

Breckland District Council

Examination of the Breckland District Local Plan (2011 – 2036) (the Plan)

Schedule of Matters and Issues for the Examination

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Matter 1 – Legal requirements

Duty to co-operate

- 1.1 Overall, has the Plan been prepared in accordance with the Duty to Co-Operate imposed by Section 33A of the Planning & Compulsory Purchase Act 2004 (as amended)?

Other legal requirements

- 1.2 Has the Plan been prepared in accordance with the Council's Statement of Community Involvement and met the minimum consultation requirements in the 2012 Regulations?
- 1.3 Is the Sustainability Appraisal (SA) adequate? Has the Plan's formulation been based on a sound process of SA and testing of reasonable alternatives?
- 1.4 Has the Habitats Regulation Assessment (HRA) been undertaken in accordance with the Regulations?
- 1.5 The HRA does not rule out the potential for likely significant effects on the Brecks Special Protection Area (SPA) from the proposed site allocations in Swaffham, Watton and Narborough. This is due to a lack of data in terms of functional land (between 1500 metres and 3 km from the SPA) for Stone Curlew. The HRA advises that the provision of project level HRAs will be required to demonstrate that there would be no significant effects. Is this an appropriate approach? Does this fulfil the requirements of the Regulations?
- 1.6 Has the Plan been prepared in accordance with the Council's Local Development Scheme?
- 1.7 Does the plan include policies designed to secure that the development and use of land contribute to the mitigation of, and adaptation to, climate change?
- 1.8 Which documents make up the policies map?

Matter 2 – The Vision and Strategic Objectives

Issues

- 2.1 Is the vision justified and consistent with national policy?
- 2.2 Are the strategic objectives justified and consistent with national policy?

Matter 3 – Housing: the objectively assessed need for housing and the housing requirement (Policy HOU 01)

Issues - OAN

- 3.1 Is the Objectively Assessed Need (OAN) figure of 612 dwellings per annum (dpa) as identified in the Strategic Housing Market Assessment (SHMA) justified?
- 3.2 Does the SHMA methodological approach to establishing the OAN follow the advice set out in the Planning Practice Guidance (PPG) (under the heading 'Methodology: assessing housing need')?
- 3.3 The OAN is based on applying a 10 year migration trend (2005 to 2015) to the ONS 2014-based sub-national population projections. Why is this more appropriate than the 'starting point' estimate provided by the latest Government household projections? What is the difference from the 2014 based projections?
- 3.4 An uplift has been added to the OAN to take account of concealed families and homeless households. How has the figure of 42 dpa (approx. 1.5% uplift) been arrived at and is it justified?
- 3.5 A further uplift of 8.5% has been added to reflect market signals (to improve affordability). How has this figure been arrived at and is it justified? Is the uplift sufficient to address affordability issues?
- 3.6 Is it justified and consistent with the PPG methodology to subtract the uplift from concealed families and homeless households from the market signals uplift?
- 3.7 Does the SHMA take into account any accrued housing shortfall before 2011? If so, how?
- 3.8 Does the OAN provide enough new homes to cater for those likely to take up the new jobs expected in Breckland over the Plan period?

- 3.9 What relevance can be afforded to the Local Plan Experts Group recommendations and the Government's consultation planning for the right homes in the right places standard methodology?

Issues – Housing Requirement

- 3.10 Should the housing requirement be amended to reflect the 'City Deal', which plans for an additional 13,000 additional jobs?
- 3.11 Are Broadland, Norwich, South Norfolk seeking to meet the additional need for housing as a result of the 'City Deal' in full?

Matter 4 – Housing: the supply of land for housing, deliverability and viability

Issues - Overall Supply

- 4.1 Policy HOU 01 sets out that 15,298 new homes are needed over the Plan period. Policy HOU 02 indicates that 15,950 house could be delivered. What is the justification for planning for a supply around 4% above the Plan requirement?
- 4.2 Why do the projected completions in Appendix 1 Housing Trajectory of the Plan not conform to the anticipated completions in the Council's latest Housing Land Supply Statement, published July 2017 (Table on Page 9)?
- 4.3 Are the projected completions in the Housing Trajectory based on a realistic assessment of the likely timing of housing delivery? What evidence is there to support the completions shown for each year, and what assumptions have been made?
- 4.4 Are the projected completions in the Housing Trajectory based on a sound assessment of infrastructure requirements and their deliverability?

In answering the above two question, please can the Council produce a diagram (a gantt chart or similar) showing the level of anticipated housing delivery for each allocated site on a year by year basis, along with the delivery of the infrastructure needed to support the new homes. It may help to group sites on a settlement by settlement basis. A column indicating the likely costs, funding sources and mechanisms to secure funding would also be of assistance.

- 4.5 In broad terms, is the housing development set out in Policy HOU 02 based on a sound understanding of financial viability?
- 4.6 How have the completions/ commitments and saved allocations for each settlement in Policy HOU 02 been calculated? Please could the Council have regard to:

- a) Are there saved housing allocations? If so, should these become new allocations?
 - b) How many homes have been completed since 2011?
 - c) How many other homes have been granted planning permission since 2011, but have yet to be completed?
- 4.7 Should an allowance for dwellings coming forward under Policy HOU 05 be included in Policy HOU 02?

Issue - Five Year Housing Land Supply

- 4.8 Should the Housing Trajectory include a 20% buffer, within the figures?
- 4.9 Why does the Council's latest Housing Land Supply Statement (July 2017) not use the proposed stepped trajectory set out in the Policy HOU 01?
- 4.10 Is the proposed stepped trajectory justified?
- 4.11 Is the SHMA OAN figure of 612 dpa, the most appropriate figure to consider shortfall against?
- 4.12 Is addressing the shortfall via the Liverpool method justified?
- 4.13 Will the Plan deliver a five year housing land supply on adoption?

Matter 5 – Housing: the settlement hierarchy and spatial distribution of new housing (Policies GEN 03, GEN 05, HOU 02, HOU 03, HOU 04 and HOU 05)

Issues

- 5.1 Is the proposed distribution of housing supported by the Sustainability Appraisal, and will it lead to the most sustainable pattern of housing growth?
- 5.2 Is the settlement hierarchy set out in Policy GEN 03 justified and based on robust evidence? Is each settlement in the right category?
- 5.3 Is the reliance on two large Strategic Urban Extensions to deliver 50% of the housing over the Plan period justified?
- 5.4 Is Policy GEN 05 justified and consistent with national policy?

- 5.5 Is the Percentage of Growth split across the settlement hierarchy identified in Policy HOU 02 justified and how has it been established?
- 5.6 Are the housing targets for additional dwellings in each settlement set out in Policy HOU 02 based on robust evidence? Exactly how have they been established?
- 5.7 How have the completions / commitments (2011-2017) for each settlement been identified? Is there evidence to suggest that the existing commitments will be implemented as anticipated?
- 5.8 Is the Plan positively prepared and justified, insofar that there is a reliance on windfall developments (under Policy HOU 03) coming forward to meet the housing target for some Local Service Centres?
- 5.9 What justification is there for the Plan not making provision for the identified housing target in some of the Local Service Centres (Kenninghall, Litcham, Mattishall, Necton, North Elmham and Old Buckenham)? What efforts were made by the Council to identify suitable sites?
- 5.10 Is Policy HOU 03 justified and consistent with national policy?
- 5.11 Is Policy HOU 04 justified and consistent with national policy? *(Please can the Council have particular regard to criteria 1, 2 and 3)*
- 5.12 Is Policy HOU 05 justified and consistent with national policy? *(Please can the Council have particular regard to criteria 2, 3 and 5)*
- 5.13 What are the exceptional circumstances referred to in Policy HOU 05?
- 5.14 Taking into account all of the above, overall, is the spatial distribution of housing justified?

Matter 6 – Affordable Housing (Policies HOU 07 and HOU14)

Issues

- 6.1 Is the OAN for affordable housing justified and in line with national policy and guidance?
- 6.2 Does the SHMA's approach to calculating affordable housing need, comply with the stages set out in PPG guidance?

- 6.3 Policy HOU 07 requires 25% of units of qualifying developments (11 dwellings or more) to be affordable. Is this justified and will this ensure that the OAN for affordable housing in the District is met? Is there a need to increase the housing requirement to help deliver more affordable housing?
- 6.4 Policy HOU 07 identifies that in 'exceptional circumstances' an off-site commuted sum may be acceptable. What are the exceptional circumstances?
- 6.5 Is an 'exceptional circumstances' 'test' more stringent than the approach set out in Paragraph 50 of the National Planning Policy Framework? If so, what is the justification for it?
- 6.6 Paragraph 3.58 of the Plan sets out that where relevant a £50,000 commuted sum per equivalent whole dwelling will be sought. Is this an appropriate figure? If so, should this not be included within the policy?
- 6.7 Is criterion iv. of Policy HOU 07, which states that affordable rented housing provided on-site should be maintained as affordable housing in perpetuity consistent with national policy?
- 6.8 To be effective, should Policy HOU 07 include a tenure split?
- 6.9 To be effective, should Policy HOU 07 refer to starter homes?
- 6.10 Is Policy HOU 14 justified and consistent with national policy?
- 6.11 Is the requirement for provision to be made for specialist housing in Policy HOU 14, where there is a local need, justified?

Matter 7 - Other Housing Types and Related Policies (HOU 09, HOU 10, HOU 11, HOU 12 and HOU 13)

Issues

Policy HOU 09 – Specialist Housing

- 7.1 What are the identified needs for housing for older people, particularly residential institutions (Use Class C2)?
- 7.2 Does the Plan do enough to ensure that the needs of older people are met?
- 7.3 What is considered to be a higher order settlement within criterion b.?

Policy HOU 10 – Technical Design Standards for New Homes

- 7.4 Are the Technical Design Standards for New Homes set out within Policy HOU 10 justified and consistent with national policy?
- 7.5 Is Policy HOU 10 supported by a robust assessment of viability that includes all Plan policy costs?
- 7.6 What is the status of the 'Optional Technical Standards Topic Paper' that has been referred to by the Council? Does this or should it form part of the examination evidence?

Policy HOU 11 – Residential Replacement, Extension and Alteration

- 7.7 Is Policy HOU 11 consistent with national policy and justified, in terms of its approach to replacement dwellings?
- 7.8 Is the criterion in relation to not being abandoned justified? Under what circumstances would this be relevant?
- 7.9 Is the last sentence of Policy HOU 11, which refers to the settings of listed buildings consistent with national policy?

Policy HOU 12 – Conversion of Buildings in the Countryside

- 7.10 Is the approach of Policy HOU 12 justified and consistent with national policy?

Policy HOU 13 – Agricultural Workers Exceptions

- 7.11 Should the title of the policy refer to rural workers to be consistent with national policy?
- 7.12 Is the last bullet point of Policy HOU 13 justified?

Matter 8 – Housing: provision for gypsies, travellers and travelling showpeople (Policy HOU 08)

Issues

- 8.1 Has the need for additional pitches and plots been robustly calculated?
- 8.2 To be positively prepared, should the Plan make provision for the identified need for additional pitches and plots through a site allocation(s)?

8.3 Is Policy HOU 08 justified and consistent with national policy?

Matter 9 – Economic Development (Policies EC 01, EC 02, EC 03, EC 04, EC 06, EC 07 and EC 08)

Issues

- 9.1 Is the need for additional employment land set out in Policy EC 01 justified and are the figures based on robust evidence? Is the Employment Growth Study (2013) up-of-date?
- 9.2 The Employment Growth Study (2013) only considers the period up to 2031. How has the Council considered need up to 2036?
- 9.3 The Employment Growth Study (2013) when considering different growth scenarios includes a labour supply scenario, based on a housing need estimate of 699 dpa, which is higher than that identified OAN in the Plan at 612 dpa. What is the justification for this? Does this have implications on the calculation of need?
- 9.4 How has an additional need figure of 64 hectares of employment land, as set out within Policy EC 01, been arrived at?
- 9.5 How many jobs is 64 hectares of additional employment land likely to generate? Does this correlate with the anticipated job growth set out in the SHMA?
- 9.6 Is the overall distribution and quantum set out in Policy EC 01 for each settlement justified?
- 9.7 To be effective should Policy EC 01 include safeguarding measures to control the loss of employment land?
- 9.8 Is the approach to Snetterton Heath in Policy EC 02 justified and effective?
- 9.9 Where is area LP[087]010 identified on the proposals map? Which area of land does Policy EC 02 relate?
- 9.10 Is the approach of Policy EC 03 to safeguarding General Employment Areas (as shown on the proposals map) justified and effective? Could it lead to sites that are no longer suitable for employment uses lying derelict for long periods of time?

- 9.11 Is the approach to mixed-use development in Policy EC 03 justified and effective?
- 9.12 Is the approach to employment development outside General Employment Areas in Policy EC 04 justified and effective?
- 9.13 Is the approach to farm diversification in Policy EC 06 justified and effective?
- 9.14 Is the approach to tourism related development in Policy EC 07 justified and effective?
- 9.15 Is the approach to advertising and signs in Policy EC 08 justified and effective?

Matter 10 – Economic development site allocations, deliverability and viability

Issues

- 10.1 Have all sites put forward for allocation been considered through a robust SA process, including the consideration of reasonable alternatives?
- 10.2 What site selection methodology has been used for employment sites?

A topic paper from the Council is likely to be useful in answering this question.
- 10.3 Are the sites the most appropriate option given the reasonable alternatives?
- 10.4 Are the site allocations based on a sound assessment of infrastructure requirements and their deliverability, including landowner support?
- 10.5 In broad terms, is the economic development identified in Policy EC 01 based on a sound understanding of financial viability?
- 10.6 How has the continued suitability of General Employment Areas and their boundaries been considered? Is it robust?
- 10.7 To be effective and consistent with national policy, should Attleborough Employment Allocation 1 refer to the need to consider the historic environment?

- 10.8 Should Attleborough Employment Allocation 1 refer to 'at least' 10 hectares to ensure consistency with Policy EC 01?
- 10.9 To be effective, should Snetterton Employment Allocations 1 & 2 refer to the need to consider the historic environment?
- 10.10 Are Saved Policies: D5 (Land East of Dereham Business Park); SW2 (Land to the North of the Eco-Tech Centre); SW3 (Land to the West of the Eco-Tech Centre); and TH30 (New Employment Land) (of the Thetford Area Action Plan) still considered to be deliverable, given they were originally allocated in 2012? Do they still have landowner support? Why have the sites not been delivered over the past 5 years? Should they be considered as new allocations?
- 10.11 Is the settlement boundary set out in Map 6.3 of the Plan consistent with the boundary shown on the Swaffham Policies Map?

Matter 11 – Town Centre and Retail Strategy (Policy EC 05)

Issues

- 11.1 Is the retail and town centre hierarchy identified in Policy EC 05 justified?
- 11.2 Are the floorspace requirements set out in Policy EC 05 justified and founded upon robust and up-to-date evidence?
- 11.3 Is the approach of Policy EC 05 in terms of delivering the identified floorspace requirements justified?
- 11.4 Why do the additional convenience and comparison floorspace figures set out in Policy EC 05 not match those identified in the Breckland Retail and Town Centre Study (2017) at Tables 6.1 and 6.2?
- 11.5 Are the impact assessment thresholds set out in Policy EC 05 justified?
- 11.6 What is the status of Policy D6 Dereham Retail Allocation - Georges Road/ Nunn's Way to Cowper Road of the adopted Site Specific Policies and Proposals Development Plan Document? Does this need to be referred to in the Plan for it to be effective?

Matter 12 – Environment (Policies ENV 01, ENV 02, ENV 03, ENV 04, ENV 05, ENV 06, ENV 09 and ENV 10)

Issues

Policy ENV 01 – Green Infrastructure

- 12.1 Policy ENV 01 sets out that if a development will have a detrimental effect on the quantity or function of existing green infrastructure, applications will be expected to demonstrate how the green infrastructure will be enhanced? How can this be achieved in such circumstances?
- 12.2 To be positively prepared should the Plan identify a network of Green Infrastructure?
- 12.3 To be effective should Policy ENV 01 or its supporting text refer to existing local Green Infrastructure strategies?
- 12.4 Overall, is Policy ENV 01 justified, effective and consistent with national policy (namely Paragraph 114 of the NPPF)?

Policy ENV 02 – Sites of International, European, National & Local Nature Conservation Importance

- 12.5 Is Policy ENV 02 justified and consistent with legislation and national policy, insofar, that it requires all development that may affect a designated site, protected species or any species or habitat of principal importance for conservation to be subject to an Environmental Impact Assessment?

Policy ENV 03 – The Brecks Protected Habitats & Species

- 12.6 Is Policy ENV 03 effective, to ensure that no adverse impacts would occur to the Brecks SPA/SAC through increased recreational pressure from new housing?

Policy ENV 04 – Open Space, Sport & Recreation

- 12.7 Is Policy ENV 04 based on robust and up-to-date evidence?
- 12.8 Is Policy ENV 04 justified and effective, insofar that it does not recognise the need for different types of open space?
- 12.9 In relation to open space, are the occupancy rates set out in Table 5.1 based on robust and up-to-date evidence?

12.10 Is Policy ENV 04 consistent with national policy and justified, insofar, that it requires all residential development to make provision for outdoor playing space?

12.11 Is the requirement within Policy ENV 04 for outdoor playing space at 2.56 hectares per 1,000 population justified and supported by robust evidence and a sound assessment of viability?

12.12 Are the Local Green Space designations identified on Page 162 of the Plan justified and based on a sound and robust selection methodology?

Policy ENV 05 – Protection and Enhancement of the Landscape

12.13 Is the approach of Policy ENV 05 consistent with national policy, most notably, Paragraphs 17, 109, 113 of the National Planning Policy Framework?

Policy ENV 06 – Trees, Hedgerows and Development

12.14 Is Policy ENV 06 consistent with national policy, most notably Paragraph 118 of the National Planning Policy Framework?

12.15 Is the approach of Policy ENV 06, in relation to the loss of protected trees justified?

Policy ENV 09 – Flood Risk & Surface Water Drainage

12.16 Is Policy ENV 09 consistent with national policy?

12.17 Are the Strategic Flood Risk Assessment (2017), Sequential Test (2017) and Water Cycle Study (2017) robust and should they have considered 'villages with boundaries'?

Policy ENV 10 – Renewable Energy

12.18 With particular regard to, but not limited to wind energy development, is Policy ENV 10 consistent with national policy?

Cumulative Effects

12.19 Is the Plan effective in terms of its consideration of potential cumulative effects on the environment?

Matter 13 – Housing: the basis for the housing allocations and the settlement boundaries

Issues

- 13.1 Have all sites put forward for allocation been considered through the SA, along with all reasonable alternatives? Is the SA based on appropriate criteria and is it a robust?
- 13.2 Have the sites been chosen using a robust site selection methodology?
- 13.3 Overall, do the proposed allocations reflect the outcomes of the SA and testing of reasonable alternatives through the site selection methodology?

Matter 14 – Strategic urban extensions, housing site allocations and settlement boundaries

Issues

Attleborough SUE (Policy GEN 4)

- 14.1 Is the projected site delivery trajectory (commencement 2019/20) realistic?
- 14.2 What is the current status of the planning application submitted for the Attleborough SUE?
- 14.3 Is the Attleborough SUE based on a robust assessment of reasonable alternatives? Is it the most sustainable option?
- 14.4 Is the Attleborough SUE based on a sound understanding of infrastructure requirements?
- 14.5 Are the trigger points for the necessary infrastructure requirements based on sound evidence?
- 14.6 Is Policy GEN 4 consistent with national policy, in terms of the historic environment?
- 14.7 Can the Attleborough SUE be delivered without unacceptable harm to heritage assets?

In answering the above two questions, I would encourage the Council to produce a Statement of Common Ground with Historic England.

- 14.8 Can the Attleborough SUE be delivered without unacceptable harm to highway safety?
- 14.9 Is there a need for Policy GEN 4 to refer to additional health care services to be effective?
- 14.10 What is the current status of the Attleborough Neighbourhood Plan? Are the two consistent?

Thetford

- 14.11 Although not forming part of this examination, how does the delivery of the Thetford strategic urban extension affect the soundness of this Plan? Is the Thetford SUE still considered deliverable?
- 14.12 Are there any existing infrastructure delivery issues that could affect the delivery of the site?
- 14.13 Will housing be delivered in accordance with the current estimated trajectory?

General Questions Relevant to all Sites Allocations

- 14.14 Are the allocated sites in each case the most appropriate options given the reasonable alternatives?
- 14.15 Is each site allocation and its criteria justified and appropriate in all aspects, having regard to the likely impacts of the development?

Specific Questions for the Site Allocations by Settlement

Dereham

- 14.16 Is the evidence that has ruled out alternative sites put forward for allocation in Dereham sufficiently robust?
- 14.17 To be effective, should the criteria of all of the Dereham Housing Allocations include the need to undertake an archaeological assessment and refer to the need to have regard to the findings of the Historic Characterisation Study, as set out in the allocation's supporting text?
- 14.18 Can 60 dwellings and associated infrastructure (such as open space) be delivered within the proposed site boundary of Dereham Housing Allocation 1?
- 14.19 Is criterion 5 of Dereham Housing Allocation 4 justified and consistent with Policy ENV 04?

14.20 To be effective should Dereham Housing Allocation 4 include the need to have regard to heritage assets, namely the Grade II listed water tower and the Dereham Conservation Area?

14.21 Is the Dereham settlement boundary justified, particularly with regard to whether it should include St Nicholas Junior School and Neatherd High School?

Swaffham

14.22 Table 3.3 sets out that Swaffham Allocation 1 and 5 are counted as part of the completions and commitments. Why are these sites therefore allocated? Is there any double counting?

14.23 Are the allocations justified, consistent with national policy and deliverable, insofar, that the HRA cannot rule out likely significant effects on the Brecks SPA?

14.24 To be effective, should the criteria of Swaffham Allocation 3 refer to the need to have regard to the findings of the Historic Characterisation Study, as set out in the supporting text (3.163)?

14.25 To be effective, should the criterion 4 of Swaffham Allocation 4 refer to the need to also have regard to non-designated heritage assets and require a Heritage Statement to inform any future proposal?

14.26 Swaffham Allocation 5 refers to the provision of 78 dwellings. However, Table 3.3 identifies the site as having capacity for 130 dwellings? To be effective, should this be corrected?

14.27 To be effective, should the criteria of Swaffham Allocation 5 refer to the need to have regard to the findings of the Historic Characterisation Study, as set out in the supporting text (3.172)?

14.28 Is criterion 3 of Swaffham Allocation 6 consistent with national policy and would it ensure that any potential effects on heritage assets (namely the Grade II* listed Manor House) are fully considered?

Watton

14.29 The two site allocations total 205 dwellings, however, Policy HOU 02 identifies a need for 175 dwellings. What is the justification for allocating more dwellings than required by Policy HOU 02?

14.30 Are the allocations justified, consistent with national policy and deliverable, insofar, that the HRA cannot rule out likely significant effects on the Brecks SPA?

14.31 Are criteria 1, 2 and 8 set out in Watton Housing Allocation 2 justified?

14.32 Is criterion 9 of Watton Housing Allocation 2 consistent with national policy?

Ashill

14.33 Is there sufficient evidence to suggest that Ashill Housing Allocation 1 could come forward without causing harm to heritage assets?

14.34 Is Criterion 2. consistent with national policy?

Banham

14.35 Is the settlement boundary for Banham justified?

14.36 Are the requirements for open space, as part of the allocation justified?

14.37 Is there sufficient evidence to suggest that Banham Housing Allocation 1 could come forward without causing harm to heritage assets?

Bawdeswell

14.38 Is there sufficient evidence to suggest that Bawdeswell Housing Allocation 1 could come forward without causing harm to heritage assets?

Garboldisham

14.39 Are sites LP[031]004 & LP[031]005 the most appropriate option given the reasonable alternatives?

14.40 Is there sufficient evidence to demonstrate that the development of the site allocation would not unacceptably affect flood risk and highway safety?

14.41 To be effective, should the criteria of Garboldisham Housing Allocation 1 refer to the need to have regard to heritage assets?

Great Ellingham

14.42 Is the Plan positively prepared and justified, insofar, that no allocations are proposed for Great Ellingham?

14.43 If no suitable sites can be identified in Great Ellingham, is relying on the delivery of dwellings through windfall development justified?

14.44 Is the settlement boundary set out in Map 3.7 up-to-date for Great Ellingham?

Harling

14.45 To be effective, should the criteria of Harling Housing Allocation 1 refer to the need to have regard to highway safety and any potential mitigation measures that could be required?

14.46 To be effective, should the criteria of Harling Housing Allocation 1 refer to the need to have regard to heritage assets?

14.47 To be effective, should the criteria refer to the need to avoid the Anglian Water 15 metre protection zone from the pumping station?

Hockering

14.48 The text of Hockering Residential Allocation 1 states that the site is approximately 1.2 ha. However, the support text at 3.243 refers to the site being 0.8 ha. Why is this?

Kenninghall

14.49 Is the Plan positively prepared and justified, insofar, that only 15 dwellings are allocated within Kenninghall?

14.50 Is there sufficient evidence to demonstrate that the development of the site allocation would not unacceptably affect highway and pedestrian safety?

14.51 Is Criterion 1. consistent with national policy?

14.52 To be effective, should the criteria of Kenninghall Housing Allocation 1 refer to the need to have regard to heritage assets?

Litcham

14.53 Is the Plan positively prepared and justified, insofar, that no allocations are identified in Litcham?

14.54 Is the evidence, particularly with regard to highways, that has ruled out sites put forward for allocation in Litcham robust?

14.55 If no suitable sites can be identified in Litcham, is relying on the delivery of 22 dwellings through windfall development justified?

Mattishall

14.56 Is the Plan positively prepared and justified, insofar, that no allocations are identified in Mattishall?

14.57 Is the evidence that has ruled out sites put forward for allocation in Mattishall robust?

14.58 If no suitable sites can be identified in Mattishall, is relying on the delivery of 42 dwellings through windfall development justified?

14.59 What is the current position of the Mattishall Neighbourhood Plan?

Narborough

14.60 Is the allocation justified, consistent with national policy and deliverable, insofar, that the HRA cannot rule out likely significant effects on the Brecks SPA?

Necton

14.61 Is the Plan positively prepared and justified, insofar, that insufficient allocations are identified in Necton?

14.62 If insufficient sites can be identified in Necton, is relying on the delivery of 17 dwellings through windfall development justified?

14.63 Is the evidence, with particular regard to flood risk, that has ruled out other sites put forward for allocation in Necton robust?

14.64 Is Criterion 3. of Necton Housing Allocation 2 consistent with national policy?

14.65 Is the site boundary of Necton Housing Allocation 3 justified?

14.66 To be effective, should the criteria of Necton Housing Allocation 3 refer to the need to have regard to non-designated heritage assets?

North Elmham

14.67 Is the Plan positively prepared and justified, insofar, that insufficient allocations are identified in North Elmham?

14.68 If insufficient sites can be identified in North Elmham, is relying on the delivery of 14 dwellings through windfall development justified?

14.69 Is the evidence that has ruled out sites put forward for allocation in North Elmham robust?

14.70 To be effective, should the criteria of North Elmham Housing Allocation 1 refer to the need to have regard to archaeological remains?

14.71 Is Criterion 4. of North Elmham Housing Allocation 1 consistent with national policy?

14.72 Are Criteria 2 and 3 of North Elmham Housing Allocation 2 consistent with national policy?

Old Buckenham

14.73 Is the Plan positively prepared and justified, insofar, that insufficient allocations are identified in Old Buckenham?

14.74 If insufficient sites can be identified in Old Buckenham, is relying on the delivery of 17 dwellings through windfall development justified?

14.75 Is the evidence that has ruled out other sites put forward for allocation in Old Buckenham robust?

14.76 To be effective, should the criteria of Old Buckenham Residential Allocation 1 refer to the need to have regard to heritage assets?

Shipdham

14.77 Is there sufficient infrastructure to support new development in Shipdham?

14.78 To be effective, should the criteria of Shipdham Residential Allocation 1 refer to the need to have regard to the nearby Conservation Area?

14.79 To be effective, should the criteria of Shipdham Residential Allocation 2 refer to the need to have regard to the nearby Conservation Area?

14.80 In combination can the Shipdham Residential Allocation 1 & 2 be delivered without adverse impacts on the highway network?

Sporle

14.81 Is Criterion 5. of Sporle Residential Allocation 1 consistent with national policy?

Swanton Morley

- 14.82 To be effective, should the criteria of Swanton Morley Residential Allocation 1 refer to the need to have regard to heritage assets, namely the Grade I listed Parish Church of All Saints?

Settlements with boundaries

- 14.83 Is the Beetley settlement boundary, as shown on Map.2 justified?
- 14.84 Is the Hockham settlement boundary, as shown on Map.7 justified?
- 14.85 Is the Saham Toney settlement boundary, as shown on Map.13, accurate and justified?
- 14.86 Is the Yaxham settlement boundary, as shown on Map.17 justified?
- 14.87 Is the approach to settlement boundaries and whether schools are located within them justified and consistent across the District?

Matter 15 – Historic Environment (Policies ENV 07 and ENV 08)

Issues

- 15.1 Is the wording of Policy ENV 07 and its supporting text, consistent with relevant legislation and national policy, namely Section 12 of the National Planning Policy Framework?
- 15.2 To be effective, should Policy ENV 07 include a commitment to undertake a programme of work to develop conservation area appraisals, as suggested by Historic England?
- 15.3 Is Policy ENV 08 consistent with national policy, most notably Paragraph 128 of the National Planning Policy Framework, in terms of archaeological interest?

Matter 16 – Communities & Design (Policies GEN 1, GEN 2, COM 01, COM 02, COM 03, COM 04)

Issues

- 16.1 To be effective should Policy GEN 1 refer to Neighbourhood Plans?

- 16.2 Is Policy GEN 2 consistent with national policy, insofar, that it requires all development to improve the character and quality of the area? Will this be feasible and reasonable for all development proposals?
- 16.3 To be justified and effective, should Policy COM 01 refer to the need to have regard to the financial viability of schemes?
- 16.4 Are all of the criteria set out in Policy COM 01 necessary given the other policies included within the Plan? For example, Policy COM 01 cross refers to several other policies.
- 16.5 Is Policy COM 02 justified, effective and consistent with national policy, insofar, that it requires all large and complex applications to undertake a Health Impact Assessment?
- 16.6 To be effective should Policy COM 03 refer to the loss of outlook?
- 16.7 Policy COM 04 refers to the 'development strategy' what is this? Should it be defined? Or does this mean the other policies in the Plan?
- 16.8 Should this section of the Plan set out how proposals for new health care facilities would be considered by the Plan?

Matter 17 – Transport (Policies TR 01 and TR 02)

Issues

- 17.1 Is Policy TR 01 consistent with national policy, namely Section 4 of the National Planning Policy Framework?
- 17.2 Is Policy TR 02 consistent with national policy, namely Section 4 of the National Planning Policy Framework?

Matter 18 – Infrastructure (Policy INF 01 and INF 02)

Issues

- 18.1 Is Policy INF 01 justified, effective and consistent with national policy? Is there a need to refer to the historic environment?
- 18.2 To be effective and consistent with national policy, should Policy INF 02 refer to financial viability?

- 18.3 Overall, is Policy INF 02 justified, effective and consistent with national policy?
- 18.4 On a related matter, for many of the proposed allocations there is a requirement to undertake a pre-application enquiry with Anglian Water Services to demonstrate that sufficient capacity is available to transfer wastewater for treatment and that where there is insufficient capacity financial contributions may be sought. Is such a requirement justified and could this constrain development from coming forward?

Matter 19 - Monitoring Framework

Issues

- 19.1 To be effective should all policies have a monitoring framework with suitable and measurable indicators and targets to indicate if or when a review of the Plan may be necessary?