

# Breckland Local Plan Pre-Submission Publication: Late and Unduly Made Representations

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December 2017

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## Contents Page

<b>Consultee Name</b>	<b>Policy/</b>	<b>Organisation</b>	<b>Late</b>	<b>Unduly made</b>	<b>Sound/unsound</b>	<b>If late, date received</b>	<b>If unduly made, why</b>	<b>Page</b>
Mandy Maguire	Policy HOU 05 - Small Villages and Hamlets Outside of Settlement Boundaries	Bridgham Parish Council		X	Unsound		Did not state to which test of soundness representation applied	1
Kirsty Heath	Dereham Housing Allocation 2			X	Unsound		Did not state to which test of soundness her representation applied	5
Kirsty Heath	Dereham Housing Allocation 5				Unsound		Did not state to which test of soundness her representation applied	6
Kirsty Heath	3.144 Paragraph				Unsound		Did not state to which test of soundness her representation applied	8
Kirsty Heath	3.145 Paragraph				Unsound		Did not state to which test of soundness her representation applied	9
Kirsty Heath	3.147 Paragraph				Unsound		Did not state to which test of soundness her representation applied	11

							ion applied	
Kirsty Heath	4.4 Paragraph				Unsound		Did not state to which test of soundness her representation applied	12
Jamie Bird	Saham Toney Settlement Boundary	Blubird Land & Planning Limited		X	Unsound		Did not fill in required form	13
Jamie Bird	Policy HOU 4	Blubird Land & Planning Limited		X	Unsound		Did not fill in required form	16
Luisa Cantera	5 Year Land Supply	Mattishall Parish Council	X		Unsound	03/08/2017		19
Ben Weatherly	Swaffham Allocation 4	Knights 1759	X		Sound	03/08/2017		24
Ben Weatherly	Banham Housing Allocations	Knights 1759	X		Unsound	03/08/2017		29
Jamie Bird	Chalk Lane, Narborough Allocation	Blubird Land & Planning Limited		X	Sound		Did not fill in required form	34
Councillor Theresa Hewett	Carbrooke	Breckland District Councillor Council for Saham Toney Ward	X		Unsound	03/08/2017		35
Amber Slater	Paragraph 2.28 Attleborough	Brown & Co	X		Unsound	03/08/2017		39
Garth Hanlon	Breckland Strategic Vision	Savills (UK) Ltd on behalf of Abel Homes Ltd		X	N/A (did not fill in)		Did not fill in Question 1	44
Garth Hanlon	Policy HOU 01- Development	Savills (UK) Ltd on behalf of Abel		X	Unsound		Did not fill in Question 9	48

	Requirements (Minimum)	Homes Ltd						
Garth Hanlon	Policy HOU 02	Savills (UK) Ltd on behalf of Abel Homes Ltd Savills (UK) Ltd on behalf of Abel Homes Ltd		X	Unsound		Did not state to which test of soundness his representation applied	52
Garth Hanlon	Paragraph 1.41			X	N/A (did not fill in)		Did not fill in Question 1	61
Gillian de Cruz	Shipdham		X	X	Unsound	03/08/2017	Late and did not use required form	65
Unknown	Great Ellingham							69
Valerie Baker	Dereham		X		Unsound	03/08/2017		71
David J Purple	Dereham Housing Allocation 1	Theatre Royal Surgery Walking Group	X		Unsound	03/08/2017		73
Phil Eggleton	Dereham Housing Allocation 1		X		Unsound	03/08/2017		77
Nigel Bailey	Dereham Housing Allocation 1		X		Unsound	03/08/2017		81
Philip Morton	Dereham Housing Allocation 1		X		Unsound	03/08/2017		85
Miss T. A. Walby	Dereham Housing Allocation 1		X		Unsound	03/08/2017		89
Mrs J Wright	Dereham Housing Allocation 1		X		Unsound	03/08/2017		93
Mr Keith	Dereham		X		Unsound	03/08/2017		97



Proudfoot	Housing Allocation 1					7		
Joan E Purple	Dereham Housing Allocation 1		X		Unsound	03/08/2017		101
Mrs Pauline Pearson	Dereham Housing Allocation 1		x		Unsound	03/08/2017		105
David Blundell	Dereham Housing Allocation 1		X		Unsound	03/08/2017		109
Rob Pidgby	Dereham Housing Allocation 1		X		Unsound	03/08/2017		113
Daniel Wilson	Dereham Housing Allocation 1		X		Unsound	03/08/2017		117
M Harper	Dereham Housing Allocation 1		X		Unsound	03/08/2017		121
Mr C C Claxton	Dereham Housing Allocation 1		X		Unsound	03/08/2017		125
Gary West	Dereham Housing Allocation 1		X		Unsound	03/08/2017		129
Nathan Pearson	Dereham Housing Allocation 1		X		Unsound	03/08/2017		133
Jake Flood	Dereham Housing Allocation 1		X		Unsound	03/08/2017		137
Darren Greenwood	Dereham Housing Allocation 1		X		Unsound	03/08/2017		141
Mrs L Barker	Dereham Housing Allocation 1		X		Unsound	03/08/2017		145

Miss D Lee	Dereham Housing Allocation 1		X		Unsound	03/08/2017		149
Mrs D J Sandford	Dereham Housing Allocation 1		X		Unsound	03/08/2017		153
Mark Ogilvy	Dereham Housing Allocation 1		X		Unsound	03/08/2017		157
Steve Dorrington	Dereham Housing Allocation 1		X		Unsound	03/08/2017		161
Robin Bartlett	Dereham Housing Allocation 1		X		Unsound	03/08/2017		165
Ross Kincaide	Dereham Housing Allocation 1		X		Unsound	03/08/2017		169
Luke Patey	Dereham Housing Allocation 1		X		Unsound	03/08/2017		173
Kyle Pease	Dereham Housing Allocation 1		X		Unsound	03/08/2017		177
D J Organ	Dereham Housing Allocation 1		X		Unsound	03/08/2017		181
Calum Barker	Dereham Housing Allocation 1		X		Unsound	03/08/2017		185
Mrs Vanessa Houghton	Dereham Housing Allocation 1		X		Unsound	03/08/2017		189
Sally Henman	Dereham Housing Allocation 1		X		Unsound	03/08/2017		193
Shaun Haughton	Dereham Housing Allocation		X		Unsound	03/08/2017		197

	1							
Mrs Helen Foster	Dereham Housing Allocation 1		X		Unsound	03/08/2017		201
Mrs M A Thurlow and Miss N K Thurlow	Dereham Housing Allocation 1		X		Unsound	03/08/2017		205
Mr M Richer	Dereham Housing Allocation 1		X		Unsound	03/08/2017		209
Jamie Gadson	Dereham Housing Allocation 1		X		Unsound	03/08/2017		213
Lee Dobson	Dereham Housing Allocation 1		X		Unsound	03/08/2017		217
Marion Dalston	Dereham Housing Allocation 1		X		Unsound	03/08/2017		221
Louize Harris	Dereham Housing Allocation 1		X		Unsound	03/08/2017		225
Jennifer Thomson	Dereham Housing Allocation 1		X		Unsound	03/08/2017		229
Andy Rivett	Dereham Housing Allocation 1		X		Unsound	03/08/2017		233
John Parsons	Dereham Housing Allocation 1		X		Unsound	03/08/2017		237
Jon Goodbody	Dereham Housing Allocation 1		X		Unsound	03/08/2017		241
Cheyann e Jones	Dereham Housing Allocation 1		X		Unsound	03/08/2017		245
Wayne	Dereham		X		Unsound	03/08/2017		249



<h2 style="margin: 0;">Breckland Local Plan Pre-Submission Publication Representation Form</h2>
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**This form should be used to make representations on the soundness of the Breckland Local Plan Pre-Submission Publication only.**

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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](mailto: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: Mandy Maguire	
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)	✓

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

Policy	✓
Paragraph	✓
Site	
Proposals Map	
Settlement Boundary	
Other	

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

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

<b>Legal Tests</b>	
Is the plan legally compliant?	
<b>Soundness Tests</b>	
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)**

Bridgham Parish Council are happy with the current 'No new build policy except for exceptional cases' as we have at present and are concerned the suggested new wording is too loose and will not stop most applications applied for. We do not want lots of new build and the proposal is seen as too loose a policy and we feel will not stand up to the many proposals we receive and will lead to lots of new building in a very small village with no amenities or transport.

**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)

<b>Notified of the Submission</b>	✓
<b>Notified of the Inspectors Recommendations</b>	✓
<b>Notified of the Adoption</b>	✓

<b>Declaration:</b> I understand that the details included on this form will be available in the public domain. (please tick box)	✓
<b>Signature:</b> M Maguire	<b>Date: 1.10.2017</b>

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

<b>Consultee</b>	MRS KIRSTY HEATH (972215)
<b>Email Address</b>	
<b>Address</b>	
<b>Event Name</b>	Local Plan Pre-Submission Publication Document
<b>Comment by</b>	MRS KIRSTY HEATH
<b>Comment ID</b>	275
<b>Response Date</b>	02/10/17 10:16
<b>Consultation Point</b>	Dereham Housing Allocation 2 ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	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

<b>Consultee</b>	MRS KIRSTY HEATH (972215)
<b>Email Address</b>	
<b>Address</b>	
<b>Event Name</b>	Local Plan Pre-Submission Publication Document
<b>Comment by</b>	MRS KIRSTY HEATH
<b>Comment ID</b>	276
<b>Response Date</b>	02/10/17 10:23
<b>Consultation Point</b>	Dereham Housing Allocation 5 ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	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 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

<b>Consultee</b>	MRS KIRSTY HEATH (972215)
<b>Email Address</b>	
<b>Address</b>	
<b>Event Name</b>	Local Plan Pre-Submission Publication Document
<b>Comment by</b>	MRS KIRSTY HEATH
<b>Comment ID</b>	278
<b>Response Date</b>	02/10/17 10:27
<b>Consultation Point</b>	3.144 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	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

<b>Consultee</b>	MRS KIRSTY HEATH (972215)
<b>Email Address</b>	
<b>Address</b>	
<b>Event Name</b>	Local Plan Pre-Submission Publication Document
<b>Comment by</b>	MRS KIRSTY HEATH
<b>Comment ID</b>	279
<b>Response Date</b>	02/10/17 10:32
<b>Consultation Point</b>	3.145 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	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

<b>Consultee</b>	MRS KIRSTY HEATH (972215)
<b>Email Address</b>	
<b>Address</b>	
<b>Event Name</b>	Local Plan Pre-Submission Publication Document
<b>Comment by</b>	MRS KIRSTY HEATH
<b>Comment ID</b>	280
<b>Response Date</b>	02/10/17 10:35
<b>Consultation Point</b>	3.147 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	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

<b>Consultee</b>	MRS KIRSTY HEATH (972215)
<b>Email Address</b>	
<b>Address</b>	
<b>Event Name</b>	Local Plan Pre-Submission Publication Document
<b>Comment by</b>	MRS KIRSTY HEATH
<b>Comment ID</b>	282
<b>Response Date</b>	02/10/17 10:43
<b>Consultation Point</b>	4.4 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Do you consider the Pre-Submission Publication to be:</b>	<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.

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:



**From:** [Jamie Bird](#)  
**To:** [Planning Policy Team](#)  
**Cc:** [Jamieson Bird](#)  
**Subject:** Pre-submission Comment - Development Boundary Saham Toney  
**Date:** 02 October 2017 17:50:19  
**Attachments:** [Suggested development Boundary Amendment Saham Toney Sept 17.pdf](#)

---

REF: Development Boundary Saham Toney & Policy HOU 4

### **Development Boundary - Saham Toney**

Please see the attached plan which illustrates a small area of land partially included within the development boundary. We feel the development boundary should be moved northward slightly to either include all of the land to coincide with the natural boundaries of the site or more of the land to enable buildings to be constructed which are set back from the natural hedge and tree boundary on site. This allows the trees to be preserved and the green frontage of this road to be retained.

The restrictive development boundary does not enable homes to be constructed that easily. NCC Highways have agreed to the development of no more than three dwellings here but the development boundary needs to be moved to allow for a sensitive form of development given the constraints of the trees and natural water course along the site frontage.

### **Policy HOU 4**

We do not believe there should be a reference to item 3 'Significant community benefit'. Housing itself is a community benefit and contributes to local communities and sustainable development. Requiring small scale developments to make a 'significant' community benefit is ambiguous and is likely to lead to confusion over what is or is not 'significant'. It may also end with communities asking for more than is reasonable or viable and this in turn has an impact on viability, risk and deliverability. It flies in the face of the written ministerial statement and is likely to lead to developments not occurring at all.

Point 3 should either be removed entirely or the word 'significant' removed.

It should however call for a high standard of design and execution.

Regards

Click [here](#) to report this email as spam.

Jamie Bird - Director  
Blubird Land & Planning Ltd





KEY:

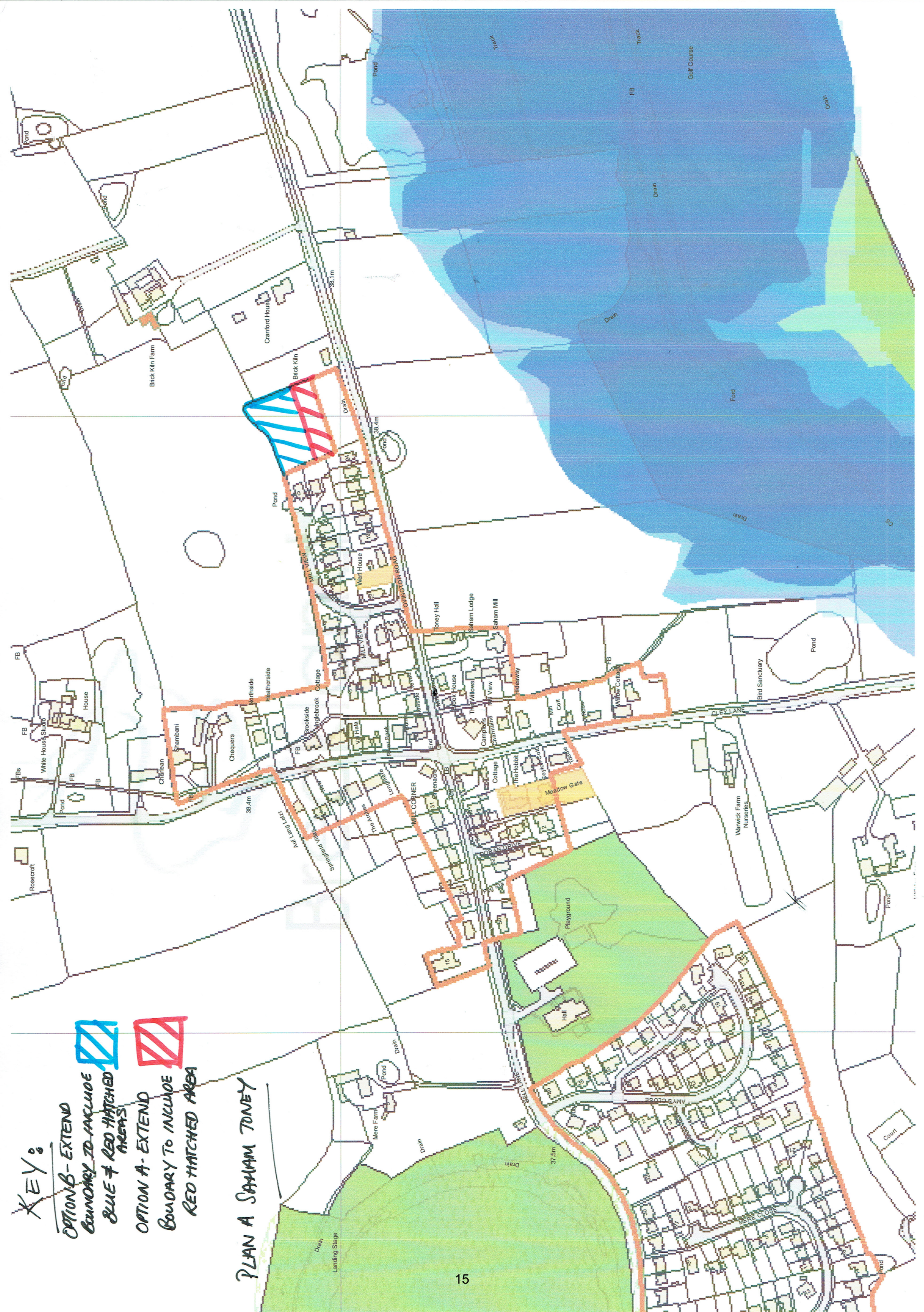
OPTION B - EXTEND BOUNDARY TO INCLUDE

BLUE & RED HATCHED AREAS

OPTION A - EXTEND BOUNDARY TO INCLUDE

RED HATCHED AREA

PLAN A SAHAM TONEY





**From:** [Jamie Bird](#)  
**To:** [Planning Policy Team](#)  
**Cc:** [Jamieson Bird](#)  
**Subject:** Pre-submission Comment - Development Boundary Saham Toney  
**Date:** 02 October 2017 17:50:19  
**Attachments:** [Suggested development Boundary Amendment Saham Toney Sept 17.pdf](#)

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REF: Development Boundary Saham Toney & Policy HOU 4

### **Development Boundary - Saham Toney**

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The restrictive development boundary does not enable homes to be constructed that easily. NCC Highways have agreed to the development of no more than three dwellings here but the development boundary needs to be moved to allow for a sensitive form of development given the constraints of the trees and natural water course along the site frontage.

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It should however call for a high standard of design and execution.

Regards

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Jamie Bird - Director  
Blubird Land & Planning Ltd



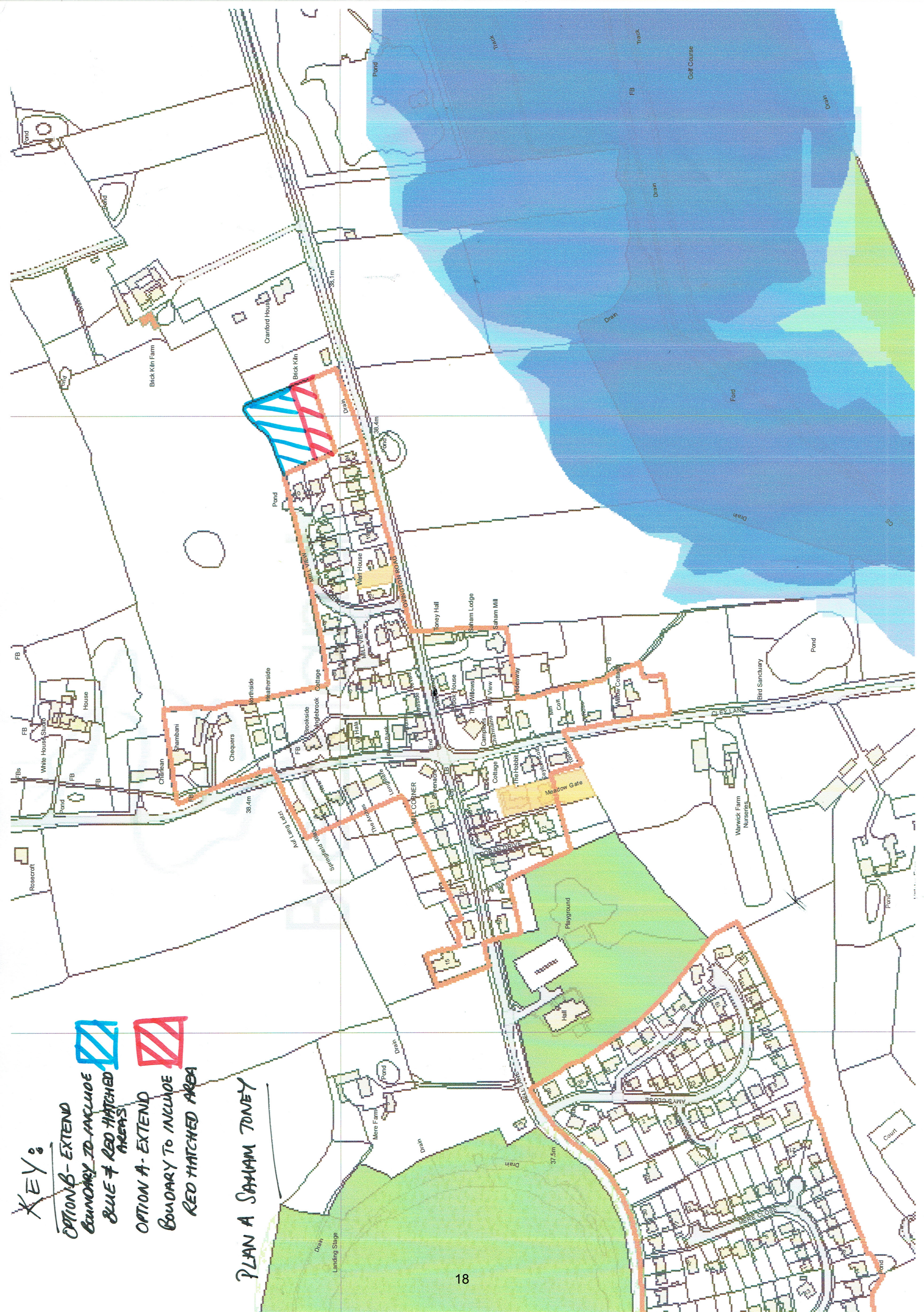


KEY:

OPTION B - EXTEND BOUNDARY TO INCLUDE BLUE & RED HATCHED AREAS

OPTION A - EXTEND BOUNDARY TO INCLUDE RED HATCHED AREA

PLAN A SAHAM TONEY





## Breckland Local Plan Pre-Submission Publication Representation Form

CAPITA

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### Part 1: Your Contact Details

Name: Luisa Cantera	
Organisation:	
Address:	
Post code:	Telephone:
E-mail: c	

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

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

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

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

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

Policy	
Paragraph	
Site	
Proposals Map	
Settlement Boundary	
Other	✓

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

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

<b>Legal Tests</b>	
Is the plan legally compliant?	
<b>Soundness Tests</b>	
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.**



**Relevant documents only recently available**

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

The existence of a 5 year land supply is fundamental to the full implementation of the Plan policies. For all parties to have confidence in the land supply document, and the decisions based upon it, it must be prepared on a consistent basis from accurate and verifiable data.

Since the September 2016 land supply report permissions for just over 500 dwellings have been added. However, since that earlier report an equivalent number of dwellings, previously shown as not started or under construction, have been removed. Allowing for completions in the intervening period this has reduced the land supply to less than 5 years. No explanation is given for the deletions. It is also difficult to reconcile the data in the report with that from the Central Norfolk SHMA.

**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.**

**An ongoing 5 year land supply is one of the mainstays of the current planning system. Any doubts as to its validity need to be addressed in a public forum.**

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

<b>Notified of the Submission</b>	✓
<b>Notified of the Inspectors Recommendations</b>	✓
<b>Notified of the Adoption</b>	✓

<b>Declaration:</b> I understand that the details included on this form will be available in the public domain. (please tick box)	✓
<b>Signature:</b>	<b>Date:</b> 2 October 2017

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<p><b>Breckland Local Plan Pre-Submission Publication Representation Form</b></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](mailto: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: MLN (Land and Properties) 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: Ben Weatherley	
Organisation: Knights 1759	
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	Swaffham Allocation 4
Paragraph	
Site	LP[097]010
Proposals Map	
Settlement Boundary	Swaffham
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).

<b>Legal Tests</b>	
Is the plan legally compliant?	
<b>Soundness Tests</b>	
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.**

It is considered that the plan is sound insofar as it proposes to allocate the land to south of Norwich Road, Swaffham - site reference (LP[097]010) - for residential development of at least 185 dwellings.

This proposed allocation is supported, as is the proposal for the Swaffham settlement boundary to wrap around/include this site allocation on the edge of the existing built-up area of the town.

Continued on next page...

MLN (Land and Properties) Limited is the applicant in connection with the outline planning application for 185 dwellings that is referred to at paragraph 3.165 of the plan. It is considered that the supporting documentation that accompanied that planning application, and the officer report to planning committee and subsequent resolution to grant planning permission subject to a section 106 agreement, demonstrate the suitability of the site for residential development.

It is also considered that the site comprises a genuinely deliverable housing site that can accommodate a good proportion of the dwellings to be allocated to the market towns for delivering within the plan period, and that the planning application submission has demonstrated the potential for the site's development to have a positive impact on this eastern edge of the town, at a gateway location.

We can confirm that the section 106 agreement in connection with the outline planning application is close to being finalised, such that the planning permission will then be issued. We consider that the site should remain as an housing allocation in the plan, for delivery of housing within the plan period, after planning permission has been granted - rather than be shown simply as a site with planning permission.

Although the site is located at the eastern to the eastern edge of Swaffham, as a result of the existing elongated built form of the town the site is in a highly sustainable/accessible location within walking distance of the town centre and thus in close proximity to the majority of key services and facilities available within the town.



**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)**

<b>Notified of the Submission</b>	✓
<b>Notified of the Inspectors Recommendations</b>	✓
<b>Notified of the Adoption</b>	✓

<b>Declaration:</b> I understand that the details included on this form will be available in the public domain. (please tick box)	
<b>Signature:</b>	<b>Date:</b> 02.10.2017

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

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**Part 1: Your Contact Details**

Name:	
Organisation: MLN (Land and Properties) 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: Ben Weatherley	
Organisation: Knights 1759	
Address:	
Post code: :	Telephone: :
E-mail:	

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

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

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

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

Policy	Banham Housing Allocations
Paragraph	3.200
Site	Land at Kenninghall Road, Banham
Proposals Map	Banham
Settlement Boundary	Banham
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).

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

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

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

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

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

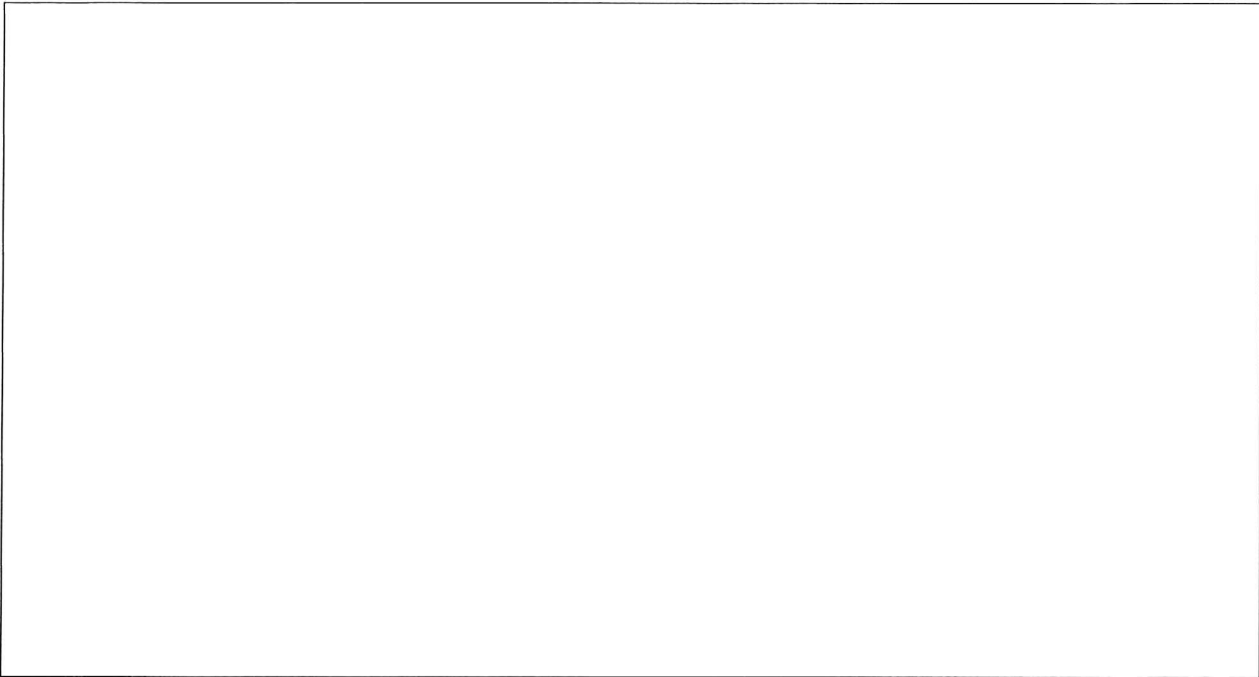
These representations relate to land at Kenninghall Road, Banham, which is the subject of outline planning permission for up to 43 dwellings (reference 3PL/2014/1006/O) - MLN (Land and Properties) Limited being the applicant in connection with that permission.

We support the proposal for the Banham settlement boundary to wrap around/include this site allocation on the edge of the existing built-up area of the village. However, we consider that the site should be included as an additional housing allocation in the plan, for delivery of housing within the plan period, rather than shown solely as a site with planning permission.

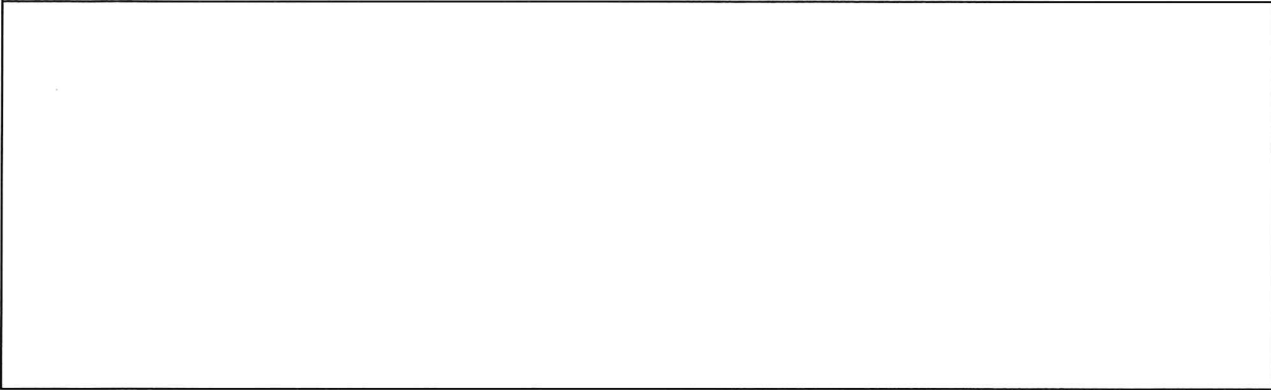
It is considered that the supporting documentation that accompanied that planning application, and the officer report to planning committee and subsequent resolution to grant planning permission subject to a section 106 agreement, demonstrate the suitability of the site for residential development.

It is also asserted that the site comprises a genuinely deliverable housing site that can accommodate a good proportion of the dwellings to be delivered within the local service centres within the plan period, and that the planning application submission has demonstrated the potential for the site's development to have a positive impact on this western edge of the town, at a gateway location.

Although the site is located at the western edge of Banham, it is in a highly sustainable/accessible location within walking distance of the village centre and its amenities, as demonstrated in the outline planning application submission and via the positive determination of that application.



**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)**

<b>Notified of the Submission</b>	✓
<b>Notified of the Inspectors Recommendations</b>	✓
<b>Notified of the Adoption</b>	✓

<b>Declaration:</b> I understand that the details included on this form will be available in the public domain. (please tick box)	
<b>Signature:</b>	<b>Date:</b> 02.10.2017

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**From:** [Jamie Bird](#)  
**To:** [Planning Policy Team](#)  
**Cc:** [Jamieson Bird](#)  
**Subject:** Pre-submission Comment - Chalk Lane, Narborough LP065008  
**Date:** 02 October 2017 17:16:10

---

Dears Sir/Madam

We write as agent for the landowner of the above property and confirm we support the allocation of LP065008 for 40 dwellings and have no objections to the proposed allocation of at least 40 new homes.

The site is available, suitable, deliverable and achievable and we fully support its allocation.

Regards

Jamie Bird - Director  
Blubird Land & Planning Ltd



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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](mailto: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: Theresa Hewett	
Organisation: District Councillor for Breckland District Council for Saham Toney Ward	
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	
Proposals Map	x
Settlement Boundary	x
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).

<b>Legal Tests</b>	
Is the plan legally compliant?	
<b>Soundness Tests</b>	
Is the plan positively prepared?	x
Is the plan justified?	x
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.**

I was recently elected to be Ward Member and so was not involved in or aware of the Plan for Saham Toney or Carbrooke at the previous stages.

**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)**

My concern is around the Watton Town Council map which incorporates a significant proportion of Carbrooke within the Watton Town settlement boundary, relevant portion of map copied below. Area W2, marked for housing development, lies within both Watton and Carbrooke equally.

**Is the plan positively prepared?**

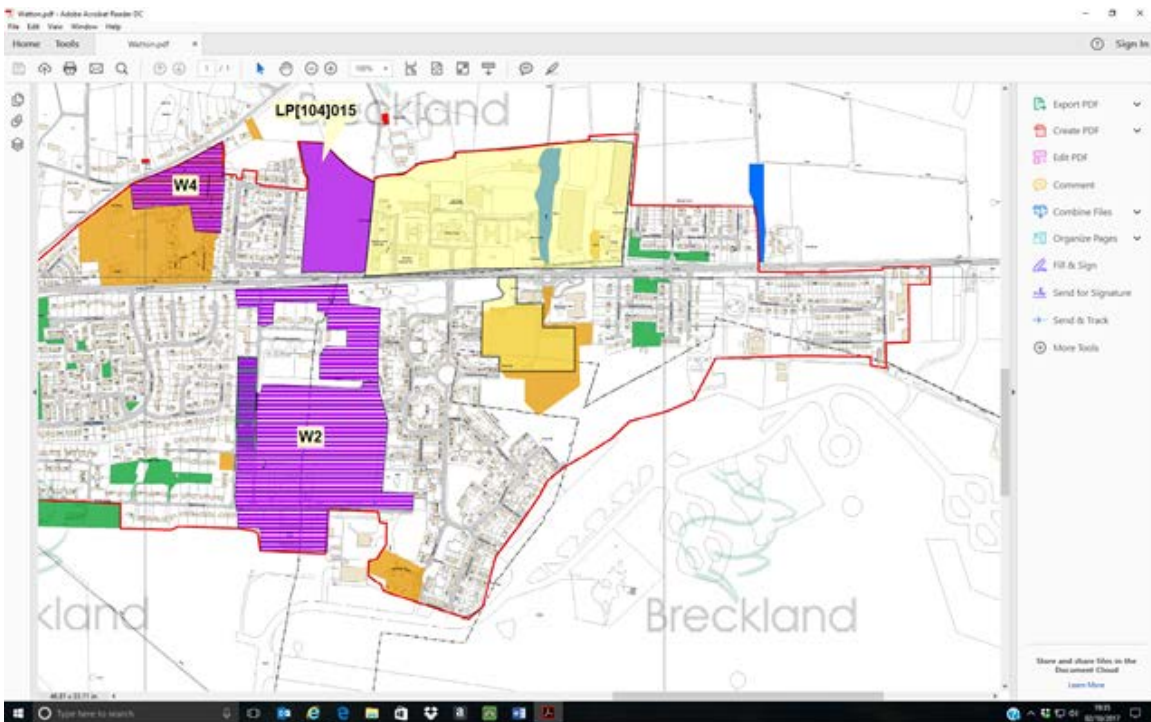
Does the plan seek to meet the local needs for housing, land for businesses, community facilities, infrastructure (e.g. for transport, water, energy), education, shops, facilities for sport and leisure etc., which have been identified through the studies which make up the evidence base

The identified need for housing that this site addresses is a need for housing in Watton not in Carbrooke.

**Is it justified?**

Is the chosen strategy the best one compared with the alternatives considered? Is it clear how the Sustainability Appraisal has informed the plan (the Sustainability Appraisal report should set this out, and can help you to compare alternative options)? Has the plan been prepared with participation of the community? Is it clearly founded on evidence - backed up by facts?

Many Carbrooke residents are concerned by the unsustainable nature of the proposed growth in addition to the doubling of the housing in the village in recent years due to the previous development (Blenheim Grange) along this road.



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

--

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

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

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

--

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

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

<b>Declaration:</b> I understand that the details included on this form will be available in the public domain. (please tick box)	
<b>Signature: Theresa Hewett</b>	<b>Date: 2<sup>nd</sup> October</b>

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**Part 1: Your Contact Details**

Name: Saffell Family Trust and Mrs A J King	
Organisation: C/O Agent	
Address:	
Post code:	Telephone:
E-mail:	

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

**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	2.28
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).

<b>Legal Tests</b>	
Is the plan legally compliant?	
<b>Soundness Tests</b>	
Is the plan positively prepared?	
Is the plan justified?	
Is the plan effective?	<b>x</b>
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)**

Our comments relate to paragraph 2.28 of the document which relates to allocation of land for housing in Attleborough. We support the identification of Attleborough as a key settlement. However, we believe that our client's land should be delivered as part of the growth proposed in this settlement.

We believe that the development of these sections of land forms a logical extension of the existing development in the area, effectively representing a 'rounding off' of the existing surrounding planning permissions, some of which have already been built. The attached plan demonstrates the logical sequence of development that our client's site represents. The site effectively forms the last piece of the jigsaw in this stretch of development and does not seem logical to leave this part of land between the existing development and the A11 undeveloped.

By allocating all future housing growth in one place, i.e. the south of Attleborough does not, in our view give sufficient choice in location for housing around the town. Furthermore, it does not allow for meeting short term housing needs, with not enough allocation of smaller to medium sites.

The site has good access to a wide range of services and facilities all within walking distance of the site, and has good access to Norwich by road and rail. It is therefore well placed to deliver sustainable growth. The site is in single ownership and can therefore come forward immediately. Furthermore, there are no constraints to development in terms of flooding, transport and drainage. Evidence of this is currently being prepared through various technical reports to be submitted at a later date.

In the absence of a 5 year housing land supply we believe the development of this site, which is entirely deliverable given the single ownership, presence of services and lack of site constraints, should therefore be included in the plan.

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

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

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

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

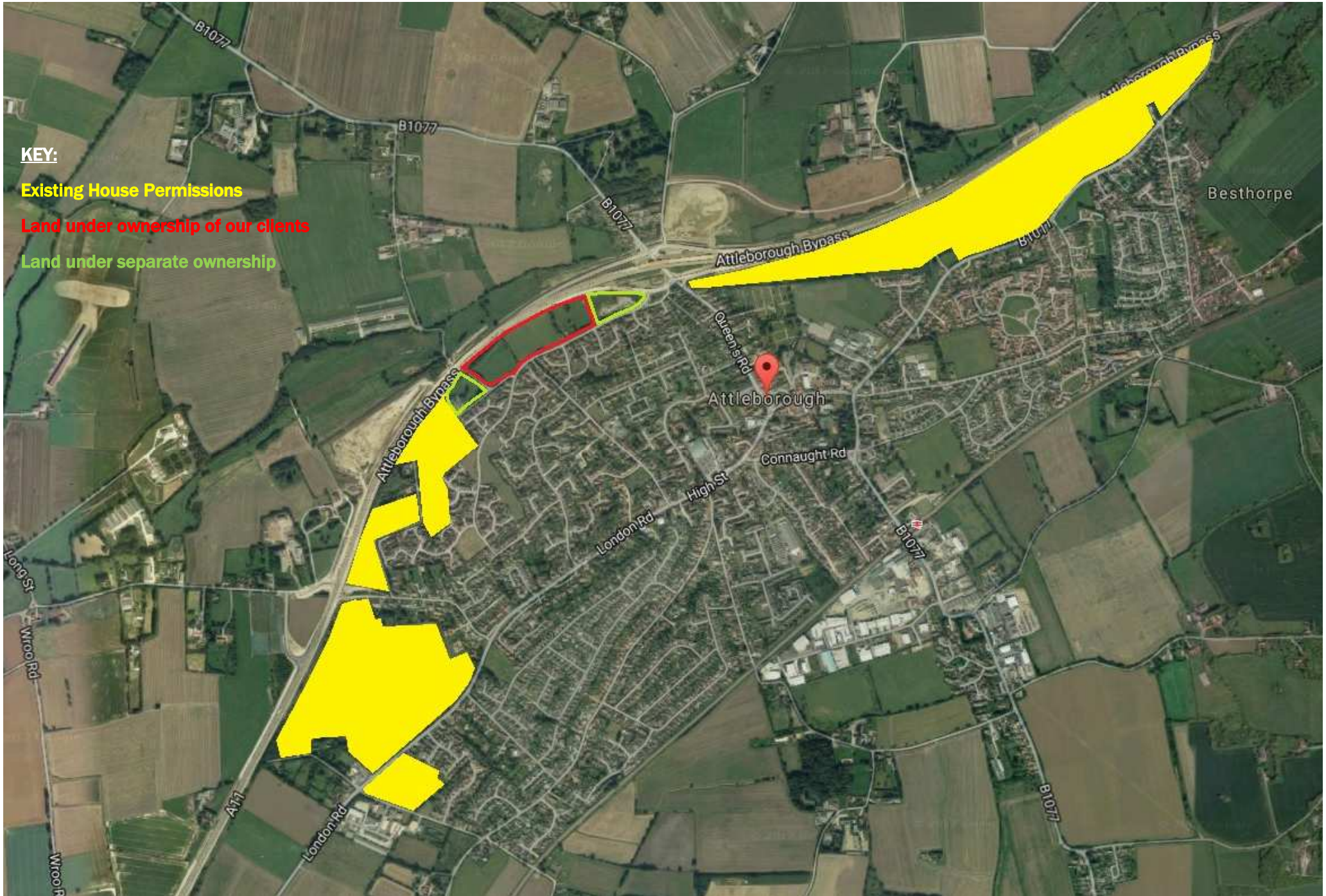
**10. Do you wish to be:** (Please tick appropriate boxes)

<b>Notified of the Submission</b>	✓
<b>Notified of the Inspectors Recommendations</b>	✓
<b>Notified of the Adoption</b>	✓

<b>Declaration:</b> I understand that the details included on this form will be available in the public domain. (please tick box)	✓
<b>Signature: A Slater</b>	<b>Date: 04/10/17</b>

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**KEY:**

Existing House Permissions

Land under ownership of our clients

Land under separate ownership

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### Part 1: Your Contact Details

Name: Paul LeGrice	
Organisation: Abel Homes 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: Garth Hanlon	
Organisation: Savills (UK) Ltd	
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	Breckland's Strategic Vision – Page 13
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).

<b>Legal Tests</b>	
Is the plan legally compliant?	
<b>Soundness Tests</b>	
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)**

Support is given to Breckland's Strategic Vision. In particular support is given to the following text. It is however suggested that there is a minor change to support services and facilities throughout the District.

*"By 2036 Breckland's settlements and its wider rural area will have developed in a sustainable manner appropriate for the rural nature of the District; building on its achievements and strengths to deliver an improved quality of life for its next generation of residents... and will be better placed to attract investment and jobs into the District..."*

*"...New development will be directed to locations that are co-ordinated with transport provision, have good access to support existing services, community facilities and open space..."*

*"Services and facilities will be supported and prized ~~in rural villages~~. A sense of local community and belonging will be maintained and reinforced, with decisions made at community level reflected in development proposals through the consideration of Neighbourhood Planning..."*

*"...Through working with stakeholders and partners, strong working relationships will be delivering improved health care and wellbeing to meet the needs of the communities."*

**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.**

In response to Breckland's Strategic Vision it is considered that the comments raised can be adequately dealt with by written representation.

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

<b>Notified of the Submission</b>	✓
<b>Notified of the Inspectors Recommendations</b>	✓
<b>Notified of the Adoption</b>	✓

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

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<h2 style="margin: 0;">Breckland Local Plan Pre-Submission Publication Representation Form</h2>
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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](mailto: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: Paul LeGrice	
Organisation: Abel Homes 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: Garth Hanlon	
Organisation:	
Address:	
Post code:	Telephone:
E-mail: <a href="#">g</a>	

**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	Draft Policy HOU 01
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).

<b>Legal Tests</b>	
Is the plan legally compliant?	
<b>Soundness Tests</b>	
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)**

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 14<sup>th</sup> 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."*

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

The Plan needs to make full provision for OAN

**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)

<b>Notified of the Submission</b>	✓
<b>Notified of the Inspectors Recommendations</b>	✓
<b>Notified of the Adoption</b>	✓

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

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**Part 1: Your Contact Details**

Name: Paul LeGrice	
Organisation: Abel Homes 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: Garth Hanlon	
Organisation: Savills (UK) Ltd	
Address:	
Post code:	
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	HOU 02
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).

<b>Legal Tests</b>	
Is the plan legally compliant?	
<b>Soundness Tests</b>	
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)**

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 throughout Breckland focusing the majority of growth at Key Settlements and the Market Towns, including Swaffham.

- Key settlements = 50%
- Market Towns = 28%

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.

In respect of **Swaffham**, the District Council has suggested that there should be growth of 1,612 dwellings throughout the plan period 2011-2036. It is however noted that in the period 2011 to 2016 there have been a number of speculative applications within the town. It is stated at paragraph 3.148 that 525 dwellings are currently proposed through planning applications with decision to grant subject to S106. As such, only one of the proposed allocation sites, Land off New Sporle Road, (North) 'LP[097]008' does not currently benefit from planning permission or a resolution to grant planning permission.

It is our view 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 and consequently should be allocated for development. Located to the south of the town the site not only delivers new housing but also includes provision for facilities that are currently lacking in this part of Swaffham.

Accordingly the Local Plan should allocate this site west of Brandon Road , Swaffham for mixed use development. Given the location of the site outside the present settlement envelope, we comment on the landscape , ecology and accessibility issues as it relates to the site . These are considered below.

Landscape issues

The site is located on the southern edge of Swaffham, a market town within the district of Breckland. (see enclosed plan) The town of Swaffham lies at the northern edge of the Brecks. The identity of this region is based on a particular land-use history, with ancient heathland once covering huge areas of the Brecks. The underlying chalk geology has produced a low, gently undulating plateau, largely covered with sandy soils of glacial origin. The Brecks is sandwiched between the more fertile, and more wooded, clayland plateau to the north, east and south, and the level drained peat and silt fens to the west.

The Brecks can be characterised as a lowland rural landscape comprising a simple, large scale mosaic of mixed and coniferous plantations, arable agriculture and lowland heathland. The large-scale pine plantations of Thetford Forest, and the use of modern farming technology have transformed much of the

Brecks, and two thirds of the area is now used for vegetable and cereal production.

Swaffham is a historic market town with a large, characterful marketplace at its centre. The earlier prosperity of the town is evident in a series of fine buildings grouped around the marketplace in the town centre, many of them dating from the 18<sup>th</sup> century, and in the impressive parish church.

Swaffham is located on a plateau, and this landform is typical of the wider Breckland landscape. There are slight undulations across the area, and the elevation within the town ranges from 60-75m AOD. The town is notable for its lack of rivers, and the town used to be served by a series of wells as recently as the 19<sup>th</sup> century. The land to the south of the town tends slightly downwards. Certain undulations within the plateau can be perceived; Watton Road for example sits within a gentle fold in the landscape, and is thus lower relative to the town.

A number of routes converge on the town. The primary routes in the vicinity of the town are Brandon Road (A1065), which follows a line southward to Brandon; Castle Acre Road (A1065), which is aligned northwards to Castle Acre, and the A47, which by-passes the town to the north. A number of lesser roads also converge on the town. These include Beachamwell Road and Cley Road which run south-westwards from the settlement, and Watton Road which runs south-eastward. See Figure 1: Location plan.

The site is located at the southern edge of the town. To the north, the site adjoins 20th century suburban development at Sutton Road, Ranworth Close, Ormesby Drive, Surlingham Drive and Hoveton Drive. The housing comprises a mix of single, one and half, and two storey dwellings with private gardens.

The A1065 Brandon Road follows the eastern edge of the site. A group of sycamores is present on highway land adjoining the south-eastern edge of the site. The Redlands Park development can be found on the eastern side of the road. Redlands Park comprises a large housing development on the site of a former factory. The housing is typically two storeys high and has a suburban character. Houses within the Redlands Park development are set back from Brandon Road by some distance, with an area of amenity green space between the buildings and the road. There are around 15 properties, fronting onto the open space, which overlook the site. The site immediately north of Redlands Park is referred to as the Swans Nest site and is currently being developed by Abel Homes

Agricultural land currently in cereal production extends southwards from the proposed site west of Brandon Road. This area of countryside is sparsely settled; however, Brandon Road forms a prominent north-south route through the area. The field pattern comprises large, geometric enclosures, separated by hedges and tree lines. Further to the south there is a series of woodland blocks. These include Stags Heath which is an area of mixed woodland on former heathland, and extensive areas of coniferous woodland within the Swaffham Heath plantation, which is owned by the Forestry Commission. Beyond this is an area of sparsely settled countryside comprising a mix of plantation woodland and farmland.

To the west is an area of arable farmland which is generally used for cereal cultivation. Again, the field pattern is made up of large geometric fields separated by boundary hedgerows, tree lines and woodland blocks. Cley Road runs south-westwards from Swaffham towards Cockley Clay, passing through the countryside to the west of the proposed site. To the west of Cley Road is Swaffham Golf Club, Snails Pit Farm, and further arable farmland.

The site is located at the southern edge of the town and is adjacent to the A1065 Brandon Road. The A1065 is part of the primary route networks and carries traffic north-south through the centre of Swaffham. The A1065 Brandon Road represents the principle route into the town from the south, and as such the site is located at an important gateway into the town. The town of Swaffham forms a nucleated settlement, with the town originally developing around the historic marketplace. The urban area expanded significantly to the south during the twentieth century with the development of private housing estates, a leisure centre and schools. The settlement edge is clearly defined, with housing estates adjoining the surrounding farmland. The urban edge tends to be defined by the rear gardens of residential properties, with little in the way of screen planting. Built form is prominent in views from the surrounding area, creating a harsh urban edge. There is a strong distinction between the town, which forms a nucleated settlement, and the sparsely settled countryside beyond.

Whilst new development is often poorly integrated into the surrounding landscape, with little screen planting, it is noted that views towards the town from the south are somewhat restricted. The plateau landform means that existing dense vegetation and buildings form effective screening elements. Blocks of Woodland and an avenue of mature trees at Cherry Tree Farm prevent longer-distance views from the road towards the town. To the north of this, views towards the settlement from the road are partially filtered by the hedgerow adjoining the highway. From this section of road the urban edge is already apparent with development at Redlands Park, on the eastern side of Brandon Road.

The southern gateway to the town is marked by a roundabout which provides access to the Redlands Park housing estate from Brandon Road. The residential development extends along the eastern side of Brandon Road and gives the road a partially urbanised character.

The Peddars Way is a promoted long-distance footpath which starts in the Brecks, to the east of Thetford, and follows a line NNW towards Hunstanton, on the north Norfolk coast. The path follows the course of a roman road. The Peddars Way runs through open countryside to the east of Swaffham, and is approximately 3.1km from the site at its nearest point.

There is no public access onto the application site. However, the following public rights of way can be found in the vicinity of the site:

- Public Footpath No. 61 from Watton Road to Brandon Road. This path commences from a point close to Carol House and continues westwards to Brandon Road, just beyond Bride's Pit.
- Public Footpath No. 62 from Watton Road to Brandon Road. This path commences from the junction of Dulgate Lane and Watton Road immediately to the east of the site, westwards to Brandon Road, between the Swans Nest and Redlands Park developments.
- Restricted Byway No. 48 from Cockley Cley Road to Brandon Road. This road starts from the Cockley Cley Road and follows in a straight line eastwards to the Brandon Road, to the south of Stags Heath woodland.
- Restricted Byway No. 49 from Brandon Road to Watton Road. This road starts from the Brandon Road, immediately opposite the end of Restricted Byway No. 48, and follows in a straight line eastwards to Watton Road.

#### Site features

The site is almost square in shape and covers an area of agricultural land at the southern edge of the settlement. The main part of the site represents a single, large, broadly rectangular field to the west of Brandon Road. The site boundary extends slightly further west up to the edge of the existing adjacent development to take in a part of two adjoining fields.

The site is located on a plateau and the site and its immediate surroundings are almost flat, with no significant topographical features.

The site is currently in agricultural use and the main field within the site is used for cereal cultivation. The north-western corner of the site comprises a small parcel of land which is part of a larger field. This portion of the site is not actively cultivated and currently has a tall grassland cover. The south-western part of the site forms a part of a large field which is actively used for cereal cultivation.

Vegetation cover is limited to a block of woodland at the southern edge of the site, boundary hedgerows around the perimeter of the site, and short lengths of hedgerow/hedgerow trees within the interior of the site. The woodland plantation is rectangular in form and dates from the early 20th century. The woodland is indented into the main field and adjoins the southern site boundary. It appears that the woodland was planted around two historic ponds, and comprises Scots pine around the perimeter, with broadleaved trees in the centre. Many trees within the woodland are mature trees and have reached 15-20m tall.

There are no built structures or areas of hardstanding on the site.

The northern site boundary adjoins the rear gardens of residential properties at Sutton Road, Ranworth Close, Ormesby Drive, Surlingham Drive and Hoveton Drive. A variety of boundary features are present including hedgerows, close board fences, and post and rail fences, which exert a domestic influence. The eastern boundary hedgerow adjoining Brandon Road is approximately 2m tall and is dense and bushy. The southern boundary is marked by a field hedgerow. The condition of the southern boundary hedgerow is declining and it has developed gaps. The western site boundary runs through existing fields and is not marked by any physical feature. The boundary between the main field and the fields to the west would originally have been marked by a hedge; however, much of the woody vegetation is now lost. The boundary between the two fields in the western part of the site is marked by a mature hedge including a line of mature hedgerow trees.

There is no public access on to the site.

The site is currently accessed via a farm track along the southern site boundary that extends westwards from Brandon Road. There are no tracks within the site itself.

We would confirm that there are no scheduled AONBs in this area. A designated Conservation Area covers the centre of Swaffham and there is no inter-visibility between the conservation Area and the site. There are no Ancient Woodlands within the site. The nearest Scheduled Monuments are located some 800 metres distant from the site. There are no listed buildings on the site nor is the land subject to an registration in terms of Parks and Gardens.

An SSSI lies some 240 metres south of the site.

Regarding the visual context of the site itself, the site is relatively contained. Existing suburban development, extending along the northern edge of the site, limits views from the north. The Redlands Park housing development to the east of Brandon Road (which is in the process of being built out) limits views from the east. The site is more open to the south and west. The site is potentially visible from roads and public rights of way to the south and east of the site, principally Brandon Road and Cley Road. Views towards the site from these roads are partially contained by existing hedgerows which line the roads. A block of coniferous plantation woodland, forming part of a Forestry Commission plantation on Swaffham Heath, is located approximately 250m south of the site and this prevents views longer-distance towards the site from the south.

### Ecology

On ecological issues, breeding bird surveys, bat roost and activity surveys and hedgerow surveys were undertaken in 2017 as part of the proposals for the site.

The site itself is primarily arable farmland and the bird assemblage reflects this with good numbers of birds typical of farmland with 12 pairs of skylark and 8 pairs of yellowhammer. Additional species nesting on adjoining farmland were willow tit and barn owl. Both of these were recorded foraging within the footprint of the scheme. No stone-curlews were noted during any of the surveys of the site or any of the adjacent fields.

To the south of the site there are extensive areas of woodland which provides potential habitat for SPA designated species such as woodlark, nightjar and other typical Breckland species such as crossbill, goshawk and hobby. Although this area was outside the main survey area, survey transect walks (daytime and nocturnal) along the northern perimeter of the woodland found no sign of woodlark or nightjar presence in the woodland bordering the site and surrounding fields. Both of these species would require cleared areas with open ground for breeding. No such areas are currently present along the northern edge of this part of the forest.

The woodland blocks to the south of the site are also favoured by other birds of prey with red kite. Red kites were recorded on three occasions over the woodland and on two occasions seen directly over the site. Given the frequency of kite sightings it is believed this species breeds locally but not in the immediate vicinity of the site. Large numbers of common buzzard were observed over the woodland to the south of the site with 21 individuals observed in the air simultaneously on 8<sup>th</sup> March indicating a very high density of this species. Common buzzards were also recorded regularly over the site with four different common buzzard breeding territories located in the woodland block adjacent to south of the site.

Regarding the bat surveys, A day roost of a single common pipistrelle bat was recorded in a mature hedgerow tree at the north-west of the site. No other bat roosts were recorded. Bats were recorded moving on to or through the site shortly after sunset from possible roosts in houses to the north and the farm to the west off site. Bat activity was low to moderate on site and mainly restricted to the small mixed plantation to the south of the site, southern hedgerow, around a hedgerow tree to the west of the site and the hedge to the north-west of the site. Bats generally avoided the eastern hedge which was lit by the road and were not recorded using the main arable field on site.

Concerning hedgerows, Four hedgerows were identified on site for further survey in accordance with the Hedgerow Regulations. None were classified as 'Important Hedgerows'. Information on the hedgerow species composition can be used for any compensation and enhancement requirements.

There are opportunities afforded by the design for the development to achieve beneficial ecological enhancement, using guidance in the Norfolk Biodiversity Action Plan. These include:

- Ensure the establishment of replacement hedgerow trees either through hedgerow management or new planting of suitable native stock.
- Establish new hedgerows including new Scot's pine hedges which are typical of the Brecks.
- Provision of bat boxes in the plantation woodland/hedgerow trees
- Provision of integrated swift/bird boxes on the houses

#### Accessibility

The site is located on the southern edge of the town in an area where significant residential growth has occurred in recent years. Two major sites are currently under construction. Both sites required the necessary investment into footpaths and cycleway leading to the town centre together with a major new roundabout which not only provides appropriate access to those new housing sites but also provides an important traffic calming role as one approaches and leaves Swaffham .

Our development proposals as shown on the enclosed illustrative masterplan seek to plug into this roundabout and thus exploit the highways infrastructure which is already in place . In addition, our proposals would need to include the provision of a new footway within our site to connect into the footway to the north and on the western side of Brandon Road.

The opportunity now exists for our site to bring forward facilities such as a surgery and retail outlets that are sadly lacking in this part of the town. The provision of such facilities may allow for the reduction in the number of journeys that would otherwise take place on the highway network and therefore there are good sustainability reasons for supporting our site being allocated within the Plan.

#### Conclusion

In the light of the above, we object to the local plan in that it fails to allocated our site west of Brandon Road for development. Consequently, we consider our site to be an Omission Site in the context of this Local Plan representation.

We consider the plan needs to be amended to include a new Local Plan Policy to include the following wording and which by implication would require the necessary proposals map 3.2 to be amended to include our site.

New policy to read:

#### **“Land West of Brandon Road**

**Land amounting to approximately 13.7 hectares is allocated for mixed use development of approximately 160 dwellings, retirement homes, a 50-60 bed care home, a local medical centre and local shops**

**A minimum of 1 Local Equipped Area for Play (LAP) will be provided on site. New development will be permitted subject to compliance with adopted policies in the Local Plan and the following criteria:**

- 1. Principal highway access is provided from the roundabout on Brandon Road;**
- 2. The layout and design of the site will provide an appropriate response to the established pattern of development along Brandon Road and respect the site's location as a key gateway into Swaffham;**
- 3. 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.**
- 4. 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.”**

**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.**

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 Limited

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

<b>Notified of the Submission</b>	✓
<b>Notified of the Inspectors</b>	✓

<b>Recommendations</b>	
<b>Notified of the Adoption</b>	✓

<b>Declaration:</b> I understand that the details included on this form will be available in the public domain. (please tick box)	✓
<b>Signature:</b>	<b>Date: 02.10.2017</b>

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**Part 1: Your Contact Details**

Name: Paul LeGrice	
Organisation: Abel Homes 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: Garth Hanlon	
Organisation: Savills (UK) Ltd	
Address:	
Post code:	

**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	1.41
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).

<b>Legal Tests</b>	
Is the plan legally compliant?	
<b>Soundness Tests</b>	
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.**

**Strategic Objectives – Page 14, paragraph 1.41**

We support the following objectives:

Development in the Right Place  
3) Make sure the majority of development is focused into areas where services are available, and where facilities can be supported;

Meeting the Housing Need  
4) Deliver housing that meets the needs of the community and local economy through the concentration of development in the Strategic Urban Extensions of Attleborough and Thetford and where services and facilities can be supported within or adjacent to the market towns of Dereham, Swaffham and Watton and the local service centres...

5) Support the development and maintenance of a balanced housing market and a variety of decent, affordable housing which meets the needs of all local people and supports economic and community development;

A Strong Economy

A Rich Environment  
13) Promote a safe and healthy environment, and high quality design minimising the impacts of development and ensuring quality of life and sense of place;

Thriving Communities  
16) To improve the health and well-being of our communities by reducing health inequalities, promoting healthy living and supporting locally accessible, high quality health care;  
17) To protect and enhance community facilities and services and maximise accessibility to them; and  
18) To encourage and facilitate a sense of community and belonging, and make sure decisions are made at community level as far as possible (through implementation of this plan and through Neighbourhood Planning).

**Is 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)

<b>Notified of the Submission</b>	✓
<b>Notified of the Inspectors Recommendations</b>	✓
<b>Notified of the Adoption</b>	✓

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

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## Wicks, Natalie

---

**From:** Gillian de Cruz  
**Sent:** 02 October 2017 16:34  
**To:** Planning Policy Team  
**Cc:**  
**Subject:** Clerk; John Carey Bennett  
Re: Emerging Local Plan

Dear all

As I have submitted my comments already; albeit to a website that was meandering, unhelpful, unclear and contained little guidance or help to the end user; And because I am currently away on holiday in the Maldives (enjoying a thunderstorm after 5 days of glorious sunshine) I would again give my comments and categorically state:

"IF you are TRULY interested in taking representative view of your emerging plan, please take all comments in WHATEVER format and Pay attention to them!"

I cannot access your stated form ( nor find it in your ridiculously complex website)

...SO

...Please take these comments and ~copy and paste~ into your correct format to meet your bureaucracy that will then ignore reality anyway no doubt.

"My Immediate areas of concern) are in regard to the following highlighted Developments:

- Dereham - West of Shipdham Road - 130 dwellings
- Dereham - East of Shipdham Road - 290 Dwellings
- Shipdham - Old Post office lane - 25 Dwellings
- Shipdham - Brick Kiln Lane 55 dwellings
- Watton - 175 dwellings
- Business Development on Shipdham Airfield (Cranworth)

all of which state ease of access onto A1075..... (and then obviously through Shipdham). However no Improvement to road infrastructure is noted anywhere other than at the A47/A1075 junction.

We have already raised our concerns within Shipdham regarding the A1075 through the village carrying heavy articulated lorries, huge farming machinery and in addition enormous pieces of crane, these all have to come around the curve in the road around the church. The church wall has been hit a number of times. However the huge vehicles met on the bend are also extremely hazardous to oncoming vehicles forcing them to stop. This IS an accident waiting to happen but still plans for increased housing and traffic are put forward without joined up thought for the infrastructure.

I also note that Shipdham is classified as a Local Service Centre (LSC) so we ought to be looking at "Developer Contribution" funding for improvement of local facilities (e.g. the rebuilding of the Village Hall which is stated as being a key factor in the LSC classification).

Further I note that Watton has previously received Lottery grant money to improve the Watton to Griston traffic free zone. Perhaps that is something for consideration with the ever increasing traffic flow through the village to provide safe walk ways for children and adults to Bullock Park"

All of these comments are blinding obvious to anyone with a functioning brain. Build your houses; ignore the failed infrastructure issues and when either someone is killed or a village destroyed, sob silently into your sleeves

Regards  
Gillian de Cruz "

Your emerging plan

Regards G - via iPhone

On 2 Oct 2017, at 17:44, John Carey Bennett <

Dear Planning Team and District Councillors

I attach the completed Representation Form and have explained my reasons for submitting my Comments and my opinion that the Emerging Local plan is unsound and in what respects  
Yours sincerely

John Carey Bennett

On 29 September 2017 at 15:03, Planning Policy Team  
<[Planning.PolicyTeam@breckland.gov.uk](mailto:Planning.PolicyTeam@breckland.gov.uk)> wrote:

Dear Mr Bennett,

Please would you be able to put your comments into the attached representation form? As you believe the Local Plan to be unsound, either question 4 or 5 must be filled in.

Kind regards,

NR19 1EE

Submit Planning Applications online at <http://www.planningportal.gov.uk/apply>



*Think of the environment...please don't print this e-mail unless you really need to*

**From:** John Carey Bennett [mailto:  
**Sent:** 28 September 2017 17:39  
**To:** Planning Policy Team  
**Cc:** Hewett, Paul; Turner, Lynda  
**Subject:** Emerging Local Plan

Dear Planning Policy Team

Please accept these comments about the Plan and the Road Transport Infrastructure

Dear District Councillors

FYI

Regards

J C Bennett

--

John Carey Bennett  
The Granary,

Click [here](#) to report this email as spam.

\*\*\*\*\*  
\*\*\*\*\*

Unless expressly stated otherwise, the contents of this e-mail are confidential, represent only the views of the sender expressed only to the intended recipient and are not intended to impose any legal obligation upon Breckland Council.

If you are not the intended recipient, you are asked to notify the sender and delete the message as soon as possible.

\*\*\*\*\*  
\*\*\*\*\*

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pdf>



Personal Address

planningpolicyteam@preckland.gov.uk

Add Cc | Add Bcc | Add Reply-To | Add Followup-To

Subject: Gt. Ellingham

Understand on good authority that Gt. Ellingham, has already exceeded the numbers required over the 'plan period', therefore further  
The majority of the villagers dislike the fact that too many houses have already been allocated to our very rural village, spoiling  
very IMPORTANT FACT WE WISH TO REMAIN AN UNSPOILT VILLAGE.

The infrastructure hasn't changed for the better over the years, in fact, since development here and in Attleborough, the services  
and understaffed, hard to cope with the influx of families from all new housing. Very little employment, if any, within the village  
to the limit with the new intake of people going outside of the areas for 'jobs'.

Our roads too narrow to cope with the extra cars and not 'built to accommodate' all the extra traffic, which obviously makes walki  
more of a danger. So much more to add, against all the new properties, is the fact, we enjoy the peacefulness, the village atmosphe  
the possible 'greed' of the over selling of land to property developers, destroying our picturesque village, please, no more, we've  
development'.

Residents.... Church St. and Chequers Lane. Gt. Ellingham.

To » Cc »

Send now

Cancel



1st October 2017

Dear Sir/Madam

Local Plan Public Consultation

I know it was very late in the day but I tried today to comment on the latest local plan public consultation. I used to work in the Planning Department, albeit in a junior capacity, so thought I should be able to do so quite easily.

I met my first obstacle – one has to register with a password to make a comment on the plan which I tried to do but failed – I think. It said to await an e.mail but gave no indication as to how long one would have to wait. The “help” button did not answer my query.

On a Sunday I was rapidly losing the will the live. I then decided to go back to the old fashioned letter to put my views to you.

Why should it be so difficult to make a simple comment – is it made difficult so that you get no response from ordinary members of the public – and then assume that they agree with all the proposals?

The gist of my comments, with particular reference to Dereham, is that before large housing development sites are included in the plan – that all the correct infrastructure is put in place. To ignore the need for a comprehensive traffic system, adequate supply of jobs and other requirements such as doctors and schools would only store up trouble for the next Local Plan period. Developers should also have to supply adequate open space with proper facilities. One only has to look at the problems with the development on the outskirts of Norwich where the roads were not completed and the developer went conveniently bankrupt. Developers promise the earth and then once permission is granted there is some reason promises are not met.

I note that this happened when Crisp Maltsters stated they would open up the maltings in the Town and then “surprise surprise” - once housing development had been approved, this is not going to happen.

We all know that developers should contribute but not on a piecemeal basis. Why should a Town be ruined – Planners should do a proper job and plan not just respond to developers and landowners who are hoping to get rich quick. Hopefully the Dereham Neighbourhood plan will give a sensible solution. We need good quality, well planned affordable housing. Perhaps Breckland should build a new estate of Council owned properties. The wholesale disposal of Council homes and the setting up of housing associations really did store up trouble.

I have written to Councillor Duigan about this matter.

I look forward to receiving an acknowledgement and reply to this letter.

Yours faithfully

Valerie Baker (Mrs)

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**Part 1: Your Contact Details**

Name: <u>DAVID J. PURPLE</u>	
Organisation: <u>THEATRE ROYAL SURGERY WALKING GROUP</u>	
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).

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

**The fields traditionally flood-** it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that because the adjoining Shillings Lane is lower that flooding of the lane once a rare occurrence now occurs frequently- Development as proposed will further increase this flooding.The likely impact on the risk of flooding elsewhere as a result of an increase in the volume of run off post development. **Contrary to NPPF paragraphs 103 and 109**

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

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.

**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
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--

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

<b>Notified of the Submission</b>	
<b>Notified of the Inspectors Recommendations</b>	x
<b>Notified of the Adoption</b>	

<b>Declaration:</b> I understand that the details included on this form will be available in the public domain. (please tick box)	x
<b>Signature:</b>	<b>Date:</b> 20 <sup>th</sup> SEP 2017

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**Part 1: Your Contact Details**

Name: <i>PHIL EGGLETON</i>	
Organisation:	
Address:	
Post code:	Telephone:
E-mail:	

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

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

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

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

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**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.

--

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

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

<b>Notified of the Submission</b>	<b>x</b>
<b>Notified of the Inspectors Recommendations</b>	<b>x</b>
<b>Notified of the Adoption</b>	<b>x</b>

<b>Declaration:</b> I understand that the details included on this form will be available in the public domain. (please tick box)	x
<b>Signature:</b>	<b>Date:</b> 23/10/17

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**Part 1: Your Contact Details**

Name: <i>NIGEL BAILEY</i>	
Organisation:	
Address:	
Post code:	Telephone:
E-mail:	

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

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

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

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

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

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

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

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

<b>Legal Tests</b>	
Is the plan legally compliant?	
<b>Soundness Tests</b>	
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)**

<b>Notified of the Submission</b>	<b>x</b>
<b>Notified of the Inspectors Recommendations</b>	<b>x</b>
<b>Notified of the Adoption</b>	<b>x</b>

<b>Declaration:</b> I understand that the details included on this form will be available in the public domain. (please tick box)	x
<b>Signature:</b> _____	<b>Date:</b> 23-9-17

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**Part 1: Your Contact Details**

Name: <u>Philip Morton</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)	<b>X</b>

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

Policy	
Paragraph	
Site	<b>Land to the west of EtlingView (LP[025]007</b>
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).

<b>Legal Tests</b>	
Is the plan legally compliant?	
<b>Soundness Tests</b>	
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.

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

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

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

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

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

<b>Notified of the Submission</b>	x
<b>Notified of the Inspectors Recommendations</b>	x
<b>Notified of the Adoption</b>	x

<b>Declaration:</b> I understand that the details included on this form will be available in the public domain. (please tick box)	x
<b>Signature:</b> _____	<b>Date:</b> 22/9/17

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**Part 1: Your Contact Details**

Name: <u>Miss T. A. Walby</u>	
Organisation: <u>/</u>	
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	
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Proposals Map	
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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).

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Is the plan legally compliant?	
<b>Soundness Tests</b>	
Is the plan positively prepared?	X
Is the plan justified?	X
Is the plan effective?	X
Is the plan consistent with national policy?	X

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

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

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

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

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

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

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

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

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

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

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

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

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

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

/
---

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

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

<b>Declaration:</b> I understand that the details included on this form will be available in the public domain. (please tick box)	x
<b>Signature:</b> _____	<b>Date:</b> 18/9/17

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**Part 1: Your Contact Details**

Name: <b>MRS J. WRIGHT</b>	
Organisation:	
Address:	
Post code:	Telephone:
E-mail:	

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

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**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

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

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Is the plan legally compliant?	
<b>Soundness Tests</b>	
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)	