.uk so that appropriate conditions can be placed on the development.

Alternatively, if further information is submitted, we request we are re-consulted and we will aim to provide bespoke comments within 21 days of the formal consultation date.

Yours Sincerely,

Matt

Matt Aitchison
Flood Risk Officer

Lead Local Flood Authority

Disclaimer

We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue.

Annex: Norfolk County Council LLFA Additional Information to LPA

LPA Application Ref: 3PL/2015/0498/O	LPA: Breckland Council
LLFA Ref: FWP/17/3/4648	Applicant name: Gladman Developments Ltd
Site name/Description: 50 residential dwellings with associated infrastructure. Land South of Dereham Road, Mattishall	Greenfield or Brownfield Development: Greenfield
Planning Stage: Outline	Summary of Surface Water Drainage Proposed: Additional surface water flows that will be generated by this development will be attenuated in a basin. The outflow from the basin will be pumped due to the invert of receiving water course being above the invert of the pond

Local Flood Risk : Summary of Local Flood risks in the vicinity of the site

Provide a brief summary of Local Flood risk surrounding site, referring to information from the NCC desk top study if appropriate,

- **Surface water**
There are areas of medium to high risk of surface water flooding within and adjacent to the development revised site boundary of 1 in 30 (3.33% annual probability) and 1 in 100 (1% annual probability) flood event as shown in the Environment Agency's Risk of [Flooding from Surface Water \(RoFSW\) maps](#). The applicant has undertaken site specific hydraulic modelling to confirm that there is enough flood free land available for the development. There is an area set aside for allotments and an Orchard that will be at risk in the 1 in 100 year plus climate change event.
- **Watercourses**
The main watercourse conveys flow in a northerly direction along the western boundary of Old Hall Road which crosses under Old Hall Road adjacent to the site approximately 35m prior to the junction of Dereham Road via a 750mm diameter. The main land drain channel continues to convey flow north around the wider Sites western boundary, and then east around the northern boundary for approximately 95m, before flowing north under Dereham Road via another culvert. Another smaller land drain conveys flow west along the northern boundary of the wider Site. There are also several minor land drains which cross the wider Site, which feed into the main land drain channel.
- **Flow paths**
The Topographical plan indicates that the overland flow is an North Westerly direction and will be concentrated in the area adjacent to the proposed development but still within land controlled by the applicant. It is proposed to construct a "Cut off" drain along the southern boundary of the proposed development to intercept overland flows and route them towards Old Hall Road.
- **Ordinary Watercourse**
The watercourse that the culvert underneath Dereham road drains into connects into an ordinary watercourse at the northern boundary of the property immediately north of

Dereham road. This ordinary watercourse drains to the north and connects into the River Tud around 1.5 km to the north

- The site does not lie within an Internal Drainage Board (IDB) area for the regulation of ordinary watercourses.
- *Groundwater*
An onsite borehole conducted in 1983 identifies groundwater at 8.5 m below ground level.
- *Sewers*
We are not aware of any records of sewer flooding in the immediate vicinity, however this would need to be confirmed with Anglian Water.
- *Historical flooding incidences*
We have records of a reported incident of external flooding on the site from January 2016. This appears to be caused by surface water backing up behind the culvert that runs underneath Dereham road adjacent to the site and then topping over the road itself. This hazard has been identified in the hydraulic modelling. There are no LLFA records of incidents of internal flooding on or adjacent to the site. However it should be noted that our records only cover the period of 2011 to the present day.

Policy: What we expect relating to site drainage and flood risk management.

The following national and regional policies apply to flood risk management within the planning framework.

[Paragraph 103](#) of the National planning policy framework (NPPF)

Ministerial statement ([HCWS161](#))

[Policies UC10 and UC11](#) of LLFA Local Flood Risk Management Strategy

The LPA will also have policies relating to flood risk management and applicants are recommended to have regard to these.

Specifically in Breckland Council the following policies apply

Policy DC 13 (Flood Risk) of the Breckland District Council Core Strategy (2009) states that, "*All development proposals in areas at risk of flooding will be expected to provide a Flood Risk Assessment commensurate with the scale of the flood risk and recognising all likely sources of flooding.*" In addition, Core Strategy Policy DC13 states that "*suitable measures to deal with surface water arising from development proposals will be required to minimise the impact to and from new development. The preference is to manage surface water through the incorporation of SUDS unless this is not technically feasible, or where it can be demonstrated that ground conditions are unsuitable for such measures.*"

Core Strategy Policy CP 5 (Developer Obligations) states that, "*all development in the plan area will be accompanied by appropriate infrastructure to meet site specific requirements and create sustainable communities. The infrastructure will be provided in tandem with the development and where appropriate arrangements will be made for its subsequent maintenance ... Site specific infrastructure requirements to be addressed through developer obligations may include ... Sustainable Drainage Systems (SUDS).*"

Core Strategy Policy CP 8 (Natural Resources) states that "*Development must not cause a deterioration in water quality*" and that "*All new development will be located in such a way as to*

minimise its own risk of flooding and new development should not materially increase the flood risk to other areas or increase the risk of flooding to European Habitats which are water sensitive. This will be minimised through the installation of infiltration and attenuation measures to dispose of surface water (SUDS)."

Guidance: Information for developers

Information for developers can be found on our website

<https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers>

Assessment: Summary of assessment of flood risk and submitted drainage proposals

The Flood Risk Assessment / Drainage Strategy (Enzygo SHF.1132.066.HY.R.001.B) submitted with the planning application, has been assessed against the National Planning Policy Framework (NPPF), Planning Practice Guidance, the SuDS Non-Statutory Technical Standards (NSTS) (March, 2015) and the policies of the adopted Norfolk Local Flood Risk Management Strategy as follows:

- The FRA has identified the relevant sources of risk to the site from Flooding. Of main concern is the surface water flooding as identified in the Environment Agencies RoSWF maps. The applicant has undertaken a site specific risk assessment which includes a 40% allowance for climate change. As part of this modelling a mitigation to divert flows away from the proposed development area to the western part of the site was included. This modelling indicated that there would not be any increase in flood risk to the adjacent properties as a result of this mitigation.

Ground water flooding has been identified as an issue on the BGS Groundwater Flooding Susceptibility Maps however the BGS borehole log located on site indicated that the ground water table is 8.5m below ground level and that the superficial deposit is clay which would prevent ground water from reaching the surface.

- The SuDS hierarchy has been followed with the proposed discharge of flows, attenuated to Greenfield rates, discharging to a water course. Discharge via infiltration is normally preferred however this is not possible in this situation given the impervious nature of the ground in this area.
- Greenfield Rates appear to have been calculated correctly and the applicant proposes to discharge via a pumping system at rates slightly less than Q BAR. Discharging via a pump system is not an ideal situation however it cannot be avoided in this instance as the invert level of the attenuation basin is below the invert level of the receiving watercourse
- As there is very limited scope to infiltrate runoff from the development the overall runoff **volume** will increase as a result of the development. This will be mitigated by discharging at a rate slightly less than Q BAR in all events up until the 1 in 100 year plus climate change event.

- At this stage a high level approach has been taken with regard to the proposed SuDS features. The drainage strategy suggests that applicable options could include
 - Detention Basins
 - Water Butts
 - Permeable Paving
 - Swales
 - Filter Strips

As mentioned above the use of infiltration has been ruled out given the poor soakage characteristics of the site. Calculations have been provided that confirm the proposed attenuation basin will prevent an increase in the **rate** of runoff. It is vital that this attenuation basin is located in a flood free location to ensure that storage is available up to the 1 in 100 year plus climate change event.

- Site specific hydraulic modelling has been undertaken up until the 1 in 1000 plus climate change event. The 1 in 1000 modelling shows that the proposed development is still flood free indicating that the exceedance routes for runoff originating off site will avoid the proposed development and accumulate to the west of the development.
- Maintenance of the SuDS features has been discussed in general terms as part Drainage strategy. Consideration needs to be given to the ongoing management and maintenance of all drainage features over the lifetime of the development. A maintenance plan identifying the required actions and responsible owners should be submitted at the detailed design stage to ensure that all parties understand their responsibilities. This includes all drainage infrastructure, such as pipes and tanks adopted by Anglian Water, permeable paving within the curtilage of the dwellings, and the proposed ditch/swale.

SuDS Standards: Summary of alignment to relevant Non-Statutory Technical Standards for Sustainable Drainage systems

S2 MET: The FRA states that the 1:1 year run off rate will be 5 l/s this is lower than the calculated Q bar of 5.5 l/s

S4/S6 NOT MET however runoff be restricted to a low rate (less than QBAR in line with national guidance) to mitigate this

S7 NOT MET however the applicant has provided calculations showing that the attenuation basin is sized to accommodate the 1:100 + climate change event but no information has been provided on the rest of the drainage system. This information will be expected at the detailed design stage.

S8 The applicant has demonstrated that there will be no flooding of properties or any utility plant (e.g. pumping stations) during the 1 in 100 year rainfall event. Property thresholds throughout the development are recommended to be set to a minimum of 300mm above the anticipated flood levels to provide protection in the event of exceedance of the drainage system. Where there is uncertainty in the flood levels, this freeboard allowance should be increase to 600mm.

S9 – The applicant will need to identify exceedance routes for flows in excess of a 1 in 100 year rainfall event at detailed design stage. . Consideration should be given to the expected depth/velocity of flood water to quantify any potential risks to people and property in the event of exceedance of the drainage inlets.



Hydraulic Modelling Report

Land South of Dereham Road, Mattishall

Gladman Developments Ltd

SHF.1132.066.HY.R.001.A

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Land South of Dereham Road, Mattishall

Project:	NPPF: Flood Risk Assessment
For:	Gladman Developments Ltd
Status:	Final
Date:	November 2016
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Executive Summary

This hydraulic modelling report details the hydrology and modelling methodologies used, results from the modelling study, indicative mitigation measures, and consideration of the Sequential and Exception Tests.

Pluvial (surface water) and fluvial (river) flooding have been identified as primary sources of flooding to the Site, sourced from associated land drains, which flow around and through the Site boundary.

The aim of the modelling study was to produce a hydraulic model to assess the pluvial and fluvial flood risk to the wider Site. The hydraulic modelling considers the influence from existing highway crossings and ditches, in order to more accurately establish the pluvial/fluvial flood outline.

This hydraulic modelling report demonstrates that the risk of pluvial/fluvial flooding to the Site can be mitigated to an acceptable level, so that part of the Site can be developed without impacting on flood risk to and from the Site.

It is proposed that the Site is sequentially developed (i.e. located outside the mapped extent of pluvial/fluvial flooding), and a land drain crossing is provided to the north of the Site (Site access to Dereham Road), which will be designed to convey the 1 in 1000 year flow. This approach would negate the requirement for the Sequential and Exception Tests.

It is concluded that the development should not be precluded on the grounds of pluvial/fluvial flood risk. A Flood Risk Assessment would however be required to assess all other sources of flooding.

1.0 Introduction

1.1 Background

- 1.1.1 At the request of Gladman Developments Ltd, Enzygo Ltd have undertaken a 1D/2D hydraulic modelling study to assess the surface water (pluvial) and fluvial (river) flood risk for a proposed residential development Site, located on Land to the South of Dereham Road in Mattishall (hereafter referred to as the 'Site').
- 1.1.2 This hydraulic modelling report details the hydrology and modelling methodologies used, results from the modelling study, indicative mitigation measures, and consideration of the Sequential and Exception Tests

1.2 Scope

- 1.2.1 The project is a development proposal which is the subject of a planning application. As part of the flood risk investigations, pluvial/fluvial flooding has been identified as the primary source of flooding to the Site. As such, a hydraulic modelling study has been commissioned to further understand the risk of pluvial/fluvial flooding, which includes the local detail (i.e. structures and channel bathymetry), and is therefore a more refined approach (compared to the Environment Agency online mapping) to base flood risk mitigation measures on.

1.3 Aims and Objectives

- 1.3.1 The key objectives of the hydraulic modelling study are to establish:
- The baseline catchment hydrology;
 - Peak flows within the catchment;
 - Surface water flood outlines, as well as associated depths, velocities, and hazard ratings;
 - Potential flood risk mitigation measures;
 - Whether the development will be safe and pass the Sequential and Exception Test.
- 1.3.2 The aim of the hydraulic modelling study will be to report on whether surface water flooding can be mitigated, and whether the development will be able to either negate the triggering of the Sequential Test, or if necessary pass the Sequential and Exception Tests, before proceeding onto a full Flood Risk Assessment (FRA).

1.4 Report Structure

- 1.4.1 This modelling report has the following structure:
- Section 2 introduces the study Site and the proposed development. This section also introduces the baseline hydrology associated with the site and associated catchment;
 - Section 3 presents the hydrological assessment methodology, results and choice taken forward within the modelling study;
 - Section 4 presents the methodology and mapped results from the modelling study;
 - Section 5 outlines indicative flood risk mitigation measures for the proposed development Site;
 - Section 6 provides considers the requirements of the Sequential and Exception Tests; and
 - Section 7 presents the summary and conclusions from the modelling study.

2.0 Study Site and Proposed Development

2.1 Existing Site

- 2.1.1 The Site is located on land south of Dereham Road, Mattishall, NR20 3NU. The National Grid Reference of the Site is 603935, 311190. A location plan of the Site is shown in Figure 2.2 and 5.1).
- 2.1.2 The Site is 3.19 hectares (Ha) in area, located within a wider 4.0 Ha land ownership boundary (hereafter referred to as the 'wider Site'). The wider Site is currently agricultural land.
- 2.1.3 The wider Site is bounded by Dereham Road to the north, Old Hall Road to the west, and agricultural land to the south and east.

Figure 2.1. View Looking South Across the Site



2.2 Proposed Development

- 2.2.1 The proposal is for outline planning permission for residential development, which will include the introduction of 2.08 developable area, structural planting and landscaping, informal public open space, surface water flood mitigation and attenuation, with all matters to be reserved, except access. The layout of the proposed development will factor in the result of the hydraulic modelling study, and proposed mitigation measures (see Figure 5.1).

2.3 Topographic Information

- 2.3.1 The following topographic data has been acquired as part of the modelling study. Further details on how the data was used has been included within Section 4.
- 0.5m LIDAR covering the area of interest.
 - Detailed topographic survey for the land off Howes Lane and the channel survey of the land drain adjacent to Old Hall Road.
 - Detailed topographic survey of the development Site.
- 2.3.2 The wider Site falls in a north-east direction towards the land drain located along the northern boundary of the wider Site. The wider Site falls from a topographic peak of 43.96m AOD located along the south-east boundary, to a topographic low of 40.78m AOD located along

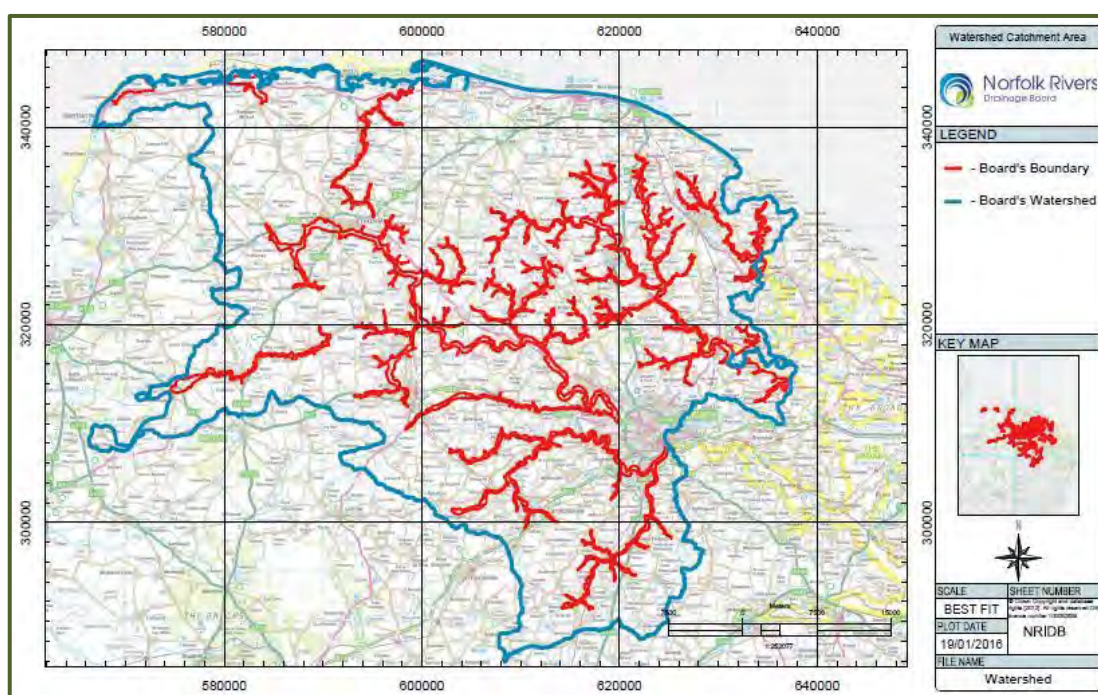
the north-west boundary. This is a topographic fall of 3.18m over a distance of 220m, or a 1:70 gradient.

- 2.3.3 Lidar data and channel survey data demonstrates that the catchment associated with the bounding land drain, drains in a northerly direction towards the River Tud (see Section 2.4 below).

2.4 Catchment Hydrology

- 2.4.1 Based on a review of the Environment Agency online flood mapping and OS Mapping, the nearest 'Main River' (watercourse under the authority of the Environment Agency) is the River Tud, which flows in an easterly direction, approximately 1.44km to the north of the Site. The Tud also falls within the Norfolk Rivers Drainage Board catchment boundary (hereafter referred to as the 'Board'). A map of the Boards catchment has been included within Figure 2.2 below.

Figure 2.2. Norfolk Rivers Drainage Board Catchment Boundary



- 2.4.2 There is a land drainage network associated with the western and northern boundaries of the Site (see Figure 2.3 below). The land drainage network is under the authority of the local drainage authority (Lead Local Flood Authority [LLFA]) / Riparian land ownership. Whilst the land drainage network is located outside the Boards boundary, the land drainage network ultimately drains to the River Tud.
- 2.4.3 The main channel runs south to north on the west side of Old Hall Road and crosses under Old Hall Road approximately 35m prior to the junction of Dereham Road via a 750mm diameter pipe (see Figure 2.4 below). The main channel continues to flow north around the wider Sites western boundary, and then east around the northern boundary for approximately 95m, before flowing north under Dereham Road via another culvert (see Figure 2.5). The survey contractor was unable to survey the Dereham Road culvert as flows were too deep and it has therefore been assumed that this pipe is an equivalent size to the Old Hall Road crossing size, and so a 750mm diameter pipe has been modelled. Another smaller land drain flows west along the northern boundary of the wider Site (see Figure 2.6).

2.4.4 There are also several minor land drains which cross the wider Site, which feed into the main channel runs (see Figure 4.2).

Figure 2.3. Location of Watercourses

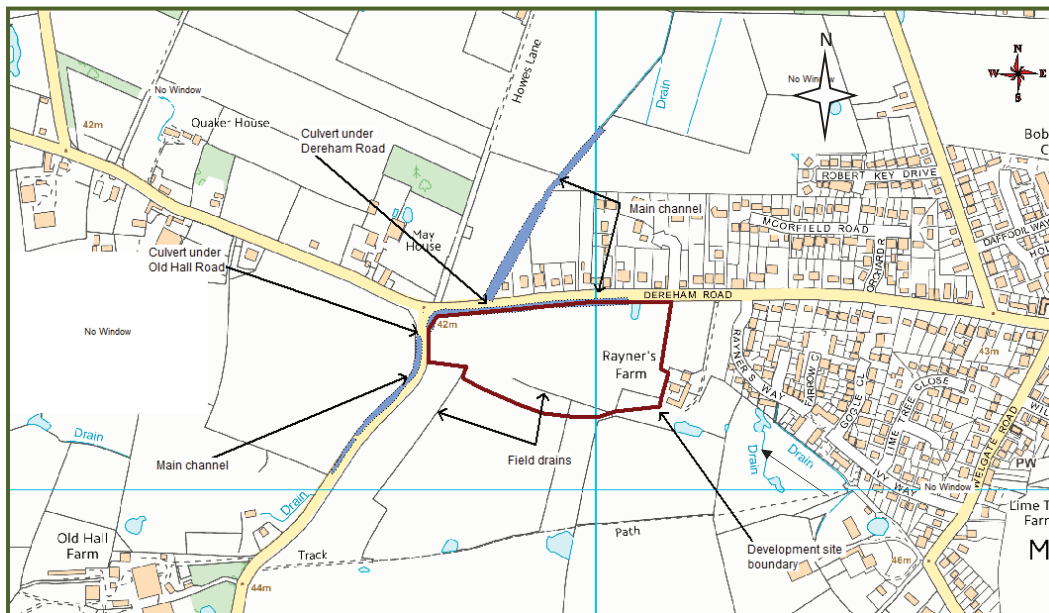


Figure 2.4. Left - View looking downstream (North) to the Old Hall Road/Dereham Road junction; Right - Culvert (Upstream/West Face) Under Old Hall Road and into the Wider Site



Figure 2.5. Dereham Road Culvert Crossing (Upstream/Southern Face)



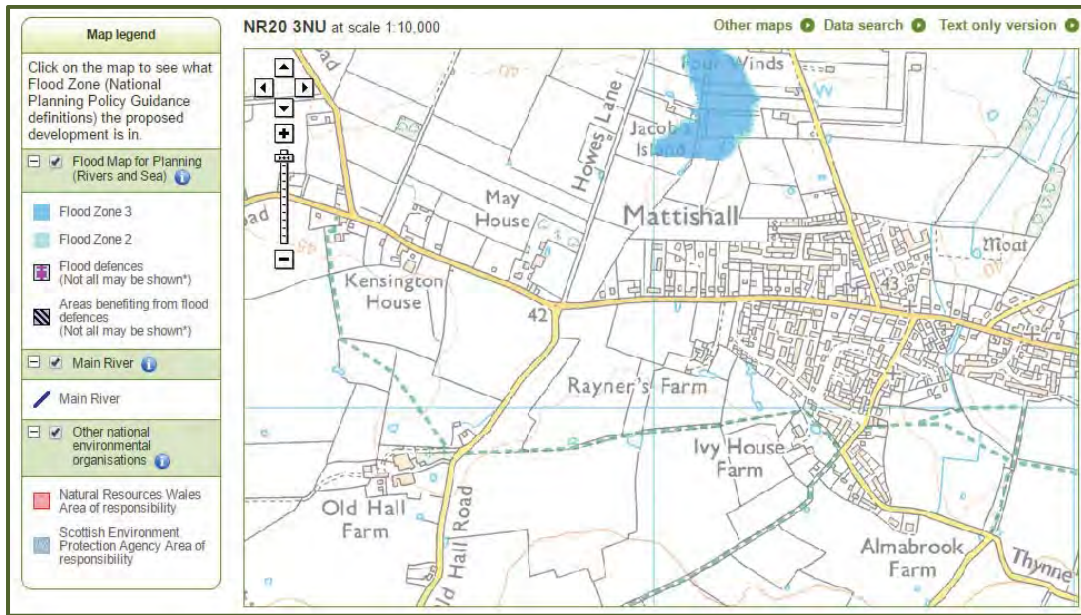
Figure 2.6. View looking upstream (east) Along the Northern Land Drain



2.5 Flood Risk

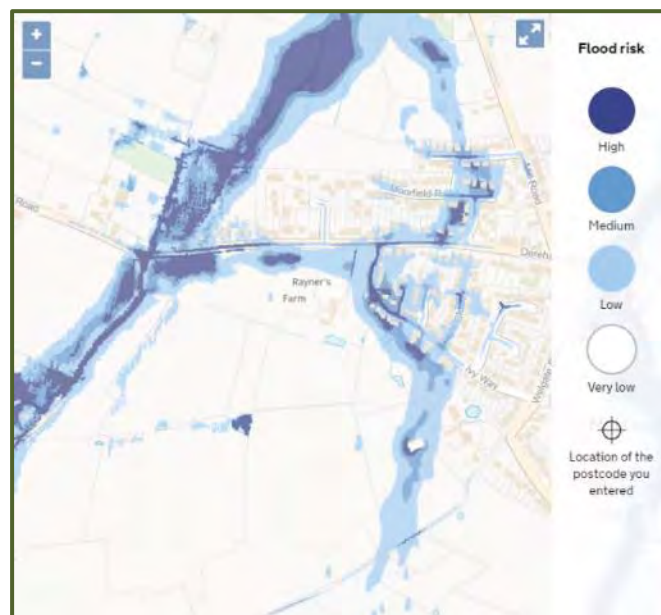
- 2.5.1 The Environment Agency online Flood Map for Planning (see Figure 2.7), the wider Site is located within Flood Zone 1, which is land located outside the 1 in 1000 year (0.1% Annual Exceedance Probability [AEP]) risk of fluvial flooding. Flood Zone 1 is land at low risk of fluvial (river) flooding.

Figure 2.7. Environment Agency – Flood Map for Planning (River and Sea)



- 2.5.2 The Environment Agency online Risk of Flooding from Surface Water (see Figure 2.8), shows that the wider Site is located largely outside the mapped extent of surface water flooding. However, there is an area of surface water flooding, which is associated with a surface water (pluvial) flow pathway, located along the land drains along the north and western boundary. As such, the pluvial flood outline is likely to be associated with the fluvial flooding from the land drains, which is not included within the Flood Map for Planning.
- 2.5.3 This risk of flooding associated with the pluvial flow pathway is between low to high risk. Low risk has an associated velocity of <300mm and velocity of <0.25m/s, whereas high risk has an associated velocity of >900mm and velocity of >0.25m/s.

Figure 2.8 Environment Agency – Risk of Flooding from Surface Water



2.6 Flood Risk and NPPF Considerations

2.6.1 An FRA is required where a development is:

- In Flood Zone 2 or 3 including minor development and change of use;
- More than 1 Ha in Flood Zone 1; or
- Less than 1 Ha in Flood Zone 1, including a change of use in development type to a more vulnerable class (e.g. from commercial to residential), where they could be affected by sources of flooding other than rivers and the sea (e.g., surface water drains, reservoirs).

2.6.2 The proposal is for residential development, located within Flood Zone 1. However, the Site is greater than 1 hectare in area, and is at risk of surface water flooding. The risk of surface water flooding should be approached similarly to fluvial flooding (i.e. Flood Zone 2 and 3, medium to high risk respectively).

2.6.3 Under PPG ID: 7, residential development is considered 'more vulnerable' use. All development uses are considered acceptable within Flood Zone 1, however the northern and western extents of the wider Site, including access to Dereham Road, is located within Flood Zone 2 and 3.

2.6.4 Based on the flood risk and standing advice described above, the development would only be compatible with NPPF and PPG ID: 7 after the completion of a satisfactory flood risk assessment, inclusive of mitigation measures (see Section 5).

2.6.5 As noted above, the Site access is affected by Flood Zones 2 and 3 (pluvial/fluvial flooding). However, the mapped extent of flooding, as demonstrated by the hydraulic modelling (see Section 4) is associated with the land drain along the northern boundary of the Site. As such, the 'flooding' is the water conveyed within channel (i.e. not overtopping), therefore is not a flow pathway which requires mitigation. Instead, a channel crossing designed to convey the 1 in 1000 year event is proposed (see details below within Section 5). As such, the above approach would negate the requirement for the Sequential and Exception Tests (see details within Section 6).

2.6.6 The purpose of this modelling study will be to map in detail, the flood depth, velocity and hazard rating associated with the pluvial/fluvial flooding affecting the Site. The output from this exercise will be to guide the sequential development and Sequential and Exception Test considerations. The output from this study will then feed into an FRA, subject to gaining an agreement in principle with the LLFA.

3.0 Hydrological Assessment

3.1 Introduction

- 3.1.1 This Section investigates the peak flows associated with a catchment associated with a land drainage network, at a downstream point along the northern boundary of a 3.5 hectare (Ha) Site (hereafter referred to as the 'study catchment'), located adjacent to the junction of Dereham Road and Old Hall Road, to the west of the Mattishall village.
- 3.1.2 The catchment was derived from an adjustment of the FEH Catchment Boundary, using flow pathway analysis using a detailed ground model. FEH catchment descriptors were adjusted accordingly.
- 3.1.3 Peak flows were generated using a range of industry standard methodologies and software. It was concluded that the Revitalised Flood Hydrograph method was considered the most appropriate methodology to generate peak flows within the ungauged, rural and relatively impermeable catchment.

3.2 Catchment Boundary


- 3.2.1 The aim of this study is to provide flow estimates to represent the hydrology at a downstream point at the culvert along the northern boundary of the Site.
- 3.2.2 The catchment boundary from the FEH Web Service had already been identified by the LLFA (Norfolk County Council) as not being representative of the true catchment outline.
- 3.2.3 An indicative catchment boundary was provided by the LLFA, and the indicative catchment was checked/refined through a review of the FEH catchment boundary and KEY-TERRA FIRMA (KTF) flow pathway analysis (see Drawing SHF.1132.065.HY.D.008) using 0.5m LiDAR data.
- 3.2.4 The resulting catchment was found to be 2.47km², approximately 0.1km² smaller than the FEH derived outline (albeit a different shape).

3.3 Catchment Characteristics – Unadjusted Catchments

FEH Catchment

- 3.3.1 Based on a comparison of the FEH Web Service with KTF flow pathway analysis, it has been established that the catchment boundary associated with the study catchment is incorrect.
- 3.3.2 Before manipulating the catchment boundary and catchment descriptors, FEH derived catchment boundaries were extracted at the culvert along the northern boundary of the Site, in order to establish an understanding of where the catchment boundaries would need to be manipulated.
- 3.3.3 FEH catchment descriptors were extracted from a catchment, which forms the majority of the study catchment.
- 3.3.4 Table 3.1 provides a summary of the aforementioned catchment boundary, as depicted by the FEH Web Service. A review of the study catchments characteristics is included below.

Table 3.1. Unadjusted Study Catchments

FEH Catchment Boundary	Easting	Northing	Area (km ²)
	603850	311250	2.565

3.3.5 An analysis of the FEH Web Service catchment descriptors for the study catchment has been carried out. A discussion of the study catchments descriptors, and how key catchment descriptors have been checked through a desktop study is provided below.

Catchment Descriptors Review

3.3.6 The FEH catchment descriptors have been extracted from this catchment, and summarised within Table 3.2 below.

3.3.7 A discussion of the catchment descriptors, and how key catchment descriptors have been checked through a desktop study is provided below.

Table 3.2. Unadjusted Catchment Descriptors from the FEH Web Service

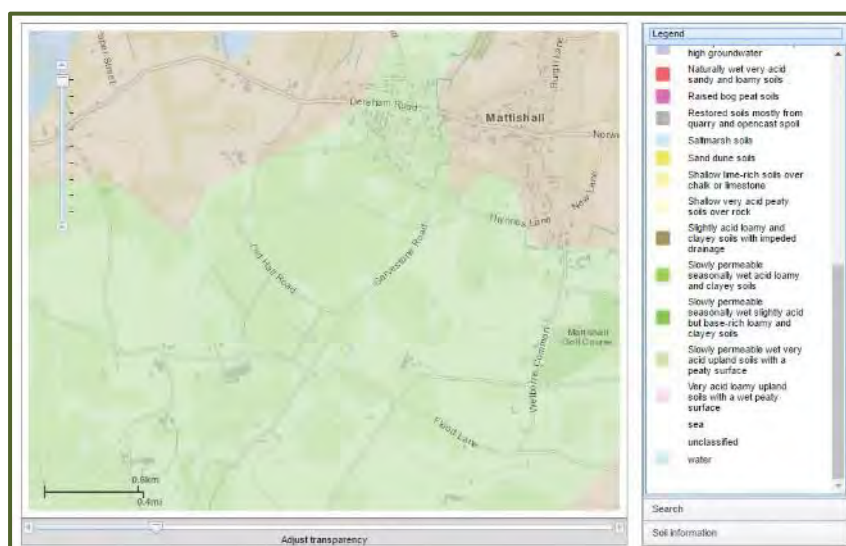
Catchment Descriptor	Value	Catchment Descriptor	Value
GRID REFERENCE	603850, 311250	SPRHOST	38.98
AREA	2.565	URBCONC1990	-999999
ALTBAR	53	URBEXT1990	0.0039
ASPBAR	349	URBLOC1990	-999999
ASPVAR	0.49	URBCONC2000	-999999
BFIHOST	0.364	URBEXT2000	0.001
DPLBAR	1.77	URBLOC2000	-999999
DPSBAR	11.3	C	-0.02352
FARL	1	D1	0.29563
FPEXT	0.1979	D2	0.32777
FPDBAR	0.974	D3	0.2724
FPLOC	1.001	E	0.31418
LDP	3.59	F	2.46624
PROPWET	0.31	C(1 km)	-0.023
RMED-1H	11.3	D1(1 km)	0.293

Catchment Descriptor	Value	Catchment Descriptor	Value
RMED-1D	28.4	D2(1 km)	0.326
RMED-2D	36.4	D3(1 km)	0.274
SAAR	650	E(1 km)	0.312
SAAR4170	642	F(1 km)	2.474

i. BFIHOST

- 3.3.8 BFIHOST is the baseflow index developed using the Hydrology of Soil Types (HOST) classification and is the baseflow proportion of the flow on average. It is an estimate based on the daily mean flow data. Baseflow comprises water entering the watercourse through shallow subsurface flow and groundwater flow (mechanisms other than direct surface runoff); hence permeable soils and geology tend to yield a higher baseflow.
- 3.3.9 The National Soils Resources Institute (Cranfield University) Soilsmap map and British Geological Survey (Geology of Britain Viewer) online mapping was reviewed to verify the BFIHOST value.
- 3.3.10 The National Soils Resources Institute (Cranfield University) Soilsmap map (see Figure 3.1) shows that the catchment is largely comprised of slowly permeable, seasonally wet, slightly acid, but base-rich loamy and clayey soils. There is a small area within the northern (downstream) extent of the catchment comprised of slightly acid, loamy, and clayey soils with impeded drainage.
- 3.3.11 The clay soils within the catchment are indicative of potentially low infiltration potential.

Figure 3.1. Soilscape Map



- 3.3.12 The British Geological Survey (Geology of Britain Viewer) mapping (see Figure 3.2) shows that the catchments superficial deposits are largely Lowestoft Formation – Diamicton, with some areas of River Terrace Deposits (sand and gravel) and Alluvium (clay, silt, sand and gravel). The bedrock geology map (see Figure 3.3) shows that the catchment is underlain by Lewes Nodular Chalk Formation, Seaford Chalk Formation, Newhaven Chalk Formation, Culver Chalk Formation.
- 3.3.13 The underlying superficial deposits are indicative of a potentially mixed permeability, whereas the bedrock geology is indicative of potentially high permeability.

Figure 3.2. BGS Map – Superficial Deposits



Figure 3.3. BGS Map – Bedrock



3.3.14 The BFIHOST of 0.364 indicates a relatively impermeable catchment, probably due to the clay soils and underlying superficial deposits. The unadjusted BFIHOST value taken from the FEH Web Service therefore remains acceptable.

ii. SPRHOST

3.3.15 The SPRHOST parameter reflects the amount of surface runoff in a catchment, and is also based on the HOST soils classifications. The SPRHOST value for the catchment from the FEH Web Service is 38.13%. This SPRHOST value reflects the slowly permeable clayey soil, leaving 61.87% to infiltrate).

3.3.16 This value was verified by a review of the Soilscape Map, where slowly permeable loamy and clayey soils generate a high percentage of overland flow. The unadjusted SPRHOST value taken from the FEH Web Service therefore remains acceptable.

iii. PROPWET

3.3.17 PROPWET describes the proportion of time that soils are wet. PROPWET values for the UK range from approximately 0.80 in Northern Scotland where there is high annual rainfall, to 0.20 in East Anglia where annual rainfall is much lower.

3.3.18 Low PROPWET values tend to inhibit flooding, as the catchment is not saturated prior to a flood event and there is higher capacity for infiltration, the opposite is true for catchments with higher PROPWET values. The PROPWET value of 0.3 for this catchment is moderate to low, and may be explained by the following factors:

- Wet spells only occur at a moderate frequency and tend to be of a relatively short duration (supported by the SAAR figures below);
- The presence of clay soils maintains a low amount of water to be present in soils.

3.3.19 The unadjusted PROPWET value taken from the FEH Web Service is therefore considered reasonable and remains acceptable.

iv. FARL

3.3.20 The FARL value is a measure of flow attenuation caused by reservoirs and lakes, and ranges from 0 (total attenuation) to 1.0 (no discernible attenuation). The catchment has a FARL value of 1.0. This has been confirmed by studying OS mapping of the catchment, whereby there are no lakes or reservoirs offering any attenuation. The unadjusted FARL value taken from the FEH Web Service therefore remains acceptable.

v. URBEXT

3.3.21 Urban Extent, URBEXT1990 output was 0.0039 indicating an 'essentially rural' catchment. The new FEH catchment descriptor URBEXT2000 was 0.001, also indicating an essentially rural catchment.

3.3.22 The FEH Statistical Method uses an updated URBEXT value, URBEXT2000 has been updated to URBEXT2016 using the national average model of urban growth within the WINFAP-FEH v3.0 CD-ROM. URBEXT2016 was calculated to be 0.001, maintaining the view of an essentially rural catchment.

3.3.23 The urban extent from (URBEXT2000) is similar to the extent shown on the OS mapping and there are no significant variations between the two datasets. There has been no substantial development since 2000 and therefore updating the URBEXT to 2016 using the national average model of urban growth within the WINFAP-FEH v3.0 CD-ROM and an urban expansion factor (UEF) within the ReFH/Rainfall Runoff Methods is acceptable. The URBEXT2016 value has been used when calculating the adjusted catchment peak flows using the FEH Statistical, Rainfall Runoff and ReFH Methods outlined below.

vi. SAAR

3.3.24 SAAR values within the FEH represent standard average annual rainfall data for the standard period 1961-1990 and a value of 650 mm shows that the catchment is low to moderately wet. The unadjusted SAAR value taken from the FEH Web Service therefore remains acceptable.

vii. DPSBAR

3.3.25 The Drainage Path Slope (DPSBAR) shows a value of 11.3, which indicates that the catchment has a low relief. This is supported by a review of Ordnance Survey mapping. The DPSBAR value taken from the FEH Web Service therefore remains acceptable.

3.4 Catchment Characteristics – Adjusted Catchments

Summary of Unadjusted Catchments

3.4.1 As noted in Section 2.3 above, a comparison of the FEH Web Service with KTF flow pathway analysis, it has been established that the catchment boundary associated with the study catchment is incorrect.

- 3.4.2 FEH catchment descriptors were extracted from the unadjusted catchment (located at the culvert along the northern boundary of the Site), which forms the majority of the study catchment. The catchment descriptors associated with unadjusted catchment was found to be acceptable, with the exception of URBEXT2000, which was scaled up to URBEXT2016 using the national average model of urban growth within the WINFAP-FEH v3.0 CD-ROM.

Catchment Adjustment Methodology

- 3.4.3 As noted above, the catchment boundary from the FEH Web Service had already been identified by the LLFA as not being representative of the true catchment outline.
- 3.4.4 An indicative catchment boundary was provided by the LLFA, and the indicative catchment was checked/refined through a review of the FEH catchment boundary and KTF using 0.5m LiDAR data.
- 3.4.5 The unadjusted catchment was found to be acceptable in term of the associated catchment descriptors, with the exception of URBEXT, which was updated to present day values (2016).
- 3.4.6 There are nine catchment descriptors, which are used within the peak flow calculations. These catchment descriptors, and the standard catchment descriptor adjustment methodologies (when re-sizing the catchment) are summarised below within Table 3.3.

Table 3.3. Standard Catchment Descriptor Adjustment Methodologies

Catchment Descriptor	Adjustment Methodology
AREA	Measure the new KTF derived catchment boundary
SAAR, BFIHOST, SPRHOST, PROPWET, URBEXT, DPSBAR	These are all simple area averages and can be adjusted by an area-weighting method. The weights to use are the fractions of the combined catchments covered by each individual component.
FARL	The computation of this index is complex and relies on having a contiguous drainage path network from the catchment outlet to each node. Experience and judgement are needed.
DPLBAR	This also relies on having an unbroken drainage path network. It is highly correlated with drainage area, and it can be estimated from the regression equation $DPLBAR = AREA^{0.548}$.
Others	All other catchment descriptors are provided for information only, so need not be adjusted.

- 3.4.7 The AREA values for the adjusted catchment boundary was simply measured. The adjusted catchment measures 2.47km² (see Drawing SHF.1132.065.HY.D.008). The increase in area was found to be 0.1km² (3.9% decrease) when compared to the unadjusted catchment boundary (2.57 km²).
- 3.4.8 The resulting catchment was found to be 2.47km², approximately 0.1km² smaller than the FEH derived outline (albeit a different shape).
- 3.4.9 The FARL value for the catchment is 1.0, and a review of the OS mapping found that there are no lakes or reservoirs located within the adjusted catchment boundary, therefore FARL values would remain unadjusted.
- 3.4.10 The DPLBAR values were adjusted in line with the suggested regression equation.

- 3.4.11 The adjustment to the catchment area does not have catchment descriptors specifically assigned to areas extended into, therefore, the methodologies within Table 3.3 are not necessarily applicable for SAAR, BFIHOST, SPRHOST, PROPWET, URBEXT, DPSBAR.
- 3.4.12 DPSBAR (mean Drainage Path Slope) provides an index of overall catchment steepness. It was developed for the Flood Estimation Handbook and is calculated as the mean of all inter-nodal slopes (derived using the IHDTM) for the catchment. The index is expressed in meters per kilometer with values ranging from >300 in mountainous terrain to <25 in the flattest parts of the country. The relief of the catchment was considered to be of low relief, and it was felt that the negligible increase in the catchment area would not affect the catchment steepness. Therefore, this catchment descriptor was left unaltered.
- 3.4.13 Average annual rainfall in the standard period (1961-1990) in millimetres (SAAR4170 is from 1941 to 1970). The negligible increase in the catchment area would not affect the average annual rainfall within the catchment. Therefore, this catchment descriptor was left unaltered.
- 3.4.14 An alternative methodology had to be considered to adjust the aforementioned catchment descriptors: BFIHOST, SPRHOST, PROPWET and URBEXT. The values associated with these catchment descriptors were increased according to percentage increase in the catchment area and review of OS mapping, and soils and geology mapping.
- 3.4.15 A summary of the methodologies employed are included below within Table 3.4.

Table 3.4. Catchment Descriptor Adjustment Summary

Catchment Descriptor	Adjustment Method
BFIHOST	Catchment soils and geology is not variable. No adjustment made.
SPRHOST	Catchment soils and geology is not variable. No adjustment made.
PROPWET	Catchment soils and geology is not variable. No adjustment made.
2016URBEXT	OS mapping shows extension moves into a rural area; therefore, a percentage decrease should be applied. The 0.39% deduction factor makes no difference to the unadjusted URBEXT2016 value.

3.5 FEH Statistical Method

Introduction

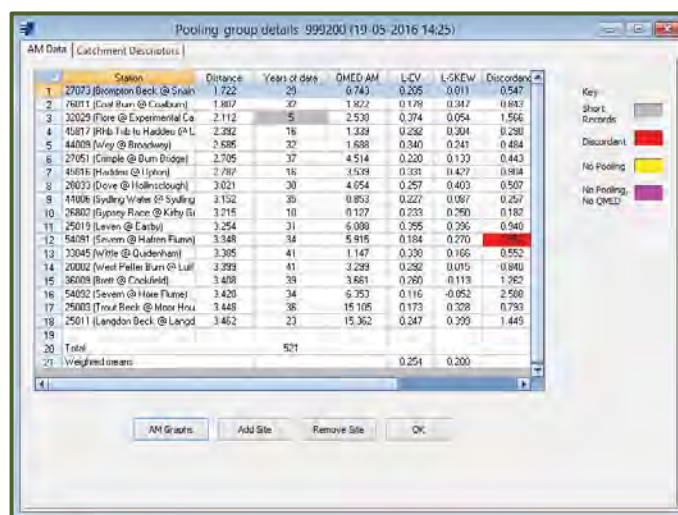
- 3.5.1 The FEH Statistical Method is based on an Index Flood, which is the median annual flood (QMED – with a return period of 2 years) from catchment descriptors and then improving this using data from an appropriate Gauging Station (if available). This reduces the error associated with the estimation of QMED using only catchment descriptors.
- 3.5.2 To calculate QMED at ungauged sites, data transfer from a similar site is used or from a nearby upstream or downstream Gauging Station. To calculate peak flows for different probabilities, growth curves are developed from statistically similar catchments or ‘pooling groups’. The FEH Statistical Method is sometimes favoured because it is based on a larger dataset than the ReFH Method and been more directly calibrated to reproduce flood frequency in the UK.
- 3.5.3 The study site is not directly gauged, and there are no nearby gauges on the same watercourse, or along a nearby catchment. As such, QMED for the catchment must rely on catchment descriptors alone.

- 3.5.4 The FEH Statistical Method uses an updated URBEXT value, URBEXT2000 can be updated to URBEXT2016 using the national average model of urban growth within the WINFAP-FEH v3.0 CD-ROM. The URBEXT2016 indicates an essentially rural catchment with an URBEXT value of 0.001.
- 3.5.5 The QMED flood is equivalent to a flood event of approximately 2 years return period. In order to provide flow estimates for floods of a greater magnitude it is necessary to derive a flood frequency curve using the QMED value and applying a series of growth factors.
- 3.5.6 The pooling group analysis and QMED Estimation (based on catchment descriptors) is discussed below.

QMED Estimation

- 3.5.7 In order to estimate the magnitude of the statistical flood events occurring within the catchment, it is necessary to determine a flood growth curve and a flood frequency curve. This is done by forming a pooling group, a group of hydrologically similar catchments across the UK, which have existing gauged records covering a statistically adequate number of years to obtain reliable flood estimates, and subjecting this group to statistical analysis.
- 3.5.8 In order to calculate reliable flood estimates, the FEH recommends that a pooling group should contain five times as many station-years as the target return period (5T) however, the ‘Improved Statistical Method’ (2008) recommends that a fixed pooling group size of at least 500 annual maxima events should be used for all return period events. Therefore, this revised advice has been adopted.
- 3.5.9 The adjusted catchment descriptors were imported in the WINFAP-FEH v3.0 CD-ROM and a pooling group with 521 years of data was created (see Figure 3.4).

Figure 3.4. Pooling Group



- 3.5.10 The WINFAP-FEH v3.0 CD-ROM indicates that the pooling group is ‘heterogeneous’ and a review of the pooling group is ‘essential’. However, all of the sites, which are ranked, are satisfactory in terms of their hydrological similarity with the subject site and the pooling group distribution provides an acceptable statistical fit.
- 3.5.11 It is noted that the Station 54091: Severn@Hafren Flume, was found to be discordant, but was not removed as it was moderately ranked in the pooling group. Similarly, Station 32029: Fore@Experimental Catchment was noted as having a short record, but was highly ranked in the pooling group.

- 3.5.12 The FEH states that a significant proportion of pooling groups remain heterogeneous, even after a review and adapting a heterogeneous pooling group to make it homogeneous is not advised. Consequently, the pooling group is considered acceptable in its initial state.
- 3.5.13 The growth curve fittings and flood frequency curve fittings were derived using the revised URBEXT2016 and QMEDcds (0.668) derived from adjusted catchment descriptors.
- 3.5.14 The FEH recommends the Generalised Logistics Distribution as the most suitable for fitting pooled growth curves to UK flood data and this recommendation has been adhered to in this assessment. However, it should be noted that the results can vary slightly, depending upon the chosen distribution for the statistical analysis. The Pooling Group growth curve fittings and flood frequency curve fittings is included below in Table 3.5.

Table 3.5. Pooled Group Growth Fittings and Flood Frequency

Return Period	Growth Fittings	Flood Frequency
2	1.00	0.67
5	1.41	0.95
10	1.71	1.15
20	2.04	1.36
25	2.15	1.44
30	2.24	1.50
50	2.52	1.69
75	2.77	1.85
100	2.95	1.97
150	3.23	2.16
200	3.44	2.30
500	4.19	2.80
1000	4.86	3.25

3.6 ReFH Method

Introduction

- 3.6.1 The Revitalised Flood Hydrograph (ReFH) method is based on robust hydrological modelling techniques and is considered to be an improvement over the FEH/FSR Rainfall Runoff method (FEH), as described in the FEH. This method used the adjusted catchment descriptors to generate design flood events of specific return periods.
- 3.6.2 The ReFH calculation was undertaken within ISIS hydraulic modelling software.

Storm Duration Estimation

- 3.6.3 A recommended storm duration was derived by ISIS as 6.379hrs, which was rounded up down 6.25hrs. The ReFH Method requires the user to have a storm duration divided by the data interval, which is an odd integer to ensure the use of an odd number of rainfall blocks in the storm profile. Therefore, an integer of 0.25hrs was applied.

Peak Flow Estimation

- 3.6.4 In line with ReFH Method guidance, a winter storm profile was selected based on the catchment's rural nature (winter profile applied to catchments with an URBEXT <0.125) and flows were estimated for each required return period.
- 3.6.5 The model parameters for the ReFH method (time-to-peak, baseflow, and standard percentage runoff) should ideally be based on actual flood event data comprising rainfall and flow records rather than catchment descriptors alone. However, due to the lack of availability flow data for the study catchment, the ReFH design standards have been adopted in this instance based on the relevant technical guidance. The time to peak was calculated at 3.866hrs.
- 3.6.6 The peak flows calculated using the ReFH Method are shown in Table 3.6.

Table 3.6. ReFH Method Peak Flows

Return Period	Peak Flow (m ³ /s)
2	0.74
5	1.00
10	1.20
20	1.42
25	1.49
30	1.56
50	1.76
75	1.94
100	2.08
150	2.31
200	2.49
500	3.21
1000	3.94

3.7 FEH Rainfall Runoff Method

Introduction

- 3.7.1 The FEH/FSR Rainfall Runoff method (FEH), superseded by the above ReFH method, is a method which uses catchment descriptors to generate design flood events of specific return periods. This superseded method does not allow for catchment infiltration (i.e. a 'kink' in the falling limb of the hydrograph), which typically causes an overestimation in peak flows. Whilst this method is superseded by the ReFH method, the results from the method provide some context of peak flows generated from other methodologies.
- 3.7.2 The FEH Rainfall Runoff calculation was undertaken within ISIS hydraulic modelling software using adjusted catchment descriptors.

Storm Duration Estimation

- 3.7.3 A recommended storm duration was derived by ISIS as 10.538hrs, which was rounded down to 10.5hrs. The ReFH Method requires the user to have a storm duration divided by the data interval, which is an odd integer to ensure the use of an odd number of rainfall blocks in the storm profile. Therefore, an integer of 0.50hrs was applied.

Peak Flow Estimation

- 3.7.4 In line with FEH Rainfall Runoff guidance, a summer storm profile was selected based on the catchment's rural nature and flow flows were estimated for each required return period.
- 3.7.5 The model parameters for the FEH Rainfall Runoff method (time-to-peak, baseflow, and standard percentage runoff) should ideally be based on actual flood event data comprising rainfall and flow records rather than catchment descriptors alone. However, due to the lack of flow data for study catchment, the ReFH design standards have been adopted based on the relevant technical guidance. The time to peak was calculated at 6.387hrs.
- 3.7.6 The peak flows calculated using the FEH Rainfall Runoff method are shown in Table 3.7.

Table 3.7. FEH Rainfall Runoff Method Peak Flows

Return Period	Peak Flow (m ³ /s)
2	0.61
5	0.76
10	0.94
20	1.18
25	1.27
30	1.35
50	1.58
75	1.79
100	1.96
150	2.23
200	2.44
500	3.27
1000	4.08

3.8 Summary of Results

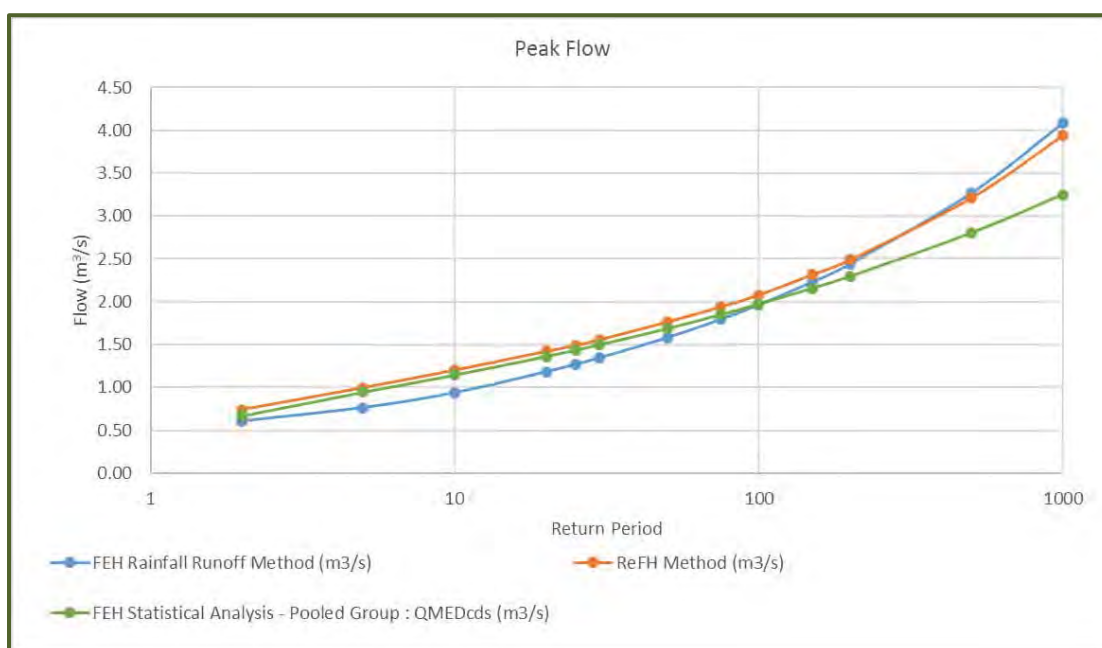
- 3.8.1 Peak flows were generated for a range or return periods (including the 1 in 100 year event with +35%CC, in line with new climate change policy guidance). Table 3.8 and Figure 3.5 summarises the findings of the hydrological methodologies.

Table 3.8. Summary of Results

Return Period	FEH Rainfall Runoff Method (m ³ /s)	ReFH Method (m ³ /s)	FEH Statistical method (Pooled Group Analysis) (m ³ /s)
2	0.61	0.74	0.67
5	0.76	1.00	0.95
10	0.94	1.20	1.15
20	1.18	1.42	1.36
25	1.27	1.49	1.44
30	1.35	1.56	1.50
50	1.58	1.76	1.69
75	1.79	1.94	1.85

Return Period	FEH Rainfall Runoff Method (m ³ /s)	ReFH Method (m ³ /s)	FEH Statistical method (Pooled Group Analysis) (m ³ /s)
100	1.96	2.08	1.97
150	2.23	2.31	2.16
200	2.44	2.49	2.30
500	3.27	3.21	2.80
1000	4.08	3.94	3.25
100+35%CC	5.51	5.32	4.38

Figure 3.5. Summary of Results



3.9 Analysis of Peak Flow and Choice Going Forward

Analysis of Peak Flow

- 3.9.1 The peak flows calculated using the FEH Rainfall Runoff, ReFH and FEH Statistical (Pooled Group) methods and ReFH methods have been compared (see Table 3.1 and Figure 3.5).
- 3.9.2 It is expected that results using the different methods will vary and the ReFH Method normally gives larger estimates than the FEH Statistical (Pooled Group) method (which typically underestimates peak flows), whereas the FEH Rainfall Runoff method (now superseded) typically overestimates peak flows. This pattern has been replicated in part, within the peak flows produced.
- 3.9.3 The Environment Agency’s ‘Flood Estimation Guidelines (Operational Instruction 197_08) document (June 2012) provides advice on the most suitable methods to use, based on different requirements/data available.
- 3.9.4 Below is a summary of the advantages and disadvantages associated with each of the methodologies.

FEH Statistical Method

3.9.5 Below is a summary of the advantages to using the Statistical Method within this study catchment:

- The FEH Statistical method should be favoured in permeable catchments; however, this study catchment is considered relatively impermeable.

3.9.6 Below is a summary of the disadvantages to using the Statistical Method within this study catchment:

- There are less than 2-3 years of flood peak data, as the study site is not directly gauged, and there are no gauges located within the vicinity of the site.
- The catchment is less than 1000km², therefore the Statistical Method has no advantage over the ReFH method.
- The FEH Statistical method generated a heterogeneous Pooling Group, which not surprising given that the study catchment is less than 5m² (i.e. there are few representative small catchments that are gauged).

ReFH Method

3.9.7 Below is a summary of the advantages to using the ReFH Method within this study catchment:

- The ReFH method is based on catchment descriptors specific to the study catchment, with catchment descriptors being verified or updated. However, as noted above, there are few representative small catchments, which are gauged.
- There are no continuous flow records as the site is not directly gauged, and there are no gauges located within the vicinity of the site.
- This catchment is considered relatively impermeable. The ReFH method is considered appropriate within impermeable catchments.

3.9.8 Below is a summary of the disadvantages to using the ReFH Method within this study catchment:

- The ReFH method is not reliable when generating longer return periods (i.e. 1000yrs). In this case, the ReFH method is generating more conservative (larger) peak flows, which are considered more applicable to the study site when used within a hydraulic modelling study.

FEH Method

3.9.9 The FEH/FSR Rainfall Runoff method (FEH), was superseded by the ReFH method, since the method does not allow for catchment infiltration (i.e. a 'kink' in the falling or recession limb of the hydrograph), which typically causes an overestimation in peak flows. Nevertheless, the results from the method provide some indication of typical peak flows generated from similar catchments using other methodologies. In this case, the FEH Rainfall Runoff method generated similar peak flows to the ReFH method.

Choice Going Forward

3.9.10 The results from the ReFH method should be favoured as it is a method based on catchment descriptors specific to the study catchment, with several catchment descriptors having being verified or adjusted for the study catchment, which is not a catchment correctly identified by the FEH Web Service.

3.9.11 The intended use of the peak flows is for hydraulic modelling. The ReFH produced more conservative figures, which would feed through as a conservative input into the hydraulic modelling study.

4.0 Hydrologic Modelling Study

4.1 Introduction

4.1.1 The detailed Environment Agency flood map shows that the northern and western extents of the wider Site are at risk of pluvial flooding, during the 1 in 30 year, 1 in 100 year and the 1 in 1000 year events. The southern extent of the wider Site is located outside the mapped extent of surface water flooding (see Figure 4.1 below). It is noted that the Environment Agency surface water flood mapping within Figure 4.1 is based on a 'bare earth' ground model, and does not include the full detail of the land drain channels and structures, which convey flows more effectively. A Site-specific modelling exercise has been undertaken to refine the conservative flood outlines, which has been included below within Figure 4.2. The remainder of this Section details the modelling methodology and results.

Figure 4.1. Environment Agency Surface Water Flood Outline (1 in 1000 year event)

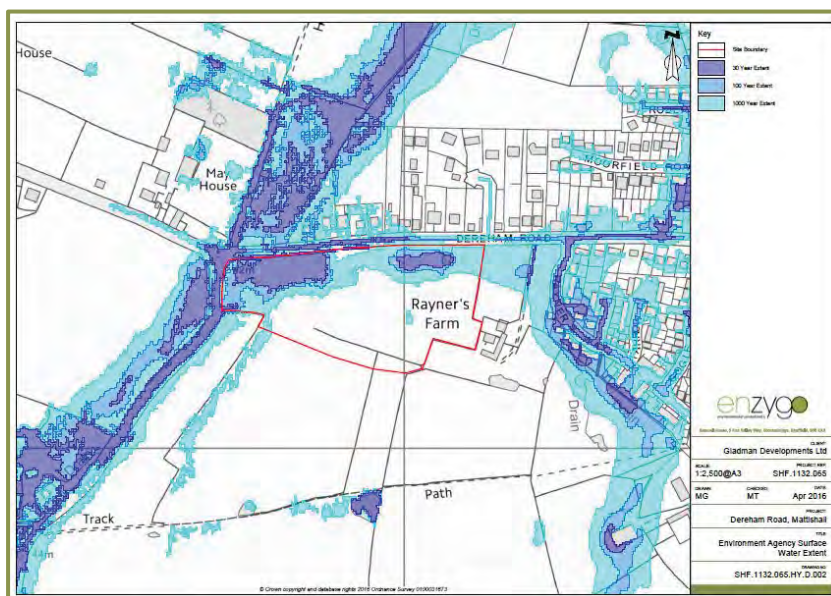


Figure 4.2. Enzygo's Refined Surface Water Flood Outline



4.1.2 The aim of this study is to produce a 1D/2D hydraulic model to assess the pluvial and fluvial flood risk to the wider Site. The hydraulic modelling considers the influence from existing highway crossings, in order to more accurately establish the pluvial/fluvial flood outline.

4.1.3 In order to achieve these aims, a 2D hydraulic river model has been built using Infoworks ICM (industry standard modelling software), which incorporates the land drains which the wider Site and the highway culverts. The land drains have been incorporated within the 2D mesh.

4.2 Data Obtained

4.2.1 In order to undertake these modelling study, the following data was obtained.

- 0.5m LIDAR covering the area of interest.
- Detailed topographic survey for the land off Howes Lane and the channel survey of the land drain adjacent to Old Hall Road (including culvert crossings).
- Detailed topographic survey of the development Site.
- Indicative Framework Plan (see Figure 5.1)

4.3 Site Walkover

4.3.1 Two Site visits were undertaken on the 28th May 2016 and the 18th November 2015. The Site walkovers enabled the project team to familiarise themselves with the catchment area but also to confirm or check assumptions made during the model build process.

4.4 Model Build

4.4.1 The land drain channels within the study catchment have been constructed using InfoWorks ICM. This is a 1D/2D integrated modelling package whereby the main channels are represented by a 1D network built from the topographic survey data, and then interlinked with a 2D representation of the catchment area and minor land drains built from LIDAR data.

4.4.2 The integrated catchment model utilises the capabilities of the software to represent the interaction of open channels and culverts, along with overland flow from both impermeable and permeable surfaces within one modelling platform.

4.4.3 The model includes the following features:

- Main channel running to the west of the Old Hall Road;
- Old Hall Road culvert crossing;
- Main channel bounding the development Site;
- Dereham Road culvert crossing;
- Main continuation channel north from Dereham Road;
- FEH generated inflows for a range of return periods, detailed within Section 3.
- 2D representation of the overland flow paths covering both permeable and impermeable areas, based on 0.5m LIDAR data.

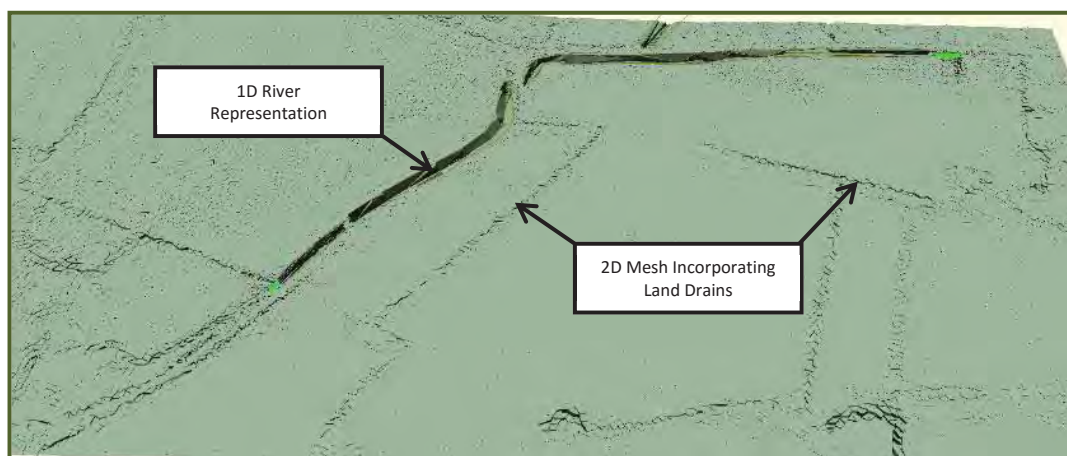
4.5 General Approach to Representation of Watercourses

4.5.1 The hydraulic model incorporates the main channels, road crossings and 2D overland flow paths as described above. The watercourses and associated culverts have been modelled based upon the topographical surveys identified above. Cross sections have been generated manually initially based upon LiDAR data across the watercourses. These sections have then

been updated with the topographical survey information at strategic points along the channels. This information has been supplemented where necessary by generating additional cross sections based on 0.5m LIDAR data, utilising the automated tools within InfoWorks ICM.

- 4.5.2 The land drain bank lines were created from the cross section ends and are aligned to follow the river reach centre line. At certain points within the model it has been necessary to modify the bank lines to ensure a better correlation with the LIDAR data.
- 4.5.3 Roughness values for the channels have been based upon the Manning's 'n' values for channels (Chow, 1959). All culverts identified during the survey works have been incorporated within the model. Culvert inlet coefficients are based upon the standard 'culvert inlet' parameters within the modelling software.
- 4.5.4 Minor land drains channels (see Figure 4.3) have been are incorporated within the 2D mesh generated by the 0.5m LiDAR.

Figure 4.3. Minor Land Drain Channels within the 2D Mesh



4.6 Ground Model and 2D Mesh

- 4.6.1 The watercourse 1D network has been constructed utilising a mixture of LiDAR and survey data. This has been interlinked with a 2D representation of the catchment area built from 0.5m LIDAR data.
- 4.6.2 A 2D mesh was generated based upon the 0.5m LIDAR data which covers an area of approximately 434 Ha. The elements within the mesh have been set to a minimum size of 25m² and maximum size of 50m². These values define the size of the mesh elements within the model and therefore the detail of the topography within the area. A more detailed mesh has been generated for the areas adjacent to watercourse to better define the bank watercourse layout.
- 4.6.3 No adjustments have been made to roads, and these have been simply represented by the LIDAR data. The majority of roads within the area of concern are minor rural lanes with no definitive kerb line.
- 4.6.4 In general, surveyed levels compared well with the LIDAR levels; however, there were a few locations where slight differences existed. These locations have been reviewed and if necessary adjustments made to ensure smooth interaction between the 1D watercourse and the 2D floodplain.

4.7 Model Outputs

- 4.7.1 Following completion of the model build the base 'clean' model has been run with a variety of fluvial and pluvial events namely the 50% (1 in 2), 3.3% (1 in 30), 1% (1 in 100) 1% + CC (1 in 100 +35% Climate Change) and 0.1% (1 in 1000) AEP events.
- 4.7.2 Fluvial flows as described above have been generated for the land drain to the west of the wider Site, and applied as an input file to the top end of the reach. FEH rainfall has also been generated and applied directly to the 2D mesh outside the western reach catchment area. This has been applied to allow any additional flows from the east connecting into the short length of land drain to the south of Dereham Road to be accounted for in the system.
- 4.7.3 In order to generate a relative amount of runoff, the SPRHOST value of 38.98% has been applied to the mesh. This figure has been taken from the FEH parameters and represents the volume of rainfall runoff that will contribute to overland flow, therefore leaving the 61.02% of the rainfall to infiltrate into the ground.
- 4.7.4 A review of the flood outlines and depths in comparison to historical evidence, photos from the <http://www.mattishallmatters.org.uk/> website and Environment Agency flood maps has been undertaken. The initial predictions based upon a 'clean' model (where Dereham Road culvert crossing is clean) indicated that the level of flooding was less than that experienced during the recent events in January 2016. The SPRHOST value was increased to 65% meaning that 65% of rainfall would contribute to overland flows and the remaining 35% would infiltrate or be lost from the system. The simulations were then re-run and the results predicted better correlation with the observed events. The 65% SPRHOST value has been utilised in the further assessments of the model.
- 4.7.5 In addition to increasing the SPR values, as identified earlier the Dereham Road culvert was submerged when surveyed, and therefore assumed to be partially or fully blocked. Three scenarios 66% blocked, 90% blocked and 100% blocked have then been generated to review the impact upon the flood depths and outlines.
- 4.7.6 Due to the volume of flows generated by ReFH and rain falling onto the mesh, sensitivity analysis on of the culvert blockage on flooding identified little variation in the flood outline for the three blockage scenarios. The primary factor in flooding is the hydraulic restriction caused by culvert. The capacity of the clean culvert is approximately 1m³/s; the ReFH flows generated for the model are summarised below within Table 4.1.

Table 4.1. Surface Water Flood Outline

Return Period	Peak Flow (m ³ /s)
2	0.75
30	1.56
50	1.58
100	2.08
1000	3.94
100+35%CC	2.80

- 4.7.7 Out of bank flooding has been replicated at the junction of Dereham Road, Old Hall Road and Howes Lane, as reported, for the 50% (1 in 2yr) event as can be seen in Drawing SHF.1132.066.D.011A. The representation of the flooding has been generated using a 90% blockage in the culvert under Dereham Road. As can be seen the model accurately represents the extents of the flooding based upon the images captured

4.8 Model Simulations

- 4.8.1 Model simulations have been carried out against a range of fluvial and pluvial events, as identified in the Table 4.2 below.
- 4.8.2 Inflows have been applied to the upper extent of the western land drain. The inflow has been applied as flat line peak flow derived using the ReFH and adjusted upstream catchment area for the relevant return period.
- 4.8.3 No downstream boundary conditions have been applied. Flows have been allowed to discharge on to the 2D mesh generated by the 0.5m LiDAR and follow the contours of the mesh.

Table 4.2. Sensitivity Scenarios

Event	Clean	60% Blocked	60% Blocked	60% Blocked
50% (1 in 2)	✓	✓	✓	✓
3.33% (1 in 30)	✓	✓	✓	✓
1% (1 in 100)	✓	✓	✓	✓
1%+CC (1 in 100)	✓	✓	✓	✓
0.1% (1 in 1000)	✓	✓	✓	✓

4.9 Predicted Flood Mechanisms and Comparison with Environment Agency Flood Outlines

- 4.9.1 Flooding is predicted within the potential development site (to the south of Dereham Road) across all return periods.
- 4.9.2 The flood mechanism is fundamentally the same with variance only in terms of flooding extents and depths of flooding. The comparison of the 100 year and 1000 year outputs against the EA flood maps depicting the extents of Flood Zones 2 and 3 is discussed in Section 4.5 of this report.
- 4.9.3 The predicted flood outlines for each return period are shown in the drawings attached (as referenced).
- 30 year outputs - Drawing: 1132.066.D.012.A
 - 100 year outputs - Drawing: 1132.066.D.013.A
 - 100 year + Climate Change outputs - Drawing: 1132.066.D.014.A
 - 1000 year outputs - Drawing: 1132.066.D.015.A
- 4.9.4 The drawings show that the main flooding area across all events is in the north-west corner of the wider Site at the junction of Dereham Road and Old Hall Road. The majority of the flooding is caused by the fluvial waters escaping and discharging on the adjacent land, which is further exacerbated by pluvial flows crossing the wider Site via the local land drains and contributing to the flood extents. In addition, pluvial flows are collecting in the topographic low spots near the existing pond.
- 4.9.5 The model compares well across all events with the Environment Agency flood maps and anecdotal photographic evidence. The model appears slightly more conservative across the wider Site when compared to the Environment Agency flood maps.

4.10 Development Design Results

- 4.10.1 As detailed within Section 5, the Site will be developed sequentially, by limiting the developable area outside the mapped extent of pluvial/fluvial flooding, whilst infilling low areas on the site which are areas of surface water ponding during the flood events.
- 4.10.2 In order to mitigate residual risk of fluvial flooding from the minor land drain to the south of the Site, it is recommended that a formal channel is created. This minor land drain will be connected into the existing land drain running parallel with Old Hall Road. In addition a new access road will be created to access the site off Dereham Road.
- 4.10.3 In order to maintain the flows through the existing watercourse a culvert under the road has been proposed, and designed to ensure conveyance in all storms up to the 1000yr event. Drawing SHF.1132.066.D.016.A outlines the proposed layout.
- 4.10.4 This model has been based on the calibrated model which assumes that the culvert under Dereham Road is 90% blocked.
- 4.10.5 Table 4.3 summarises the Drawing references, which have been produced from the model runs for various return periods.

Table 4.3. Drawing Reference for Model Runs

ReFH & Rainfall return period	Drawing Reference
50% (1 in 2yr)	SHF.1132.066.D.017.A
3.33% (1 in 30yr)	SHF.1132.066.D.018.A
1% (1 In 100yr)	SHF.1132.066.D.019.A
Option 100yr+CC	SHF.1132.066.D.020.A
Option 1000yr	SHF.1132.066.D.021.A

- 4.10.6 The Drawings show that the proposed flood outline ensures that all the developable land remains dry for all return periods, whilst not increasing the overall flood area.

4.11 Conclusions

- 4.11.1 A 2D integrated model has been created to review the impact of pluvial and fluvial flooding affecting land to the south of Dereham Road. The model has been constructed based on survey data and 0.5m LiDAR data and calibrated based upon recent flooding photos of the site. The calibration study required the SPR value to be increased from 35% to 65% and the culvert under Dereham Road to be modelled as 90% blocked to represent the reported flooding. The model accurately predicted the flooding within and around the site as identified from recent flooding photos and when compared with the EA surface water flood maps.
- 4.11.2 Whilst flooding is predicted within the boundary of the wider Site, it is largely confined to the north-west corner, the majority of which is generated by the relatively large upstream catchment and a lack of capacity in the culverts and land drains to be able to convey the flows downstream. Some flooding is also predicted across the Site from pluvial sources due to the topography of the land, which generally slopes north-west; however, there are also some local depressions in the land close to the existing pond where pluvial flows are ponded. A small network of land drains cross the site which aren't formally connected to the main watercourse and appear to contribute to the site flooding.
- 4.11.3 In order to mitigate residual risk of fluvial flooding from the minor land drain to the south of the Site, it is recommended that a formal channel is created. The minor land drain will be connected into the existing land drain running parallel with Old Hall Road.

- 4.11.4 The modelling study has demonstrated that development of the Site (including Site access via a culvert crossing, and formalising a land drain) would not increase the flood risk to or from the Site.

5.0 Indicative Mitigation Measures

5.1 Primary Sources of Flooding

5.1.1 Pluvial and fluvial flooding have been identified as the primary sources of flooding to the Site.

5.1.2 The modelling study has identified that the wider Site is located largely outside the mapped extent of surface water flooding, and is located within Flood Zone 1 (low risk). However, there is an area of surface water flooding, which is associated with a pluvial/fluvial flow pathway, located along the land drains along the north and western boundary. This area of the wider Site is considered to be at medium to high risk.

5.2 Flood Risk Mitigation

5.2.1 Recommended mitigation measures include:

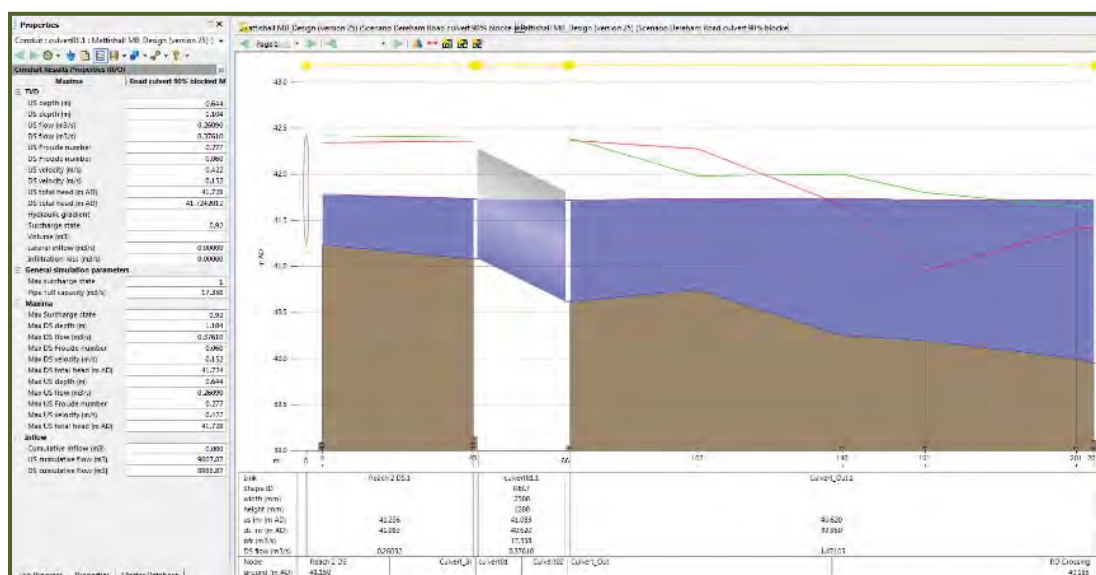
- Sequentially develop the Site, limiting the built development and surface water attenuation (i.e. pond or basin) outside the mapped extent of pluvial/fluvial flooding. As demonstrated in Figure 5.1 below, the 3.19 Ha 'Site' depicts the developable area within the 4.0 Ha 'wider Site' area, which is located outside the mapped extent of pluvial/fluvial flooding. The sequential development of the Site has been based on the modelled outputs from Section 4.
- In order to mitigate residual risk of fluvial flooding from the minor land drain to the south of the Site, it is recommended that a formal channel is created (as detailed in Section 4.10 above). It is also recommended that any depressions which create ponding are infilled. This scenario has been modelled (see Section 4), and has been demonstrated that the above recommendations mitigate the risk of flooding to the Site, and do not increase flood risk from the Site.

Figure 5.1. Indicative Framework Plan (Draft Only)



- Avoid land raising activities within the mapped extent of pluvial/fluvial flooding flow pathways. This approach would mitigate the requirement for floodplain compensation.
- Set finished floor levels of any buildings +150mm above external levels to mitigate the residual risk of surface water flooding.
- Provide a 4m easement free from development along the reach of the land drains associated with the wider Site. The recommended easement would allow access for inspection and maintenance purposes (including vehicle access).
- As a riparian owner, the land drain should be regularly inspected and cleared of overgrown vegetation, debris, sediment, in order to maintain the capacity and conveyance of the land drain. Similar, any culverts should be inspected and cleared of blockages.
- Provide a Site access to Dereham Road, with a culvert crossing scaled to conveying the 1 in 1000 peak flow. The model was run with a rectangular culvert crossing (height = 1200mm and width = 2500mm, length = 23m), which demonstrates that the 1 in 1000 year flows along the northern land drain can be conveyed without surcharging (see Figure 5.2 below).

Figure 5.2. Modelled Culvert Crossing (1 in 1000 year event)



5.2.2 Development of the Site would require consideration of a surface water drainage strategy. Storage will be provided on Site for surface water up to the 1 in 100 year plus 40% climate change. As noted above, the surface water attenuation (i.e. pond or basin) will be located outside the mapped extent of pluvial/fluvial flooding. Attenuation of surface water in line with the above design standards, would offer a betterment to localise flooding, in comparison to the current uncontrolled conditions. The surface water drainage assessment will be considered in fuller detail within the FRA.

6.0 Sequential and Exception Test Considerations

6.1 Sequential Test

- 6.1.1 The Sequential Test ensures that a sequential approach is followed to steer development towards areas with the lowest probability of river or sea flooding (Planning Policy Guidance (PPG) Paragraph: 019 Reference ID: 7-019-20140306) i.e. Environment Agency fluvial Flood Zone 1 (areas with a low probability of river or sea flooding as shown on Environment Agency or Strategic Flood Risk Assessment maps).
- 6.1.2 All sources of flooding need to be taken into account in applying the sequential approach to the location of development. At this stage, both pluvial and fluvial flooding has been identified as primary sources of flooding.
- 6.1.3 The mitigation measures detailed in Section 5, specifically the sequentially development of the Site, and a land drain crossing provided to the north of the Site (designed to convey the 1 in 1000 year flow), would negate the requirement of the Sequential Test, given that the flow pathway along the northern boundary is associated with conveyance within the land drain channel and not an overland flow pathway.

6.2 Exception Test

- 6.2.1 The Exception Test is a method to demonstrate and help ensure that flood risk to people and property will be managed satisfactorily, while allowing necessary development to go ahead in the situations where suitable sites at lower risk of flooding are not available. There are two parts to the Exception Test:
- Will development provide wider sustainability benefits to the community, which outweigh flood risk.
 - Will development be safe for its lifetime, without increasing flood risk elsewhere, and where possible reduce it.
- 6.2.2 As per Section 6.1, the Sequential Test is satisfied, therefore the Exception Test would not be required.

7.0 Summary and Conclusions

7.1 Introduction

7.1.1 This hydraulic modelling report details the hydrology and modelling methodologies used, results from the modelling study, indicative mitigation measures, and consideration of the Sequential and Exception Tests.

7.2 Summary

7.2.1 This hydraulic modelling report has demonstrated the following:

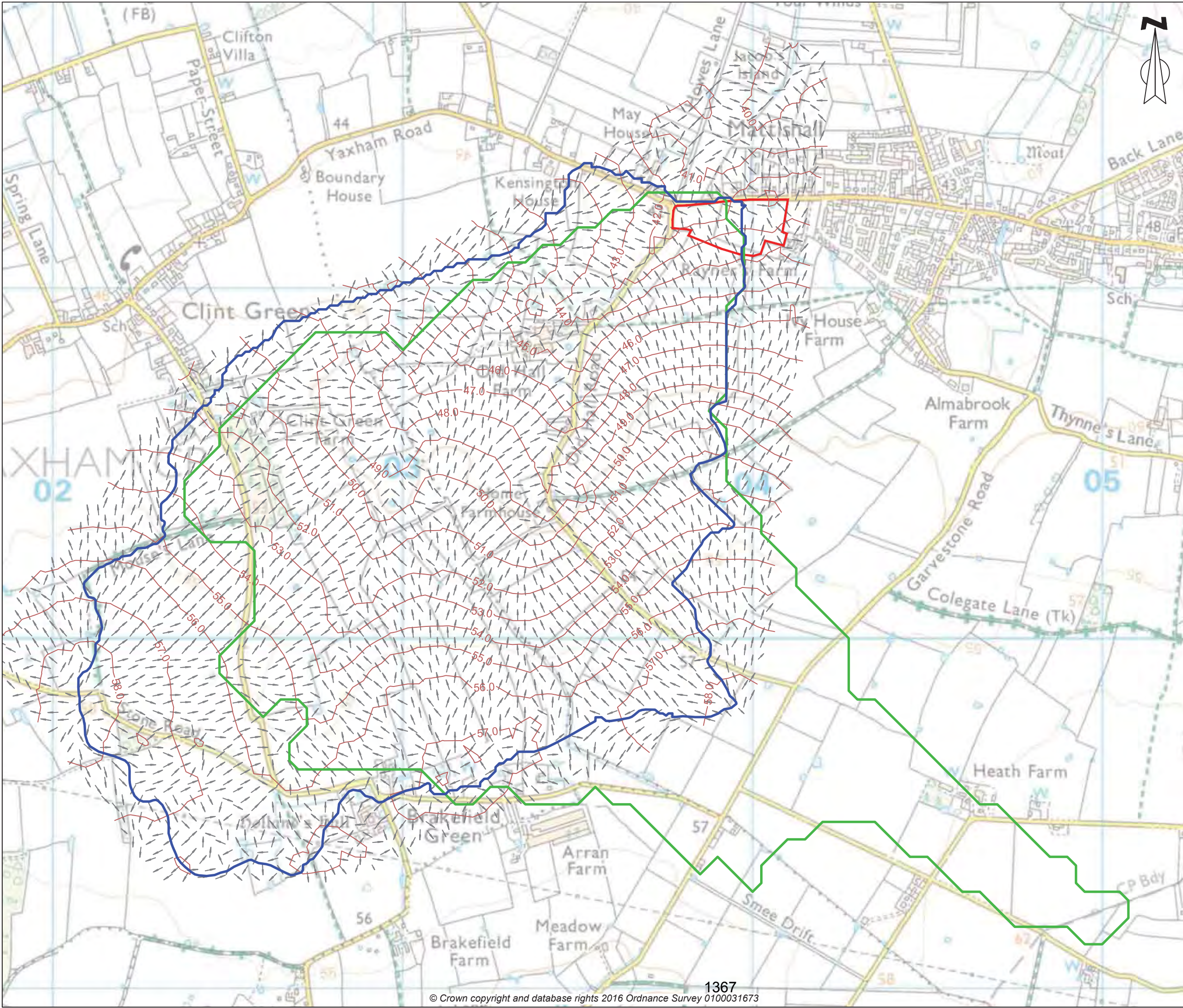
- There is a land drainage network associated with the western and northern boundaries of the Site. The risk of fluvial flooding is considered to be low (Flood Zone 1)
- The Environment Agency flood mapping shows that there is an area of surface water flooding, which is associated with a surface water (pluvial) flow pathway, located along the land drains along the north and western boundary of the Site. The risk of surface water flooding should be approached similarly to fluvial flooding (i.e. Flood Zone 2 and 3, medium to high risk respectively).
- Following the modelling exercise, it was demonstrated that land drain along the northern boundary of the Site conveyed flows within channel (no overtopping), therefore is not an overland flow pathway which requires mitigation. Instead, a channel crossing designed to convey the 1 in 1000 year event is proposed. Coupled with the mitigation measures details below (management of overland flow pathways and ponding) the approach to the Site would negate the requirement for the Sequential and Exception Tests.
- The proposal is for residential development. Residential development is considered 'more vulnerable' use. All development uses are considered acceptable within Flood Zone 1.
- Development of the Site would require a satisfactory FRA, inclusive of mitigation measures. At this stage, recommended mitigation measures include:
 - Sequentially develop the Site, limiting the built development and surface water attenuation outside the mapped extent of pluvial/fluvial flooding. A modelling study has been undertaken to establish the pluvial/fluvial flood outline within the Site, and associated flood depths, velocities and hazard ratings. The outputs from the modelling study have been used to guide the sequential development of the Site. Furthermore, the modelling study has demonstrated that development of the Site (including Site access via a culvert crossing, formalising a land drain, and infilling any depressions which create ponding) would not increase the flood risk to or from the Site.
 - Formalise the minor land drain to the south of the Site.
 - Avoid land raising activities within the mapped extent of pluvial/fluvial flooding flow pathways (excluding the ponded areas, which will be infilled).
 - Set finished floor levels of any buildings above external levels.
 - Provide a 4m easement free from development along the reach of the bounding land drains.
 - Regularly inspected and clear overgrown vegetation, debris, sediment along the reach of the bounding land drains and associated culverts.
 - Provide a Site access to Dereham Road, with a culvert crossing scaled to conveying the 1 in 1000 peak flow.

- Attenuate surface water runoff from the proposed development up to the 1 in 100 year plus 40% climate change event. Attenuation of surface water would offer a betterment to localise flooding, in comparison to the current uncontrolled conditions.

7.3 Conclusions

- 7.3.1 This hydraulic modelling report demonstrates that the risk of pluvial/fluviat flooding to the Site from overland flow pathways can be mitigated to an acceptable level, without impacting on flood risk to and from the Site.
- 7.3.2 The sequential development of the Site (limiting developable area outside the mapped extent of pluvial/fluviat flooding) and provision of a land drain crossing along the northern boundary designed to convey the 1 in 1000 year flows, would negate the need for a Sequential and Exception Tests.
- 7.3.3 It is concluded that the development should not be precluded on the grounds of pluvial/fluviat flood risk. A Flood Risk Assessment would however be required to assess all other sources of flooding.

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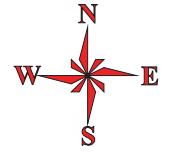
- Key**
- Wider Site
 - Catchment Boundary
Based on 50cm Lidar Data and Flow Path Analysis
 - FEH Catchment Boundary
 - Contours
At 1.0m intervals
 - Contours
At 1.0m intervals



Samuel House, 5 Fox Valley Way, Stocksbridge, Sheffield, S36 2AA

		CLIENT:
		Gladman Developments Ltd
SCALE:		PROJECT REF:
1:10,000@A3		SHF.1132.066
DRAWN:	CHECKED:	DATE:
MG	DA	Apr 2016
		PROJECT:
		Dereham Road, Mattishall
		TITLE:
		Catchment Area and Flow Path Analysis on 50cm Lidar Data
		DRAWING NO:
		SHF.1132.066.HY.D.008

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Legend:



Flood Depth

- 1.5 to 2
- 0.75 to 1
- 0.5 to 0.75
- 0.25 to 0.5
- 0.1 to 0.25
- 0.05 to 0.1
- 0.01 to 0.05
- all others

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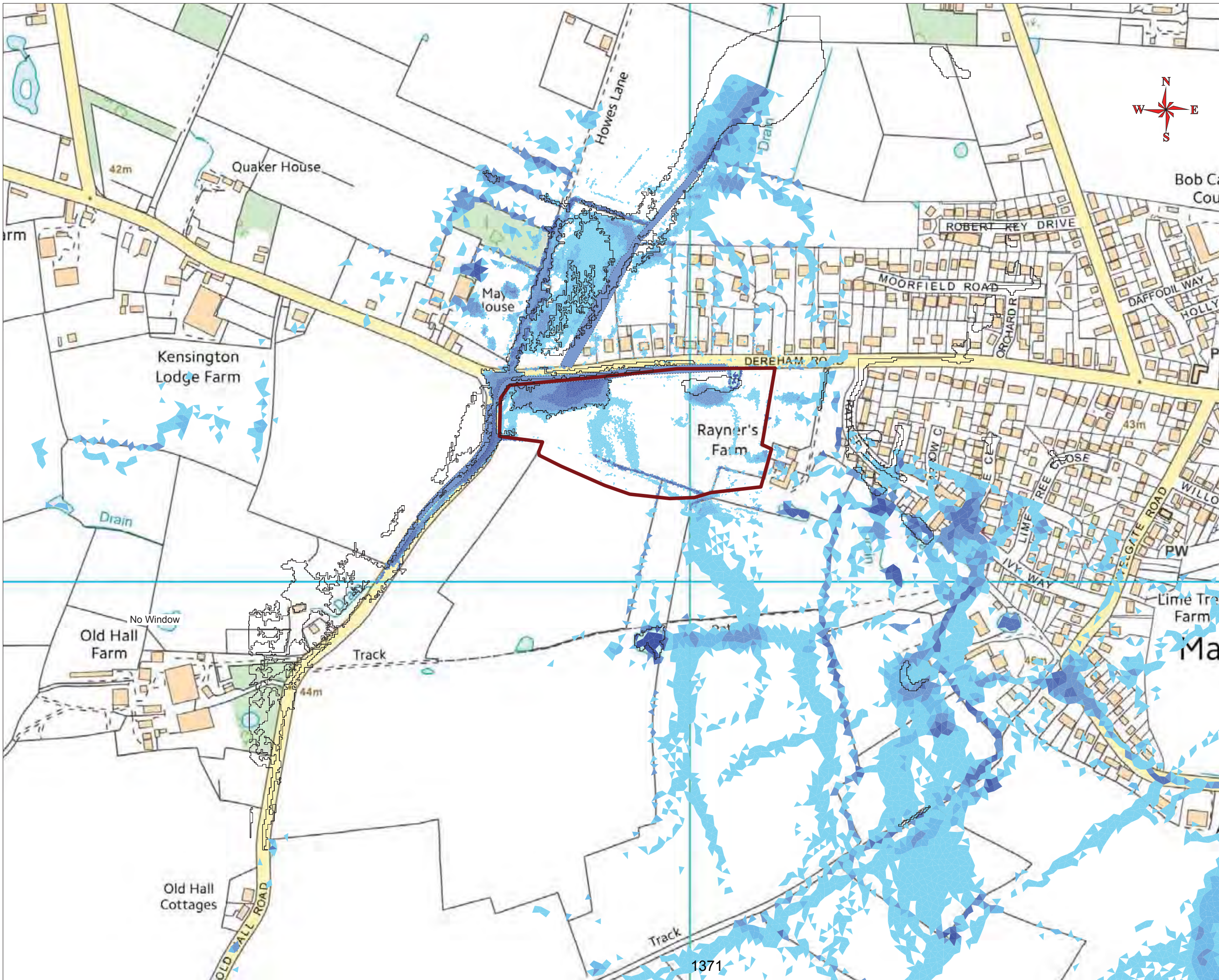


Project Title:
Mattishall Flood Risk Modelling

Drawing Title:
Verification of Observed Flooding
2yr ReFH Inflows
2yr 240min Rainfall
90% Blocked Culvert

Drawn By: JD	Date Printed: Oct 2016
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Drawing Ref: SHF.1132.066.D.011.A	Rev: P1

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Legend:



Flood Depth

- 1.5 to 2
- 0.75 to 1
- 0.5 to 0.75
- 0.25 to 0.5
- 0.1 to 0.25
- 0.05 to 0.1
- 0.01 to 0.05
- all others



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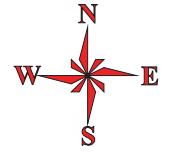
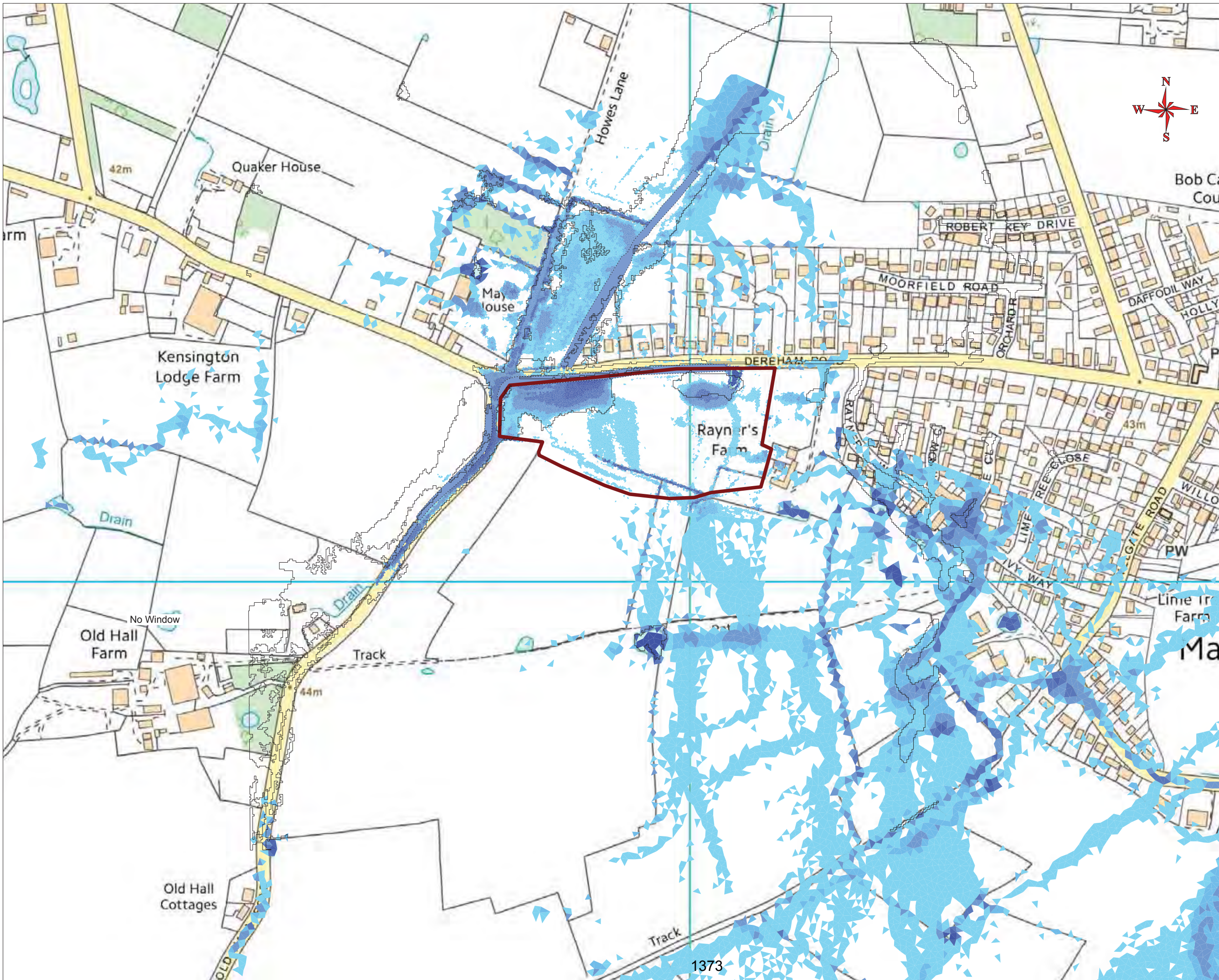


Project Title:
Mattishall Flood Risk Modelling

Drawing Title:
Base Model 30yr Comparison
30yr ReFH Inflows
30yr 240min Rainfall
90% Blocked Culvert

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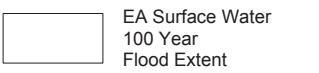


Legend:



Flood Depth

- 1.5 to 2
- 0.75 to 1
- 0.5 to 0.75
- 0.25 to 0.5
- 0.1 to 0.25
- 0.05 to 0.1
- 0.01 to 0.05
- all others



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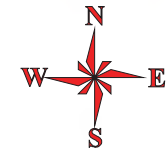
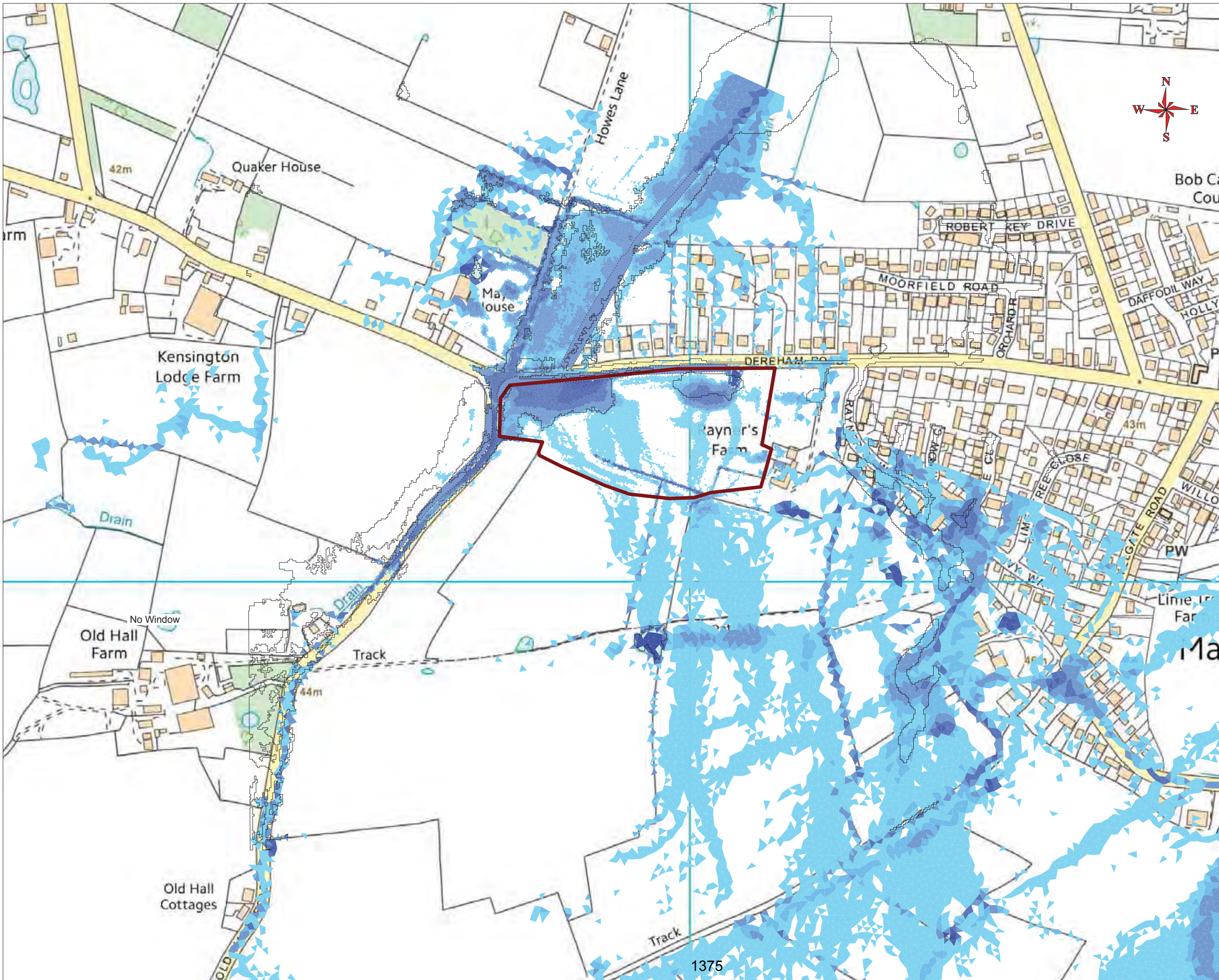


Project Title:
Mattishall Flood Risk Modelling

Drawing Title:
Base Model 100yr Comparison
100yr ReFH Intflows
100yr 240min Rainfall
90% Blocked Culvert

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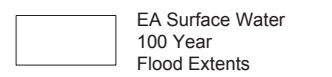


Legend:



Flood Depth

- 1.5 to 2
- 0.75 to 1
- 0.5 to 0.75
- 0.25 to 0.5
- 0.1 to 0.25
- 0.05 to 0.1
- 0.01 to 0.05
- all others



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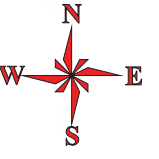
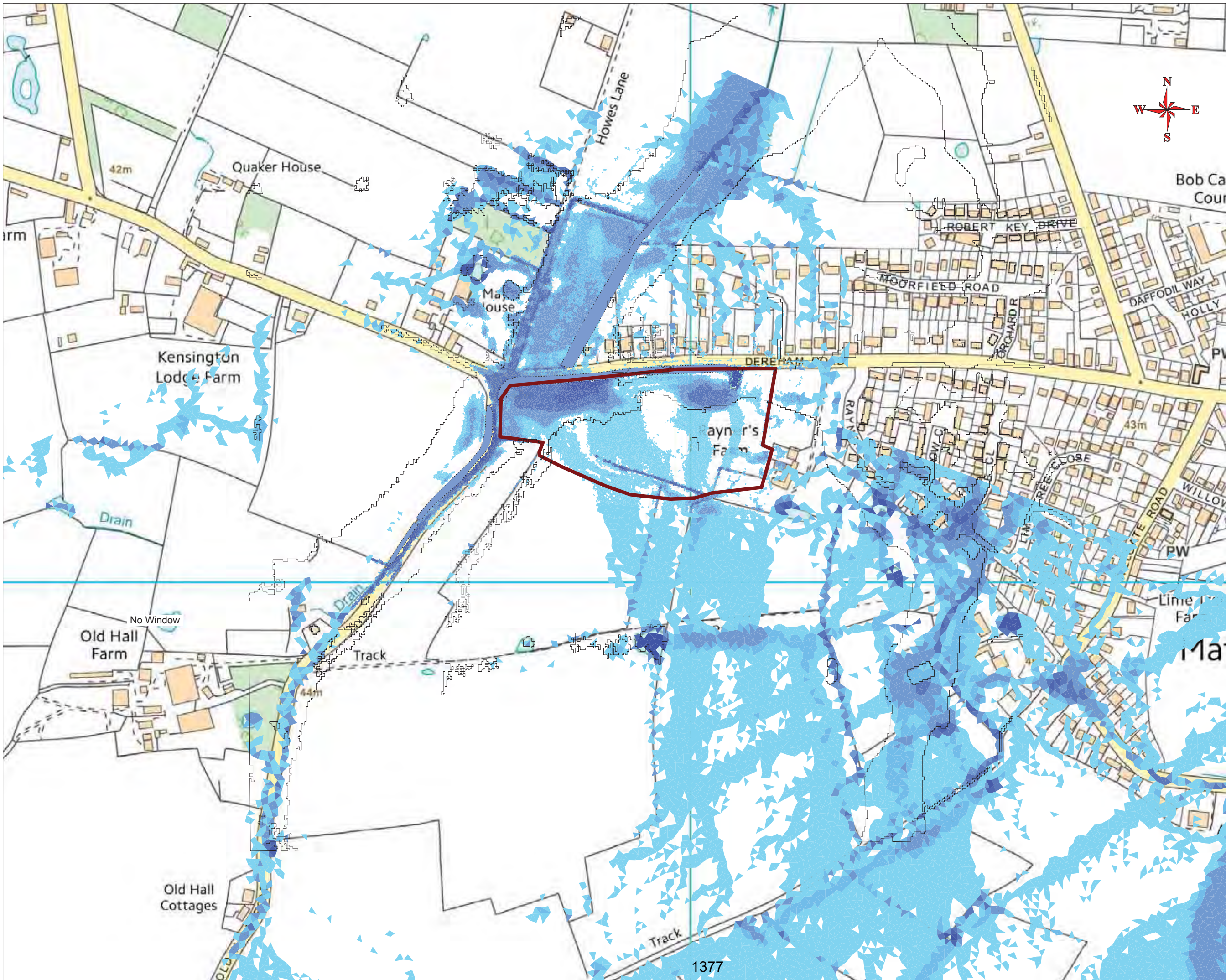


Project Title:
Mattishall Flood Risk Modelling

Drawing Title:
Base Model 100yr+cc Comparison
100yr+cc ReFH Inflows
100yr+cc 240min Rainfall
90% Blocked Culvert

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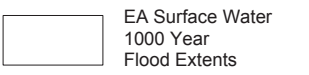


Legend:



Flood Depth

- 1.5 to 2
- 0.75 to 1
- 0.5 to 0.75
- 0.25 to 0.5
- 0.1 to 0.25
- 0.05 to 0.1
- 0.01 to 0.05
- all others



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Project Title:
Mattishall Flood Risk Modelling

Drawing Title:
Base Model 1000yr Comparison
1000yr ReFH Inflows
1000yr 240min Rainfall
90% Blocked Culvert

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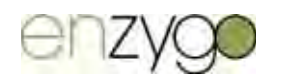
New culvert across Old Hall Road
500mm diameter pipe

New access road with
2500mm wide x 1200mm high
rectangular culvert

New drainage ditch to convey
flows to existing watercourse
round perimeter of site

APPROVED APPLICATION
FOR 3NO. BUNGALOWS

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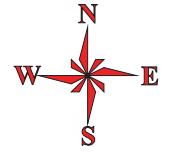
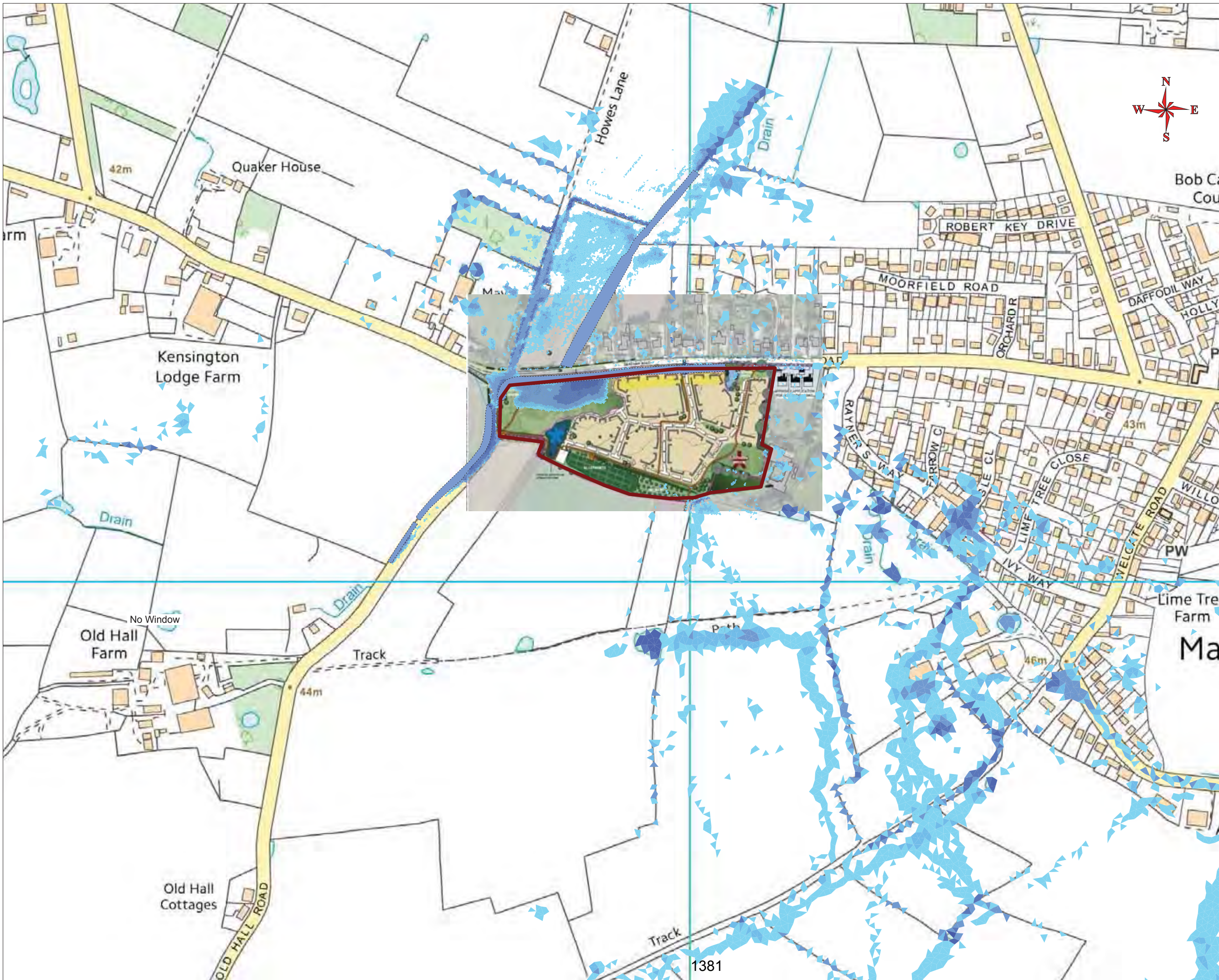


Project Title:
Mattishall Flood Risk Modelling

Drawing Title:
Design Model Configuration

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Legend:



Flood Depth

- 1.5 to 2
- 0.75 to 1
- 0.5 to 0.75
- 0.25 to 0.5
- 0.1 to 0.25
- 0.05 to 0.1
- 0.01 to 0.05
- all others

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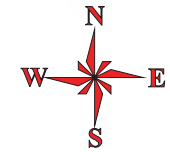
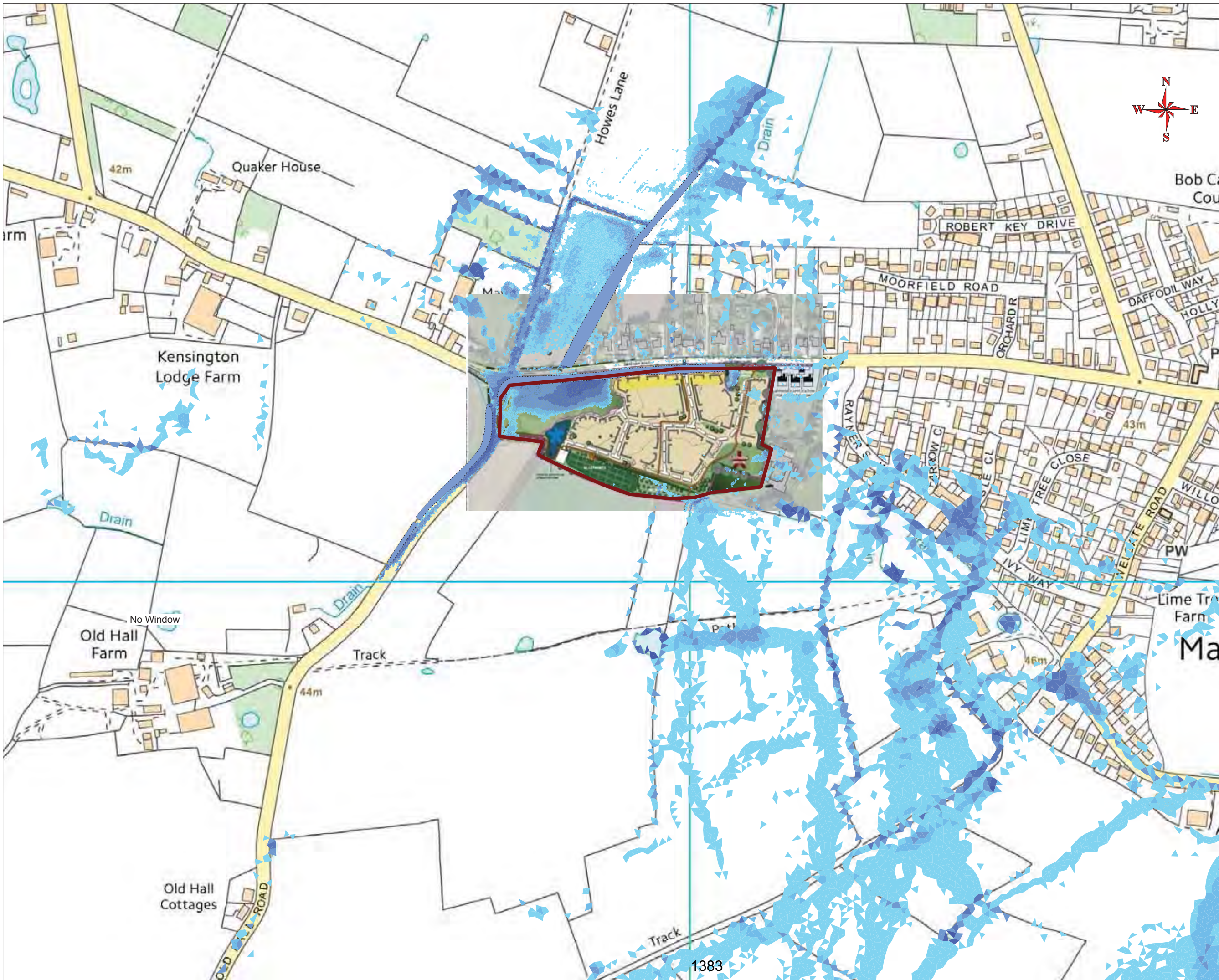


Project Title:
Mattishall Flood Risk Modelling

Drawing Title:
Development Model 2yr Review
2yr ReFH Inflows
2yr 240min Rainfall
90% Blocked Culvert

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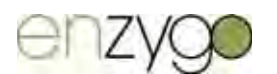
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Flood Depth

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- 0.75 to 1
- 0.5 to 0.75
- 0.25 to 0.5
- 0.1 to 0.25
- 0.05 to 0.1
- 0.01 to 0.05
- all others

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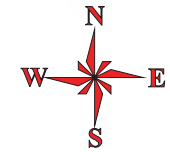
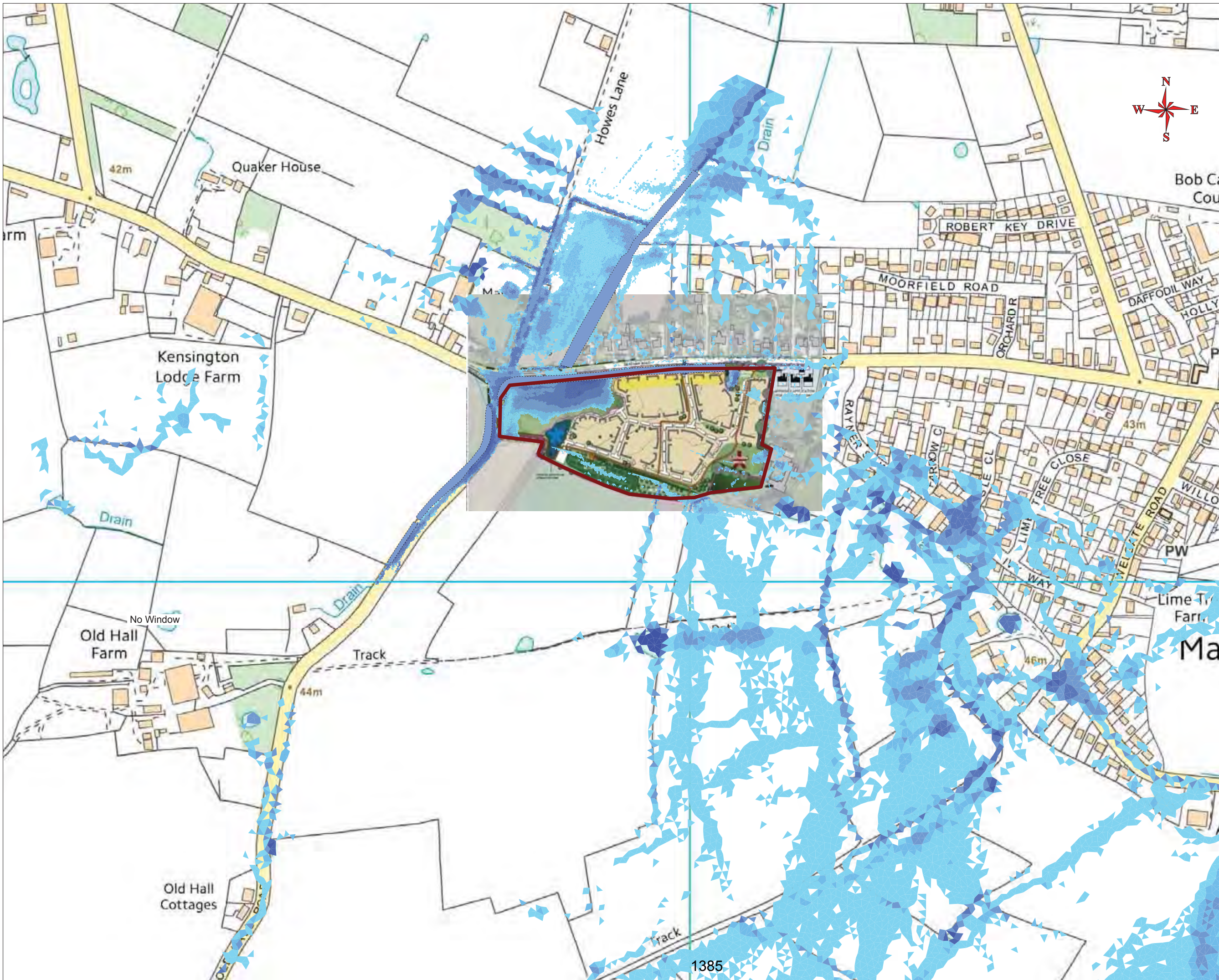


Project Title:
Mattishall Flood Risk Modelling

Drawing Title:
Development Model 30yr Review
30yr ReFH Inflows
30yr 240min Rainfall
90% Blocked Culvert

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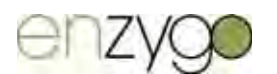
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Flood Depth

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- 0.5 to 0.75
- 0.25 to 0.5
- 0.1 to 0.25
- 0.05 to 0.1
- 0.01 to 0.05
- all others

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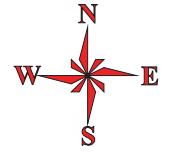
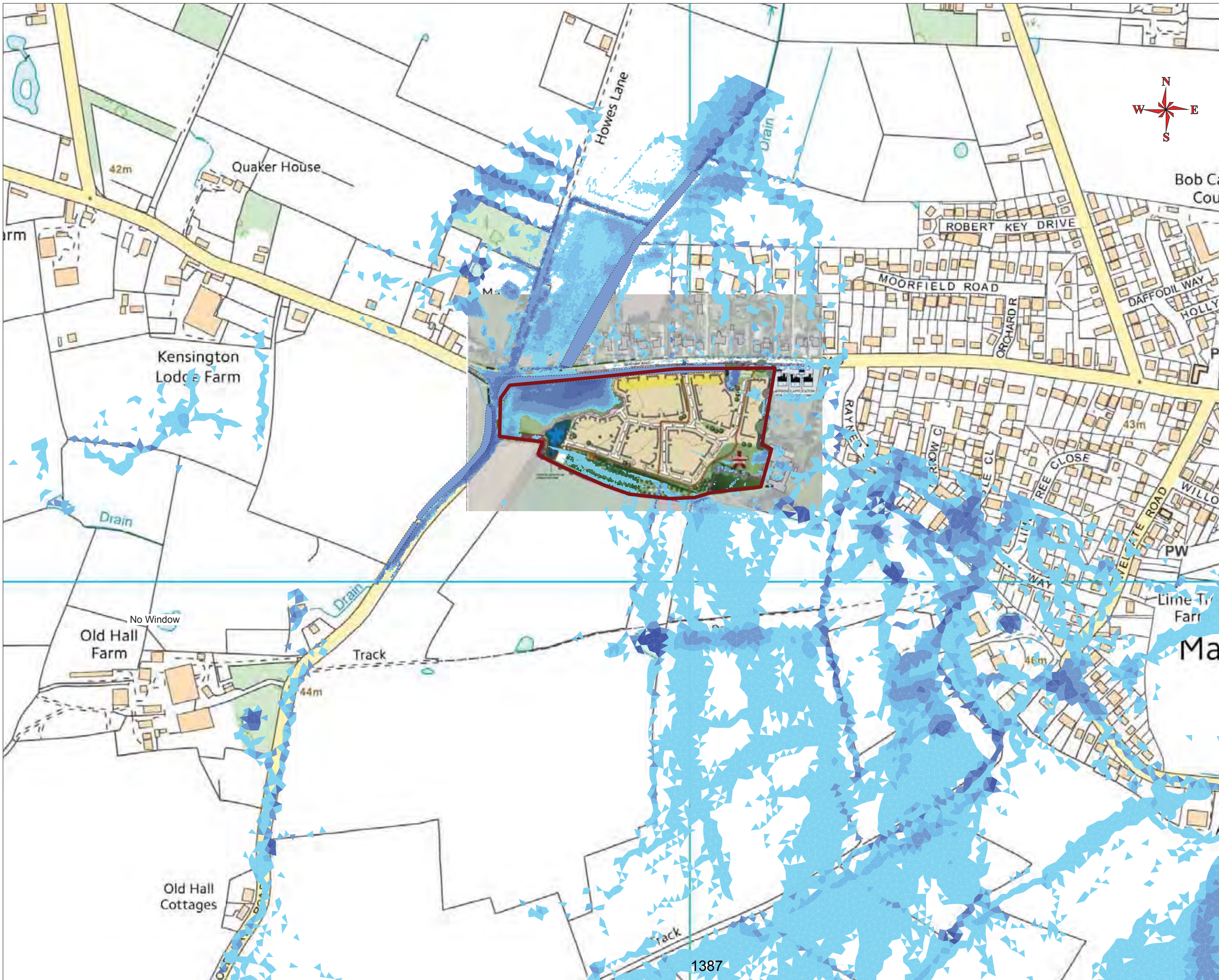


Project Title:
Mattishall Flood Risk Modelling

Drawing Title:
Development Model 100yr Review
100yr ReFH Inflows
100yr 240min Rainfall
90% Blocked Culvert

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Legend:



Flood Depth

- 1.5 to 2
- 0.75 to 1
- 0.5 to 0.75
- 0.25 to 0.5
- 0.1 to 0.25
- 0.05 to 0.1
- 0.01 to 0.05
- all others

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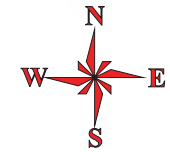
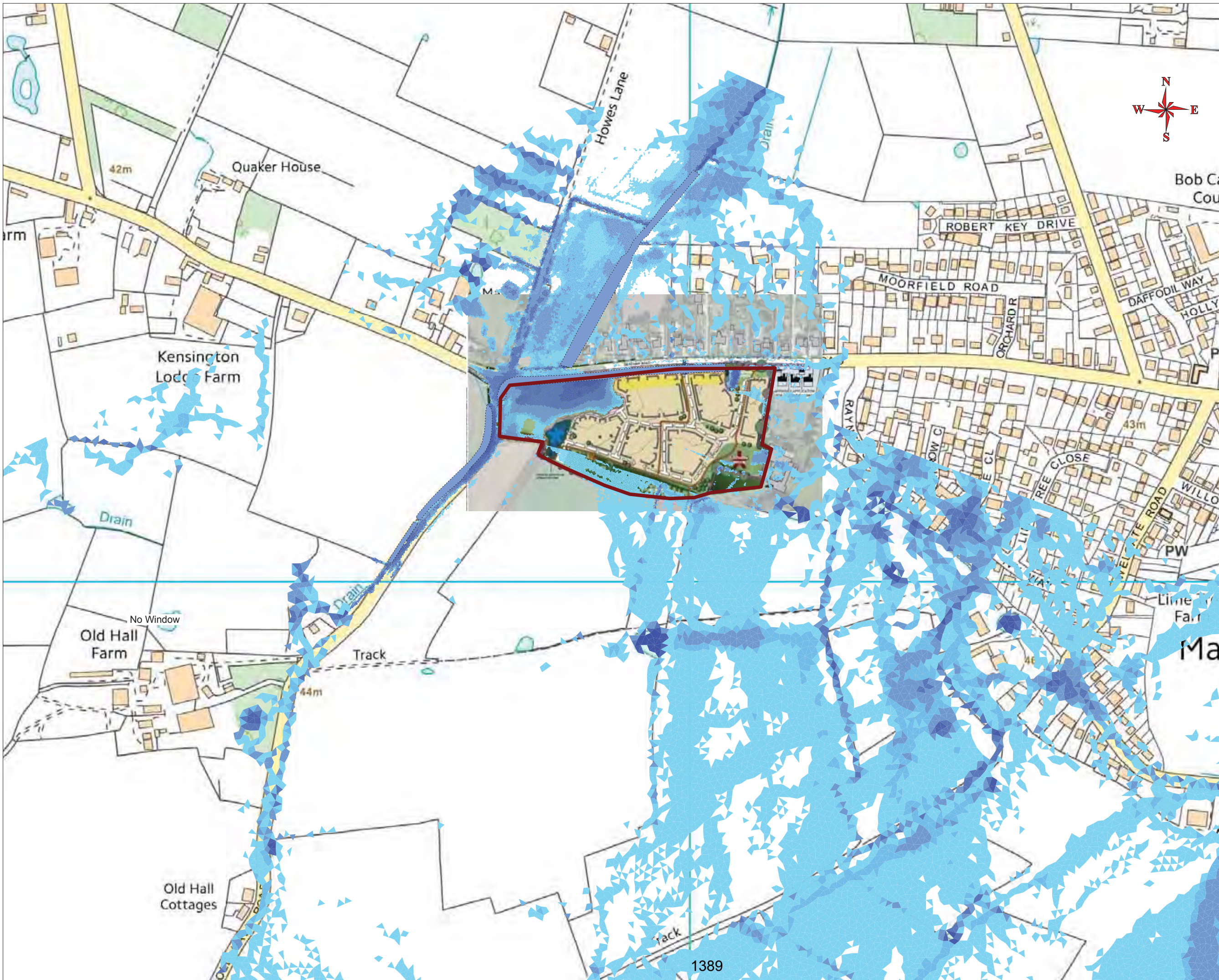


Project Title:
Mattishall Flood Risk Modelling

Drawing Title:
Development Model 100yr+cc Review
100yr+cc ReFH Inflows
100yr+cc 240min Rainfall
90% Blocked Culvert

Drawn By:	JD	Date Printed:	OCT 16
Checked By:	MT	Scale:	NTS
Drawing Ref:	SHF.1132.066.D.020.A	Rev:	P1

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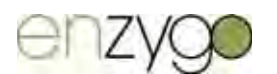
Legend:



Flood Depth

- 1.5 to 2
- 0.75 to 1
- 0.5 to 0.75
- 0.25 to 0.5
- 0.1 to 0.25
- 0.05 to 0.1
- 0.01 to 0.05
- all others

C		
B		
A	First Issue	
REV		



Project Title:
Mattishall Flood Risk Modelling

Drawing Title:
Development Model 1000yr Review
1000yr ReFH Inflows
1000yr 240min Rainfall
90% Blocked Culvert

Drawn By:	JD	Date Printed:	OCT 16
Checked By:	MT	Scale:	NTS
Drawing Ref:	SHF.1132.066.D.021.A	Rev:	P1

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Enzygo specialise in a wide range of technical services:

Property and Sites

Waste and Mineral Planning



Our Ref: SHF.1132.068.HY.L.001.A

Date: 17th January 2017

FAO: Matt Aitchison

Email: llfa@norfolk.gov.uk

Norfolk County Council

Dear Matt,

LAND SOUTH OF DEREHAM ROAD, MATTISHALL (3PL/2015/0498/O)

Introduction

Enzygo produced a Hydraulic Modelling Report (Document Reference SHF.1132.066.HY.R.001.A) during November 2016, for a the above named site.

Following submission of this report, we received your request (Email Reference 3PL/2015/0498/O, dated 11th January 2017) requesting further clarification on a number of points. This letter provides a response to the points raised.

Enzygo Ltd Response

- 1. Are you able to increase the colour range that show the different depths of flooding on the plans other than shades of blue? I struggled to differentiate between the different depths.*

A new set of drawings (SHF.1132.066.D.011.B, and SHF.1132.066.D.017.B to SHF.1132.066.D.021.B) have been included within Attachment 1. This set of drawings include an increased colour range as per the colour pallet agreed in previous correspondence.

- 2. Are you able to create a plan that shows the changes in level of inundation (plus and minus), as a range of colours, to the land within and adjacent to the development site as a result of the proposed mitigations that are shown on plan SHF.1132.066.D.016.A (P1) in the FRA?*

Drawing SHF.1132.066.D.016.A has been included within Attachment 2, as a reminder of design model configuration.

Drawing SHF.1132.066.D.022.A has been included within Attachment 3, which shows the changes in level of inundation as two tones, with the 'Design Model' overlaid on top of the 'Base Model'. A range of colours could not be provided, as this option is not possible within the modelling software.

- 3. Is there any flood risk to the balance of the site that hasn't been identified within the catchment boundary or does the model extend past the catchment boundary?*

There is no flood risk to the balance of the site. The mapping provided shows that the model extends beyond the catchment Boundary.

- 4. Are there areas of land that need to be protected as offset storage areas as a result of this development? If so do they need to be protected from further development?*

There are no areas which need to be protected as offset storage as a result of the proposed development.

Closure

We trust that the details presented herein are self-explanatory and we have addressed the matters raised. If, for any reason you should have any queries or comments, please do not hesitate to contact me on **01143 215 151**.

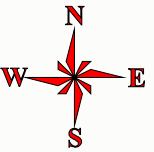
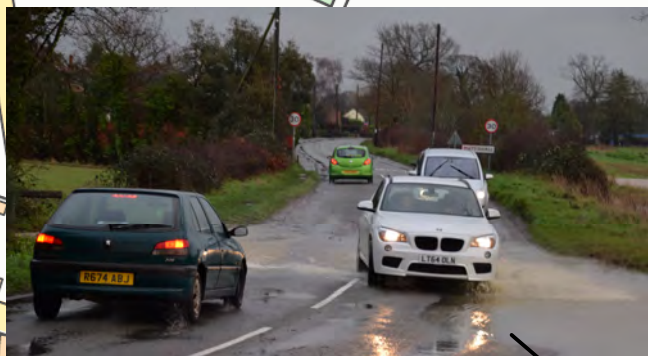
Yours sincerely

A handwritten signature in black ink, appearing to read 'Daniel Alstead'.

Daniel Alstead BSc (Hons), MSc, MCIWEM, C.WEM

Principal Hydrologist

Enzygo Ltd



Legend:

- Development Area
- 1.5 to 2
- 1 to 1.5
- 0.75 to 1
- 0.5 to 0.75
- 0.25 to 0.5
- 0.1 to 0.25
- 0.05 to 0.1
- 0 to 0.05
- all others

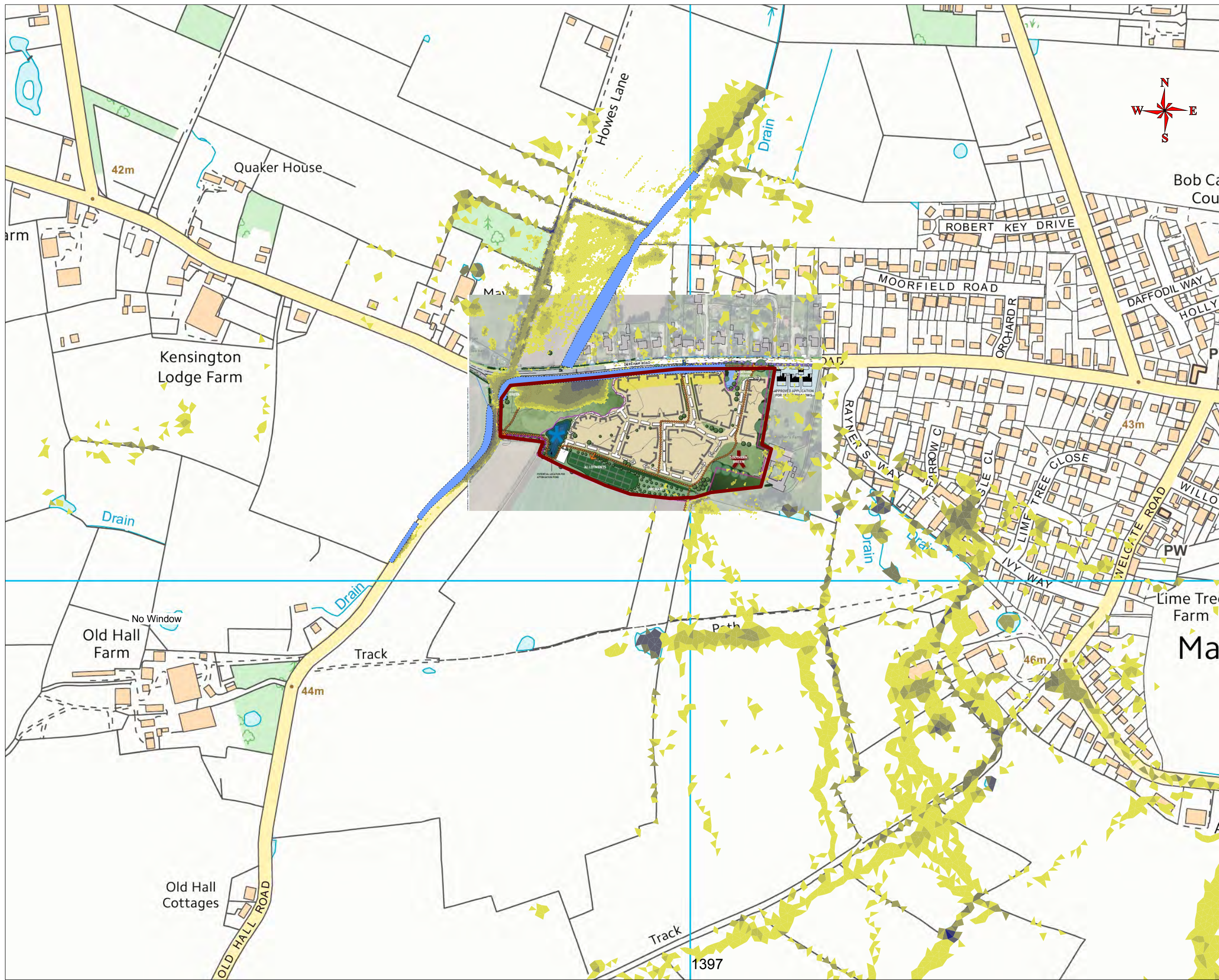
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Project Title:
Mattishall Flood Risk Modelling

Drawing Title:
Verification of Observed Flooding
2yr ReFH Inflows
2yr 240min Rainfall
90% Blocked Culvert

Drawn By: JD	Date Printed: Oct 2016
Checked By: MT	Scale: NTS
Drawing Ref: SHF.1132.066.D.011.B	Rev: P1



Legend:



Flood Depth

- 1.5 to 2
- 1.0 to 1.5
- 0.75 to 1.0
- 0.5 to 0.75
- 0.25 to 0.5
- 0.1 to 0.25
- 0.05 to 0.1
- 0.01 to 0.05

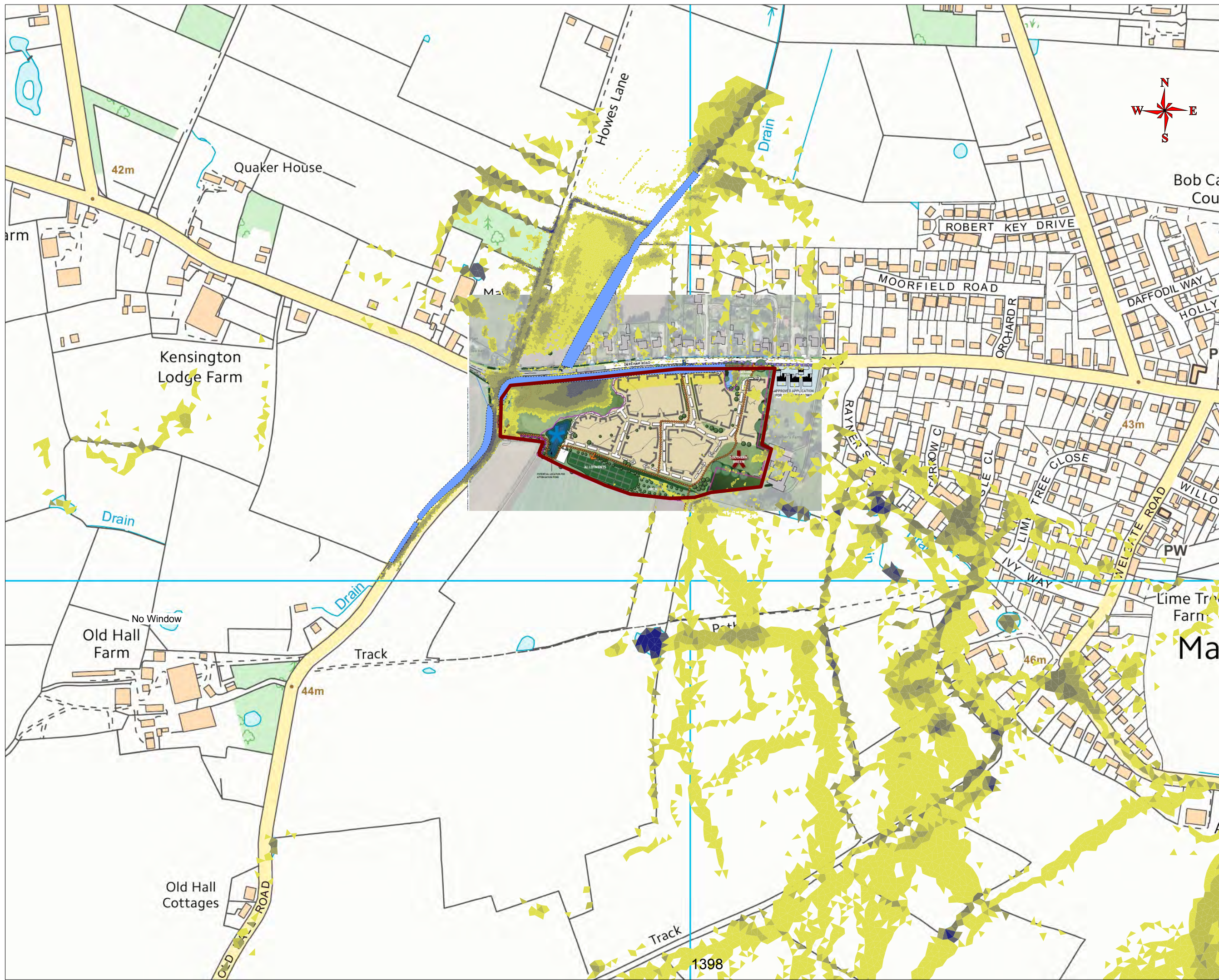
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Project Title:
Mattishall Flood Risk Modelling

Drawing Title:
Development Model 2yr Review
2yr ReFH Inflows
2yr 240min Rainfall
90% Blocked Culvert

Drawn By:	JD	Date Printed:	OCT 16
Checked By:	MT	Scale:	NTS
Drawing Ref:	SHF.1132.066.D.017.B	Rev:	P1



Legend:



Flood Depth

- 1.5 to 2
- 1.0 to 1.5
- 0.75 to 1.0
- 0.5 to 0.75
- 0.25 to 0.5
- 0.1 to 0.25
- 0.05 to 0.1
- 0.01 to 0.05

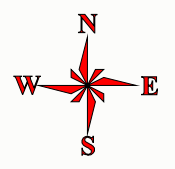
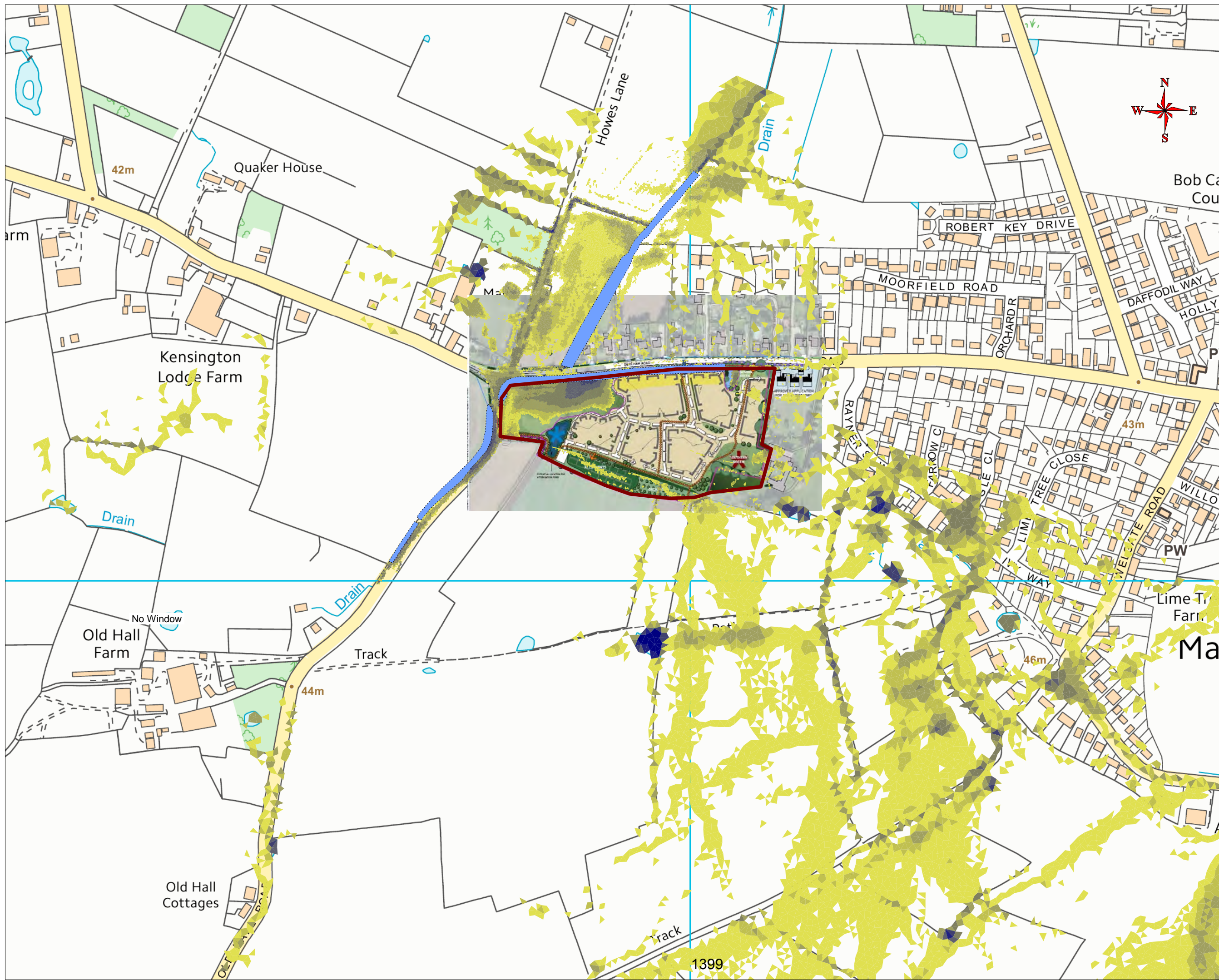
C		
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REV		



Project Title:
Mattishall Flood Risk Modelling

Drawing Title:
Development Model 30yr Review
30yr ReFH Inflows
30yr 240min Rainfall
90% Blocked Culvert

Drawn By:	JD	Date Printed:	OCT 16
Checked By:	MT	Scale:	NTS
Drawing Ref:	SHF.1132.066.D.018.B	Rev:	P1



Legend:

- Development Area
- 1.5 to 2
- 1 to 1.5
- 0.75 to 1
- 0.5 to 0.75
- 0.25 to 0.5
- 0.1 to 0.25
- 0.05 to 0.1
- 0.01 to 0.05
- 0 to 0
- all others

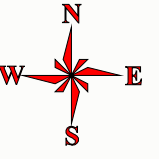
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A	First Issue	
REV		



Project Title:
Mattishall Flood Risk Modelling

Drawing Title:
Development Model 100yr Review
100yr ReFH Inflows
100yr 240min Rainfall
90% Blocked Culvert

Drawn By:	JD	Date Printed:	OCT 16
Checked By:	MT	Scale:	NTS
Drawing Ref:	SHF.1132.066.D.019.B	Rev:	P1



Legend:

- Development Area
- 1.5 to 2
- 1 to 1.5
- 0.75 to 1
- 0.5 to 0.75
- 0.25 to 0.5
- 0.1 to 0.25
- 0.05 to 0.1
- 0 to 0.05
- all others

C		
B		
A	First Issue	
REV		



Project Title:
Mattishall Flood Risk Modelling

Drawing Title:
Development Model 100yr+cc Review
100yr+cc ReFH Inflows
100yr+cc 240min Rainfall
90% Blocked Culvert

Drawn By:	JD	Date Printed:	OCT 16
Checked By:	MT	Scale:	NTS
Drawing Ref:	SHF.1132.066.D.020.B	Rev:	P1



Legend:

- Development Area
- 1.5 to 2
- 1 to 1.5
- 0.75 to 1
- 0.5 to 0.75
- 0.25 to 0.5
- 0.1 to 0.25
- 0.05 to 0.1
- 0 to 0.05
- all others

C		
B		
A	First Issue	
REV		



Project Title:
Mattishall Flood Risk Modelling

Drawing Title:
Development Model 1000yr Review
1000yr ReFH Inflows
1000yr 240min Rainfall
90% Blocked Culvert

Drawn By:	JD	Date Printed:	OCT 16
Checked By:	MT	Scale:	NTS
Drawing Ref:	SHF.1132.066.D.021.B	Rev:	P1

Attachment 2



Legend:

Development Area

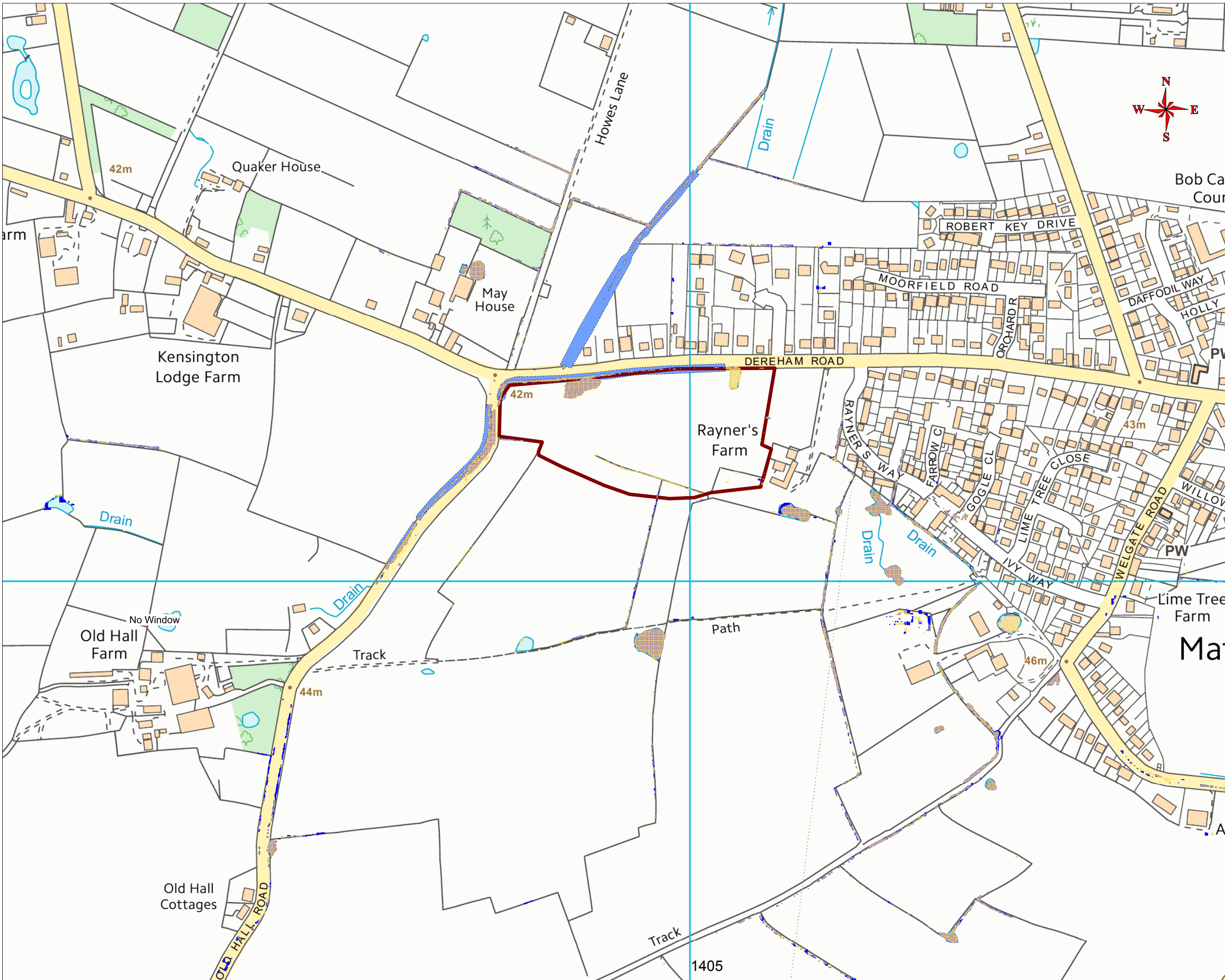
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Project Title:
Mattishall Flood Risk Modelling

Drawing Title:
Design Model Configuration

Drawn By:	JD	Date Printed:	OCT 16
Checked By:	MT	Scale:	NTS
Drawing Ref:	SHF.1132.066.D.016.A	Rev:	P1



Legend:

- Development Area
- Base Model Flood Outline
- Design Model Flood Outline

C		
B		
A	First Issue	
REV		



Project Title:
Mattishall Flood Risk Modelling

Drawing Title:
Development Model 100yr omparison
100yr ReFH inflows
100yr 240min Rainfall
90% Blocked Culvert

Drawn By:	JD	Date Printed:	OCT 16
Checked By:	MT	Scale:	NTS
Drawing Ref:	SHF.1132.066.D.022.A	Rev:	P1

APPENDIX 3:-

Lichfields Review of Central Norfolk SHMA, September 2017

Norfolk Strategic Framework Consultation Review of Central Norfolk SHMA

Gladman Developments

September 2017

LICHFIELDS

LICHFIELDS

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1.0 Introduction

1.1 This report has been prepared by Lichfields on behalf of Gladman Developments (“Gladman”) in the context of the Norfolk Strategic Framework (“the Framework”) Consultation. The Framework aims to provide an agreed position between the Norfolk authorities on strategic matters which will inform each authority’s next Local Plan. The Framework will cover areas such as housing, employment and economy, climate change and environmental issues.

1.2 The ‘housing’ section of the Framework concludes that between 2015 and 2036 there is a need for 4,000 new homes per annum across all of Norfolk. This figure is underpinned by a number of Strategic Housing Market Assessments (“SHMAs”) which cover various parts of the county;

- 1 The Central Norfolk SHMA (2017), which covers Norwich, Broadland, South Norfolk, North Norfolk, Breckland and the Broads Authority;
- 2 King’s Lynn and West Norfolk SHMA, which covers the Borough of King’s Lynn and West Norfolk; and
- 3 Great Yarmouth SHMA, which covers Great Yarmouth.

1.3 Agreement 10 of the Framework states that;

“When determining their respective Local Plan housing targets each authority, working together where desirable, will aim to deliver at least Objectively Assessed Need as identified in the most up to date evidence (Table 8). Where this would result in unsustainable development, agreement will be sought with other authorities, initially within the same Housing Market Area, to ensure sufficient homes are provided to meet identified needs and demands in the area until at least 2036.” (Framework emphasis)

1.4 For the Central Norfolk authorities, the OAHN to 2036 is as set out in Table 1.1. The total for Central Norfolk excludes any housing needs for the Broads Authority Area and also excludes any additional provision associated with the Greater Norwich City Deal (“the City Deal”). The City Deal is intended to “commercialise world-class research, ideas and innovation to create jobs”¹, and overall maximise the economic potential of Norwich Research Park. As a result it is expected to, amongst other things, bring forward an additional 3,000 homes within the North East Norwich Growth Triangle.

Table 1.1 Annual Housing Need for Central Norfolk Authorities as per the Framework

	Total Need 2015-36	Annual
Norwich City	15,201	724
South Norfolk	16,032	763
Broadland	8,160	389
Breckland	12,272	584
North Norfolk	8,511	405
Central Norfolk Total (excluding Broads Authority Area)	60,176	2,865

Source: Framework, Table 8

1.5 This report provides a review of the Central Norfolk Strategic Housing Market Assessment (“the SHMA”) published by ORS in June 2017. There have been a number of iterations of the SHMA, however the June 2017 version underpins the current Framework.

¹ Source: Greater Norwich City Deal Document published by the Coalition Government. Available at - <https://www.gov.uk/government/publications/city-deal-greater-norwich>

2.0 Background – Objectively Assessing Needs

Current guidance

2.1 The National Planning Policy Framework (“NPPF”) outlines the evidence required to underpin a local housing requirement, including the need to assess full housing needs. Paragraph 47 of the NPPF sets out that Local Planning Authorities (“LPAs”) should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area (“HMA”) whilst paragraph 159 sets out that LPAs in evidencing housing needs should:

“Prepare a Strategic Housing Market Assessment to assess their full housing needs... identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which;

- *Meets household and population projections, taking account of migration;*
- *Addresses the needs for all types of housing, including affordable housing...; and*
- *Caters for housing demand and the scale of housing supply necessary to meet this demand.”*

2.2 The NPPF also sets out the twelve core land-use planning principles, including ensuring that plans should be kept up-to-date and take account of market signals (paragraph 17).

2.3 The Planning Practice Guidance (PPG), formally introduced in March 2014, clarifies the position on how the NPPF should be interpreted and applied. It confirms that an assessment of need must fulfil the following criteria:

- Be proportionate and not consider purely hypothetical scenarios, only future scenarios that could reasonably be expected to occur (2a-003);
- Based on facts and unbiased evidence. Constraints should not be applied to the overall assessment of need (2a-004);
- Utilise up-to-date household projections published by the Department for Communities and Local Government as the starting point estimate of overall housing need (2a-015);
- Consider sensitivity testing, specific to local circumstances, based on alternative assumptions in relation to the underlying demographic projections and household formation rates (2a-017); and
- Take account of employment trends (2a-018), appropriate market signals, including market indicators of the balance between the demand for and supply of dwellings (2a-019) and affordable housing needs (2a-019).

2.4 It is clear that the approach taken to planning for housing delivery must be grounded in the background evidence of need and demand within an area, and this evidence must be sound and robust to inform the strategy making and, where appropriate, the decision taking processes. This provides the framework against which the report has been reviewed.

Future guidance

2.5 In September 2017 the Government published its proposed changes to the current methodology for calculating OAHN, to a standardised approach based upon the household projections and a single measure of affordability. In addition, it proposes a much higher threshold than currently exists from deviating from this standard methodology; the consultation proposal stated there should be *“very limited grounds”* for adopting an alternative method which results in a lower

figure (than the proposed ‘standard approach’). The consultation on this proposed methodology (amongst other proposals) is to take place until November, and we consider the potential implications of this methodology on Central Norfolk in Section 4.0.

3.0 Review of the SHMA

Demographic-led Needs

- 3.1 The PPG sets out that in assessing demographic-led housing need, the official household projections (currently prepared by DCLG, but in future by the ONS) form the overall starting point for the estimate of housing need, but that these this may require adjustments to reflect future changes and local demographic factors which are not captured within the projections (ID 2a-015). It also sets out that regard should also be taken of the most recent demographic evidence, for example the ONS Population Estimates (2a-017).
- 3.2 The SHMA favours use of a ten year trend on the basis that shorter term trends which inform **the official projections are ‘less reliable’ (SHMA para 2.15)**. This is generic text that appears to **be the SHMA author’s general opinion rather than** – as required by the PPG – for this any adjustments to be based on local evidence. This is demonstrated by the outputs in Figure 37 of the SHMA which actually suggest that there is little difference between the overall population in **Central Norfolk between the SHMA’s ten year migration scenario** and the 2014-based Sub-National Population Projections (SNPP); by 2036, the population under the SNPP of Central Norfolk is **728,101 and under the SHMA’s long term trend is 729,784**. **The fact that in 2036, the** number of households is almost identical under the two scenarios (329,768 in the SNPP, cf. 300,323 under the SHMA scenario) suggests the two are also similar in terms of age structure. When translated in an annual dwelling figure (including a second home/vacancy rate, and over the period 2015-36), both scenarios show a need for **2,612 dwellings per annum** in Central Norfolk.
- 3.3 **On this basis, we would question whether the SNPP represents a scenario which is ‘less reliable’ and not ‘robust for long-term planning’ when** it shows an almost identical level of population and household growth to **ORS’s preferred** long term trend. In any event, the NPPF/PPG is based on the use of the official projections as the starting point, so there can be no suggestion that DCLG would in any way agree with ORS on the in-principle use of official projections for plan making. **The ‘cut and paste’ approach** of ORS in this regard – ignoring clearly the DCLG position - is of concern in terms of their general approach to this evidence base.

London

- 3.4 The Greater London Authority (GLA) produces population and household projections for **London, which differ in the underlying assumptions compared to ONS’ projections**. The GLA successfully argued at the Further Alterations to the London Plan (FALP) examination in 2014 that net migration was uncharacteristically high during the recession due to economic circumstances; a trend unlikely to be repeated. As a result, the current London Plan is underpinned by long term migration trends (which show a lower need for London than short term trends published at the time by ONS).
- 3.5 In July 2016, the GLA published its 2016-based population and household projections, and for the first time also provided corresponding figures for the rest of England. This provides some degree of consistency **between the GLA’s figures and** the impact on the rest of the country. Three projections were published, based on five, ten and 15 year trends (the five year trend scenario is based upon the five year period to 2016, compared to ONS’s 2014-based projections which use

the five years to 2014, hence the two differ in their outputs). The GLA have not yet indicated which of these will underpin the upcoming London Plan Review.

- 3.6 **The GLA’s figures for Central Norfolk are shown in Table 3.1. The GLA’s central scenario** indicates almost exactly the same level of need as the ONS/DCLG 2014-based projections (c. 2,600 dpa), however if shorter term trends persisted or if the area saw a return to even long term trends (15 years) the need would be around 100 dpa higher. On the whole the GLA’s projections suggest the direction of growth, compared to DCLG projections, is likely to be upward. The Central Norfolk authorities may wish to carefully monitor population growth, new projections and the status of the emerging London Plan to ensure the OAHN continues to meet population and household projections.

Table 3.1 Comparison of projected household growth for Central Norfolk - 2015-36

	DCLG 2014-based	GLA Short Term (5-year mig.)	GLA Central (10-year mig.)	GLA Long Term (15 year mig.)
Norwich City	515	575	504	493
South Norfolk	668	664	623	598
Broadland	379	336	348	406
Breckland	512	590	575	609
North Norfolk	388	371	392	459
Central Norfolk Total	2,462	2,536	2,442	2,565
Dwellings pa (estimate)*	2,605	2,684	2,584	2,714

Source: DCLG 2014-based Household Projections, GLA 2016-based Household Projections *Estimate based on 5.5% vacancy rate across all areas applied in SHMA (derived from SHMA Figure 82).

Market Signals

- 3.7 The PPG sets out a clear two-stepped process to addressing market signals within the calculation of OAN:
- 1 Firstly, to determine **whether** a market signals uplift is necessary. This is set out in PPG ID2a-019 within the first sub-paragraph as follows:

“Appropriate comparisons of indicators should be made... A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections.”
 - 2 Secondly, when a market signals uplift is required, to identify **what scale** that should be set at with guidance given that it should be set at a level that could be expected to improve affordability. This is set out in PPG ID2a-019 within the second and third sub-paragraphs as follows:

“In areas where an upward adjustment is required, plan makers should set this adjustment at a level that is reasonable... they should increase planned supply by an amount that, on reasonable assumptions and consistent with principles of sustainable development, could be expected to improve affordability, and monitor the response of the market over the plan period.” (our emphasis).
- 3.8 The SHMA undertakes some analysis as per stage (1) above, and concludes that *“housing market pressure in Central Norfolk are generally comparable to those in similar areas, with some being a little better and some a little worse. Overall ... conditions across Central Norfolk suggest that the level of Objectively Assessed Need for Central Norfolk should be higher than suggested by household projections”*. We concur with this conclusion that a market signals uplift is required in Central Norfolk (affordability data for the HMA is shown in Appendix 1).

However we do not consider that the scale of uplift put forward in the SHMA (a 10% uplift) could “reasonably be expected to improve affordability”, as required in the PPG. We consider a range of approaches below to determine what scale of uplift may be required.

Determining an appropriate scale of uplift for Central Norfolk – an evidence-based approach

1. National benchmark

- 3.9 The purpose of a market signals uplift is to ensure the Government’s housing aims (as expressed in the NPPF to “*significantly boost the supply of housing*”) are met and to ensure this is reflected in assessments of need by making “*upward adjustment to planned housing numbers compared to ones based solely on household projections*” (PPG ID2a-020) where market signals indicate such an adjustment is necessary. The principle of providing ‘more’ than ‘unvarnished’ household projections in England has long been established through successive assessments of the country’s problems with lack of housing supply.
- 3.10 Under localism, achieving a national outcome for housing supply is the product of implementing a large number of individual local plans. As such it is fundamentally necessary to link any local strategies to the overarching national principles which are driving Government policy (i.e. ‘**think global, act local**’). Each area will have its role to play in contributing towards the Government’s aims; some more than others, based on their circumstances.
- 3.11 There is a consensus, including from Government that the country should be building in the region of 250,000 homes each year². The Conservative Party Manifesto stated that the government was continuing to honour its target of one million homes by 2020, and provide 500,000 more by 2022; a position confirmed by the Rt Hon Sajid Javid MP in the consultation proposals ‘**Planning for the right homes in the right places**’, (September 2017).
- 3.12 Compared to the current projections (which project growth of 210,000 households per annum, equivalent to c.215,000 dwellings per annum), a figure of around 250,000 per annum represents on average a **16%** uplift on the household projections. In reality, the level of uplift applied across each local authority will vary; in areas with very poor and worsening affordability problems, uplifts in excess of this will be required, and vice versa. However, this provides an indication of the overall average needed to meet an overall target of 250,000. Applying this average to the Central Norfolk authorities gives a figure of **3,029 dwellings per annum**.

Table 3.2 Market Signals uplift - National Average

	DCLG 2014-based (Dwellings)	With 16% uplift
Norwich City	543	629
South Norfolk	691	801
Broadland	390	452
Breckland	539	626
North Norfolk	449	520
Central Norfolk Total	2,612	3,029

Source: Lichfields based on DCLG 2014-based Household Projections and SHMA

Note: To estimate number of dwellings from the DCLG Household Projections, the vacancy rates used in the SHMA (as inferred from Figure 80 of the SHMA) have been applied. The vacancy rates are: Breckland – 5.1%; Broadland – 2.8%; North Norfolk -13.5%; Norwich – 5.1% and South Norfolk 3.3%.

² For example, see Fixing Our Broken Housing Market, which acknowledges the need for 225,000-275,000 dpa.

2. Wider Literature Review

- 3.13 A number of academic and other independent studies have been produced (both independent and on behalf of government) which considered, at a national level, the scale of housing supply needed to improve affordability. A literature review of these assessments is included at Appendix 2. They demonstrate, over a sustained period, a consensus over the need to increase supply above household projections to deliver improvements in housing affordability. This has **continued to underpin successive Governments' approach to assessing housing need, including** within the PPG and more recently as recognised within the Housing White Paper. Successive evidence at the national level suggests we actually need to be building up to 310,000 per annum. Across these reports, the evidence would suggest that - at the national level (i.e. applying to all local authority areas) - an uplift of between **20.9%** and **44.2%** above the number of homes implied by household projections alone would be necessary to deliver improvements in affordability. Applying these uplifts to the Central Norfolk authorities would suggest a need for between **3,160 and 4,550 dwellings per annum**, as shown in Table 3.3.

Table 3.3 Market Signals uplifts – based on review of literature on affordability

	DCLG 2014-based (Dwellings)	With 21% uplift (to meet 260k nationally)	With 44% uplift (to meet 310k nationally)
Norwich City	543	656	945
South Norfolk	691	836	1,204
Broadland	390	472	679
Breckland	539	653	940
North Norfolk	449	543	782
Central Norfolk Total	2,612	3,160	4,550

Source: Lichfields based on Literature in Appendix 1

- 3.14 It is acknowledged that housing supply is but one factor influencing the affordability of housing (availability of credit and household incomes being two other key influencers), but the role of the planning system in increasing supply to achieve this is clearly an important lever available to government, and one that it seeks to apply through PPG-compliant assessments of OAHN.

3. Apportionment of national needs

- 3.15 In terms of workplace-based affordability (see data at Appendix 1), all parts of the Central Norfolk HMA (except Norwich) are worse in respect of affordability than the national equivalent, with lower quartile affordability ratios of between 8.7 and 9.6 compared with 7.2 nationally. All other things being equal, to improve affordability across the Country, these authorities, and their housing market area peers, would need to make a proportionately greater uplift than those areas where affordability issues are less acute.
- 3.16 Taking the minimum national level of delivery required as being c.250,000 dpa (e.g. as in the July 2016 House of Lords Select Committee report – see Appendix 2) - this would imply a 35,000 dwelling uplift to the 2012-based and 2014-based household projections (both at showing a need for around 215,000 dwellings per annum).
- 3.17 We then turn to consider how this required uplift should be shared between 320+ Local Planning Authorities across the country in order to merely seek to hold the affordability ratio (at least at a national level) constant. In so doing, one can broadly adopt a localised version of the approach adopted by the National Housing and Planning Advice Unit (NHPAU) as summarised in Appendix 2.

3.18 We have modelled three alternative scenarios for market signals uplifts across the country, with outcomes for the Central Norfolk authorities as follows:

- 1 Each district with an affordability ratio above the national ratio applies a market signals uplift in proportion to its difference with the national figure;
- 2 Each district with an affordability ratio above the national ratio applies a market signals uplift in proportion to its difference with (a) the national figure (weighted 50%); and (b) its projected household growth (weighted 50%); and
- 3 Every district (whether above or below the national ratio) applies a market signals uplift in proportion to (a) its difference with the lowest affordability ratio, namely Copeland at 2.6, (weighted 50%); and (b) its projected household growth (weighted 50%).

3.19 The outcomes for the Central Norfolk authorities under each of these methods are shown in Table 3.4, Table 3.5 and Table 3.6. Two of the three methods suggest that in the Central Norfolk HMA a **12% uplift** would be applicable, giving a total of c. **2,900 dwellings per annum** across the HMA overall.

Table 3.4 Outcomes of national apportionment - Method 1

	DCLG 2014-based (Dwellings)	Method 1		
		Uplift (of 35k)	Total Dwellings	Equivalent uplift
Norwich City	543	~	543	0%
South Norfolk	691	69	760	10%
Broadland	390	105	495	27%
Breckland	539	67	607	12%
North Norfolk	449	65	513	14%
Central Norfolk Total	2,612	306	2,917	12%

Source: Lichfields analysis

Table 3.5 Outcomes of national apportionment – Method 2

	DCLG 2014-based (Dwellings)	Method 2		
		Uplift (of 35k)	Total Dwellings	Equivalent uplift
Norwich City	543	~	543	0%
South Norfolk	691	54	744	8%
Broadland	390	46	436	12%
Breckland	539	40	580	7%
North Norfolk	449	29	478	6%
Central Norfolk Total	2,612	169	2,781	6%

Source: Lichfields analysis

Table 3.6 Outcomes of national apportionment – Method 3

	DCLG 2014-based (Dwellings)	Method 3		
		Uplift (of 35k)	Total Dwellings	Equivalent uplift
Norwich City	543	51	594	9%
South Norfolk	691	89	780	13%
Broadland	390	58	448	15%
Breckland	539	68	608	13%
North Norfolk	449	51	499	11%
Central Norfolk Total	2,612	317	2,928	12%

Source: Lichfields analysis

4. OBR Affordability Modelling

- 3.20 The Office for Budget Responsibility (OBR) produced Working paper No.6 forecasting house prices in July 2014 which looked at the relationship between earnings and house prices³. The University of Reading's affordability model found a high price elasticity (-2.0) in relation to increases in stock at regional level in England, implying in effect that for every 1% increase in supply, relative prices would be expected to fall by 2%.
- 3.21 **There has been some degree of change in OBR's forecasts of house price and earnings growth** since the publication of its working paper no.6 in July 2014. Updating the model to account for **the OBR's March 2017 economic outlook** indicate average house price growth of **4.80% per annum** and peak annual wage growth of **3.7% over the period to 2022** (the horizon of OBR's economic outlook, but applied as a long run assumption).
- 3.22 Based on these updated assumptions, affordability calculations undertaken by Lichfields **demonstrate that under the SHMA's current OAHH affordability across all parts of the HMA** would worsen, as shown in Table 3.7 (full outputs can be found in Appendix **3**). Under the housing requirement set out in the SHMA (i.e. including the City Deal), the housing figures for Norwich, South Norfolk and Broadland are **higher than the SHMA's OAHN**. As such, under these scenarios the affordability outcomes are slightly better than based on the OAHN alone, albeit all areas will still see a worsening of affordability over the period.

Table 3.7 Affordability outcomes under SHMA OAHN/Requirement

	Current ratio	SHMA OAHN without City Deal (per annum)	Affordability Outcome (2036)	SHMA requirement with City Deal (per annum)	Affordability Outcome (2036)
Norwich City	7.1	724	7.8	813	7.4
South Norfolk	8.7	765	10.3	829	9.9
Broadland	9.6	391	12.0	487	11.2
Breckland	8.7	584	10.5	584	10.5
North Norfolk	8.6	409	11.0	409	11.0
Central Norfolk Total	~	2,873	~	3,122	~

Source: Lichfields based on SHMA/OBR/University of Reading

³ 'Working paper No.6: Forecasting house prices' (July 2014) Office for Budgetary Responsibility, Toby Auterson - http://budgetresponsibility.org.uk/docs/dlm_uploads/WP06-final-v2.pdf

- 3.23 On this basis, Lichfields has tested two scenarios for each area. Firstly, we test the number of dwellings per annum (2015-36) needed to maintain affordability in each District at the current [2016] level. We then test the number of dwellings per annum needed to bring affordability to the national average (7.2) by 2036 (this is with the exception of Norwich, which is already marginally below the national average). The outcomes of this area shown in Table 3.8.
- 3.24 To maintain the current affordability across all parts of the HMA to 2036, the Central Norfolk authorities would need to provide 4,211 dpa, equivalent to a **61%** uplift on the household projections. To improve affordability to the national average would evidently require more housing; our evidence shows a total of 5,187 dpa would be needed. This figure is almost double the household projections.

Table 3.8 Dwellings per annum (2015-36) needed for affordability outcomes and uplifts

	Dwellings p.a. (2015-36) needed to...		Uplift on DCLG (dwellings)	
	Maintain affordability at 2016 level	Return affordability to national (7.2) by 2036	Maintain affordability at 2016 level	Return affordability to national (7.2) by 2036
Norwich City	870		60%	
South Norfolk	1,036	1,275	50%	84%
Broadland	700	1,009	79%	159%
Breckland	868	1,096	61%	103%
North Norfolk	737	937	64%	109%
Central Norfolk Total	4,211	5,187	61%	99%

Source: Lichfields based on OBR/University of Reading

5. Government Proposed Methodology

- 3.25 As set out previously the Government has recently published its consultation on a proposed standardised methodology for assessing housing needs. As part of this, the methodology proposes a fixed scale of uplift depending on an **area's median** workplace-based affordability ratio (this differs to the metric used above, which is based on lower quartile affordability).
- 3.26 The proposed uplift is;
- “...each 1 per cent increase in the ratio of house prices to earnings above four results in a quarter of a per cent increase in need above projected household growth.”*
- 3.27 The Government also proposes caps to ensure levels of housing under the assessment are realistic and deliverable; the cap varies depending on when an area adopted its Local Plan. None of the Central Norfolk authorities would be subject to a cap since the proposed methodology does not give a figure 40% in excess of the adopted requirement or household projections.
- 3.28 For the Central Norfolk authorities, **the Government's proposed standardised uplifts would give** between a 14% uplift in Norwich to a 28% uplift in North Norfolk. Across the HMA, the uplift would equate to **25%**, as shown in Table 3.9.

Table 3.9 Outcomes of applying proposed standardised market signals uplift to Central Norfolk

	DCLG 2014-based (Dwellings)	Median workplace-based affordability (2016)	Uplift	OAHN
Norwich City	543	6.3	14%	619
South Norfolk	691	8.3	27%	877
Broadland	390	9.2	33%	519
Breckland	539	8.2	26%	680
North Norfolk	449	8.5	28%	574
Central Norfolk Total	2,612	~	~	3,269

Source: Lichfields based on DCLG and ONS

Bringing the evidence together

3.29

Table 3.10 summarises (the total, for Central Norfolk) the outcomes under the different methods presented above. The scale of uplift on the projections ranges from 6% to 99%. The median is 21%, **which is slightly lower than the 25% derived from the Government's proposed standardised methodology**. On balance, we consider that an uplift of c.20% across the Central Norfolk HMA is appropriate, albeit this could be viewed as conservative in the context of the affordability modelling, which suggests a 61% uplift on the household projections (or 4,211 dwellings per annum) would be needed just to maintain affordability in each area at its current level.

Table 3.10 Summary of market signals outcomes – total for Central Norfolk

	Total Dwellings (Central Norfolk)	Uplift on Projections
1. National	3,029	16%
2. Literature-based (260k)	3,160	21%
2. Literature-based (310k)	4,550	74%
3. National apportionment - method 1	2,917	12%
3. National apportionment - method 2	2,781	6%
3. National apportionment - method 3	2,928	12%
4. OBR - maintain current affordability	4,211	61%
4. OBR - bring affordability to national	5,187	99%
5. Proposed Standardised methodology	3,269	25%

Source: Lichfields analysis

3.30

As at 2016, there were a total of 294,817 dwellings in the Central Norfolk HMA⁴. An uplift to the baseline (2,612 dwellings) of between 20% and 25% would give a figure of 3,134-3,265 dpa. This would equate to a growth rate of 1.06% to 1.11% per annum. This figure is reasonable in the context of the national rate of growth required to meet the national 250,000 homes per annum target, as has been achieved consistently by a number of areas across the wider south of England historically between 2001 and 2015, even including the recessionary period⁵. Authorities within

⁴ Source: DCLG Council Tax Base 2016

⁵ Source: Based on DCLD Live Table on housing completions.

Central Norfolk have achieved this historically also, with South Norfolk delivering growth of 1.3% over the last 15 years⁵. On this basis, an uplift of 25% (consistent with the standard methodology) would be a scenario which could ‘*reasonably be expected to occur*’, as required by the PPG.

Employment-led Needs

3.31 Having sufficient housing available with reasonable distance of employment represents a central facet of any efficiently functioning economy. With regard to employment-led needs, the PPG states (ID 2a-018):

“Plan makers should make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate and also having regard to the growth of the working age population in the housing market area....

Where the supply of working age population ... is less than the projected job growth, this could result in unsustainable commuting patterns ... and could reduce the resilience of local businesses. In such circumstances, plan makers will need to consider how the location of new housing or infrastructure development could help address these problems.”

The City Deal

3.32 In December 2013, the Coalition Government published its second wave of ‘City Deals’ which included a City Deal for Greater Norwich (“the City Deal”). The Government expect the City Deal in Greater Norwich to lead to:

- A step-change in commercialisation at the Norwich Research Park, creating 3,000 new high value jobs by 2020;
- At least 300 new businesses and 3,000 high value jobs across the Local Enterprise Partnership Area established by 2015;
- £100m additional private sector investment to support business growth; and
- 13,000 additional jobs across Greater Norwich.

3.33 In addition to this, the City Deal expects over £2.3bn in private sector housing investment and an additional 3,000 houses in the North East Norwich Growth Triangle.

3.34 The SHMA states that:

“These [job] figures are considered to be aspirational by the local authorities and therefore do not form part of the OAN for the area, but they can be considered to form part of the potential housing requirements.” (SHMA para 5.6)

3.35 However, given the City Deal has been agreed with Government (and is the basis for an agreed package of governance and funding), **it therefore forms an assessment of “the likely change in job numbers” as per the PPG ID 2a-018** (one would not imagine Government agreeing with something that is “unlikely”). Furthermore, the previous 2016 iteration of the SHMA clearly considered job growth associated with City Deal to be part of the OAHN (for example see 2016 SHMA, para 5.80, 5.87 and 5.212). It is entirely unclear why the current SHMA now seeks to adopt a different view. It appears to justify this changed approach by stating “*greater clarity now indicates that it is an aspirational jobs target which should be treated as part of the housing requirement, not the OAN*” (SHMA para 5.7); however the City Deal had been signed 2-3 years before the publication of the 2016 SHMA and there has been no clear change of circumstances (or case law, or the PPG) which mean that now (after four years) the figure should be treated as ‘aspirational’ or ‘policy-on’. For the purposes of the PPG and assessing the

scale of job growth that could reasonably be expected to occur, the City Deal should have remained a part of the OAHN.

- 3.36 **The SHMA’s purported ‘policy-on’ housing requirement which includes growth as part of the City Deal now found elsewhere in the Framework (Agreement 18) which states “*In addition to their OAN, Broadland, Norwich City, and South Norfolk Councils will seek to deliver an additional supply of 5,228 homes within the Greater Norwich Local Plan to ensure the housing needs arising from the City Deal are met in full.*”** Given that such jobs are now omitted (in our view, incorrectly) from the OAHN, there will need to be a clear commitment from these authorities that meeting the needs associated with the City Deal are non-negotiable and form an equal contribution to the overall housing requirement to the remainder of the OAHN.

Affordable Housing Needs

- 3.37 The PPG sets out an approach to identifying affordable housing needs (ID 2a-022 to ID 2a-029), and states that total affordable housing need should be:

“...considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments...an increase in the total housing figures included in the plan should be considered where it could help deliver the required number of affordable homes.”

- 3.38 However, before consideration can be given to addressing affordable housing within the identification of OAHN, how affordable housing need is calculated in the SHMA must be considered.

- 3.39 The PPG sets out a structured methodology for the calculation of affordable housing needs with clear stages, not least because any deviation from this methodology can start to incorporate double-counting into the calculation. The SHMA has failed to follow the prescribed methodology of calculating the affordable housing needs of the HMA as set out in the PPG, **utilising its own ‘housing mix model’ to determine the future level of affordable housing need in the HMA.** It provides little information about the sources of data which feed into the model, **utilising a ‘black-box’ approach where it is not possible to assess any inputs or assumptions to test if they are suitable and reasonable.** Lichfields note a number of flaws in the SHMA’s approach to affordable housing needs with the two main problems set out below.

Housing Benefits

- 3.40 The model to determine future affordable housing need is based on analysis of housing benefit claimants (see paragraphs 3.40 onwards and Figure 57 of the SHMA). It does not undertake analysis comparing local incomes to housing costs for newly forming households as required by the PPG in ID 2a-015, **but rather uses affordability percentages calculated using “data published by DWP about housing benefits claimants alongside detailed information from the 2011 Census” para 3.67 of the SHMA.**

- 3.41 **Not only does this method not accord with the PPG’s requirement for an assessment of local incomes to housing costs for newly forming households, it assumes that only those claiming housing benefit can be in need of affordable housing.** This is a flawed concept for a number of reasons:

- 1 Limiting the definition of affordable housing need to persons in receipt of housing benefit is contrary to the definition of affordable housing in the NPPF (Annex 2 Glossary) set out below:

“Affordable housing: Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing

should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.

Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.

Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).

Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.

Homes that do not meet the above definition of affordable housing, such as “low cost market” housing, may not be considered as affordable housing for planning purposes.” (our emphasis)

- 2 It is also contrary to the requirement to assess needs in the PPG which expressly includes dealing with those who cannot afford to rent or buy market housing, but does not purport to confine it to housing benefit eligible claimants. It does not recognise that one could be in, for example, private rented sector and still be in affordable housing need, not least due to over-crowding, or lack of security of tenure.
- 3 The approach patently excludes large swathes of people who are in need of affordable housing, but who are unable to buy a house and will clearly not be eligible for housing benefit. Those not eligible for housing benefit⁶ include people living with a close family member, so the ORS flawed method knocks out many of the otherwise recognised persons who would be in affordable housing need as part of existing families with young people seeking to move out but are unable to afford to do so. Furthermore, people are also not eligible for housing benefit if you have savings of more than £16,000. That immediately creates the catch-22 situation that if you are a key worker trying to save, perhaps even for a deposit on a new house, once you have saved as little as £16,000 you would lose your **entitlement to housing benefit and therefore fall outside the Council’s definition of someone** in affordable housing need, yet still be unable to buy a property; and
- 4 It is contrary to established practice by only covering those with the most acute needs ORS assert that one cannot actually calculate who is in need unless it is by reference to those known to be claiming for Housing Benefit. This is however contradicted by the well-established **practice and the approach in a number of SHMA’s behind adopted post NPPF Local Plans.**

3.42 As set out in the PPG, an increase in the total OAHN included in the plan should be considered where it could help deliver the required number of affordable homes. This has been further clarified in the courts with Satnam⁷, highlighting the importance of considering affordable housing needs as part of – and not separate to - concluding on OAHN and Kings Lynn⁸ is clear that the correct method for considering the amount of housing required to meet full affordable

⁶ <https://www.gov.uk/housing-benefit/eligibility>

⁷ Satnam Millennium Limited and Warrington Borough Council [2015] EWHC 370

⁸ Kings Lynn and West Norfolk Borough Council v Secretary of State for Communities and Local Government [2015] EWHC 1958

housing needs is to consider the quantum of market housing needed to deliver full affordable housing needs (at a given percentage). The judgment also sets out that although it may not be reasonable and therefore should not be expected that the OAHN will include affordable housing **needs in full, an uplift or similar consideration of how affordable needs can be 'addressed' is necessary** as part of the OAHN calculation. This also reflects paragraph 159 of the NPPF. However, as the SHMA does not correctly calculate affordable housing need, the full OAHN (**"FOAHN"**) cannot be known from the current evidence. The SHMA is therefore flawed on this basis alone. It does not, actually, provide a FOAHN in it.

Changing Circumstances of Existing Households

3.43 The PPG (ID: 2a-025) states that the number of newly arising households likely to be in affordable housing need should be calculated using the below equation.

"total newly arising affordable housing need (gross per year) =

(the number of newly forming households x the proportion unable to afford market housing) + existing households falling into need"

3.44 In terms of the number of existing households falling into need, the SHMA identifies that 966 **households each year will see an improvement in circumstances and effectively 'climb out of need'** (para 3.88); this is more than the number of existing households assumed to fall into need (901 per year), hence has a net reduction on overall need of 64 households per annum. This introduces an element of double counting into the calculation; those pulling themselves out of need should be counted as re-lets, as per the methodology set out in the PPG (ID: 2a-027).

3.45 In summary, it is clear that the purported OAHN in the SHMA is incapable of being an OAHN required by policy because there has been a failure to assess affordable housing need consistent with the requirements of the NPPF and the PPG, and a subsequent failure to assess what part of that need will form part of the OAHN. The NPPF at paragraph 47 sets out that the Local Plan should meet the full OAHN for market and affordable housing, whilst paragraph 159 requires the SHMA, and the evidence on the scale of housing needed, to fully address the need for affordable housing. The proper approach is to conduct the exercise in the PPG ID2a-029; that is to identify full affordable housing needs and then identify its likely delivery as a proportion of mixed market and affordable housing developments. That then gives a figure for meeting full affordable housing needs, which does form an important component, and necessary step, in arriving at OAHN. Addressing the SHMA's fundamental shortcomings above is likely to show an affordable housing need which would necessarily place upward pressure on the OAHN.

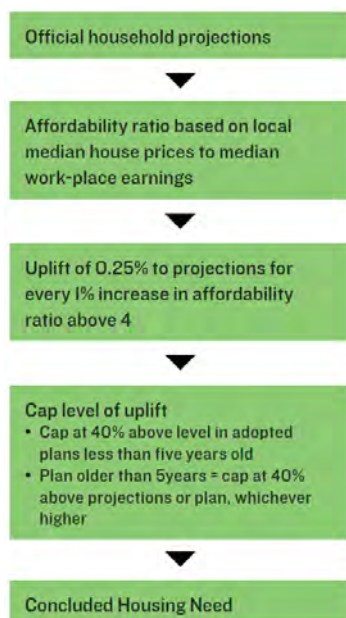
4.0 Proposed new methodology for assessing housing needs

4.1 Following the Housing White Paper, the Government has published (on 14th September) its consultation on a proposed new, simplified methodology for assessing housing needs.

4.2 The approach can be summarised as shown in Figure 4.1. Similar to the current approach, it begins with the household projections (using a ten year average), and applies an affordability-based market signals uplift based on median workplace-based earnings. Caps are introduced to ensure the method does not give figures too high above current Local Plans or household **projections, although this cap is likely to only 'catch' areas with very high affordability ratios** and/or areas with recently adopted Plans which contain relatively low housing targets. The government published a table with the results of what the current methodology would produce

(albeit this is subject to change, depending on when the assessment is undertaken, for example if there is a change in the affordability ratio).

Figure 4.1 Government proposed new standard methodology



Source: Lichfields based on DCLG

4.3 The proposals also raise the bar for areas seeking to deviate from this methodology and produce assessments which give a lower number. However, the consultation also suggests that where an area proposes a higher number (for example, on the basis of job growth), Inspectors are advised to accept this as sound (unless there are compelling reasons to suggest otherwise).

Outputs for Central Norfolk

4.4 The Government’s outputs for Central Norfolk, which were published alongside the consultation in September 2017, are shown in Table 4.1. For Central Norfolk they suggest a total need for 3,243 dwellings per annum over the period 2016-26. This equates to around 400 dwellings per annum more than the current SHMA OAHN, and 100 dpa more than the current requirement, including the City Deal.

Table 4.1 Outputs for Central Norfolk under Government's Proposed Standardised Methodology

	Indicative assessment of housing need (2016-26)
Norwich	602
North Norfolk	511
Broadland	528
Breckland	680
South Norfolk	922
Central Norfolk total	3,243

Source: DCLG⁹

⁹ These figures vary from those shown in Section 3.0 as the proposed methodology does not include an allowance for second home/vacancies, and uses a shorter period for household growth.

Transitional Arrangements

- 4.5 Alongside its proposed methodology, the Government also set out proposed transitional arrangements to determine how authorities should respond to the standardised methodology depending on where they are in the Plan process. Of relevance to the Central Norfolk authorities, the proposed transitional arrangements include:
- 1 Where there is no plan or plan adopted more than five years ago and has not yet reached publication, the new standardised methodology should be used (unless the plan will be submitted before the end of March 2018 [or before the revised NPPF is published, whichever is later]);
 - 2 Plan has been published, but not yet submitted, if the plan will be submitted for examination on or before the end of March 2018 (or before the revised NPPF is published), continue with the current plan preparation, otherwise use the new standardised method; and
 - 3 Plan adopted within the last five years, use the new standardised method when reviewing or updating the plan.
- 4.6 If the methodology, in its current proposed form, is adopted and implemented by Government by Spring 2018, it is likely that most of the Central Norfolk authorities would have to adopt the new standardised methodology when producing their next Plans. In Breckland, the Pre-submission version of the Local Plan is currently out for consultation and the Local Development Scheme (June 2017) indicates this will be submitted in October 2017. However if submission is delayed until after 31st March 2018 (or before the revised NPPF is published, whichever is later), it is possible the new methodology will need to be implemented.

5.0 Summary and Conclusions

- 5.1 When assessed against the current guidance, there are a number of issues with the Central Norfolk SHMA which make it inappropriate and not robust for the purposes of underpinning the Norfolk Strategic Framework (and the subsequent Local Plans which will follow). The key reasons are:
- 1 Failing to evidence that the scale of market signals uplift proposed could be expected to improve affordability. Our analysis supports a higher uplift, and based on a whole range of approaches we conclude that an uplift for the HMA of 25% could be expected to improve affordability, whilst also being a scale which, as required by the PPG could “*reasonably be expected to occur*”;
 - 2 Failing to include the needs associated with the City Deal within OAHN, despite this being an approach that the SHMA previously advocated. Whilst we note that a separate agreement within the Strategic Framework addresses these additional needs, including them as part of the OAHN would cement their position with future; and
 - 3 Significant under-estimation of the scale of affordable housing needs by using an approach which does not follow the stages set out in the PPG, and uses the criteria of housing benefit (which is not recognised within the NPPF or PPG) which fails to appropriately assess all households which are not able to afford market housing. This approach also inherently assumes the continued role of the private rented sector – an approach which has been rejected by Inspectors and does not fall within the NPPF definition of affordable housing.
- 5.2 The Central Norfolk (and other Norfolk) authorities may wish to consider the potential implications of the Government implementing its proposed new standardised methodology. In

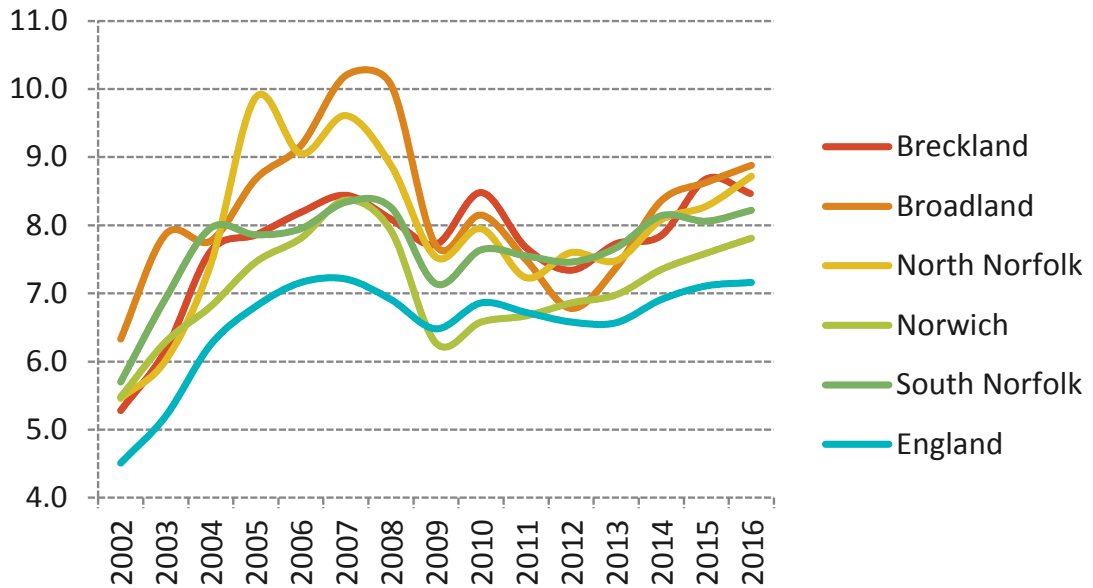
its current form, the methodology would generate housing **need figures in excess of the SHMA's** OAHN, and the requirement including the City Deal, at just over 3,200 dwellings per annum. Given current Plan progression across Central Norfolk, this methodology would likely apply to most authorities if adopted.

Appendix 1: Affordability data – Central Norfolk HMA

Resident-based Affordability

Analysis of resident-based affordability, i.e. the ratio of wages of those that live in a District relative to house prices shows that, with the exception of Norwich, all parts of the HMA have been consistently above the national average historically. Since the onset of the financial crisis in 2008, affordability nationally has been relatively stable (slightly above or below 7.0), however has worsened steadily in almost all parts of the HMA.

Figure 5.1 Resident-based Lower Quartile Affordability Ratio - 2002-16

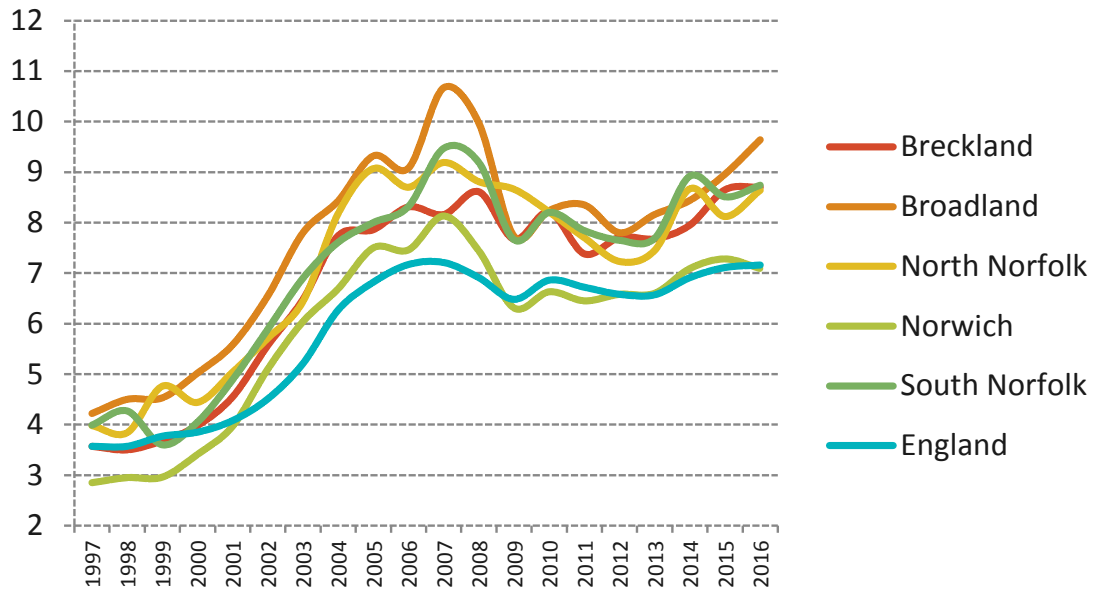


Source: Lichfields based on ONS

Workplace-based Affordability

Workplace-based affordability, i.e. the ratio of wages of those that work in a District relative to house prices shows a similar pattern. Affordability across all parts of the HMA, except Norwich, is currently worse than the national average. The least affordable District in the HMA is Broadland, where house prices are 9.6 times earnings. With the exception of Norwich, workplace-based affordability has worsened since c.2011.

Figure 5.2 Workplace-based Lower Quartile Affordability Ratio - 1997-2016



Source: Lichfields based on ONS

Appendix 2: Review of national evidence – market signals

Barker Review

- 1 The Barker Review of Housing Supply¹⁰ was a seminal report that continues to influence government policy. Published in 2004 and using a baseline figure of 140,000 private sector dwelling starts in 2002-03, the report concluded that to reduce the long term price trend from 2.7% per annum seen prior to 2004, to the 1.1% per annum seen as an average across the EU, would require an increase of 120,000 additional private homes per annum, totalling 260,000 per annum to 2026, alongside an increased provision of social sector housing. The Barker Review concluded that such a level would be necessary for **“improving the housing market” and ensure that “affordability is increasingly improved over time” (paras 1.39 and 1.40).**
- 2 In making such a recommendation, the Review acknowledged that this was in excess of projected rates of household formation (at that point estimated at 179,000 per annum). Even today, with household projections in England at around 210,000 households per annum¹¹ and equating to around 215,000 dwellings per annum (incorporating a notional 2.5% vacancy rate), the 260,000 dwellings per annum concluded within the Barker Review as necessary to increasingly improve affordability would represent a national average uplift of **20.9%** above the demographic projection.
- 3 Flowing from the Barker Review, Government commissioned the development of an Affordability model by Reading University, designed to relate affordability to housing supply in the medium to long term. The key findings from the 2007 version of the model was that the elasticity of house prices with respect to housing stock is found to be relatively high, at -2.0 i.e. a 1% increase in stock at the regional level leads to a 2% fall in house prices, everything else being equal. This has informed much subsequent work by Government.

National Housing & Planning Advice Unit (NHPAU)

- 4 The NHPAU was founded by Government as a direct response to the recommendations of the Barker Review. **In October 2007, it published work entitled ‘Developing a target range for the supply of new homes across England’¹²** flowing from analytical modelling (using the Reading University model) on the impact of the Government’s housing supply target for housing affordability prospects over the medium and long-term. Its conclusion was that a supply range from a minimum of 240,000 dpa (the Government’s annual target at that point) and a high 280,000 dpa should be tested (Table 18), going on to identify (para 4.68):

“NHPAU believes that there is a realistic possibility of stabilising the affordability of market housing over the long-term if a supply target for 270,000 net additions to stock, in the right place and of the right type can be adopted through the planning system for delivery before or by 2016.”

- 5 At 270,000 dwellings per annum, this would represent a national average **25.6%** uplift above the bare demographic projection of the 2014-based household projections.

¹⁰ ‘Review of Housing Supply, Delivering Stability: Securing our Future Housing Needs’ (March 2004), Kate Barker - http://news.bbc.co.uk/1/hi/shared/bsp/hi/pdfs/17_03_04_barker_review.pdf

¹¹ CLG 2014-based household projections, which at the national level represent the same level of annual growth projected in the earlier 2012-based household projections.

¹² ‘Developing a target range for the supply of new homes across England’ (October 2007), NHPAU - <http://webarchive.nationalarchives.gov.uk/20120919132719/http://www.communities.gov.uk/documents/housing/pdf/523984.pdf>

- 6 Crucially, the NHPAU concluded that if stabilising affordability in each region is the goal, then the most efficient way to achieve that is to proportionately increase supply in the areas where affordability is most severe. Thus it focussed 80% of its uplifts (over the then RSS targets) across the South East, the South West and the East of England.

Bramley & Watkins

- 7 Academic research by Bramley & Watkins¹³ has looked at the potential for modelling housing markets at a local level to inform planning decisions. One aspect it considers is affordability impacts of supply changes at the sub-regional level. It includes modelled scenarios that conclude “very high” increases in supply (over other elements within the model) across the South East, defined as 35%, can deliver notable improvements to affordability, including some improvement to affordability in London. This implies that high uplifts just short of **35%**, such as around **25%** in high value areas surrounding London, would be sufficient to address affordability at a local level (i.e. without spill-over benefits to surrounding areas).
- 8 Interestingly, this methodological approach is applied by Bramley to a review of the Bristol Area SHMA for Business West¹⁴. It concludes that an uplift of 50-60% is appropriate compared to 7.5% suggested by the SHMA.

House of Lords Select Committee on Economic Affairs

- 9 In July 2016, the House of Lords Select Committee on Economic Affairs published their report ‘Building More Homes’¹⁵ which was the output of the House of Lords’ inquiry into the housing market. It reflects on past failure to build sufficient numbers of homes, highlighting how supply has substantially undershot the recommended amounts within the Barker Review. It also draws upon evidence provided to the inquiry by HM Treasury (HMT) which indicated (para 81) that “*The modelling suggests that in order to keep the house prices to earnings ratio constant, somewhere between 250,000 and 300,000 homes per year need to be built.*” albeit the report goes on to note (footnote 91) that “*Due to low interest rates building 250,000–300,000 homes above may now be insufficient to keep the price: earnings ratio constant*”
- 10 Ultimately based on the evidence brought to the inquiry, the select committee concluded that:

“To address the housing crisis at least 300,000 new homes are needed annually for the foreseeable future.”

- 11 At 300,000 dwellings per annum, this represents a **39.5%** uplift on the 2014-based household projection equivalent, and although at the upper end of the range identified by HMT, the qualification within the report suggests it would be the figure necessary to keep the affordability ratio constant.

¹³ 'Housebuilding, demographic change and affordability as outcomes of local planning decisions; exploring interactions using a sub-regional model of housing markets in England' (2 October 2014) Bramley & Watkins, Heriot Watt University (Published in Progress in Planning 2015) - [https://pureapps2.hw.ac.uk/portal/en/publications/housebuilding-demographic-change-and-affordability-as-outcomes-of-local-planning-decisions\(23dfd394-4dc7-406d-ad05-3ee18fdd8497\).html](https://pureapps2.hw.ac.uk/portal/en/publications/housebuilding-demographic-change-and-affordability-as-outcomes-of-local-planning-decisions(23dfd394-4dc7-406d-ad05-3ee18fdd8497).html)

¹⁴ Business West: Wider Bristol Housing Market Area Strategic Housing Assessment 2015: Commentary by Bramley <http://initiativewest.co.uk/content/uploads/2015/12/Final-Bramley-WoE-SHMA-critique-30Nov2015.pdf>

¹⁵ 'Building more homes' 1st Report of Session 2016–17 (15 July 2016) House of Lords Select Committee on Economic Affairs (HL Paper 20) - <http://www.publications.parliament.uk/pa/ld201617/ldselect/ldeconaf/20/20.pdf>

Redfern Review

- 1 The Redfern Review¹⁶ was an independent review of the causes of falling home ownership, and associated housing market challenges. Published in November 2016, it was informed by a housing market model and built by Oxford Economics which looked at the impacts of different supply assumptions on prices and home ownership. The review ultimately concludes (para 33):

“...looking forward, if the number of households in the UK were to grow at around 200,000 per year, new supply of 300,000 dwellings per year over a decade would be expected to cut house price inflation by around 5 percentage points (0.5 percentage points a year)... In other words boosting housing supply will have a material impact on house prices, but only if sustained over a long period.”

The accompanying report by Oxford Economics¹⁷ identifies that *“To put downward pressure on prices new supply would need to outstrip underlying household formation”*. It actually models a boost in housing supply of 100,000 above their baseline forecast of 210,000 dwellings per annum, concluding that **310,000 dpa** *“helps to keep prices in check” up to 2026, albeit still rising marginally*. Although no corresponding analysis is presented on the affordability ratio (i.e. accounting for changes in income over that period), the adoption of 310,000dpa as a figure to keep prices in check would represent a **44.2%** uplift over the demographic baseline suggested by the 2014-based projections. A lower percentage would be sufficient to hold affordability constant if household incomes increased in a corresponding manner.

¹⁶ ‘The Redfern Review into the decline of home ownership’ (16 November 2016) - http://www.redfernreview.org/wp-content/uploads/2016/01/TW082_RR_online_PDF.pdf

¹⁷ ‘Forecasting UK house prices and home ownership’ (November 2016) Oxford Economics - <http://www.redfernreview.org/wp-content/uploads/2016/11/20161114-Redfern-Review-modelling-paper.pdf>

Appendix 3: OBR Modelling Outputs

OBR/University of Reading affordability Modelling																					
TOTAL DWELLINGS - IMPLICIT																					
Dwellings	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2036	
Underlying growth	543	65,888	66,431	66,974	67,517	68,060	68,603	69,146	69,689	70,232	70,775	71,318	71,861	72,404	72,947	73,490	74,033	74,576	75,119	75,662	
Base line	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2036	
Earnings	3.70%	£20,172	£20,918	£21,692	£22,495	£23,327	£24,190	£25,085	£26,014	£26,976	£27,974	£29,009	£30,083	£31,196	£32,350	£33,547	£34,788	£36,075	£37,410	£38,794	£40,230
House Prices	4.80%	£143,000	£149,864	£157,057	£164,596	£172,497	£180,777	£189,454	£198,548	£208,078	£218,066	£228,533	£239,503	£250,999	£263,047	£275,673	£288,905	£302,773	£317,306	£32,536	£348,988
Affordability Ratio	7.1	7.2	7.2	7.3	7.4	7.5	7.6	7.6	7.7	7.8	7.9	8.0	8.0	8.1	8.2	8.3	8.4	8.5	8.6	8.7	
Affordability testing																					
2016 onwards	742	65,345	66,087	66,829	67,571	68,313	69,055	69,797	70,539	71,281	72,023	72,765	73,506	74,248	74,990	75,732	76,474	77,216	77,958	78,700	
SHMA OAN (without City Deal)																					
New ratio		7.1	7.2	7.2	7.2	7.3	7.3	7.3	7.4	7.4	7.4	7.5	7.5	7.6	7.6	7.7	7.7	7.7	7.8	7.8	
SHMA OAN (with City Deal)																					
New ratio		7.1	7.1	7.1	7.1	7.1	7.2	7.2	7.2	7.2	7.2	7.2	7.3	7.3	7.3	7.3	7.3	7.4	7.4	7.4	
Keep constant (or at national)																					
New ratio		7.1	7.1	7.1	7.1	7.1	7.1	7.1	7.1	7.1	7.1	7.1	7.1	7.1	7.1	7.1	7.1	7.1	7.1	7.1	
Completions 2015/16	365	Source: Joint AMR 2015/16 https://www.south-norfolk.gov.uk/sites/default/files/Annual_Monitoring_Report_2015-2016.pdf																			
SHMA OAN (without City Deal)	15,204																				
Residual annual requirement	742																				
SHMA OAN (WITH City Deal)	17,074																				
Residual requirement	835																				
OBR/University of Reading affordability Modelling																					
TOTAL DWELLINGS - IMPLICIT																					
Dwellings	691	58,940	59,631	60,322	61,013	61,704	62,395	63,086	63,777	64,468	65,159	65,850	66,541	67,232	67,923	68,614	69,305	70,000	70,687	71,378	
South Norfolk																					
Base line	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2036	
Earnings	3.70%	£20,032	£20,773	£21,542	£22,339	£23,165	£24,022	£24,911	£25,833	£26,789	£27,780	£28,808	£29,874	£30,979	£32,125	£33,314	£34,547	£35,825	£37,150	£38,525	£39,950
House Prices	4.80%	£175,000	£183,400	£192,203	£201,429	£211,098	£221,230	£231,849	£242,978	£254,641	£266,864	£279,673	£293,098	£307,166	£321,930	£337,362	£353,555	£370,526	£388,311	£406,950	£426,484
Affordability Ratio	8.7	8.8	8.9	9.0	9.1	9.2	9.3	9.4	9.5	9.6	9.7	9.8	9.9	10.0	10.1	10.2	10.3	10.5	10.6	10.7	
Affordability testing																					
2016 onwards	765	58,940	59,705	60,471	61,236	62,001	62,767	63,532	64,297	65,063	65,828	66,594	67,359	68,124	68,890	69,655	70,420	71,186	71,951	72,716	
SHMA OAN (without City Deal)																					
New ratio		8.8	8.9	9.0	9.0	9.1	9.2	9.3	9.3	9.4	9.5	9.6	9.7	9.7	9.8	9.9	10.0	10.1	10.2	10.3	
SHMA OAN (with City Deal)																					
New ratio		8.8	8.8	8.9	8.9	9.0	9.1	9.1	9.2	9.2	9.3	9.4	9.4	9.5	9.5	9.6	9.7	9.7	9.8	9.9	
Keep constant																					
New ratio		8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.6	8.6	8.6	8.6	8.6	8.6	8.6	8.6	8.6	8.6	8.7	
Improve to 7.2 (national)																					
New ratio		8.6	8.6	8.5	8.4	8.3	8.2	8.1	8.1	8.0	7.9	7.8	7.8	7.7	7.6	7.5	7.5	7.4	7.3	7.2	
Completions 2015/16	765	Source: https://www.south-norfolk.gov.uk/sites/default/files/Annual_Monitoring_Report_2015-2016.pdf Comprises NPA and Rural Area																			
SHMA OAN (without City Deal)	16,072																				
Residual annual requirement	765																				
SHMA OAN (WITH City Deal)	17,415																				
Residual requirement	833																				

OBR/University of Reading affordability Modelling																						
TOTAL DWELLINGS - IMPLICIT																						
	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	
Dwellings	56,680	57,070	57,460	57,850	58,240	58,630	59,020	59,410	59,800	60,190	60,580	60,970	61,360	61,750	62,140	62,530	62,920	63,310	63,700	64,090	64,480	
Broadland																						
Base line																						
Earnings	3.70%	£18,676	£19,367	£20,084	£20,822	£21,597	£22,396	£23,225	£24,084	£24,975	£25,900	£26,858	£27,852	£28,882	£29,951	£31,059	£32,208	£33,400	£34,636	£35,917	£37,246	£38,624
House Prices	4.80%	£180,000	£188,640	£197,695	£207,184	£217,129	£227,551	£238,474	£249,900	£261,916	£274,488	£287,664	£301,472	£315,942	£331,108	£347,001	£363,657	£381,112	£399,406	£418,577	£438,669	£459,725
Affordability Ratio	9.6	9.7	9.8	9.9	10.1	10.2	10.3	10.4	10.5	10.6	10.7	10.8	10.9	11.1	11.2	11.3	11.4	11.5	11.7	11.8	11.9	
Affordability testing																						
2016 onwards																						
Broadland																						
SHMA OAHN (without City Deal)	56,680	57,061	57,441	57,822	58,202	58,583	58,964	59,344	59,725	60,105	60,486	60,867	61,247	61,628	62,008	62,389	62,770	63,150	63,531	63,911	64,292	64,673
New ratio		9.7	9.9	10.0	10.1	10.2	10.3	10.4	10.5	10.6	10.7	10.8	10.9	11.1	11.2	11.3	11.5	11.6	11.7	11.8	11.9	
SHMA OAHN (with City Deal)	56,680	57,161	57,643	58,124	58,605	59,087	59,568	60,049	60,531	61,012	61,494	61,975	62,456	62,938	63,419	63,900	64,382	64,863	65,344	65,826	66,307	66,789
New ratio		9.7	9.8	9.9	9.9	10.0	10.1	10.2	10.3	10.4	10.5	10.5	10.6	10.7	10.8	10.9	11.0	11.1	11.1	11.1	11.2	
Keep constant	56,680	57,385	58,090	58,795	59,500	60,205	60,910	61,615	62,320	63,025	63,730	64,435	65,140	65,845	66,550	67,255	67,960	68,665	69,370	70,075	70,780	71,485
New ratio		9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6	9.6		
Improve to 7.2 (national)	56,680	57,710	58,740	59,770	60,800	61,830	62,860	63,890	64,920	65,950	66,980	68,010	69,040	70,070	71,100	72,130	73,160	74,190	75,220	76,250	77,280	78,310
New ratio		9.5	9.4	9.3	9.2	9.1	8.9	8.8	8.7	8.6	8.4	8.3	8.2	8.1	8.0	7.8	7.7	7.6	7.4	7.3	7.2	
Completions 2015/16	598	Source: https://www.south-norfolk.gov.uk/sites/default/files/Annual_Monitoring_Report_2015-2016.pdf																				
Comprises NPA and Rural Area																						
SHMA OAN (without City Deal)	8,210																					
Residual annual requirement	381																					
SHMA OAN (WITH City Deal)	10,225																					
Residual requirement	481																					
OBR/University of Reading affordability Modelling																						
TOTAL DWELLINGS - IMPLICIT																						
	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	
Dwellings	59,879	60,418	60,957	61,496	62,035	62,574	63,113	63,652	64,191	64,730	65,269	65,808	66,347	66,886	67,425	67,964	68,503	69,042	69,581	70,120	70,659	
Broadland																						
Base line																						
Earnings	3.70%	£17,519	£18,167	£18,839	£19,536	£20,259	£21,009	£21,786	£22,592	£23,428	£24,295	£25,194	£26,126	£27,093	£28,095	£29,135	£30,213	£31,331	£32,490	£33,692	£34,939	£36,231
House Prices	4.80%	£152,500	£159,820	£167,491	£175,531	£183,956	£192,786	£202,040	£211,738	£221,901	£232,553	£243,715	£255,414	£267,673	£280,522	£293,987	£308,098	£322,887	£338,385	£354,628	£371,650	£389,489
Affordability Ratio	8.7	8.8	8.9	9.0	9.1	9.2	9.3	9.4	9.5	9.6	9.7	9.8	9.9	10.0	10.1	10.2	10.3	10.4	10.5	10.6	10.8	
Affordability testing																						
2016 onwards																						
Broadland																						
SHMA OAHN (without City Deal)	59,879	60,462	61,044	61,627	62,210	62,792	63,375	63,958	64,540	65,123	65,706	66,288	66,871	67,453	68,036	68,619	69,201	69,784	70,367	70,949	71,532	72,115
New ratio		8.8	8.9	8.9	9.0	9.1	9.2	9.3	9.4	9.5	9.5	9.6	9.7	9.8	9.9	10.0	10.1	10.2	10.3	10.4	10.5	
SHMA OAHN (with City Deal)	59,879	60,462	61,044	61,627	62,210	62,792	63,375	63,958	64,540	65,123	65,706	66,288	66,871	67,453	68,036	68,619	69,201	69,784	70,367	70,949	71,532	72,115
New ratio		8.8	8.9	8.9	9.0	9.1	9.2	9.3	9.4	9.5	9.5	9.6	9.7	9.8	9.9	10.0	10.1	10.2	10.3	10.4	10.5	
Keep constant	59,879	60,759	61,639	62,519	63,399	64,279	65,159	66,039	66,919	67,799	68,679	69,559	70,439	71,319	72,199	73,079	73,959	74,839	75,719	76,599	77,479	78,359
New ratio		8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7	8.7		
Improve to 7.2 (national)	59,879	60,999	62,119	63,239	64,359	65,479	66,599	67,719	68,839	69,959	71,079	72,199	73,319	74,439	75,559	76,679	77,799	78,919	80,039	81,159	82,279	83,399
New ratio		8.6	8.6	8.5	8.4	8.3	8.2	8.2	8.1	8.0	8.0	7.9	7.8	7.7	7.7	7.6	7.5	7.4	7.4	7.3		
Completions 2015/16	619	Source: https://www.breckland.gov.uk/media/2663/Annual-Monitoring-Report-2016/pdf/AMR_2016_For_website																				
SHMA OAN (without City Deal)	12,272																					
Residual annual requirement	583																					
SHMA OAN (WITH City Deal)	12,272																					
Residual requirement	583																					

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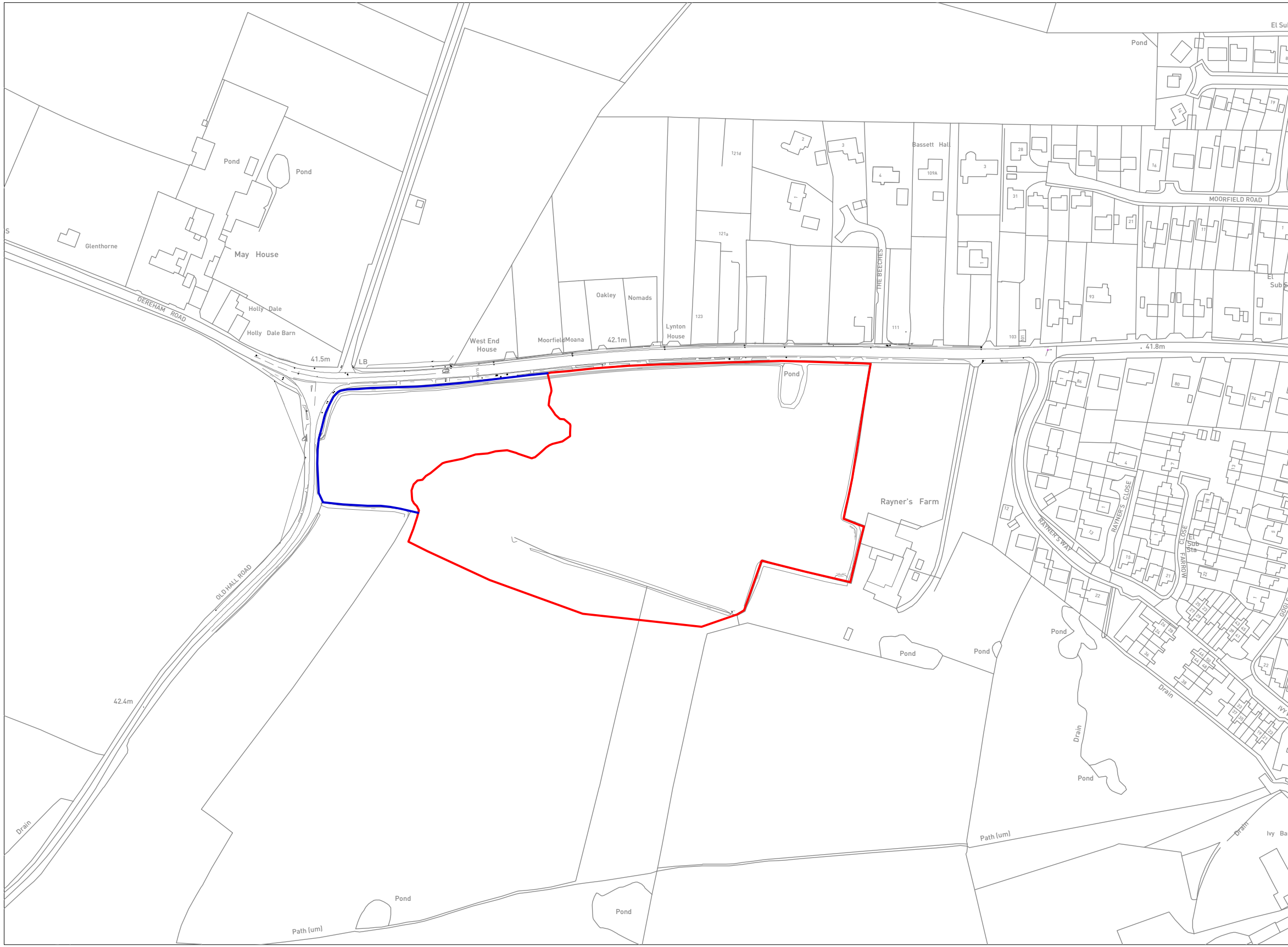
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APPENDIX 4:-

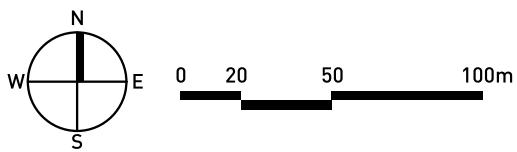
Location Plan and Framework Plan for Land off Dereham Road, Mattishall

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KEY

- SITE LOCATION 3.19HA
- LAND UNDER APPLICANTS CONTROL



LAND SOUTH OF DEREHAM ROAD MATTISHALL- SITE LOCATION PLAN

