

# Breckland Local Plan Examination

## **Matter 14:**

## **Strategic urban extensions, housing site allocations and settlement boundaries**

**Breckland District Council**

**Hearing Statement**

March 2018



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## Issues

### **Attleborough SUE (Policy GEN 4)**

#### **14.1: Is the projected site delivery trajectory (commencement 2019/20) realistic?**

1. The projected site delivery trajectory has been informed by pre application discussions between Attleborough Land Ltd. and the Council for the planning application for Attleborough SUE (3PL/2017/0996/O). The projected timescale is supported by the applicant which is evidenced in the Design and Access Statement accompanying the planning application<sup>1</sup> The indicative phasing plan is also referenced in the representation by Attleborough Land Ltd made at the Pre-Submission stage<sup>2</sup>.
  
2. Both the Council and the development promoter agree that the planning strategy should maximise the opportunity to commence development as early as possible. Within this context, the preliminary timeline is set out as follows:
  - Outline Planning Application 3PL/2017/0996/O determined Spring/Summer 2018;
  - S106 agreement finalised end of 2018;
  - The first Reserved Matters Application to be submitted by early 2019, subject to the sale of the site and legal processes;
  - Construction to start on site late 2019/early 2020, subject to approval processes;
  - The first residential occupation anticipated later in 2020.
  
3. The Council's Infrastructure Delivery Plan (IDP) (LP/V/1) presents a detailed trajectory in Appendix 2 which is informed by infrastructure requirements. Attleborough Land Ltd, the intention is that the site will be sold to, and developed by a consortium of developers. In their representation, Attleborough Land Ltd propose that 3 developers would be required to deliver the strategy, assuming the industry standard of around 50-60 units per outlet per year. The early stages of trajectory present a modest build out rate which is considered to be a realistic representation of

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<sup>1</sup> JTP (July 2017) Attleborough Design and Access Statement, 6.1 Delivery and Management, page 95 (3PL/2017/0996/O)

<sup>2</sup> Attleborough Land Ltd. (Sept 17) Representation to the Pre Submission consultation (502323)

what could be delivered in the first few years of construction. This is as follows (houses completed per year).

- 2019/20 – 25 houses
  - 2020/21 – 50 houses
  - 2021/22 – 80 houses
  - Rising to 160 per year with 3 developers on site.
4. Earlier consultation stages of the Local Plan had projected for the entire development of 4,000 homes to be delivered within the plan period (to 2036). The trajectory presented at submission stage represents a realistic timescale which is based on the consideration of infrastructure requirements and discussion with the applicant regarding proposed phasing. In the case that there is a risk of the projected rate of housing delivery not being achieved, the Council will work with the developer to aid delivery of the site in line with the Implementation Strategy (page 225-226 in the Pre-Submission Publication, please see in combination with proposed modifications in the Council's response to Matter 19 – Monitoring Framework).

**14.2: What is the current status of the planning application submitted for the Attleborough SUE?**

5. The outline application for Attleborough SUE (3PL/2017/0996/O) was submitted on 31st July 2017. The application has been subject to consultation and is pending determination. In response to the consultation, objections have been made by Historic England and Norfolk County Council (in their capacity as Lead Local Flood Agency and in their capacity as Highways Authority). A holding direction has been placed until 31<sup>st</sup> March by Highways England pending further information on the A11 junction with London Road. They have advised that this can be removed when agreement on the application can be made.
6. The Council has been in contact with Ptarmigan and advised them that the Council is making a request pursuant to Regulation 22 (1) of The Town and Country Planning (Environmental Impact Assessment) Regulations 2011 to provide further environmental information. A copy of the request is appended to this statement (Appendix A). Once the further information has been provided, the Council shall – in accordance with the Regulations – advertise the availability of the further information

and consult upon the same with all necessary statutory consultees. The Council are seeking to determine the application in June 2018.

**14.3: Is the Attleborough SUE based on a robust assessment of reasonable alternatives? Is it the most sustainable option?**

7. Proposals for the Attleborough SUE have a long history and have been subject to significant public consultation. The Core Strategy and Development Control Policies DPD (LP/D/1) originally identified Attleborough as a Market Town suitable for substantial residential and employment growth due to its strategic position on the A11 corridor, infrastructure capacity, market demand and available land. This formed part of an Issues and Options consultation for Attleborough and Snetterton Heath Area Action Plan (ASHAAP), which was not taken further in favour of producing a single local plan which complied with the newly introduced National Planning Policy Framework.
8. The concept of an urban extension which would accommodate a strategic growth allocation for 4,000 dwellings located to the south of railway line was therefore initially established in predecessor local development documents of which, the Core Strategy was subject to examination and was adopted in 2012. Whilst the ASHAAP was never taken to examination stage, the ground work which built on the Core Strategy included a significant level of evidence commissioned and resulted in a public consultation on the Issues and Options document. The principle of the Attleborough SUE was therefore well established prior to work beginning on the single Breckland Local Plan in January 2013.
9. In forming the current proposed local plan, the Issues and Options document (LP/S/6) set initial vision and objectives which highlighted Attleborough as a key focus for employment and housing (section 4), set out a range of options for the distribution of growth in the Spatial Strategy (section 8) and included options for the direction of growth for Attleborough SUE (section 8.2). These options were subject to sustainability appraisal in the Issues and Options Sustainability Appraisal (LP/S/7) and were also subject to consultation which invited the public to influence the strategy direction through a series of questions on proposals in each chapter.
10. The Preferred Directions document (LP/S/8) summarised the results of the issues and options consultation, favouring a balanced development pattern reflected in PD

03 and a significant level of the Breckland housing target (68%) for Thetford and Attleborough in PD04. Part 2 Preferred Directions Sites consultation document set out an assessment of all alternative proposed residential sites in Attleborough. The document set the question 'Please give us your views on the suitability of the emerging site alternatives - both reasonable and unreasonable for Attleborough' to invite representations on the proposed approach and alternative sites during the preferred directions consultation. All site options were additionally subject to SA in the accompanying Preferred Directions Part 2 Sustainability Appraisal (LP/S/9).

11. In developing the Pre-submission publication, and in the knowledge that not all 4,000 homes could be delivered within the plan period, consideration was given to alternative options including the allocation of smaller sites in Attleborough. The Pre-submission SA (LP/S/3) appraises this option when assessing Policy GEN 04 Development Requirements of Attleborough SUE (page 127). In summary, allocating 4,000 homes as a strategic urban extension and setting development requirements in policy GEN 04 scores favourably against a number of SA objectives. The proposed approach maximises the opportunity for planning obligations and requires a comprehensive masterplan for new green infrastructure, schools, medical and community facilities, local service hubs and employment which benefit both existing and new residents of Attleborough. The alternative approach; dispersing the housing requirement across a number of sites does not score as favourably as it would not provide the same level of planning obligations or benefits to the community as it would result in a piecemeal approach to the development/improvement of local infrastructure.
12. Attleborough Town Council has developed their Neighbourhood Plan alongside the production of the Local Plan. The Attleborough Neighbourhood Plan, which was made by the Council on 18<sup>th</sup> January 2018, is in conformity with the strategic policies and proposals for Attleborough set in the Local Plan.
13. The Council considers the Attleborough SUE to be the most sustainable option for allocation when considered against reasonable alternatives. This approach has been informed by evidence and has been tested through the presentation of options which have been subject to consultation and SA throughout the course of developing the local plan. The strategic growth plans for Attleborough are also endorsed by the Attleborough Neighbourhood Plan.

**14.4: Is the Attleborough SUE based on a sound understanding of infrastructure requirements?**

14. The Infrastructure Delivery Plan (IDP) (LP/V/1) contains a comprehensive list of infrastructure required to deliver the Attleborough SUE based on a range of evidence which is documented within the IDP. This has informed the development of the Attleborough SUE housebuilding and infrastructure phasing table which lists requirements and indicative costs, along with a phasing schedule (IDP, Appendix 2).

**14.5: Are the trigger points for the necessary infrastructure requirements based on sound evidence?**

15. The trigger points for infrastructure have been based on sound evidence as documented in the IDP (LP/V/1). The key trigger points are as follows:

- **Water:** Attleborough WwTW has some available flow headroom in its existing discharge permit and can accept growth of approximately 1,800 dwellings (from the 4,000 allocated), after which the volumetric discharge permit will be exceeded. Source: The Water Cycle Study 2017, produced by AECOM (LP/E/5).
- **Transport:** The threshold for the delivery of the Link Road is upon completion of the 1200th home in the SUE. This trigger point has been informed by discussion with Norfolk County Council, which is evidenced in the Norfolk Infrastructure Delivery Plan (2017-2027) produced by Norfolk County Council.

16. Appendix 2 of the IDP lists a number of infrastructure requirements and trigger points. These were informed by preliminary discussions between Breckland District Council and the developer Ptarmigan and were initially based on requirements outlined by Norfolk County Council. The costs and precise phasing of infrastructure is indicative, but will aid further discussion with the developer in assessing the planning application, and will ensure delivery of infrastructure including developer contributions in line with the policy requirement of INF 02 in the Local Plan.

17. Representations from Anglian Water (1135889) raised concern that the wording regarding the trigger of 1,800 homes in relation to the Waste Water Treatment Works may be misinterpreted as to suggest that any sewage treatment improvements would come forward only once the proposed homes had been constructed. They also state that it is unclear how the reference to 1,800 homes relates to the phasing outlined in

the first sentence of the policy. The Council have worked with Anglian Water to clarify this requirement and to propose an amendment to the policy wording to address this concern. This is outlined in full, along with agreed proposed amendments in the Statement of Common Ground - Breckland District Council and Anglian Water.

**14.6: Is Policy GEN 4 consistent with national policy, in terms of the historic environment?**

18. An objection was raised by Historic England regarding the current wording of Policy GEN 04. The current wording could be strengthened to provide assurance that consideration of the significance of known designated heritage assets and non-designated heritage assets will be undertaken in forming the development proposal and that the impact of the development proposal will not cause harm to these assets. The current policy wording requires amending to demonstrate that heritage assets, in particular the Scheduled Ancient Monument of Bunn's Bank will be conserved in a manner appropriate to their significance in accordance with Paragraph 126 of the NPPF.

19. The Council has worked with Historic England to form a Statement of Common Ground (SoCG) with regard to Policy GEN 04. The SoCG presents a number of agreed modifications to the plan which seek to ensure that the Local Plan policy complies with national policy in terms of the historic environment (see Statement of Common Ground - Breckland District Council and Historic England). Subject to these modifications Policy GEN 04 is considered to be consistent with national policy.

**14.7: Can the Attleborough SUE be delivered without unacceptable harm to heritage assets?**

20. The key issue regarding both the Local Plan Policy GEN 04 and the planning application (3PL/2017/0996/O) is the impact of the development proposal and infrastructure (specifically the Attleborough link road) on the Scheduled Ancient Monument at Bunn's Bank, located at the south eastern corner of the proposed development.



21. With regard to the planning application, the Council has been in ongoing discussions with the developer and Historic England seeking to address the impact of the Attleborough SUE on Bunn's Bank. The Council have requested additional information to supplement the Environmental Statement submitted with the planning application (see Appendix A). The information sought should outline the likely impacts of the development and their significance concerning Bunn's Bank. Further information would also outline any mitigation measures that may be proposed to reduce the level of potential harm to the heritage asset.
22. A number of potential mitigation measures could be considered, for example, in respect of the design and location of the proposed link road junction, the density, height and design of development in the adjacent area, additional open space and landscaping, additional infrastructure to educate and highlight the significance of the asset such as benches, viewpoints and information boards.
23. It must be stressed mitigation measures have not yet been determined, and this level of detail relates to the planning application, rather than the strategic policy GEN 04. However, the Council, through ongoing discussion with Ptarmigan and Historic England considers that the Attleborough SUE can be delivered without unacceptable harm to heritage assets and this will be secured through the revised policy wording presented in the SOCG Breckland District Council and Historic England.

**14.8: Can the Attleborough SUE be delivered without unacceptable harm to highway safety?**

24. Section 2.21 – 2.29 of the Infrastructure Delivery Plan (LP/V/1) documents the evidence which underpins the transport requirements for Attleborough SUE. The key evidence includes: Attleborough Town Centre Study (LP/V/4), Attleborough Link Road Study (LP/V/5) and the Attleborough Smarter Choices Study (LD/V/6)
25. The plans for Attleborough are endorsed by Norfolk County Council, in their capacity as the Highways Authority. Norfolk County Council identified Attleborough town centre improvements and the Attleborough link road in the Norfolk Infrastructure Plan 2015. The projects are included in the 'Connecting Norfolk Implementation Plan' which accompanies Norfolk County Councils Local Transport Plan. The first phase of implementation of transport improvements to the town centre is currently being undertaken by Norfolk County Council as the local Highways Authority. There is therefore confidence that from a strategic perspective, the Attleborough SUE can be

delivered without unacceptable harm to highway safety and that the scope of the projects, delivery and funding is known as set out in the Infrastructure Delivery Plan (LP/V/1).

26. With regard to the detailed planning application for the SUE (3PL/2017/0996/O), Breckland District Council has sought further information concerning the impacts of the proposed development in highway terms to satisfy Norfolk County Council as Highways Authority (Appendix A). The Planning Case Officer Council has held regular meetings with both the developer and officers for Norfolk County Council to inform the additional modelling which is required to be undertaken, in addition to addressing the connection with Breckland Lodge Roundabout and the A11. These are detailed matters for the planning application and it is considered these can be addressed through the submission of further information.

**14.9: Is there a need for Policy GEN 4 to refer to additional health care services to be effective?**

27. The policy does not make specific reference to health care services, although this has been subject to consideration in detail in the Councils Infrastructure Delivery Plan (IDP) (LP/V/1). Section 8.21 – 8.24 of the IDP (pages 62-63) outlines that through consultation with South Norfolk Clinical Commissioning Group on proposals for Attleborough SUE it is evident that there is insufficient capacity in the existing local GP service to accommodate the population increase as a result of the proposal to build 4,000 new homes. Paragraph 8.24 of the IDP recommends inserting a clause into the policy requiring that a financial contribution will be made to local health care provision, which will ensure health needs are addressed by the planning application. This recommendation was not taken forward in Policy GEN 4.
28. Despite the omission of a specific clause in GEN 4 on health, point 6 of proposed Policy INF 02 Developer Contributions of the Local Plan ensures that financial contributions will be required to secure infrastructure which is necessary to ensure the provision of health care facilities, in line with the IDP. Whilst it is not considered that a modification is required to Policy GEN 4 to make the policy effective, the Council would not be opposed to such a modification which would provide additional clarity in line with the evidence set in the IDP.

**14.10: What is the current status of the Attleborough Neighbourhood Plan? Are the two consistent?**

29. The Attleborough Neighbourhood Plan (LP/D/4) was made at a meeting of Full Council held on 18/01/18 and now forms part of the statutory development plan for Breckland Council.
30. The Local Plan has made reference to emerging policies in the Attleborough Neighbourhood Plan as it has progressed, particularly proposed Local Plan Policy GEN 04 - Development Requirements of Attleborough Sustainable Urban Extension and Attleborough Employment Allocation 1.
31. Policies in the Local Plan are considered to be consistent with policies in the Attleborough Neighbourhood Plan.

**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?**

32. Thetford, alongside Attleborough, form the key settlements for development within the Local Plan. Policy HOU02 sets out the level of growth for each of these settlements. Thetford is expected to see the development of 3,668 over the plan period from committed and completed development. Of these 3,250 dwellings are expected from the Thetford SUE.
33. The Council consider the Thetford SUE to be deliverable in the context of footnote 11 of the NPPF. This states that sites should be available now, offer a suitable location for development and be achievable within five years. Sites which have planning permission should be considered deliverable until the permission expires.
34. The Thetford SUE has outline planning permission under planning application 3PL/2011/0805/O for 5,000 dwellings. The reserved matters application for Phase 1a (for 343 dwellings) has been received by the Council and is currently being determined. The application has been received from a regional housebuilder and therefore should be considered to be deliverable in the context of the NPPF.

35. Beyond the first five years paragraph 47 of the NPPF states that Local Planning Authorities should identify a supply of specific developable sites. Footnote 12 of the NPPF states that *'to be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.'*

36. The Thetford SUE is considered to be developable in the context of the NPPF definition, Thetford is the largest town in the District and a sustainable location for growth. As shown through the planning application the site is available and can deliver a viable development. As such it can be considered developable for years 6-10 and 10-15 of the plan.

**14:12: Are there any existing infrastructure delivery issues that could affect the delivery of the site?**

37. The Infrastructure Delivery Plan (IDP) (LP/V/1) identifies infrastructure capacity and requirements in order to deliver the allocations. The IDP acknowledges that a key infrastructure issue in relation to Thetford was the need for a new electricity substation to serve the town. In addition to this the IDP also notes that there are constraints in relation to water supply beyond the first phase of the development.

38. Breckland, alongside Norfolk County Council, the Greater Thetford Development Partnership, New Anglia LEP, UK Power Network, the developers and landowners, have successfully bid for money from the Homes and Communities Agencies Housing Infrastructure Fund. From this fund £9.95 million was awarded, which will fund the construction of a new primary substation and the necessary improvements to the site's water supply. The funding for these two pieces of infrastructure will help to unlock the delivery of the site.

39. As shown through the work on the housing infrastructure fund, the Council remain committed to working with the developers to ensure the satisfactory and timely delivery of the site.

**14.13: Will housing be delivered in accordance with the current estimated trajectory?**

40. The Council consider that the housing will be delivered in accordance with the current estimated trajectory. As set out above, the Council is committed to working with the site promoters to ensure the satisfactory and timely delivery of the SUE. This includes through the successful joint bid to the Housing Infrastructure Fund.
41. The Council has also submitted a Statement of Common Ground with the site promoter (Pigeon Thetford Ltd.) which sets out the anticipated delivery rates on the site (see Statement of Common Ground – Breckland District Council and Pigeon Thetford Ltd.). The delivery rates in the statement of common ground are in broad conformity with the trajectories included within the Local Plan and also through the Infrastructure Delivery Plan. Subject to the determination of the first reserved matters application, development will commence on site in 2019, in accordance with the housing trajectory. As included in response to issue 14.11 the application has been regional housebuilder and is considered to start delivering dwellings in the short term.

**General Questions Relevant to all Sites Allocations**

**14.14: Are the allocated sites in each case the most appropriate options given the reasonable alternatives?**

**Dereham**

42. As part of the call for sites 42 sites were put forward within Dereham for allocation. Of these 42 sites, 5 sites are proposed for allocation through the Local Plan, whilst a further three sites have been considered as reasonable alternative options. All sites have been subject to sustainability appraisal and also assessment in accordance within the site selection methodology.
43. A number of the sites are considered to be unreasonable for development due to severe highways constraints (LP[083]006-LP[083]017). A number of the other sites are not considered appropriate due to the distance from services and facilities. The site selection topic paper provides a summary of the assessment (LP/H/4 pages 47-65)
44. The five allocations are considered to be the most appropriate site options within the town for development. They are well related to existing services and facilities and score well against the sustainability appraisal criteria. The results of the sustainability appraisal on the site can be seen in LP/S/3 pages 417-424.

**Swaffham**

45. As part of the call for sites 19 sites were put forward within Swaffham for allocation. Of these 19 sites, 6 sites are proposed for allocation through the Local Plan, whilst 1 alternative site, LP[097]014, was identified in the Preferred Site Options and Settlement Boundaries consultation (LP/S/12). All sites have been subject to sustainability appraisal and also assessed in accordance within the site selection methodology.
46. Sites LP[097]005, 014 and 020 are situated within an area of Moderate-High landscape sensitivity and score negatively against criteria regarding cultural heritage and landscape. Site LP[097]001 is allocated for employment use in the Site Specific

Policies and Proposals DPD (LP/D/2). Site LP[097]016 is situated upon protected open space and scores negatively in this regard. The Site Selection Topic Paper provides a summary of the assessment (LP/H/4 pages 66-77).

47. The allocations are considered to be the most appropriate site option within the town for development. The sites are well related to existing services and facilities and scores well against the sustainability appraisal criteria. The sites scores positively in comparison to the alternative site in this regard. The reasonable alternative site was not selected due to being situated within an area of moderate-high landscape sensitivity. The results of the sustainability appraisal on the site can be seen in LP/S/3 pages 426-429.

### **Watton**

48. As part of the call for sites 21 sites were put forward within Watton for allocation. Of these 21 sites, 3 sites are proposed for allocation through the Local Plan, whilst 2 alternative sites were identified at the previous stage (Preferred Options and Settlement Boundaries consultation LP/S/12). All sites have been subject to sustainability appraisal and also assessed in accordance within the site selection methodology.
49. The Site Selection Topic Paper provides a summary of the assessment (LP/H/4 pages 78-88). Of the 5 sites considered reasonable at this stage, a further assessment was carried out to determine which sites were appropriate for allocation. Landowners were contacted to determine the availability and deliverability of the sites. Site LP[104]001 Land adjacent to Linden Court is in a central location within the town, but on investigation of the site it was determined to be subject to issues with land ownership, accessibility and potentially viability. Site LP[104]017 Land to the south of Wayland Academy was not chosen for allocation due to being located partially within the primary 1500m buffer of the Breckland Special Protection Area for Stone Curlews. The HRA for the Preferred Options stage (LP/S/2) recommended this site was not allocated on this basis.
50. The allocated site Watton Housing Allocation 1 presents an opportunity to create a comprehensive development, potentially incorporating a link road with good pedestrian and cycle access to the town centre. Watton Allocation 2 comprises infill

development which offers specialist housing in the form of a care home and is easily accessible.

### **Ashill**

51. As part of the call for sites 12 sites were put forward within Ashill for allocation. Of these 12 sites, 1 site is proposed for allocation through the Local Plan, whilst 1 alternative site was identified in the Preferred Site Options and Settlement Boundaries consultation (LP/S/12).. All sites have been subject to sustainability appraisal and also assessed in accordance within the site selection methodology.
52. A number of the sites are considered to be unreasonable due to distance from services and facilities, LP[001]001, 006, 007, 011 and 012. Sites LP[001]002 and 003 score negatively in regards to potential impact upon the historic environment. The Site Selection Topic Paper provides a summary of the assessment (LP/H/4 pages 89-92).
53. The allocation is considered to be the most appropriate site option within the town for development. The site is well related to existing services and facilities and scores well against the sustainability appraisal criteria. The site is located closer to services and facilities than the reasonable alternative site. The results of the sustainability appraisal on the site can be seen in LP/S/3 pages 434-436.

### **Banham**

54. As part of the call for sites 11 sites were put forward within Banham for allocation. Of these 11 sites, 2 sites are proposed for allocation for residential and 1 site is proposed for open space through the Local Plan. All sites have been subject to sustainability appraisal and also assessed in accordance within the site selection methodology.
55. Of the 11 sites submitted, 3 are proposed for allocation as a joint site (with part of the site forming new open space). Of the options presented at Preferred Options stage (LP/S/12), two sites (LP[003]004 and LP[003]005) were considered to be reasonable alternatives but were not selected for allocation. LP[003]004 represents the last gap on Heath Road and was considered to have an adverse impact on the Conservation Area and due to being at risk of surface water flooding. Site LP[003]005 was not



preferred due to the potential adverse impact on the nearby listed building (Hillcrest, Mill Road).

56. The three allocations are considered to be the most appropriate site options within the town for development. This option will also deliver benefits to the community in the form of improved quality open space. They are well related to existing services and facilities and score well against the sustainability appraisal criteria. The results of the sustainability appraisal on the sites can be seen in LP/S/3 pages 437-439.

### **Bawdeswell**

57. As part of the call for sites 7 sites were put forward within Bawdeswell for allocation. Of these 7 sites, 1 site is proposed for allocation through the Local Plan, whilst a further 2 are considered to be reasonable alternatives at Preferred Options stage (LP/S/12). All sites have been subject to sustainability appraisal and also assessed in accordance within the site selection methodology.

58. Alternative sites (LP[004]005 and LP[004]007) score less favourably than the proposed allocation as they are slightly more remote and due to the potential impact upon the historic environment. The Site Selection Topic Paper provides a summary of the assessment (LP/H/4 pages 95-98).

59. The allocation is considered to be the most appropriate site option within the town for development. This is well related to existing services and facilities, comprises infill development and scores well against the sustainability appraisal criteria. The results of the sustainability appraisal on the site can be seen in LP/S/3 pages 441-442.

### **Garboldisham**

60. Through the call for sites 11 sites were represented to the Council for allocation. Sites LP[031]004 and LP[031]005 are proposed for allocation within the Local Plan. As part of the assessment no reasonable alternative options have been identified. Whilst a number of sites score positively within the sustainability appraisal, representations have been received from Norfolk County Council as the Highways

Authority, which indicate that Back Street is not suitable for access for additional development.

61. Sites LP[031]004 and 005 predominantly score positively when considered against the sustainability appraisal objectives. They both score negatively in relation to objective 2,3 and 5 which relate to water and flood risk. Through developing the land as a single allocation, as required through the policy, these constraints can be overcome. Sites LP[031]004 and 005 are therefore considered to represent the only reasonable option for development in Garboldisham.

### **Harling**

62. 19 sites were promoted to the council for consideration for allocation within Harling. Each of the sites has been assessed through the sustainability appraisal and using the site selection methodology. Through this assessment a single reasonable alternative was identified, alongside the preferred site. Whilst scoring well through the SA, site LP[042]008 was not considered appropriate for allocation (when considered against site LP[042]001) due to its potential impact upon the historic environment.

63. Site LP[042]001 is proposed for allocation for 85 dwellings. The site is well related to the services and facilities within the village. Existing residential development to the south and west of the site mean that there will be limited impact on the landscape and townscape. For these reasons the site scores positively through the sustainability appraisal and is considered to be the most appropriate option for allocation.

64. As part of the call for sites 5 sites (one site split into two smaller sites) were put forward within Hockering for allocation. Of these 5 sites, 1 site is proposed for allocation through the Local Plan. All sites have been subject to sustainability appraisal and also assessed in accordance within the site selection methodology.

65. A number of the sites are considered to be unreasonable for development due to surface water flood risk and impact upon the historic environment. The Site Selection Topic Paper provides a summary of the assessment (LP/H/4 pages 47-66).

66. The proposed allocation is considered to be the most appropriate site option within the town for development. The site is well related to existing services and facilities

and scores well against the sustainability appraisal criteria. The results of the sustainability appraisal on the site can be seen in LP/S/3 pages 437-439.

### **Hockering**

67. As part of the call for sites 5 sites (one site split into two smaller sites) were put forward within Hockering for allocation. Of these 5 sites, 1 site is proposed for allocation through the Local Plan. All sites have been subject to sustainability appraisal and also assessed in accordance within the site selection methodology.

68. Site LP[044]004B was identified as a reasonable alternative at preferred options stage (LP/S/12) but its proximity to the A47 and risk of surface water flooding at the frontage of the site meant it was not favoured for allocation over the proposed allocation. The site selection topic paper provides a summary of the assessment (LP/H/4 pages 120-122).

69. The proposed allocation is considered to be the most appropriate site option within the town for development. The site is well related to existing services and facilities and scores well against the sustainability appraisal criteria. The results of the sustainability appraisal on the site can be seen in LP/S/3 pages 437-439.

70. Hockering Residential Allocation 1 is proposed for allocation as it scores positively when assessed against the SA criteria LP/S/3, has footpath links to the village, is adjacent to development to the south and is not subject to surface water flood risk.

### **Litcham**

71. As part of the call for sites 6 sites (1 site split into two smaller sites) were put forward within Litcham for allocation. Of these 6 sites, no sites are proposed for allocation through the local plan. All sites have been subject to sustainability appraisal and also assessed in accordance within the site selection methodology.

72. A number of the sites are considered to be unreasonable due to highways comments. Site LP[054]005A scores negatively in regards to potential impact upon the Historic environment, while sites LP[054]005B, 006 and 007 score neutrally in this regard. Site LP[054]002 scores negatively in regards to loss of designated open

space. The Site Selection Topic Paper provides a summary of the assessment (LP/H/4 pages 129-132).

73. Site LP[054]005B was considered to be a preferred site through the Preferred Site Options and Settlement Boundaries consultation (LP/S/12), while LP[054]005A was considered to be an alternative site. Site LP[054]005B was considered to be unreasonable due to the potential impact upon the historic environment, while site LP[054]005A was considered to be unreasonable on highways grounds.

74. No sites are considered suitable for allocation through the local plan, the need will therefore be met through policy HOU 03. The results of the sustainability appraisal on the site can be seen in LP/S/3 pages 459-460.

### **Kenninghall**

75. As part of the call for sites 9 sites were put forward within Kenninghall for allocation. Of these 9 sites, 1 site is proposed for allocation through the local plan. All sites have been subject to sustainability appraisal and also assessed in accordance within the site selection methodology.

76. A number of the sites are considered to be unreasonable due to potential impact upon the historic environment. Further sites are discounted due to highways comments. Sites LP[051]004 and 005 score negatively due to potential impact upon the Banham Fens SSSI and Quidenham Mere SSSI. The Site Selection Topic Paper provides a summary of the assessment (LP/H/4 pages 123-128).

77. Through the Preferred Sites and Settlement Boundaries Consultation (LP/S/12) site LP[051]008 was considered to be a preferred site, while sites LP[051]004, 005 and 010 were considered to be alternative sites. Sites LP[051]008 and 010 was considered to be unreasonable due to highways constraints, whilst site LP[051]004 was considered to be unreasonable due to the impact upon the historic environment. Site LP[051]005 cannot come forward without site LP[051]004 and, therefore, is also considered to be unreasonable for allocation.

78. The allocation is considered to be the most appropriate site option within the town for development. The site is well related to existing services and facilities and scores

well against the sustainability appraisal criteria. The results of the sustainability appraisal on the site can be seen in LP/S/3 pages 434-436.

### **Narborough**

79. As part of the call for sites 10 sites were put forward within Narborough for allocation. Of these 10 sites, 1 site is proposed for allocation through the Local Plan. All sites have been subject to sustainability appraisal and also assessed in accordance within the site selection methodology.

80. A number of the sites are considered to be unreasonable due to highways constraints, whilst others are distant from key services and facilities. Sites LP[065]010 and 001 score negatively against criteria 6 with regards to flood risk. The Site Selection Topic Paper provides a summary of the assessment (LP/H/4 pages 148-153).

81. The allocation is considered to be the most appropriate site option within the town for development. The site is well related to existing services and facilities and scores well against the sustainability appraisal criteria. The results of the sustainability appraisal on the site can be seen in LP/S/3 pages 467-468.

### **Necton**

82. As part of the call for sites 12 sites (1 site split into 2) were put forward within Necton for allocation. Of these 12 sites, 2 sites are proposed for allocation through the Local Plan. All sites have been subject to sustainability appraisal and also assessed in accordance within the site selection methodology.

83. The majority of the sites score negatively against the Land, Water and Soil Resources objectives in the Sustainability Appraisal. Sites LP[067]004, 005, 005A, 007, 008, 012 and 013 are subject to flood risk, either fluvial or surface water. site selection topic paper provides a summary of the assessment (LP/H/4 pages 153-160).

84. Through the Preferred Sites and Settlement Boundaries consultation (LP/S/12) site LP[067]007 was considered a preferred site, whilst sites LP[067]003, 004, 005 and 005A were considered to be alternatives. Sites LP[067]007, LP[067]005A and

LP[067]004 were considered to be unreasonable due to surface water flooding. Site LP[067]003 is constrained by access and TPOs on the site, whilst site LP[067]005 was not considered to be reasonable due to ownership issues regarding access and surface water flooding.

85. The allocation is considered to be the most appropriate site option within the town for development. The site is well related to existing services and facilities and scores well against the sustainability appraisal criteria. The results of the sustainability appraisal on the site can be seen in LP/S/3 pages 469-471.

### **North Elmham**

86. Through call for sites, 12 sites were represented to the Council for consideration within the Local Plan, all of which were assessed through the site selection methodology. It is the Council's opinion that sites LP[070]001 and LP[070]007 represent the most appropriate options for development. The sites are well related to services and facilities within the village, and score positively when considered against the landscape and townscape objectives of the sustainability appraisal. As part of the assessment of sites no reasonable alternative options were identified.

87. The sites were all assessed through the sustainability appraisal. A number of the sites score neutrally through the assessment, with positive scores for the provision of houses and negatively for distance from services and facilities. Site LP[070]008 was considered as a preferred location for development through the Preferred Sites and Settlement Boundaries Consultation (LP/S/12). However as part of this consultation further representations were received from Norfolk County Council as the Highways Authority which led to the exclusion of the site.

### **Mattishall**

88. As part of the call for sites 26 sites were put forward within Mattishall for allocation. Of these 26, no sites are proposed for allocation through the local plan. All sites have been subject to sustainability appraisal and also assessed in accordance within the site selection methodology.
89. The majority of sites were considered unreasonable due to highways comments. Sites LP[061]007 and 009 are distant from key services and facilities and, therefore

score negatively in this regard. The Site Selection Topic Paper provides a summary of the assessment (LP/H/4 pages 132-147).

90. Through the Preferred Sites and Settlement Boundaries consultation (LP/S/12) site LP[061]015 and 019 were considered to be preferred sites, whilst sites LP[067]022, and 025 were considered to be alternatives. Site LP[061]015 was considered to be unreasonable due to potential impact upon the historic environment. Site LP[061]019 was considered to be unreasonable due to flood risk and potential impact upon the natural environment. Alternative sites LP[061]022 and 025 are constrained by surface water flooding and existing planning permissions.
91. No sites are considered suitable for allocation through the local plan, the need will therefore be met through policy HOU 03. The results of the sustainability appraisal on the site can be seen in LP/S/3 pages 461-465.

#### **Old Buckenham**

92. Thirteen sites were promoted to the Council within Old Buckenham through call for sites. All sites have been subject to sustainability appraisal. Through the appraisal of sites a single site was proposed for allocation LP[074]014. No reasonable alternatives were identified. As part of the assessment, Norfolk County Council as the Highways Authority have been consulted on all sites and have responded that they have severe highways constraints and as such would be an unreasonable option for allocation through the Local Plan.
93. Site LP[074]014 is considered to represent the most appropriate location for development. The site scores neutrally through the sustainability appraisal (LP/S/3) with positive scores for the social objectives, however it scores negative in relation to water as it is in a groundwater source protection zone. No objection have been made to the development of the site have been made from the Environment Agency. The site is well located in relation to services and facilities in the village. Furthermore, it is adjacent to the existing residential development and would not have a significant impact upon the landscape.

#### **Shipdham**

94. As part of the call for sites 12 sites were put forward within Shipdham for allocation. Of these 12 sites, 2 sites are proposed for allocation through the Local Plan, whilst 1

site was considered to be a reasonable alternative at preferred options stage (LP/S/12). All sites have been subject to sustainability appraisal and also assessed in accordance within the site selection methodology. The Site Selection Topic Paper provides a summary of the assessment (LP/H/4 pages 174-180).

95. The three allocations are considered to be the most appropriate site options within the town for development. They are well related to existing services and facilities and score well against the sustainability appraisal criteria. The proposed allocations are considered to score more positively in this regard than the alternative site (LP[085]009) which is located further from services and facilities than the allocated sites. The results of the sustainability appraisal on the site can be seen in LP/S/3 pages 479-480.

### **Sporle**

96. As part of the call for sites 9 sites were put forward within Sporle for allocation. Of these 9 sites, 1 site is proposed for allocation through the Local Plan. All sites have been subject to sustainability appraisal and also assessed in accordance within the site selection methodology.

97. A number of the sites are considered to be unreasonable due to distant from key services and facilities. LP[092]003, 004 and 007 score negatively against criteria 10 with regards to potential impact upon the historic environment. The Site Selection Topic Paper provides a summary of the assessment (LP/H/4 pages 181-186).

98. The allocation is considered to be the most appropriate site option within the town for development. The site is well related to existing services and facilities and scores well against the sustainability appraisal criteria. The site scores positively in comparison to the alternative site, LP[092]004, due to the potential impact upon the historic environment. The results of the sustainability appraisal on the site can be seen in LP/S/3 pages 481-482.

### **Swanton Morley**

99. Fourteen sites were promoted to the Council in Swanton Morley through call for sites. The sustainability appraisal (LP/S/3) has formed the starting point for the assessment. This has been used alongside the site selection methodology to



establish 4 reasonable alternative options to development and one preferred site. These are set out within the Preferred Site Options and Settlement Boundaries regulation 18 consultation (LP/S/12) pages 158-164. Responses from the Highways Authority indicate that reasonable alternatives LP[098]002 and 003 would be required to be developed in conjunction with each other in order to provide the highways improvements needed to Manns Lane. Site LP[098]014 is located in close proximity to the primary school, however it is further from other services and facilities within the village. Site LP[098]016 would require highways improvements Hoe Road East, and as such would need to be developed in conjunction with the surrounding land.

100. Site LP[098]013 is considered to represent the most sustainable option for development. The site scores positively against a number of the sustainability appraisal objectives. It is well related to the services and facilities within the village, enabling walking and cycling opportunities. The sites also scores positively in relation to criteria around the protection and enhancement of the landscape and historic environment.

#### **Weeting**

101. Weeting is identified as a Local Service Centre solely for the enhancement and protection of services. It is in close proximity of the Breckland Farmland Special Protection Area (SPA) and is covered by the 1500m buffer zone which is designated for the protection of the Stone Curlew, the special interest feature of the SPA. Weeting is not considered for any allocations due to environmental constraints.

#### **14:15: Is each site allocation and its criteria justified and appropriate in all aspects, having regard to the likely impacts of the development?**

#### **Dereham**

102. Responses in relation to each of the individual allocations are included in response to 14.15. The following studies have informed criteria within each of the allocations and as such an overview is provided here.
103. To support the residential allocations within Dereham, the Council undertook the Dereham Transport Study (LP/V/3). The transport study considered the cumulative level of growth proposed within the Town, and as such is considered relevant to all allocations. As such the implications and findings of Dereham

Transport Study and the use of criteria to contribute towards highways improvements in relation to the study are considered here.

104. The transport study highlights that certain junctions on the existing highway network are already over capacity, which is caused by constraints at the Tavern Lane/Yaxham Road signalised junction. This junction and South Green/Tavern Lane junction would need improvements. The transport study highlights under all growth scenarios that the overall transport network does not have the required capacity to cope with the cumulative effects of development. Through the transport study solutions were established to the junction patterns to provide sufficient capacity to meet the growth levels within the town. Criteria are included within each of the site allocations which will allow for the appropriate highways improvements to provide capacity within the network.
105. As part of the Council's ongoing work in relation to transport in Dereham, WYG have prepared an advisory note of a number of key issues raised by Dereham Town Council. This has previously been considered by the Council's Local Plan Working Group and is included at Appendix B of this statement. The additional work by WYG includes consideration of the Saturday peak.
106. In summary, it is the Council's view that the Dereham Transport Study has provided sufficient evidence for the Local Plan process. The study show that the principle of the scale of growth and allocations is sound provided that highway mitigation is made to the network. The need for development to provide that mitigation is included in policy wording of the Local Plan. The approach to include criteria within each of the allocations is therefore considered to be justified and appropriate.
107. In addition to transport, the Water Cycle Study highlighted a need for additional capacity at the waste water treatment works. Whilst the study identifies a solution to meet the growth requirements of the town, it does also include the recommendation that all planning applications are preceded by a pre-application enquiry with Anglian Water. This will ensure there is sufficient capacity within the system to accommodate development. To reflect this implication, this requirement is included as a criterion within each of the site allocations in Dereham.

108. **Dereham Housing Allocation 1:** The site is allocated for approximately 60 dwellings on land to the north-west of Dereham. The site is currently the subject of a planning application from a national housebuilder for 62 dwellings. Through the site assessment the impacts of the development have been considered. The criteria have been developed having regard to the representations made by statutory consultees including the Highways Authority in relation to the principal access requirements. Criterion 2 responds to the requirements of Policy ENV04. It also recognises the importance of Shillings Lane as a green infrastructure corridor. Criteria 5 and 6 have been developed having regard to the findings of the Water Cycle Study.
109. All the criteria in relation to Dereham Housing Allocation 1 have been developed having regard to the site assessment and the submitted evidence. Furthermore the infrastructure requirements associated with the site are considered to meet the requirements of Regulation 122 of the Community Infrastructure Levy Regulations and are necessary to make the development acceptable in planning terms.
110. **Dereham Housing Allocation 2:** The site is allocated for 130 dwellings on land to the south of Dereham. The criteria included within the policy reflect the impacts identified through the site assessments and as such are considered to be justified. Criterion 1 identifies the access points for the development; this reflects the consultation responses provided by the Highways Authority. The Landscape Character Assessment Settlement Fringe Study (LP/E/2) identifies the Shipdham Road as a key gateway into the Dereham from the south of the District. Criterion 4 addresses this impact, whilst criterion 5 sets out the requirements for open space provision having regard to Policy ENV04.
111. **Dereham Housing Allocation 3:** This site is located to the north-east of the town and is proposed for 210 dwellings. The site has a resolution to grant outline planning permission. The policy includes 9 criteria all of which respond to the site assessment and stakeholder representations. Criteria 1-4 relate to highways improvements, with the principal access coming from Swanton Road. The access will also require improvements to the level crossing of the Mid-Norfolk Railway line. These criteria have been developed in consultation with Norfolk County Council as the highways department.

112. The Landscape Character Assessment Settlement Fringe Study (LP/E/2) identifies the site as having a moderate to high sensitivity to change. Criterion 5 has been included in this regard, to ensure appropriate screening is included within any application alongside the retention of hedgerows and trees. Criterion 6 reflects the findings of the sequential test (LP/E/7) and requires a site specific flood risk assessment.
113. **Dereham Housing Allocation 4:** This site is allocated for 60 dwellings on land to the rear of Dereham Hospital. Criterion 1 sets out that the principal access to the site should come from Northgate. This has been subject to consultation with the highways authority. Due to the location of the site and the existing hospital buildings this will need to include a wider masterplan development for the site. This is set out at criterion 2.
114. Through the Historic Characterisation Study (LP/E/4), the main Dereham Hospital building was identified as a non-designated heritage asset. Criterion 4 responds to this evidence. Criterion 6 reflects the need for onsite open space, as required through Policy ENV04. Each of the criteria respond to the evidence base and as such the Council consider them to be justified.
115. **Dereham Housing Allocation 5:** This site is located to the south of Dereham and is proposed for allocation for 290 dwellings. It is the largest site proposed for allocation within Dereham. The site is currently the subject of a planning application. Criteria 1-4 reflect transport requirements, and have been developed having regard to the representations received from Norfolk County Council as the Highways Authority. Due to the size of the site, two access points are required, with the principle access coming from Shipdham Road. The site is located in close proximity to the mid-Norfolk railway line, and there is an existing bridge over it. The bridge currently allows both car and pedestrian access. As part of the development proposals, improvements will be needed to the bridge, alongside a new pedestrian footbridge.
116. The landscape character assessment settlement fringe study (LP/E/2) and the Historic Characterisation Study (LP/E/4) have highlighted the sites gateway location within the town. The impacts of the development in terms of landscape and setting are sought to be addressed through criterion 5, 6 and 10.

117. The sequential test (LP/E/7) identified surface water flooding to the south of site. Criterion 9 responds to this.
118. As set out above, the criteria in relation to the Dereham allocations are all considered to be justified and appropriate having regard to the evidence base and representations received from stakeholders.

## Swaffham

119. The plan proposes 6 residential allocations within Swaffham, which are allocated for a total of 781 dwellings. As set out within the response to issue 14.14 the sites are considered to represent the most appropriate allocations for development. All of the site allocations require a pre-application enquiry with Anglian Water to demonstrate that there is sufficient capacity in the waste water network. This is as a requirement of the Water Cycle Study (LP/E/5). In addition to this, a criterion is included in allocations requiring a project level HRA in order to demonstrate the impact of the proposed development on the Breckland SAC/SPA. This responds to the requirements of the submitted HRA.
120. **Swaffham Allocation 1:** The site is allocated for 51 dwellings. The access to the site is via New Sporle Road. The Historic Characterisation Study (LP/E/4) notes the gateway location of the site, the design of the site will need to have regard to this and as such the requirement is included within a criterion.
121. **Swaffham Allocation 2:** The site is allocated for 75 dwellings, with access to the New Sporle Road. As part of the site assessment the proximity of the A47 was considered, noise attenuation measures will be required as set out in criterion 3.
122. Similarly to allocation 1, the Historic Characterisation Study (LP/E/4) notes the gateway location of the site. The development proposal will need to respond to this.
123. **Swaffham Allocation 3:** The site is allocated for 175 dwellings. Access to the site is via Brandon Road, an existing permitted development is located to the west of the site. As part of the site assessment and Historic Characterisation Study (LP/E/4) criteria 2,3 and 4 address the need for appropriate landscaping and the development to respect the gateway location of the site.

124. The Sequential Test (LP/E/7) requires a site specific flood risk assessment to be included as part of the planning application. It may be necessary to provide mitigation measures as part of the development. This is included at criterion 5.
125. **Swaffham Allocation 4:** The site is allocated for 185 dwellings on land to the south of Norwich Road. Improvements to pedestrian and cycle links will be required as part of the development of the site. This is included in criteria 1 and 2.
126. The Historic Characterisation Study (LP/E/4) notes the proximity of the site to Wood Farm which is grade II listed. The site is also located on a gateway location into the town. Criteria 3 and 4 have been developed to respond to the findings of the study.
127. Similarly to allocation 3, the Sequential Test (LP/E/7) requires a site specific flood risk assessment to be included as part of the planning application. It may be necessary to provide mitigation measures as part of the development. This is included at criterion 5.
128. **Swaffham Allocation 5:** Land off Sporle Road is allocated for 78 dwellings. As part of the assessment, criteria 1,3, 4 and 5 have been developed to ensure the satisfactory development of the site. The site is in close proximity to the A47. Criterion 6 requires noise attenuation measures to address this and ensure the appropriate amenity of the development.
129. **Swaffham Allocation 6:** Land to the north of Norwich Road is allocated for 165 dwellings. In response to representations from Norfolk County Council as the Highways Authority, criteria 1 and 2 require improvements to the highways, pedestrian and cycle links.
130. The Sequential Test (LP/E/7) notes the need for a site specific flood risk assessment to occur alongside the planning application. This is set out at criterion 6. The results of the historic characterisation study have led to criteria 3 and 5.
131. Having regard to the above, the criteria included within the Swaffham allocations respond directly to the evidence base for this reason the Council consider the criteria to be justified.

## **Watton**

132. Watton includes two residential allocations for 205 dwellings. As set out in response to issue 14.14 the sites are considered to represent the most appropriate option for development. The following represents a summary of the criteria included within the policies. They respond to the submitted evidence base and the results of the site assessment, as such they are considered to be justified.
133. **Watton Housing Allocation 1:** is located off Saham Road and is proposed for 160 dwellings. The site includes two parcels of land and criteria are included within the policy to ensure a comprehensive development occurs. The other criteria within the policy have been informed by the evidence base, and seek to ensure the satisfactory development of the site. The Historic Characterisation Study (LP/E/4) has helped to inform criteria 3,4 and 7. The site is located in close proximity to a non-designated heritage asset and also the Watton Conservation Area. The inclusion of the criteria will ensure the significance of the assets are taken into account in the development of the scheme.
134. The Habitats Regulation Assessment (LP/S/4) considers the need for additional assessment of the site to consider effects of development. Criterion 11 requires a project level HRA to determine the impact of proposed development.
135. **Watton Housing Allocation 2:** The site is located off Norwich and is allocated for 45 dwellings and a 60 bed residential care. The policy includes 10 criteria which will be used to determine any planning application. Key evidence in relation to this site include the Historic Characterisation Study (LP/E/4), the Sequential Test (LP/E/7) and the Water Cycle Study (LP/E/5). Criteria have been included to respond to this evidence.
136. As set out within Housing Allocation 1, the submitted Habitats Regulation Assessment requires a project level HRA to be completed on the site. The site is also in close proximity to Rokeles Hall which is grade II listed. As such, the development will need to understand the significance of the asset.

## **Ashill**

137. A single allocation is proposed for 20 dwellings within Ashill on land between Church Road and Hale Road. The allocation is currently used as allotments and is designated open space. Criterion 1 requires the replacement of the allotment land; this is in accordance with the requirements of Policy ENV04 which resists the loss of open space unless replacement land is provided. Criterion 2 reflects the findings of the Historic Characterisation Study (LP/E/4).
138. Criteria 3 and 4 relate to the provision of safe access and the development of a pedestrian crossing point. These criteria have been developed in consultation with the Highways Authority. Criterion 5 relates to the requirement for a pre-application enquiry with Anglian Water. This reflects the findings of the Water Cycle Study (LP/E/5).
139. The criteria included within the policy are considered to be justified and respond to the evidence base.

## **Banham**

140. Banham includes a single allocation for 42 dwellings. The allocation is located on 3 parcels of land and includes existing open space. The open space will need to be re-provided within the scheme on site LP[003]003. This is included in criterion 7 to accord with the requirements of Policy ENV04.
141. Criterion 1 requires the principle access to the residential development to be from Wayland Way with a pedestrian link to Greyhound Lane. This requirement reflects representations made by the Highways Authority.
142. Criteria 2 - 5 seek to ensure the satisfactory design of the development having regard to the findings of the Historic Characterisation Study (LP/E/4). This includes the need to reflect on the setting of the site including its gateway location and adjacent development. Criteria 6 and 8 respond to the findings of the Sequential Test (LP/E/7) and Water Cycle Study (LP/E/5) respectively. As the above criteria reflect the findings of the evidence base and as such are considered to be justified to
143. Having regard to the above, it is the Council's opinion is appropriate, and the criteria will ensure the satisfactory development of the site.



## **Bawdeswell**

144. Bawdeswell Housing Allocation 1 is proposed for 36 dwellings on land to the south of the village. The criteria reflect the existing evidence base. An additional criterion is proposed in accordance with the Water Cycle Study. This is currently outlined in the supporting text but would be strengthened by inclusion in the policy and therefore consistent with other policies in the plan. This is outlined in the Statement of Common Ground – Breckland District Council and Anglian Water. Subsequent to the Regulation 19 publication, the site gained planning permission in August 2017 for 36 dwellings. The site should be considered deliverable in the context of the NPPF at footnote 11 to paragraph 47. In this regard the site should be viewed as appropriate and justified.

## **Garboldisham**

145. Garboldisham Housing Allocation 1 is allocated for 35 dwellings on land to the south of Garboldisham. The allocation includes 8 criteria which respond to the submitted evidence base and representations received through the regulation 18 consultations. Criteria 1 and 2 respond to highways requirements around access and pedestrian provision. Criteria 3, 4 and 5 all relate to the findings of the Historic Characterisation Study (LP/E/4) including the sites location and the need to develop a masterplan approach to the site.

146. The water cycle study (LP/E/5) highlights the need for improvements to the Elm Grove waste water treatment works in Garboldisham. The water cycle study considers that this is possible within available technology and is included within the policy at criteria 6 in response to this. The policy also requires surface water attenuation measures in response to the findings of the sequential test.

147. Due to the size of the site onsite open space is required in accordance with Policy ENV04 of the Local Plan.

148. In response to representations received from Norfolk County Council as the minerals and Waste Authority, criterion 7 has been included reflecting the Norfolk Minerals and Waste Core Strategy.

149. The criteria included within the policy are considered to be justified and respond to the evidence base.

### **Harling**

150. Harling includes a single allocation for 85 dwellings. As part of the responses to the representations at Regulation 19, additional criteria are proposed to be included as modifications to the policy. These are discussed further within issue 14.45 and 14.47.

151. Subject to the additional criteria being included as modifications, the criteria are considered to be justified and appropriate in all aspects. The criteria respond to local evidence, including the water cycle study in relation to criterion 4.

### **Hockering**

152. Land to the east of Heath Road is proposed for allocation for 25 dwellings. The site is currently the subject of a planning application. The policy includes 5 criteria which seek to lead to the satisfactory development of the site. The criteria relate to the submitted evidence base. Criteria 2-4 respond to the findings of the Historic Characterisation Study, whilst criterion 5 requires a pre-application enquiry with Anglian Water, this is in response to the Water Cycle Study.

### **Kenninghall**

153. A single allocation is proposed within Kenninghall for land off Powell Close. The site is proposed for 15 dwellings. As set out within the response to 14.14, it is considered to represent an appropriate location for development.

154. The allocation policy contains 5 criteria which seek to ensure the satisfactory development of the site. Criteria 1 and 3 respond to the findings of the Historic Characterisation Study. Criterion 4 has been included following representations from Norfolk County Council as the minerals and waste authority.

155. The criteria all seek to respond to the submitted evidence base and as such are considered to be justified.

### **Narborough**

156. Land to the south of Narborough is proposed for allocation for 40 dwellings. The site represents an extension of the previously submitted allocation site with access from Chalk Lane. 7 criteria are included within the policy to ensure the satisfactory development of the site. Criteria 1, 4 and 5 relate to the need for transport improvements to Chalk Lane, in order to ensure safe vehicular and pedestrian access to the site.

157. Criterion 6 responds to the requirements of the water cycle study (LP/E/5) to carry out a pre-application enquiry. The Habitats Regulation Assessment (LP/S/4) included the need of a submission project level HRA for this site. This requirement is included at criterion 7 of the policy.

158. The criteria included within the policy respond to the submitted evidence base. They seek to ensure the satisfactory development of the site and as such are considered to be justified.

### **Necton**

159. Two allocations are proposed in Necton. The Council wish to include a modification to the title of those policies which currently reference Necton Housing Allocation 2 and Necton Housing Allocation 3. The modification revises these to Necton Housing Allocation 1 and Necton Housing Allocation 2.

160. Site LP[067]010 is proposed for allocation for 40 dwellings, with access from North Pickenham Road. Subsequent to the submission of the Local Plan the site now has the resolution to grant planning permission. The policy includes 7 criteria which seek to achieve the satisfactory development of the scheme in response to evidence base. The criteria accord with the planning application.

161. Site LP[067]011 is included within the Local Plan for 15 dwellings on land off North Pickenham Road. The policy includes 6 criteria which have been included as a result of the evidence base and site assessment.

162. As set out within issue 14.14 the Council consider the sites to be appropriate. The criteria proposed reflect the site assessments and requirements of the submitted evidence base and are considered to be justified.

### **North Elmham**

163. North Elmham includes two residential allocations which will accommodate 27 dwellings.

164. North Elmham Housing Allocation 1 is allocated for 16 dwellings, on land equating to approximately 2.4 hectares. The policy includes 8 criteria which any planning application would be expected to meet. The criteria are all considered to be justified and respond to the evidence base and representations from stakeholders.

165. Housing Allocation 1 has outline planning permission and criteria 2 and 3 reflect the specific requirements of that permission.

166. North Elmham Housing Allocation 2 is allocated for 11 dwellings on land equating to 0.7 hectares. The policy includes 6 criteria which seek to promote the satisfactory delivery of the site. The criteria respond to representations received by Norfolk County Council as both the highways authority and the minerals and waste authority. This includes the achievement of safe access.

167. The other criteria in relation to housing allocation 2 have been informed by the Historic Characterisation Study and the Water Cycle Study. As the criteria have all been informed by representations from key stakeholders and local evidence base.

### **Old Buckenham**

168. Old Buckenham includes a single residential allocation for 20 dwellings on a site amounting to 0.9 hectares. Criteria 1,2 and 4 have been developed in response to the findings of the Historic Characterisation Study and the need for the development to reflect the surrounding area. Criterion 3 reflects the need for the site

access to be from St Andrews Close, this has been subject to consultation with Norfolk County Council as the highways authority. Criterion 5 reflects the requirements of the Water Cycle Study.

169. Having regard to the local evidence base and the requirements of key stakeholders, the criteria are considered to be justified and appropriate.

### **Shipdham**

170. Two allocations are proposed within Shipdham which seek to deliver 80 dwellings. Residential Allocation 1 is located on land at Old Post Office Street for 25 dwellings; the site is well related to existing services and facilities within the village. 5 criteria are included as part of the policy to guide the satisfactory development of the site and reflect the evidence base. Subsequent to the Regulation 19 publication, the site now has planning permission and as such can be considered to be deliverable

171. Shipdham residential allocation 2 is proposed for 55 dwellings. The land is centrally located within the village and represents an extension to the previously allocated site SH1. The policy includes 5 criteria which have been developed to reflect the findings of the evidence base.

172. Criteria 1-3 relate to the access and the need for good design of the scheme. The sequential test (LP/E/7) identified the need for surface water attenuation measures and this is reflected in criterion 4. Criterion 5 reflects the water cycle study (LP/E/5) and the need for a pre-application enquiry with Anglian Water.

173. Having regard to the above, it is considered that the criteria included within the policies are justified and appropriate.

### **Sporle**

174. Sporle includes a single residential for 35 dwellings on land to the south of the village. As set out within the response to issue 14.14 the site is considered to be an appropriate location for development. 6 criteria are included within the policy which seek the satisfactory development of the site. Criteria 1 and 3 relate to the need to provide suitable pedestrian and vehicular access. The criteria have been subject to consultation with the highways authority.

175. The sequential test (LP/E/7) requires a site specific flood risk assessment to accompany the application. This is reflected through criterion 4. As set out within the Historic Characterisation Study the site is in close proximity to Wolferton House which is grade II listed. Criterion 5 reflects this requirement.

176. Having regard to the evidence base, the criteria within the policy are considered to be justified.

### **Swanton Morley**

177. Swanton Morley Residential Allocation 1 is proposed for 85 dwellings on land amounting to 4.9 hectares. The allocation includes 8 criteria which seek the satisfactory development of the site. The criteria are considered to be justified and appropriate having regard to the evidence and stakeholder representations.

178. Criteria 1 and 3 relate to the requirements to achieve safe highways access, and improvements to Harkers Lane for pedestrian access. Criterion 5 has been developed to respond to the requirements of Policy ENV04 of the Local Plan.

179. Criteria 6 and 7 have been developed in relation to the requirements of the Water Cycle Study (LP/E/5) and the Sequential Test (LP/E/7). Criterion 8 seeks to prevent the development of the site restricting the future development requirements of Swanton Morley beyond this plan period. This approach is considered

**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?**

180. The Council considers the evidence which has ruled out alternative sites in Dereham to be sufficiently robust. The methodology for the assessment of all sites is set out within the site selection topic paper (LP/H/4) on pages 7-9. The site selection topic paper sets out the following key stages through which all sites have been considered:

1. Site has been identified to the Council either through a call for sites or through the SHLAA.
2. Initial sustainability appraisal.
3. Site visit
4. Stakeholder consultation/feedback – this has included information from Norfolk County Council as the highways authority
5. Identification of any further site specific issues – this included information from studies such as the Historic Characterisation Study, Strategic Flood Risk Assessment and Habitats Regulation Assessment
6. Re-assessment as part of the sustainability appraisal

181. Alongside the methodology within the site selection topic paper, public consultation has also taken place twice at regulation 18 (LP/S/9 and LP/S/12).

182. The site selection topic paper at appendix 4 seeks to draw together the information on the individual sites in Dereham. The sustainability appraisal accompanying the submission Local Plan (LP/S/3) sets out (Appendix C, Chapter 16) the final sustainability appraisal of each of the sites. As set out within the Environmental Assessment of Plans and Programmes Regulations (2004), sustainability appraisal is an iterative process, and it is considered that the approach taken has identified the most appropriate strategy having regard to all reasonable alternatives.

183. The Council has sought to fully assess all promoted sites and has used a wide range of evidence base in order to do this. The sites included as allocations are considered to represent the most sustainable pattern of development. This is set out further in response to issue 14.14. In this regard the evidence is considered to be 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?**

184. In response to Matter 15 the Council proposes a modification to policy ENV08 Non-Designated Heritage Assets. This will require an archaeological field evaluation where the developments location includes suspected archaeological assets. The policy does not require an archaeological field evaluation where there are no known or suspected assets. This requirement is already included within Policy ENV07 Designated Heritage Assets. The Local Plan should be read as a whole, and on the basis the requirements are already included within Policies ENV07 and ENV08 it is not considered necessary to repeat this within each of the Dereham Housing Allocations policy. In this regard the allocations policies are considered to be effective, without need for modification.

185. Where the historic characterisation study has highlighted areas of concern, the housing allocations policies have sought to include these within the policy wording. For instance the policy for Dereham Housing Allocation 4 highlights the need for development to have regard to the main Dereham Hospital building as a non-designated heritage asset. This was identified through the Historic Characterisation Study (LP/E/4) and is considered relevant and necessary to make the policy effective to include within the policy wording. Where the study has considered there to be limited impact on the historic environment and instead highlights the needs for an analysis of the immediate and wider context it is not considered necessary to make the policy effective to include this within the policy wording. Furthermore (and as set out above), any planning application and decision taking for these sites will also need to have regard to all the development plan policies, including policies ENV07 and ENV08.



**14.18: Can 60 dwellings and associated infrastructure (such as open space) be delivered within the proposed site boundary of Dereham Housing Allocation 1?**

186. It is the Council's opinion that Dereham Housing Allocation 1 is able to deliver 60 dwellings and the associated infrastructure required to support the development. The site is currently the subject of a planning application 3PL/2015/1045/O for 62 dwellings. The site amounts to 2.3 hectares which would allow for a density of 26 dwellings per hectare. This is considered to be appropriate for locations at the edge of a market town and reflects the form and character of adjoining development.

187. Due to the size of the site, onsite provision for 2 Local Areas of Play will be required in accordance with Policy ENV04 of the Local Plan. The current scheme as submitted under application 3PL/2015/1045/O shows that it is possible to accommodate this and all other infrastructure within the site boundary.

**14.19: Is criterion 5 of Dereham Housing Allocation 4 justified and consistent with Policy ENV 04?**

188. Criterion 5 requires the development to provide a minimum of two Local Areas of Play (LAPs). Policy ENV04 states that on sites of 50 dwellings or above a minimum of 2 LAPs (or equivalent provision if provided as 1 large LAP). Based on the dwelling requirement set out in Housing Allocation 4 this is considered to be consistent and justified in relation to Policy ENV04.

**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?**

189. The reasoned justification to the policy at paragraph 3.141 includes reference to the historic characterisation study and the requirement to demonstrate a full analysis of the immediate and wider context to ensure an appropriate design response within the site. Any planning application will also need to have regard to Policies ENV07 and ENV08 of the Local Plan. This includes the need to have regard to designated and non-designated assets and their settings.

190. Having regard to the requirements of the reasoned justification and the need to consider the plan as a whole (including all policies) it is considered that the approach taken is effective without further modification to the policy. However, should

the Inspector be minded to include this within the policy, the Council would not object.

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

191. Settlement boundaries are used to delineate the areas where the principle of new market dwellings is considered to be acceptable. This is set out within paragraph 2.52 of the submission Local Plan. Both St Nicholas Junior School and Neatherd High School are located at the edge of town. The schools were not previously located inside the Dereham settlement boundary. To therefore extend the settlement boundary around these schools has the potential to increase pressure on the sites for alternative uses and may indicate that new dwellings are acceptable in this area.

192. The location outside of the settlement boundary does not impact on the ability to expand the school or make alterations to the existing buildings for their existing use. The determination of any such application could occur having regard to the requirements of the NPPF and Local Plan policies. If in future the use of the schools is no longer required a wider review of the site should occur. On this basis, the Council consider the approach to the Dereham settlement boundary to be justified.

**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?**

193. During the Preferred Site Options and Settlement Boundaries Consultation (LP/S/12) Swaffham Allocation 1 and 5 were identified as Preferred Sites and, at that point in the plan making process, had resolution to grant subject to S106. At that stage, Swaffham Allocation 1 and 5 were identified as preferred options for allocation to provide certainty that the sites would be developed, as the legal agreement had not been signed. Due to the nature of the plan making process and the decision making process running in parallel to one another, these sites have since been granted outline planning permission.

194. Table 3.3 sets out that 781 dwellings are allocated for Swaffham. This includes the 181 dwellings, making up Swaffham Allocation 1 and 5. Policy HOU 02

splits this total figure into 600 dwellings under the heading 'housing allocations included within the Local Plan' and 181 dwellings are included within the 'completions and commitments' figure. There is therefore no double counting within the Local Plan.

195. Appendix 2 of Matter 5, provides an update to the figures in Policy HOU 02. This seeks to provide more clarity by breaking down the figures into a number of headings, further demonstrating that these sites have not been double counted.

**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?**

196. The allocations for Swaffham are within an area marked by orange cells in the HRA, which represents a precautionary area beyond the primary 1500m buffer and secondary buffer representing functionally linked areas such as known nesting sites. The orange cell areas mark where data is currently lacking, but where there is a possibility that the land could be functionally linked to the SPA.

197. As outlined in the Council's response to Matter 1, question 1.5, it would be disproportionate to survey all the area depicted as orange cells at the plan level as these areas are not within the SPA, or the 1500m primary buffer. For those allocations within the orange cells, mitigation can, in principle, be provided. This would be identified through a project level HRA for these sites. The HRA determines that the plan is fully compliant with the Habitats Regulations.

198. The allocated Swaffham sites are all adjacent to the built up area of Swaffham and on the east and north east of the market town, which is bordered by the strategic road (A47) to the north. The sites are therefore separated from the SPA by the built up area of the town and due to their location, are highly unlikely to contain areas that would be classed as functionally linked land for the Brecks SPA/SAC. Furthermore, most sites (other than Swaffham Allocation 2) have outline planning permission and therefore it is arguable that the policy clause is applicable in all cases as it has been demonstrated through the determination of the application that the site is suitable for housing. However, should the permission lapse or the S106 not be agreed, in line with the HRA and proposed approach in Policy ENV 03 this clause remains justified and relevant, as, in theory, there is potential that undeveloped land could become functionally linked to the SPA in future.

199. Following assessment and consultation on the proposed allocations with Natural England, the RSPB and Norfolk Wildlife Trust, there is no evidence to suggest these sites would present functionally linked land for Stone Curlew. A project level HRA will ensure that this is thoroughly investigated, and appropriate mitigation provided if it is demonstrated to present functionally linked land for Stone Curlew.
200. The allocations in Swaffham are considered justified, consistent with national policy and deliverable.

**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)?**

201. The Landscape Character Assessment Settlement Fringe Study (2007) (LP/E/2) illustrates that the site is situated within the landscape character area SW1 'Clarence Hills Open Tributary Farmland', which is of moderate sensitivity. This is shown to be a lower landscape sensitivity than areas to further south or areas to the east and north of Swaffham.
202. The Historic Characterisation Study (LP/E/4) demonstrates that Swaffham Allocation 3 would not have an impact upon the built environment, with the Grade 2 listed Carol House being over 500m from the site. The study does set out that development of the site should respect the landscape sensitivity of the area and respect the site's edge of settlement location and have regard to nearby form and character.
203. Criterion 4 of the policy states that 'the layout and design of the site will provide an appropriate response to the established pattern of development along Norwich Road and respect the site's location as a key gateway into Swaffham'. Notwithstanding a minor modification to the road name, which should state 'South Pickenham Road', the criterion as worded reflects the findings of the Historic Characterisation Study.
204. Further to the above, any planning application will also need to have regard to Policies ENV07 and ENV08 of the Local Plan. This includes the need to have regard to designated and non-designated assets and their settings.

205. Having regard to the requirements of the reasoned justification and the need to consider the plan as a whole (including all policies) it is considered that the approach taken is effective without further modification to the policy.

**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?**

206. The Historic Characterisation Study (LP/E/4) demonstrates that there are no non-designated heritage assets within the vicinity.

207. Criterion 4 states that 'the scheme design proposal will be informed via a detailed appraisal of the assets' significance'. This could be captured within a Heritage Statement.

208. Further to the above, any planning application will also need to have regard to Policies ENV07 and ENV08 of the Local Plan. This includes the need to have regard to designated and non-designated assets and their settings.

209. Having regard to the requirements of the reasoned justification and the need to consider the plan as a whole (including all policies) it is considered that the approach taken is effective without further modification to the policy.

**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?**

210. The wording in Swaffham Allocation 5 should be amended to reflect Table 3.3. It is proposed that the wording in Swaffham Allocation 5 will be updated to state "Land amounting to approximately 6 hectares is allocated for residential development of at least ~~78~~ 130 dwellings".

**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)?**

211. The Landscape Character Assessment Settlement Fringe Study (2007) (LP/E/2) illustrates that the site is situated within the landscape character area SW1 'Clarence Hills Open Tributary Farmland', which is of moderate sensitivity. This is shown to be a lower landscape sensitivity than areas to further south or areas to the east and north of Swaffham.
212. The Historic Characterisation Study (LP/E/4) demonstrates that Swaffham Allocation 3 would not have an impact upon the built environment, with existing development separating the site and the conservation area and designated heritage assets. The study does set out that development of the site should respect the site's location on the edge of the settlement and the site being a prominent gateway into the village and preserving native trees where possible.
213. Criterion 4 of the policy states that 'the layout and design of the site will provide an appropriate response to the established pattern of development along Sporle Road and respect the site's location as a key gateway into Swaffham'.
214. Further to the above, any planning application will also need to have regard to Policies ENV07 and ENV08 of the Local Plan. This includes the need to have regard to designated and non-designated assets and their settings.
215. Having regard to the requirements of the reasoned justification and the need to consider the plan as a whole (including all policies) it is considered that the approach taken is effective without further modification to the policy.

**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?**

216. Criterion 3 of Swaffham Allocation 6 is based on the evidence provided within the Historic Characterisation Study (LP/E/4) and is summarised within the supporting text of the policy. This is consistent with paragraph 169 of the National Planning Policy Framework (NPPF), which states that "*Local Planning authorities should have*

*up-to-date evidence about the historic environment in their area and use it to assess the significance of heritage assets and the contribution they make to their environment”.*

217. The wording of Criterion 3 is consistent with Chapter 12 of the (NPPF), ‘conserving and enhancing the historic environment’, which sets out the approach to the historic environment, particularly paragraphs 128 and 129. Paragraph 128 states that *“In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance”*. Paragraph 129 of the NPPF states that *“Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence any necessary expertise”*.

218. Any application that is submitted on Swaffham Allocation 6 would be expected to meet the key development considerations set out in the wording of Swaffham Allocation 6. As such, any proposal would be informed by a detailed appraisal of the assets’ significance. This would ensure that an assessment would be undertaken regarding the Grade II\* listed Manor House and that any potential effects would be fully considered.

219. Criterion 1 is included based on the up-to-date evidence regarding the historic environment and is consistent with national policy. The policy, as worded, would ensure that any potential effects on the Grade II\* listed Manor House would be 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?**

220. Watton is identified as a Market Town and therefore has a range of services and facilities, is served regularly by public transport and is a generally sustainable location for growth. No overriding issues with infrastructure capacity were identified in the Infrastructure Delivery Plan (LP/V/1) which would constrain additional growth, although additional treatment capacity will be required at the Wastewater Treatment Works and Norfolk County Council are planning to deliver a further primary school to serve the committed and planned growth for the town. The proposal for additional allocations was discussed with Watton Town Council. There was a limited response on the proposals for Watton in the consultation on the Pre-submission publication (LP/S/1). There is no evidence to demonstrate that 30 additional houses could not be delivered.

221. Paragraph 58 of the NPPF states that 'planning policies and decisions should optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including the incorporation of green and other public space as part of developments) and support local facilities and transport networks). A standardised approach was used to determine the appropriate number of housing on each site based on the density multiplier in the SHLAA which also takes into account infrastructure within the site in the final calculation (LP/H/5). It would not be justified to artificially reduce the number of dwellings for one or more site allocations in Watton to meet a lower collective target of 175 dwellings proposed in HOU 02. This could potentially have an adverse impact on viability.

222. Ultimately, the strategic policy HOU 01 sets the overall housing target as a minimum, 30 additional dwellings in a Market Town is not considered disproportionate in terms of strategic growth planned for Watton in HOU 02 and allocating above the target, where appropriate, helps to provide flexibility in the Plan.

**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?**

223. The allocations for Watton are within an area marked by orange cells in the HRA, which represents a precautionary area beyond the primary 1500m buffer and secondary buffer representing functionally linked areas such as known nesting sites. The orange cell areas mark where data is currently lacking, but where there is a possibility that the land could be functionally linked to the SPA.



224. As outlined in the Council's response to Matter 1, question 1.5, it would be disproportionate to survey all the area depicted as orange cells at the plan level as these areas are not within the SPA, or the 1500m primary buffer. For those allocations within the orange cells, mitigation can, in principle, be provided. This would be identified through a project level HRA for these sites. The HRA determines that the plan is fully compliant with the Habitats Regulations.
225. The orange cells cover a wide area around the SPA. Some areas would be more likely to contain suitable habitat for Stone Curlew than others. For example, the orange cell area covers the entire built up area of Watton which would not support suitable habitat for Stone Curlew. All sites were visited by officers in assessing their suitability for housing.
226. The southern area of Watton Housing Allocation 1 comprises infill development adjacent to housing on the east, south and west boundaries. To the north of the site is a golf course and to the west it is adjacent to Saham Road. Watton Housing Allocation 2 comprises an infill site with housing to the west, Norwich Road and further built development to the south and a business park to the east. Following assessment and consultation on the proposed allocations with Natural England, the RSPB and Norfolk Wildlife Trust, there is no evidence to suggest these sites would present functionally linked land for Stone Curlew. A project level HRA will ensure that this is thoroughly investigated, and appropriate mitigation provided if it is demonstrated to present functionally linked land for Stone Curlew.
227. The allocations in Watton are considered justified, consistent with national policy and deliverable.
228. Criteria 1 and 2 of Policy Watton Housing Allocation 2 relate to highways matters. Criterion 1 clarifies the access point to the site. Criterion 2 sets out that transport mitigation measures should be implemented to the satisfaction of Norfolk County Council (NCC) in their capacity as the Highway Authority. NCC have not indicated that transport mitigation measures are required for this site, but due to the status of Norwich Road as the principal route through Watton, the number of access points onto the road and the proposed intensive use of the site for a care home and market housing, mitigation measures may be required to ensure highway safety. A

minor modification is proposed to Policy Watton Housing Allocation 2 to clarify this point:

'2. Implementation of transport mitigation measures, where necessary, to the satisfaction of Norfolk County Council Highway Authority'

229. Criterion 8 of the policy relates to evidence presented in the Water Cycle Study (WCS) (LP/E/5). The overarching approach is explained in the Councils response to Matter 18 Infrastructure, question 18.4. The Water Cycle Study indicates that Watton in one of four Waste-water Treatment Works (WwTW) in the district where additional treatment capacity will be required (WCS, Section 3.2.2). The site (previous reference LP[104]015) is categorised as amber in the wastewater network RAG assessment indicating that the pumping station or pipe size may restrict growth; a predevelopment enquiry is recommended before planning permission is granted. The requirement is in line with the findings of the Water Cycle Study and ensures that development proposals will minimise the risk of sewer flooding or overflowing of the river system.

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

230. Criterion 9 of Watton Housing Allocation 2 is based on the evidence provided within the Historic Characterisation Study (LP/E/4) and is summarised within the supporting text of the policy. This is consistent with paragraph 169 of the National Planning Policy Framework (NPPF), which states that "*Local Planning authorities should have up-to-date evidence about the historic environment in their area and use it to assess the significance of heritage assets and the contribution they make to their environment*".

231. The wording of Criterion 9 is consistent with Chapter 12 of the (NPPF), 'conserving and enhancing the historic environment', which sets out the approach to the historic environment, particularly paragraphs 128 and 129. Paragraph 128 states that "*In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance*". Paragraph 129 of the NPPF states that "*Local*

*planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence any necessary expertise”.*

232. Criterion 9 of Watton Housing Allocation 2 is based on the up-to-date evidence regarding the historic environment and is 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?**

233. The Historic Characterisation Study (LP/E/4) makes reference to the nearby Grade I listed Church of St. Nicholas, Grade II Listed building, ‘The Glebe’, and the non-designated 19<sup>th</sup> Century school which is adjacent to the site. The study concludes by giving the site an amber rating, meaning that the site should be retained subject to policy requirements and development considerations should be updated. The study sets out that development of the site should respect the setting of the nearby non designated heritage assets and views to the Grade I listed Church of St. Nicholas.

234. The Grade I listed Church of St. Nicholas is located approximately 260m to the south west of the proposed allocation. There are a number of dwellings along Church Street, between the Church and the proposed allocation. It is from further north along Hale Road that the Church Tower can be viewed. The study concludes that development should respect the views to the Grade I listed Church of St. Nicholas, which is reflected in Criterion 2

235. The Grade II Listed ‘The Glebe’ is located approximately 220m to the south west of the proposed allocation. There are a number of dwelling along Church Street and The Woodlands, between the proposed allocation and the listed building. It is not possible to see the listed building from the site and, therefore, this would not cause harm to the heritage asset. This is reflected in the conclusion of the Historic Characterisation Study by omission.

236. The non-designated 19<sup>th</sup> Century school with attached master's house, lies adjacent to the proposed site. The asset is considered to be non-designated heritage asset by meeting the criteria of 'social or communal value' and 'aesthetic merits'.

237. It is considered that Criterion 2 of the policy which states that "The scheme design, whilst preserving and enhancing, is complementary to the special interest of the existing designated and non-designated heritage assets. The scheme design proposal will be informed via a detailed appraisal of the assets'. Further to the this, any planning application will also need to have regard to Policies ENV07 and ENV08 of the Local Plan. This includes the need to have regard to designated and non-designated assets and their settings.

238. Having regard to the requirements of the reasoned justification and the need to consider the plan as a whole (including all policies) it is considered that the Ashil Housing Allocation 1 could come forward without causing harm to heritage assets.

#### **14.34: Is Criterion 2 consistent with national policy?**

239. Criterion 2 is based on the evidence provided within the Historic Characterisation Study (LP/E/4) and is summarised within the supporting text of the policy. This is consistent with paragraph 169 of the National Planning Policy Framework (NPPF), which states that "*Local Planning authorities should have up-to-date evidence about the historic environment in their area and use it to assess the significance of heritage assets and the contribution they make to their environment*".

240. The wording of Criterion 2 is consistent with Chapter 12 of the (NPPF), 'conserving and enhancing the historic environment', which sets out the approach to the historic environment, particularly paragraphs 128 and 129. Paragraph 128 states that "*In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance*". Paragraph 129 of the NPPF states that "*Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence any necessary expertise*".

241. Criterion 2 is included based on the up-to-date evidence regarding the historic environment and is consistent with national policy.

## **Banham**

### **14.35: Is the settlement boundary for Banham justified?**

242. The settlement boundary for Banham reflects residential planning permissions and the proposed residential allocation, Banham Housing Allocation 1. The site does not include site LP[003]003 as this is proposed for open space.

243. This approach is consistent with all settlements where allocations are proposed and is considered to be justified.

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

244. Banham Housing Allocation 1 seeks to allocate sites LP[003]009 and LP[003]012 for 42 dwellings. Site LP[003]009 is currently designated open space amounting to approximately 0.75ha of open space. It is proposed that this land is swapped with site LP[003]003, which is in an equally accessible and convenient location.

245. This approach is supported by criterion C of Policy ENV 04 states that *“development that would result in the loss of existing designated open space will only be permitted if the community would gain greater benefit from the developer providing a suitable alternative recreational or amenity open space in an equally accessible and convenient location”*.

246. Furthermore, comment 300 within the Pre-Submission Publication Full Representation Schedule (LP/S/25), was submitted on behalf of Breckland Bridge Ltd. and G F Cole & Sons Ltd. and states that *‘The area of land currently designated as Open Space, immediately adjacent to Wayland Way and Gaymer Close, is approximately 0.75ha, and it is this space that is to be re-provided on the land to the*

*south of Greyhound Lane*. This illustrates that the proposed approach is supported by the landowners.

247. The Council consider that the requirements for open space as part of the allocation are justified and have landowner support. However, to ensure clarification regarding the amount of land proposed for residential allocation and the amount of land proposed for open space the following amendment to the first paragraph of the policy wording is recommended:

“Land amounting to ~~3.2ha~~ 2ha (sites LP[003]009 and LP[003]012) is allocated for a residential development of at least 42 dwellings. A minimum of ~~4~~ 0.75ha of open space including a children’s play...”

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

248. Banham Housing Allocation 1 comprises three sites LP[003]003, LP[003]009 and LP[003]012. Sites LP[003]009 and LP[003]012 are proposed for residential development of at least 42 dwellings, whilst LP[003]003 is proposed to provide at least 0.75ha of open space.

249. The methodology for the Historic Characterisation Study (LP/E/4) was produced in line with Historic England Advice Note 3 on the Historic Environment and Site Allocations in Local plans and has regard to the comments received on the Preferred Sites and Settlement Boundaries Consultation from Historic England. The methodology for the study was prepared in consultation with Historic England who states that they consider the approach to provide *‘an excellent, evidence base approach to site selection and help to ensure that the plan is robust with regard to the historic environment’*. As such, the findings of the Historic Characterisation Study are considered to be robust.

250. The Historic Characterisation Study (LP/E/4) states that, regarding LP[003]003, that development proposals must demonstrate that *“the location within the conservation area and the established pattern of adjacent mixed development will be additional factors in the formation of proposals.”* It does however include the need

for a suitable design proposal to be developed to having regard to the wider context. This is included in the supporting text.

251. This is reflected in Criterion 5 of Banham Housing Allocation 1 states that “*Development proposals should seek to protect and enhance the setting of Banham Conservation Area*” and Criterion 3, which states “appropriate use of height and scale to ensure the site’s position as a gateway to the settlement”.
252. In addition to the above, any planning application will also need to have regard to Policies ENV07 and ENV08 of the Local Plan. This includes the need to have regard to designated and non-designated assets and their settings.
253. Having regard to the requirements of the reasoned justification and the need to consider the plan as a whole (including all policies) it is considered that the approach taken is effective without further modification to the policy.

### **Bawdeswell**

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

254. Bawdeswell Housing Allocation 1 ‘Land off Hall Road (LP[004]008)’ has been assessed within the Historic Characterisation Study (LP/E/4). The conclusion in the study states that development would have ‘Limited impact on the historic environment’ and that ‘Development proposals must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken so as to inform an appropriate design response’.
255. It is acknowledged within the study that the conservation area is within close proximity to the site. However, the study states that development would have “no impact on designated heritage assets. The conservation area cannot be viewed due to the existing estate development”.

256. The Historic Characterisation Study provides 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?**

257. The Council consider that sites LP[031]004 and LP[031]005 represents the most appropriate options for development. Through the site selection process (the methodology for which is included in the site selection topic paper (LP/H/1)) the Council was not able to identify any reasonable alternative options.

258. Appendix 5 of the Site Selection Topic Paper sets out a summary of the site assessment for all land included within Garboldisham. All of the sites were also consulted on as part of the regulation 18 consultations preferred directions (LP/S/9) and preferred sites and settlement boundaries (LP/S/12). As part of this assessment, NCC highways have indicated that sites to the north of the A1066 have severe highways constraints, with Back Street not being a suitable width for increased traffic generated by development. This led to the exclusion of a number of sites, as set out in the preferred sites and settlement boundaries consultation. Further details of this are also included in response to issue 14.14

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

259. The Council consider that there is sufficient evidence to demonstrate the suitability of sites in relation to both flood risk and highway safety.

#### **Flood Risk**

260. The allocation policy includes the requirement for a site specific flood risk assessment to be undertaken alongside appropriate surface water attenuation measures to be provided onsite. The policy response is in relation to the findings of the sequential test (LP/E/7) which states '*the LLFA and the surface water flood map indicate that the western boundary of the site is subject to 1 in 1000 and, to a lesser*



*extent, 1 in 100 year flood events*'. Representations have not been received from the Lead Local Flood Authority at the regulation 19 stage to indicate that the development is not feasible due to flood risk. Further to this, the site area equates to 1.45 hectares, and with a requirement for 35 dwellings it is considered that there is sufficient land available within the site to design a suitable scheme having regard to the areas of surface water flooding on the western boundary.

#### Highways

261. NCC as the Highways Authority have provided comments on this allocation. They have not objected to the development of this site at Regulation 19. They have indicated the need for improvements to the footpath network, however subject to safe access they have stated they would not object to the site being included within the plan. Criteria are included within the allocation policy to ensure the safe provision of access from Hopton Road and Improvements to the footpath network.

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

262. In order to be effective the site must be deliverable over the plan period. The site has been assessed as part of the Historic Characterisation Study (LP/E/4), this included within the assessment of the site in relation to all designated heritage assets which were located within 500m. This methodology was agreed with Historic England prior to the assessment occurring. The representation at Regulation 19 from Historic England references scheduled monuments which are located 1600m to the west of the site. As part of the historic characterisation study, the assessment for this site notes the need for the development proposal to demonstrate a full analysis of the immediate and wider context. This is included in the supporting text to the policy.

263. The Historic Characterisation Study also notes that the topography of the site is complex and there are key views to the west. In response a criteria has been included in the policy to relation for a masterplan approach to the site which will need to have regard to site levels and landscape. This is also included within the supporting text to the policy.

264. In relation to the potential for archaeological assets, Policies ENV07 and ENV08 include criteria for archaeological field evaluation where there is suspected archaeological interest. As the requirement is included within other policies within the

plan it is not considered necessary to repeat this within the allocation policy in order for it to be effective.

265. Having regard to the findings of the Historic Character Assessment and the requirements of Policies ENV07 and ENV08 of the plan alongside the criteria within the allocation policy, Garboldisham Housing Allocation 1 is considered to be effective.

### **Great Ellingham**

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

266. Policy HOU02 sets out the housing targets for individual settlements. Since the start date of the plan (2011), 184 dwellings have either been granted planning permission or have been completed. An allocation was proposed through the regulation 18 consultations (LP/S/8 and LP/S/12) however the level of growth through the windfall planning permissions has exceeded the proposed level of growth set out at regulation 18.

267. Due to the level of housing development which is either committed or completed within the village since 2011 it is not considered appropriate to include further allocate within the village. The Government's proposals around 5 year reviews of Local Plans would allow this to be reviewed over the plan period. Further to this a neighbourhood plan would also be able to consider additional housing development within the Local Service Centre.

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

268. The Council does not intend to rely on Policy HOU03 to facilitate windfall development in Great Ellingham. As set out in response to issue 14.42, the housing target for the plan period within Great Ellingham has already been met through committed developments.

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

269. The settlement boundary as set out within map 3.7 is considered to be up to date. The boundary has been extended around sites with planning permission for residential development, this has been subject to consultation at Regulation 18 Preferred Sites and Settlement Boundaries (LP/S/12)

### **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?**

270. Significant consultation has occurred with Norfolk County Council as the Highways Authority through the preparation of the regulation 18 and 19 versions of the Local Plan and also as part of the site selection topic paper (LP/H/4).
271. Having regard to the regulation 19 representation made by Norfolk County Council as the Highways Authorities, the Council support the proposed modifications to the policy as per the Highways Authorities representations. The modifications are considered to make the policy more effective.

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

272. The site was assessed as part of the Historic Characterisation Study (LP/E/4) which considered there to be limited impact on the historic environment from the development of the site. The study does require any development proposal to include an assessment of the wider context to develop an appropriate design response. This is included in the supporting text to Harling Housing Allocation1.
273. Further to the above, any planning application will also need to have regard to Policies ENV07 and ENV08 of the Local Plan. This includes the need to have regard to designated and non-designated assets and their settings.
274. Having regard to the requirements of the reasoned justification and the need to consider the plan as a whole (including all policies) it is considered that the approach taken is effective without further modification to the policy.

**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?**

275. The Council has prepared a Statement of Common Ground with Anglian Water (see Statement of Common Ground – Breckland District Council and Anglian Water), which incorporates their comments in relation to Harling. Having received further information in relation to the position of the pumping station. The Council would wish to propose a modification to include a criteria in relation to a 15m protection zone from pumping station to the nearest dwelling.

276. Due to the size of this site, there is considered to be sufficient space to ensure that the inclusion of this criterion does not compromise the ability to achieve a well designed scheme for 85 dwellings.

**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?**

277. The site proposed through the Preferred Sites and Settlement Boundaries consultation was for 25 dwellings on 0.8ha. Due to further information being received following the Preferred Sites and Settlement Boundaries consultation regarding ownership of the site and the potential need to re-align the track that runs through the site the site was increased in size to 1.2ha. In order to ensure consistency it is proposed that paragraph 3.243 is updated to state:

“the site is situated upon ~~0.8~~ 1.2 hectares...”

**Kenninghall**

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

278. The Council consider the plan to be both positively prepared and justified in accordance with the tests of soundness as set out at paragraph 182 of the NPPF. The starting point when considering site assessments was the requirement to allocate the whole target within the Local Service Centre. The response to question 5.8 of Matter 5 illustrates that the plan has been positively prepared and is justified. Question 9.5 looks at the specific sites submitted in Kenninghall and the process that has been undertaken.

279. Where the full housing target has not been able to be met through allocations within the plan, Policy HOU03 is of relevance. This policy allows development outside of the defined settlement boundary subject to criteria. As part of Policy HOU02 all reasonable alternatives for the distribution of development were assessed. This included higher numbers of dwellings being located within the market towns and key settlements. This approach did not score as positively against the sustainability appraisal objectives as the preferred approach. This is considered at pages 157-170 of the sustainability appraisal (LP/S/3).

280. Having regard to the reasonable alternatives which were considered through the sustainability appraisal, the approach is considered to be positively prepared and justified. Further to this, the use of Policy HOU03 would allow other sites to become available over the plan period and not prevent future development.

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

281. Norfolk County Council in their role as the Highway Authority provided comments on each stage of the plan making process. The final set of comments is contained within Site Specifics – Highway Authority Technical Advice (LP/V/10). Regarding the proposed allocation itself, the Highway Authority state that '*subject to a safe access and adequate visibility the Highway Authority would not object to a*

*smaller allocation of less than eight, in the local plan. It would be possible to access 008 through 003. It is likely that 003 will meet basic technical requirements, but the highway authority has concerns over the combined scale of the land at this allocation'. As a result of the Highways Authority's concerns regarding sites LP[051]003 and LP[051]008 coming forward together, only the proposed site, LP[051]003, is considered. The Highway Authority do not object to the proposed allocation coming forward and these comments provide sufficient evidence that the development of the site allocation would not unacceptably affect highway and pedestrian safety.*

**14.51: Is Criterion 1. consistent with national policy?**

282. Criterion 1 is based on the evidence provided within the Historic Characterisation Study (LP/E/4) and is summarised within the supporting text of the policy. This is consistent with paragraph 169 of the National Planning Policy Framework (NPPF), which states that *"Local Planning authorities should have up-to-date evidence about the historic environment in their area and use it to assess the significance of heritage assets and the contribution they make to their environment"*.

283. The wording of Criterion 1 is consistent with Chapter 12 of the (NPPF), 'conserving and enhancing the historic environment', which sets out the approach to the historic environment, particularly paragraphs 128 and 129. Paragraph 128 states that *"In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance"*. Paragraph 129 of the NPPF states that *"Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise"*.

284. Criterion 1 is included based on the up-to-date evidence regarding the historic environment and is 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?**

285. Criterion 1 states that ‘The scheme design, whilst preserving and enhancing, is complementary to the special interest of the designated heritage assets and the conservation area. The scheme design proposal will be informed via a detailed appraisal of the assets’ significance.

286. Paragraph 3.254 states that ‘the site benefits from limited constraints; however, the Historic Characterisation Study (2017) sets out that development proposals “*must demonstrate that full analysis of the immediate and wider context of the site has been undertaken so as to inform an appropriate design response. In this particular instance, the existing pattern of established development will be an additional factor in the formation of proposals*”.

287. Kenninghall Housing Allocation 1 does refer to the need to have regard to heritage assets and is therefore effective.

### **Litcham**

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

288. The Council consider the plan to be both positively prepared and justified in accordance with the tests of soundness as set out at paragraph 182 of the NPPF. The starting point when considering site assessments was the requirement to allocate the whole target within the Local Service Centre. The response to question 5.8 of Matter 5 illustrates that the plan has been positively prepared and is justified. Question 9.5 looks at the specific sites submitted in Litcham and the process that has been undertaken.

289. Where the full housing target has not been able to be met through allocations within the plan, Policy HOU03 is of relevance. This policy allows development outside of the defined settlement boundary subject to criteria. As part of Policy HOU02 all reasonable alternatives for the distribution of development were assessed. This included higher numbers of dwellings being located within the market towns and key settlements. This approach did not score as positively against the

sustainability appraisal objectives as the preferred approach. This is considered at pages 157-170 of the sustainability appraisal (LP/S/3).

290. Having regard to the reasonable alternatives which were considered through the sustainability appraisal, the approach is considered to be positively prepared and justified. Further to this, the use of Policy HOU03 would allow other sites to become available over the plan period and not prevent future development.

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

291. The additional evidence that has ruled out sites put forward in Litcham is the Historic Characterisation Study (LP/E/4) and Norfolk County Council Highways Authority comments.

292. The methodology for the Historic Characterisation Study (LP/E/4) was produced in line with Historic England Advice Note 3 on the Historic Environment and Site Allocations in Local plans and has regard to the comments received on the Preferred Sites and Settlement Boundaries Consultation from Historic England. The methodology for the study was prepared in consultation with Historic England who states that they consider the approach to provide *'an excellent, evidence base approach to site selection and help to ensure that the plan is robust with regard to the historic environment'*. As such, the findings of the Historic Characterisation Study are considered to be robust.

293. Norfolk County Council Highways have provided comments throughout the plan making process in their role as the Highway Authority. Comments from the Highways Authority have indicated that all of the proposed sites are not suitable for allocation. The document Highway Authority Technical Advice (LP/V/10) provides a comprehensive comment schedule and these comments are considered to be robust.

294. The Highway Authority have also responded to further evidence provided by developers to ensure. Through the Pre-Submission Consultation a comment was made by Savills (UK) Ltd (Comment 392 LP/S/25), which provided evidence in response to comments made by the Highway Authority within the Site Selection Topic Paper (LP/H/4).



295. Formal comments have been made in response to the comments from Create Consulting to the Council. The Highway Authority states that *“Access is considered to be unachievable onto the B1145. The Highway Authority would object to this site in being in the local plan. Further evidence submitted by Create has been reviewed. There continues to be sustained objection. The recorded vehicle speeds do not accord with Manual for Streets and the proposed visibility splays are inadequate. In light of the recorded speeds visibility splays of 2.4m x 120 would be required. In addition to substandard visibility the existing footway provision along B1145 is limited in width and not adequate to cater for further development and the objection to allocation remains”*.

296. The Historic Characterisation Study and Norfolk County Council Highway Authority comments are considered to provide robust evidence.

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

297. The Council consider that the use of windfall sites as defined through Policy HOU03 is considered to be justified in relation to the tests of soundness. Having regard to the updated information on commitments and completions, as provided at Appendix 4 to Matter 4, it is possible to see the level of development which has occurred in Litcham since the start of the plan period. This shows commitments for 7 dwellings and that 2 dwellings have already been completed, an increase of four dwellings since the figures in the Pre-submission version of the plan was published. The figures show that there is existing trends around delivery through windfall development in Litcham. Policy HOU03 supports this. Due to the past trends in relation to windfall development, the approach should be seen to be justified.

**Mattishall**

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

298. The Council consider the plan to be both positively prepared and justified in accordance with the tests of soundness as set out at paragraph 182 of the NPPF. The starting point when considering site assessments was the requirement to allocate the whole target within the Local Service Centre. The response to question 5.8 of Matter 5 illustrates that the plan has been positively prepared and is justified. Question 9.5 looks at the specific sites submitted in Mattishall and the process that has been undertaken.

299. As part of Policy HOU02 all reasonable alternatives for the distribution of development were assessed. This included higher numbers of dwellings being located within the market towns and key settlements. This approach did not score as positively against the sustainability appraisal objectives as the preferred approach. This is considered at pages 157-170 of the sustainability appraisal (LP/S/3).

300. Having regard to the reasonable alternatives which were considered through the sustainability appraisal, the approach is considered to be positively prepared and justified. Further to this, the use of Policy HOU03 would allow other sites to become available over the plan period and not prevent future development.

301. On the 6<sup>th</sup> March 2018 the application 3PL/2015/0489/O was allowed on appeal (APP/F2605/W/17/3185918<sup>3</sup>) for 50 dwellings. The remaining 42 dwelling target has now been met by this appeal and no further dwellings are proposed to come forward through policy HOU 03.

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

302. The evidence that has ruled out other sites put forward within Mattishall has been Norfolk County Council Highways comments, the Historic Characterisation study and the Sequential Test.

303. Norfolk County Council Highways have provided comments throughout the plan making process in their role as the Highway Authority. The document Highway

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<sup>3</sup> Planning Inspectorate website (2018) APP/F2605/W/17/3185918 [Online] <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3185918> [Accessed 16/03/2018]

Authority Technical Advice (LP/V/10) provides a comprehensive comment schedule and these comments are considered to be robust.

304. The methodology for the Historic Characterisation Study (LP/E/4) was produced in line with Historic England Advice Note 3 on the Historic Environment and Site Allocations in Local plans and has regard to the comments received on the Preferred Sites and Settlement Boundaries Consultation from Historic England. The methodology for the study was prepared in consultation with Historic England who states that they consider the approach to provide *'an excellent, evidence base approach to site selection and help to ensure that the plan is robust with regard to the historic environment'*. As such, the findings of the Historic Characterisation Study are considered to be robust.

305. The Sequential Test (LP/E/7) was produced in accordance with the Strategic Flood Risk Assessment (LP/E/6). The study examined all preferred and alternative sites that were published within the Preferred Sites and Settlement Boundaries consultation (LP/S/12) with the inclusion of additional, suitable sites that were submitted during the consultation. This study sought to build upon the findings of the sustainability appraisal (LP/S/3), by seeking to analyse the extent to which sites were subject to fluvial flood risk, surface water flood risk and groundwater vulnerability. Site profiles were produced for sites which were situated within a fluvial flood zone or subject to more than 10% surface water flooding. The site profiles included comments by the Lead Local Flood Authority and a detailed assessment of the flood risk on the site. The study recommends that the status of two preferred sites, including site LP[067]007 at Necton, and five alternative sites, including sites LP[067]004 and LP[067]005a at Necton, should be reconsidered in the Local Plan. This evidence was used as part of the site selection process in determining proposed allocations within the pre-submission version of the local plan.

306. The Council consider that the evidence used to assess the sites in Necton, in particular with regard to flood risk, is robust.

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

307. The Council consider that the use of windfall sites as defined through Policy HOU03 is considered to be justified in relation to the tests of soundness. Having regard to the updated information on commitments and completions, as provided at appendix 4 to Matter 4, it is possible to see the level of development which has occurred in Mattishall since the start of the plan period. This shows commitments for 79 dwellings and that 21 dwellings have already been completed, an increase of one dwellings since the figures in the Pre-submission version of the plan was published. The figures show that there is existing trends around delivery through windfall development in Mattishall. Policy HOU03 supports this. Due to the past trends in relation to windfall development, the approach should be seen to be justified.

308. On the 6<sup>th</sup> March 2018 the application 3PL/2015/0489/O was allowed on appeal (APP/F2605/W/17/3185918<sup>4</sup>) for 50 dwellings. The remaining 42 dwelling target has now been met by this appeal and no further dwellings are proposed to come forward through policy HOU 03.

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

309. The Mattishall Neighbourhood Plan was made on the 2<sup>nd</sup> of November 2017 and has been submitted to the evidence library under the reference LP/D/5.

**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?**

310. The allocation for Narborough borders an area marked by orange cells in the HRA, which represents a precautionary area beyond the primary 1500m buffer and secondary buffer representing functionally linked areas such as known nesting sites. The orange cell areas mark where data is currently lacking, but where there is a possibility that the land could be functionally linked to the SPA.

311. As outlined in the Councils response to Matter 1, question 1.5, it would be disproportionate to survey all the area depicted as orange cells at the plan level as

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<sup>4</sup> Planning Inspectorate website (2018) APP/F2605/W/17/3185918 [Online] <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3185918> [Accessed 16/03/2018]

these areas are not within the SPA, or the 1500m primary buffer. For those allocations within the orange cells, mitigation can, in principle, be provided. This would be identified through a project level HRA for these sites. The HRA determines that the plan is fully compliant with the Habitats Regulations.

312. All sites were visited by officers in assessing their suitability for housing. The site (Narborough Housing Allocation 1) comprises agricultural land which adjoins a permitted housing development site which is currently under construction on the northern boundary. To the northwest is a community centre and playing fields. Following assessment and consultation on the proposed allocations with Natural England, the RSPB and Norfolk Wildlife Trust, there is no evidence to suggest these sites would present functionally linked land for Stone Curlew. A project level HRA will ensure that this is thoroughly investigated, and appropriate mitigation provided if it is demonstrated to present functionally linked land for Stone Curlew.

313. The allocation in Narborough is considered justified, consistent with national policy and deliverable.

### **Necton**

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

314. The Council consider the plan to be both positively prepared and justified in accordance with the tests of soundness as set out at paragraph 182 of the NPPF. The starting point when considering site assessments was the requirement to allocate the whole target within the Local Service Centre. The response to question 5.8 of Matter 5 illustrates that the plan has been positively prepared and is justified. Question 9.5 looks at the specific sites submitted in Necton and the process that has been undertaken.

315. Where the full housing target has not been able to be met through allocations within the plan, Policy HOU03 is of relevance. This policy allows development outside of the defined settlement boundary subject to criteria. As part of Policy HOU02 all reasonable alternatives for the distribution of development were

assessed. This included higher numbers of dwellings being located within the market towns and key settlements. This approach did not score as positively against the sustainability appraisal objectives as the preferred approach. This is considered at pages 157-170 of the sustainability appraisal (LP/S/3).

316. Having regard to the reasonable alternatives which were considered through the sustainability appraisal, the approach is considered to be positively prepared and justified. Further to this, the use of Policy HOU03 would allow other sites to become available over the plan period and not prevent future development.

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

317. The Council consider that the use of windfall sites as defined through Policy HOU03 is considered to be justified in relation to the tests of soundness. Having regard to the updated information on commitments and completions, as provided at appendix 4 to Matter 4, it is possible to see the level of development which has occurred in Necton since the start of the plan period. This shows commitments for 151 dwelling and that 79 dwellings have already been delivered, an increase of one dwellings since the figures in the Pre-submission version of the plan was published. However, appendix 4 of Matter 4 also shows that, additionally, a site has Permission in Principle for between 4-8 dwellings. The figures show that there is existing trends around delivery through windfall development in Necton. Policy HOU03 supports this. Due to the past trends in relation to windfall development, the approach should be seen to be justified.

318. Furthermore, at Planning Committee on the 15<sup>th</sup> of January 2018 a planning application (3PL/2016/0983/O) was given decision to grant subject to a section 106 agreement for 46 dwellings on site Necton Allocation 2 (LP[067]010<sup>5</sup>). This is 6 more than was set out in the policy wording for Necton Allocation 2. Therefore, subject to the section 106 being signed, only 11 dwellings will be required to come forward through windfall development over the plan period.

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<sup>5</sup> Breckland Council Website (2018) 3PL/2016/0983/O  
[Online] <http://planning.breckland.gov.uk/OcellaWeb/planningDetails?reference=3PL/2016/0983/O> [Accessed 20 March 2018]

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

319. The evidence that has ruled out other sites put forward within Necton has been Norfolk County Council Highways comments, the Historic Characterisation study and the Sequential Test.

320. Norfolk County Council Highways have provided comments throughout the plan making process in their role as the Highway Authority. The document Highway Authority Technical Advice (LP/V/10) provides a comprehensive comment schedule and these comments are considered to be robust.

321. The methodology for the Historic Characterisation Study (LP/E/4) was produced in line with Historic England Advice Note 3 on the Historic Environment and Site Allocations in Local plans and has regard to the comments received on the Preferred Sites and Settlement Boundaries Consultation from Historic England. The methodology for the study was prepared in consultation with Historic England who states that they consider the approach to provide *'an excellent, evidence base approach to site selection and help to ensure that the plan is robust with regard to the historic environment'*. As such, the findings of the Historic Characterisation Study are considered to be robust.

322. The Sequential Test (LP/E/7) was produced in accordance with the Strategic Flood Risk Assessment (LP/E/6). The study examined all preferred and alternative sites that were published within the Preferred Sites and Settlement Boundaries consultation (LP/S/12) with the inclusion of additional, suitable sites that were submitted during the consultation. This study sought to build upon the findings of the sustainability appraisal (LP/S/3), by seeking to analyse the extent to which sites were subject to fluvial flood risk, surface water flood risk and groundwater vulnerability. Site profiles were produced for sites which were situated within a fluvial flood zone or subject to more than 10% surface water flooding. The site profiles included comments by the Lead Local Flood Authority and a detailed assessment of the flood risk on the site. The study recommends that the status of two preferred sites, including site LP[067]007 at Necton, and five alternative sites, including sites LP[067]004 and LP[067]005a at Necton, should be reconsidered in the Local Plan.

This evidence was used as part of the site selection process in determining proposed allocations within the pre-submission version of the local plan.

323. The Council consider that the evidence used to assess the sites in Necton, in particular with regard to flood risk, is robust.

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

324. Criterion 3 of Necton Housing Allocation 2 is based on the evidence provided within the Historic Characterisation Study (LP/E/4) and is summarised within the supporting text of the policy. This is consistent with paragraph 169 of the National Planning Policy Framework (NPPF), which states that *“Local Planning authorities should have up-to-date evidence about the historic environment in their area and use it to assess the significance of heritage assets and the contribution they make to their environment”*.

325. The wording of Criterion 3 is consistent with Chapter 12 of the (NPPF), ‘conserving and enhancing the historic environment’, which sets out the approach to the historic environment , particularly paragraphs 128 and 129. Paragraph 128 states that *“In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance”*. Paragraph 129 of the NPPF states that *“Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence any necessary expertise”*

326. Criterion 3 of Necton Housing Allocation 2 is included based on the up-to-date evidence regarding the historic environment and is consistent with national policy.

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



327. During the Preferred Directions Consultation site LP[067]011 was submitted as shown on Map 3.13 of the Pre-Submission Publication (LP/S/1). During the Preferred Sites and Settlement Boundaries Consultation (LP/S/12) a representation was made indicating that the site could be increased in size, based on Necton Management's intention to relocate these uses to an alternative site on the edge of Necton. This representation was repeated during the Pre-submission publication by the agent on behalf of Necton Management Ltd. This can be found within comment 129 of the Pre-Submission Publication Full Representation Schedule (LP/S/25).

328. The parcel of land in question is an operational builder's yard and office. Whilst it would be agreeable in principle for the site to relocate to an alternative location within the village, no evidence has been submitted to demonstrate that this is feasible and, at present, no alternative site has been identified for the proposal to occur. It is therefore considered that, in order to ensure employment opportunities remain consistent with the level of residential growth, Necton Housing Allocation 3 does not include the existing business as part of the residential allocation.

329. The Council consider that the boundary as originally submitted and as shown in the Pre-submission publication (LP/S/1) is 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?**

330. Criterion 3 of Necton Housing Allocation 3 states that "*The scheme design, whilst preserving and enhancing, is complementary to the special interest of the existing non-designated heritage assets. The scheme design proposal will be informed via a detailed appraisal of the assets' significance*".

331. Necton Housing Allocation 3 refers to need to have regard to non-designated heritage assets and is therefore considered to be effective.

**North Elmham**

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

332. The Council consider the plan to be both positively prepared and justified in accordance with the tests of soundness as set out at paragraph 182 of the NPPF. The starting point when considering site assessments was the requirement to allocate the whole target within the Local Service Centre. The response to issue 14.69 sets out the approach the Council took to the appraisal of sites in North Elmham.

333. Where the full housing target has not been able to be met through allocations within the plan, Policy HOU03 is of relevance. This policy allows development outside of the defined settlement boundary subject to criteria. As part of Policy HOU02 all reasonable alternatives for the distribution of development were assessed. This included higher numbers of dwellings being located within the market towns and key settlements. This approach did not score as positively against the sustainability appraisal objectives as the preferred approach. This is considered at pages 157-170 of the sustainability appraisal (LP/S/3).

334. Having regard to the reasonable alternatives which were considered through the sustainability appraisal, the approach is considered to be positively prepared and justified. Further to this, the use of Policy HOU03 would allow other sites to become available over the plan period and not prevent future development.

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

335. The Council consider that the use of windfall sites as defined through Policy HOU03 is considered to be justified in relation to the tests of soundness. Having regard to the updated information on commitments and completions, as provided at appendix 5 to Matter 4, it is possible to see the level of development which has occurred in North Elmham since the start of the plan period. This shows commitments for 64 dwellings (of which 37 are windfall), a further five dwellings have been completed in the parish all of which were on windfall sites. The figures show that there is existing trends around delivery through windfall development in North Elmham. Policy HOU03 supports this. Due to the past trends in relation to windfall development, the approach should be seen to be justified.

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

336. The Council consider the methodology which has ruled out sites in North Elmham to be suitably robust. The site selection topic paper (LP/H/4) sets out the methodology for the assessment of sites. All sites which have been promoted to the Council through a call for sites, within North Elmham have been assessed in accordance with this methodology and have been subject to sustainability appraisal. In accordance with the methodology in the site selection topic paper alongside the sustainability appraisal, evidence which led to the exclusion of sites included the Historic Character Assessment and the Strategic Flood Risk Assessment.

337. Sites within the Local Service Centre have been subject to consultation twice at regulation 18 through the Preferred Directions (LP/S/9) and the Preferred Sites and Settlement Boundaries consultation (LP/S/12). Representations were received during these regulations 18 consultations also helped to shape the assessment. This included representations made by stakeholders such as Norfolk County Council as the highways authority regarding the ability to achieve safe access to sites.

338. Appendix 5 of the Site Selection Topic Paper sets out a summary of how sites have been assessed within North Elmham. This includes where evidence has led to their exclusion.

339. The Council has sought to fully assess all promoted sites and has used a wide range of evidence base in order to do this. The sites included as allocations are considered to represent the most sustainable pattern of development. In this regard the evidence is considered to be sufficiently 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?**

340. As part of the response to Policy ENV08 Non-Designated Heritage Assets, the Council is proposing a modification to the policy to include the requirement for field evaluations in areas of known or suspected heritage assets. This requirement is already included within Policy ENV07 Designated Heritage Assets.

341. As the requirements are included as part of policies within the Local Plan it is not considered necessary to repeat them as a criteria within North Elmham Housing Allocation 1 for the policy to be effective of the lifetime of the plan.

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

342. Criterion 4 sets out that the development proposals should respect the setting of designated heritage assets within the vicinity of the site. The Historic Characterisation Study (LP/E/4) has highlighted the significant quantum of designated heritage assets within the vicinity of the site. This includes being located adjacent to the conservation area and in close proximity to a number of listed buildings, a scheduled monument and also a historic park and garden.

343. Paragraphs 133 and 134 of the NPPF are of particular relevance to criterion 4. The NPPF sets out that proposed development which leads to substantial harm to a heritage asset should be refused. Where a proposal leads to less than substantial harm this should be weighed against the public benefits of the proposal.

344. Whilst criterion 4 does not consider substantial harm; by requiring the development proposal to respect the setting of designated heritage assets criterion 4 is not considered to be inconsistent with national policy. The criterion seeks to recognise that heritage assets are an irreplaceable resource in accordance with paragraph 126 of the NPPF.

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

345. Criteria 2 and 3 of North Elmham Housing Allocation 2 relate to designated heritage assets within the immediate vicinity of the site. The criteria have been developed having regard to the findings of the Historic Characterisation Study (LP/E/4).

346. Criterion 2 seeks the retention of views through the development site, respecting the setting of the conservation area. This site represents an area of open land along the northern edge of Eastgate Street and allows for views through the wider landscape.

347. Criterion 3 seeks the development proposal to respect the setting of the adjacent listed buildings. As part of their representation at regulation 19, Historic England have stated that they would wish to see the words changed from listed

buildings to heritage assets. The Council would not object to this being included as a modification.

348. As set out in response to issue 14.71, whilst the criteria do not deal with substantial harm, by requiring the development proposal to respect the setting of designated heritage assets they are not considered to be inconsistent with national policy. The criteria seek to recognise that heritage assets are an irreplaceable resource in accordance with paragraph 126 of the NPPF.

### **Old Buckenham**

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

349. The Council consider the plan to be both positively prepared and justified in accordance with the tests of soundness as set out at paragraph 182 of the NPPF. The starting point when considering site assessments was the requirement to allocate the whole target within the Local Service Centre. The response to issue 14.75 sets out the approach the Council took to the appraisal of sites in Old Buckenham.

350. Where the full housing target has not been able to be met through allocations within the plan, Policy HOU03 is of relevance. This policy allows development outside of the defined settlement boundary subject to criteria. As part of Policy HOU02 all reasonable alternatives for the distribution of development were assessed. This included higher numbers of dwellings being located within the market towns and key settlements. This approach did not score as positively against the sustainability appraisal objectives as the preferred approach. This is considered at pages 157-170 of the sustainability appraisal (LP/S/3).

351. Having regard to the site assessment and lack of reasonable alternatives which were considered through the sustainability appraisal, the approach is considered to be positively prepared and justified.

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

352. The Council consider that the use of windfall sites as defined through Policy HOU03 is considered to be justified in relation to the tests of soundness. Having regard to the updated information on commitments and completions, as provided at Appendix 5 to Matter 4, it is possible to see the level of development which has occurred in Old Buckenham since the start of the plan period. This shows commitments for 16 a further 20 dwellings have been completed in the parish all of which were on windfall sites. The figures show that there is existing trends around delivery through windfall development in Old Buckenham since the start of the plan period. Policy HOU03 supports this. Due to the information on past trends of windfall delivery the policy approach is considered to be justified.

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

353. The Council consider the methodology which has ruled out sites in Old Buckenham to be suitably robust. The site selection topic paper (LP/H/4) sets out the methodology for the assessment of sites. All sites which have been promoted to the Council through a call for sites, within Old Buckenham have been assessed in accordance with this methodology and have been subject to sustainability appraisal. In accordance with the methodology in the site selection topic paper alongside the sustainability appraisal, evidence which led to the exclusion of sites included the Historic Character Assessment and the Strategic Flood Risk Assessment.

354. Sites within the Local Service Centre have been subject to consultation twice at regulation 18, through the Preferred Directions (LP/S/9) and the Preferred Sites and Settlement Boundaries consultation (LP/S/12). Representations were received during these regulations 18 consultations also helped to shape the assessment. This included representations made by stakeholders such as Norfolk County Council as the highways authority regarding the ability to achieve safe access to sites.

355. The Council has sought to fully assess all promoted sites and has used a wide range of evidence base in order to do this. The allocated site is considered to represent the most sustainable pattern of development. In this regard the evidence is considered to be sufficiently 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?**

356. The Historic Characterisation Study (LP/E/4) notes that development of the site would have a limited impact on the historic environment. It does however include the need for a suitable design proposal to be developed to having regard to the wider context. This is included in the supporting text.

357. In addition to the above, any planning application will also need to have regard to Policies ENV07 and ENV08 of the Local Plan. This includes the need to have regard to designated and non-designated assets and their settings.

358. Having regard to the requirements of the reasoned justification and the need to consider the plan as a whole (including all policies) it is considered that the approach taken is effective without further modification to the policy.

### **Shipdham**

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

359. The Infrastructure Delivery Plan (IDP) (LP/V/1) has been updated throughout the plan making process and provides a detailed assessment of the infrastructure required to support the aspirations of the Local Plan. The IDP reported where there are known infrastructure issues with Local Service Centre settlements.

360. In terms of education Norfolk County Council (NCC) Children's Services provided comments throughout the plan making process. As of January 2017, in regards to Shipdham, it was stated that "*school could be expanded subject to Diocese approval. An additional 80 dwellings in this village will not impact on the capacity of this school to admit pupils*" (Page 51 LP/V/1).

361. The Water Cycle Study (LP/E/5) is also summarised in the IDP and does not highlight any constraints in regards to Water treatment works, wastewater network capacity or water resource availability. The Water Cycle study states that the '*pumping station or pipe size may restrict growth; a pre-development enquiry is recommended before planning permission is granted*'.

362. Norfolk County Council Highway Authority has stated that site LP[085]002 '*May be suitable for allocation but would require footway and access improvements.*

*The existing access is inadequate. Could be an acceptable site if extended through the 'Coal Yard' application. Subject to a safe access and adequate visibility. The Highway Authority would not object to this site in being in the local plan'. Norfolk County Council have stated that site LP[085]006 'may be suitable for allocation but it would require footway and access improvements'. These comments have been reflected in the policy wording: Criterion 1 of Shipdham Residential Allocation 1 and Criterion 1 of Shipdham Residential Allocation 2.*

363. Norfolk County Council Highways, in their capacity as Highways Authority, has provided comments on all of the sites throughout the plan making process. This process has included the proposed number of dwellings. During the plan making process, the Highways Authority have not expressed any concern that the number of dwelling proposed by the two sites would have a cumulative significant impact upon the local road network.

364. Aside from the aforementioned issues raised in the IDP, Infrastructure providers and statutory consultees have not raised issues with regard to infrastructure capacity in Shipdham at any stage during the plan making process.

**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?**

365. The site is situated within close proximity to the west of the conservation area. The Historic Characterisation Study (LP/E/4) states that site LP[085]002, Shipdham Residential Allocation 1, would have limited impact upon the historic environment. The assessment of the site, under the heading 'impact on designated heritage assets within the vicinity', states '*none- no views towards heritage assets*'.

366. Whilst it is acknowledged that the site is within close proximity to the conservation area it has been demonstrated through the Historic Characterisation Study that development of the site would not have an impact upon the conservation area. As such, the criteria of Shipdham Residential 1 should not refer to the need to have regard to the nearby conservation area in order to be effective.

**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?**



367. The site is situated within close proximity to the west of the conservation area. The Historic Characterisation Study (LP/E/4) states that site LP[085]006, Shipdham Residential Allocation 2, would have limited impact upon the historic environment. The assessment of the site, under the heading 'impact on designated heritage assets within the vicinity', states '*Glimpse views towards the Grade I listed All Saints Church tower from the site. One church window facing site, however there is development and brownfield land closer to the church which has permission for new development. Views from the church towards the site would be in the context of existing development and therefore it is considered not to cause significant harm to the setting*'.

368. Whilst it is acknowledged that the site is within close proximity to the conservation area it has been demonstrated through the Historic Characterisation Study that development of the site would not have an impact upon the conservation area. As such, the criteria of Shipdham Residential 2 should not refer to the need to have regard to the nearby conservation area in order to be effective.

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

369. Norfolk County Council Highways Authority has stated that site LP[085]002 '*May be suitable for allocation but would require footway and access improvements. The existing access is inadequate. Could be an acceptable site if extended through the 'Coal Yard' application. Subject to a safe access and adequate visibility. The Highway Authority would not object to this site in being in the local plan*'. Norfolk County Council have stated that site LP[085]006 '*may be suitable for allocation but it would require footway and access improvements*'. These comments have been reflected in the policy wording: Criterion 1 of Shipdham Residential Allocation 1 and Criterion 1 of Shipdham Residential Allocation 2.

370. Norfolk County Council Highways, in their capacity as Highways Authority, has provided comments on all of the sites throughout the plan making process. This process has included the proposed number of dwellings. During the plan making process, the Highways Authority has not expressed any concern that the number of dwelling proposed by the two sites would have a cumulative significant impact upon the local road network. The document Highway Authority Technical Advice (LP/V/10)

provides a comprehensive comment schedule and these comments are considered to be robust.

## **Sporle**

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

371. Criterion 5 of Sporle Residential Allocation 1 is based on the evidence provided within the Historic Characterisation Study (LP/E/4) and is summarised within the supporting text of the policy. This is consistent with paragraph 169 of the National Planning Policy Framework (NPPF), which states that “*Local Planning authorities should have up-to-date evidence about the historic environment in their area and use it to assess the significance of heritage assets and the contribution they make to their environment*”.

372. The wording of Criterion 5 is consistent with Chapter 12 of the (NPPF), ‘conserving and enhancing the historic environment’, which sets out the approach to the historic environment, particularly paragraphs 128 and 129. Paragraph 128 states that “*In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance*”. Paragraph 129 of the NPPF states that “*Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence any necessary expertise*”

373. Criterion 5 of Sporle Residential Allocation 1 is included based on the up-to-date evidence regarding the historic environment and is 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?**

374. Criteria 4 of the policy sets out that development should provide an appropriate design response having regard to the wider area. Further to this, the supporting text to the residential allocation includes reference to the need to consider the historic characterisation assessment and the wider context of the site. Any planning application will also need to have regard to Policies ENV07 and ENV08 of the Local Plan. This includes the need to have regard to designated and non-designated assets and their settings.

375. Having regard to the requirements of the reasoned justification and the need to consider the plan as a whole (including all policies) it is considered that the approach taken is effective without further modification to the policy. However, should the Inspector be minded to include this within the policy, the Council would not object.

### **Settlements with Boundaries**

#### **14.83: Is the Beetley settlement boundary, as shown on Map.2 justified?**

1. It is the Council's view that the approach to the Beetley settlement boundary is justified and represents the most appropriate strategy when considered against reasonable alternatives. The Breckland Local Plan Preferred Site Options and Settlement Boundaries document (LP/S/12) includes a section on existing settlement boundaries. The document proposed that in order for settlements to retain their boundaries, they needed to provide 3 or more of the following services; public transport, community facility e.g. a village hall, public house, restaurant or café, employment (the level of employment, whether the settlement had a business park and the size of businesses was taken into consideration), shop/post office and a school.

2. Beetley meets 4 of these criteria and is therefore considered to contain sufficient services and facilities to accommodate small scale development. As such it is proposed to retain its settlement boundary. The services and facilities Beetley benefits from are a primary school, Beetley Village Hall and The New Inn Pub, a frequent bus service to Fakenham and Dereham and 44 businesses as stated in the Inter-Departmental Business Register (2013). It does not have a shop and therefore does not meet all 5 criterion.
3. Where villages contain settlement boundaries, the following factors were evaluated: recent planning approvals, infilling and rounding off opportunities, adjoining small scale brownfield sites and the appropriate re-use of small scale rural building and environmental constraints. No changes to the Beetley settlement boundary were proposed in the Preferred Site Options and Settlement Boundaries document and no changes have been made within the submission Local Plan (LP/S/1).
4. The approach to Beetley's settlement boundary was subject to consultation at regulation 18 (LP/S/12) The approach to the Beetley settlement boundary has been subject to sustainability appraisal. The retention of the settlement boundary scores positively. The SA states "the preferred option is to retain the existing settlement boundary without amendment. The boundary remains logical and in line with the criteria of HOU 04. The alternative option is to amend the settlement boundary."

**14.84: Is the Hockham settlement boundary, as shown on Map.7 justified?**

5. It is the Council's view that the approach to the Hockham settlement boundary is justified and represents the most appropriate strategy when considered against reasonable alternatives. The Breckland Local Plan Preferred Site Options and Settlement Boundaries document (LP/S/12) includes a section on existing settlement boundaries. The document proposed that in order for settlements to retain their boundaries, they needed to provide 3 or more of the following services: public transport, community facility e.g. a village hall, public house, restaurant or café, employment (the level of employment, whether the settlement had a business park and the size of businesses was taken into consideration), shop/post office and a school.

6. Hockham meets 3 these criteria and therefore has retained its boundary. The services and facilities Hockham provides are a primary school, a village hall, The Eagle Public House and a bus service which runs to Watton and Thetford. In order to justify making changes to settlement boundaries, the following factors were evaluated, recent planning approvals infilling and rounding off opportunities, adjoining small scale brownfield sites and the appropriate re-use of small scale rural buildings, environmental constraints.
7. The settlement boundary was consulted on as part of the Preferred Sites and Settlement Boundaries regulation 18 consultations. It has also been appraised through the sustainability appraisal. The approach is considered to be justified.

**14.85: Is the Saham Toney settlement boundary, as shown on Map.13, accurate and justified?**

8. It is the Council's view that the approach to the Saham Toney settlement boundary is justified and represents the most appropriate strategy when considered against reasonable alternatives. The Breckland Local Plan Preferred Site Options and Settlement Boundaries document (LP/S/12) includes a section on existing settlement boundaries. The document proposed that in order for settlements to retain their boundaries, they needed to provide 3 or more of the following services: public transport, community facility e.g. a village hall, public house, restaurant or café, employment (the level of employment, whether the settlement had a business park and the size of businesses was taken into consideration), shop/post office and a school.
9. Saham Toney meets 3 of the criteria and therefore has retained its boundary. The services and facilities that Saham Toney provides are a primary school, The Old Bell Pub, Saham Toney Village Hall and a frequent bus service to Watton and King's Lynn. In order to justify making changes to settlement boundaries, the following factors were evaluated: recent planning approvals, infilling and rounding off opportunities, adjoining small scale brownfield sites and the appropriate re-use of small scale rural buildings, environmental constraints.

10. The settlement boundary was consulted on as part of the Preferred Sites and Settlement Boundaries regulation 18 consultation. It has also been appraised through the sustainability appraisal. The approach is considered to be justified.

**14.86: Is the Yaxham settlement boundary, as shown on Map.17 justified?**

11. It is the Council's view that the approach to the Yaxham settlement boundary is justified and represents the most appropriate strategy when considered against reasonable alternatives. The Breckland Local Plan Preferred Site Options and Settlement Boundaries document (LP/S/12) includes a section on existing settlement boundaries. The document proposed that in order for settlements to retain their boundaries, they needed to provide 3 or more of the following services: public transport, community facility e.g. a village hall, public house, restaurant or café, employment (the level of employment, whether the settlement had a business park and the size of businesses was taken into consideration), shop/post office and a school.

12. Yaxham has therefore been able to retain its settlement boundary as it contains 5 services. The services and facilities Yaxham provides are a primary school, a shop at Yaxham Waters, a village hall, a regular bus service to Norwich and Dereham and 25 registered businesses as stated by the Inter-Departmental Business Register (2013). It has, however, lost its Local Service Centre status due to the distance to facilities and services. In order to justify making changes to settlement boundaries, the following factors were evaluated: recent planning approvals, infilling and rounding off opportunities, adjoining small scale brownfield sites, the appropriate re-use of small scale rural buildings and environmental constraints.

13. The settlement boundary was consulted on as part of the Preferred Sites and Settlement Boundaries regulation 18 consultation. It has also been appraised through the sustainability appraisal. The approach is considered to be justified.

**14.87: Is the approach to settlement boundaries and whether schools are located within them justified and consistent across the District?**

14. Schools have not previously been included within settlement boundaries. This practice, however, has been inconsistent. Whilst some local schools are located within the area's settlement boundary, other schools have been excluded from the settlement boundary. Including schools within settlement boundaries may potentially increase pressure on the school sites for alternative use such as for residential purpose.
  
15. Settlement boundaries will not affect the ability to extend or make alterations to a school's existing buildings on site. These applications would be determined using the NPPF and the policies within the Local Plan. If the school was to close, a review of the site would take place to determine an alternative use. Having regard to the above it is not considered necessary to include schools within settlement boundaries at present.



# Breckland COUNCIL

Mr J Long  
John Long Planning  
john@johnlongplanning.co.uk

Your Ref: 3PL/2017/0996/O

Contact: Jon Berry  
Direct Dial: 01362 656248  
Email: Jon.Berry@breckland.gov.uk  
Date: 20<sup>th</sup> March 2018

Dear Mr Long

**Development Description:** Outline planning consent for all matters reserved apart from the principle means of vehicular access (3 accesses onto the B1077 Buckenham Road; 1 access across Burgh Common; 1 access across Hargham Road, 1 access across Leys Lane and 1 access onto London Road) for residential development for up to 4,000 dwellings on land to the south of Attleborough; construction of new link road between Buckenham Road and London Road, pedestrian footbridge across the railway line to connect with Leys Lane, provision of two, 2 Form Entry primary schools; Local centre including up to 2,600m<sup>2</sup> gross floorspace for uses within Class A1 (shops), up to 1,400m<sup>2</sup> (gross) for uses within Classes A2/A3/A4 and/or A5 and petrol filling station, along with up to 2,100m<sup>2</sup> (gross) for Community Uses (Class D1). Two further neighbourhood centres together including up to 400m<sup>2</sup> (gross) for uses within Classes A1/A2/A3 and/or A5, sports pitches, public open space and amenity greenspace with sustainable drainage systems and associated infrastructure (including off-site town centre highway improvements) and demolition of existing unused sewage works and agricultural buildings

**Site Address:** Attleborough SUE Land South of Attleborough, Attleborough NR17 1BD

**Application Reference:** 3PL/2017/0996/O

**Request pursuant to Regulation 22 (1) of The Town and Country Planning (Environmental Impact Assessment) Regulations 2011 to provide further environmental information.**

I write further to the above application which was received by Breckland Council ("Council") on 31 July 2017. An Environmental Statement was submitted with the application in accordance with the requirements of The Town and Country Planning (Environmental Impact Assessment) Regulations 2011 ("Regulations").

The Council has considered the contents of the Environmental Statement in detail, and reviewed with the relevant statutory consultees and taken account of the statutory consultation responses received to date. The Council is of the opinion, after careful consideration of all the documentation and representations received to date, that the Environmental Statement should contain further information to enable the Council to properly assess the environmental impacts of the proposed development and all appropriate mitigation as required by the Regulations.

To allow further consideration of this application, the Council requires the following further information in respect of the Environmental Statement:



1. Further information concerning the impacts of the proposed development in highway terms as fully detailed in the letter from Norfolk County Council, in its capacity as Highways Authority, dated 12 February 2018. A copy of this letter appears at **Appendix A** to this request;
2. Further information concerning the impacts of the proposed development in terms of flood risk and suitable drainage in response to the letter of Norfolk County Council, in its capacity as the Lead Local Flood Authority ("LLFA"), dated 24 August 2017. A copy of this letter appears at **Appendix B** to this request. For the avoidance of doubt, the Council requests:
  - a. Further technical assessment in the form of a Hydraulic Assessment and Hydraulic Modelling of the watercourse to more fully inform and update the applicant's submitted flood risk assessment and proposed drainage strategy, with particular focus on the eastern part of the site adjacent to Station Road. The further information should demonstrate how the drainage hierarchy is to be achieved;
  - b. in accordance with a methodology to be agreed with the LLFA, the further information should include the modelling of watercourses up to and including a 1 in 100 year flood event in accordance with up to date guidance and records; and
  - c. Further to the above assessments and methodology, the relevant chapters of the Environmental Statement should be updated in addition to any technical assessments, reports and parameter plans as appropriate.
3. Further information concerning the likely impacts and their significance concerning Bunn's Bank, located at the south eastern corner of the proposed development. In particular, further information is required as to any mitigation measures that may be proposed to reduce the level of potential harm to this heritage asset. The relevant chapters of the Environmental Statement should be updated in addition to any technical assessments, reports and parameter plans as appropriate
4. Further information concerning the likely impacts and their significance on designated sites pursuant to The Conservation of Habitats and Species Regulations 2010 and the Habitats Directive. Such information should include:
  - a. confirmation of the designated sites with the potential to be affected by the proposed development;
  - b. confirmation of the potential type of environmental impact arising from the proposed development that may have the potential to affect designated sites; and
  - c. An assessment as to the significance of such impacts on designated sites, in line with appropriate, industry standard methodology and guidance.

In the event that the applicant considers that the above further information or clarification is unnecessary, or has already been satisfactorily covered in the Environmental Statement or otherwise, the Council requests that this is detailed fully in the response to this request.

Please ensure that a minimum of 2 hard copies and 4 digital CD copies of the further information in response to this request are submitted to the Council.

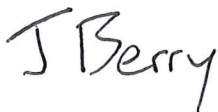
Once the further information has been provided, the Council shall – in accordance with the Regulations – advertise the availability of the further information and consult upon the same with all necessary statutory consultees. Please note that the Council may not undertake such consultation until all further information in response to this request has been submitted.

The Council reserves the ability to make additional requests for further information pursuant to Regulation 22 of the Regulations or as otherwise deemed necessary.

For the avoidance of any doubt, this letter is to be treated as a request for “further information” pursuant to Regulation 22 (1) of the Regulations.

If you have any queries arising from this request, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink that reads "Jon Berry". The signature is written in a cursive style with a large, stylized 'J' and 'B'.

Jon Berry  
Head of Development Management

**Appendix A**  
**Letter from Norfolk County Council dated 12 February 2018**



Community and Environmental  
Services  
County Hall  
Martineau Lane  
Norwich  
NR1 2SG

Planning Officer  
Breckland Council  
Elizabeth House  
Walpole Loke  
Dereham  
Norfolk  
NR19 1EE

NCC contact number: 0344 800 8020  
Text Relay - 18001 0344 800 8020

Your Ref: 3PL/2017/0996/O  
Date: 12 February 2018

My Ref: 9/3/17/0996  
Tel No.: 01603 638009  
Email: liz.poole@norfolk.gov.uk

Dear Mr Wood,

**Outline planning consent for all matters reserved apart from the principle means of vehicular access (3 accesses onto the B1077 Buckenham Road; 1 access across Burgh Common; 1 access across Hargham Road, 1 access across Leys Lane and 1 access onto London Road) for residential development for up to 4,000 dwellings on land to the south of Attleborough; construction of new link road between Buckenham Road and London Road, pedestrian footbridge across the railway line to connect with Leys Lane, provision of two, 2 Form Entry primary schools; Local centre including up to 2,600m<sup>2</sup> gross floorspace for uses within Class A1 (shops), up to 1,400m<sup>2</sup> (gross) for uses within Classes A2/A3/A4 and/or A5 and petrol filling station, along with up to 2,100m<sup>2</sup> (gross) for Community Uses (Class D1). Two further neighbourhood centres together including up to 400m<sup>2</sup> (gross) for uses within Classes A1/A2/A3 and/or A5, sports pitches, public open space and amenity greenspace with sustainable drainage systems. Attleborough SUE. Land South of Attleborough, Attleborough. NR17 1BD.**

Further to my response dated 27 September 2017, the Highway Authority has been in discussion with the applicants transport consultants. However there continues to be some information outstanding that the Highway Authority requires or requires further clarification on before it can formally respond. The key areas are as follows:

- Hargham Road - revised access strategy is required that demonstrates the impact of the severance of Hargham Road.
- Link Road - lack of understanding about its purpose and how it will accommodate strategic traffic particularly HGV's.
- Phasing and delivery of the link road and appropriate triggers.
- White Horse Lane and roads to the east of Old Buckenham Road (Burgh Common/Borough Lane) - whilst information has been provided demonstrating that there is very little impact - it would be good to see schemes that widen/improves/closes these roads as development on this side is brought forward.

- Railway Crossing - need evidence that Network Rail are involved in discussions as we will need reassurance on the delivery of the link road.
- Footbridge - delivery and phasing.
- What is expected to be done in the town centre post opening of the link road - TRO's etc? It would be useful to have a clear understanding of what the applicant is proposing particularly with the potential removal of HGV movements.
- Public Transport - we will need to see a public transport strategy which details how each element/phase is to be served by public transport and what discussions have taken place with public transport operators. This will also help inform the Travel Plan.

Once the Highway Authority is in receipt of additional information we will be able to comment further.

Yours sincerely,

*Liz Poole*

Principal Engineer Major and Estate Development  
for Executive Director for Community and Environmental Services

Please be aware it is the applicants responsibility to clarify the boundary with the public highway. Private structures such as fences or walls will not be permitted on highway land. The highway boundary may not match the applicants title plan. Please contact the highway research team at [highway.boundaries@norfolk.gov.uk](mailto:highway.boundaries@norfolk.gov.uk) for further details.

**Appendix B**  
**Letter from Norfolk County Council dated 24 August 2017**



**Norfolk** County Council

Community and Environmental Services  
County Hall  
Martineau Lane  
Norwich  
NR1 2SG

NCC contact number: 0344 800 8020  
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**via e-mail**

Development Control  
**Breckland Council**  
Elizabeth House  
Walpole Loke  
DEREHAM  
Norfolk  
NR19 1EE

Your Ref: 3PL/2017/0996/O  
Date: 24 August 2017

My Ref: FWP/17/3/5128  
Tel No.: 0344 800 8020  
Email: [lf@norfolk.gov.uk](mailto:lf@norfolk.gov.uk)

Dear Sir/Madam,

**Town and County Planning (Development Management Procedure) (England) Order 2015**

Outline planning consent for all matters reserved apart from the principle means of vehicular access (3 accesses onto the B1077 Buckenham Road; 1 access across Burgh Common; 1 access across Hargham Road, 1 access across Leys Lane and 1 access onto London Road) for residential development for up to 4,000 dwellings on land to the south of Attleborough; construction of new link road between Buckenham Road and London Road, pedestrian footbridge across the railway line to connect with Leys Lane, provision of two, 2 Form Entry primary schools; Local centre including up to 2,600m<sup>2</sup> gross floorspace for uses within Class A1 (shops), up to 1,400m<sup>2</sup> (gross) for uses within Classes A2/A3/A4 and/or A5 and petrol filling station, along with up to 2,100m<sup>2</sup> (gross) for Community Uses (Class D1). Two further neighbourhood centres together including up to 400m<sup>2</sup> (gross) for uses within Classes A1/A2/A3 and/or A5, sports pitches, public open space and amenity greenspace with sustainable drainage systems and associated infrastructure (including off-site town centre highway improvements) and demolition of existing unused sewage works and agricultural buildings.

**ATTLEBOROUGH: Attleborough SUE Land South of Attleborough**

Thank you for your consultation on the above site, received on 7 August 2017. We have reviewed the application as submitted and wish to make the following comments.

The applicant has provided a Flood Risk Assessment (FRA) / a Drainage Strategy (Attleborough Strategic Urban Extension – by MLM Consulting, Ref 666308-SBU-REP-004 revision 4 dated 21 July 2017) to look at the risks of flooding to the whole site and propose how the new development will drain.

*Continued.../*

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We **object** to this planning application in the absence of an acceptable Flood Risk Assessment (FRA) / Drainage Strategy relating to:

- The lack of consideration for the risk of flooding from the watercourses to the proposed developable area to ensure that all proposed development (including housing, roads and SuDS features) is not at risk of flooding and does not increase the risk of flooding elsewhere
- Additional information on the risk of groundwater flooding in part of the site.
- The lack of sufficient detail for the drainage proposals to show how the drainage hierarchy has been achieved, each parcel of land will drain, specifically the location of infiltration and discharge points, greenfield runoff rates and volumes proposed to prevent an increased risk of flooding elsewhere.
- An adequate demonstration that the development is in accordance with the National Planning Policy Framework (NPPF) with regard to the risk of flooding.

### Reason

To prevent flooding in accordance with National Planning Policy Framework paragraph 103 and 109 by ensuring the satisfactory management of local flood risk, surface water flow paths, storage and disposal of surface water from the site in a range of rainfall events and ensuring the surface water drainage system operates as designed for the lifetime of the development.

We will consider reviewing this objection if the following issues are adequately addressed.

- An updated Flood Risk Assessment to include modelling of the watercourses up to and including the 1 in 100 year flood event including climate change. Where watercourses are culverted or assumed to be culverted, assessment should be made of the capacity and how these would constrain flood flows. We suggest that QMed, 1 in 30 year and 1 in 100 year scenarios are also included to inform the development plan and show that SuDS storage areas are outwith areas at risk of flooding. If it is intended that new watercourse crossings for roads (including major access roads which may be on a proposed embankment), constructed wetlands or realignment of the watercourse are proposed in areas of flooding, the pre and post development scenarios should be undertaken demonstrating that there is no increased risk of flooding elsewhere.
- As groundwater has been encountered on parts of the site at 0.23m below ground, further information would be required to show what level of risk exists, where these areas of risk are expected and what additional mitigation and management would be required for groundwater flooding e.g. rafting of foundations and drainage network.
- Infiltration testing to be undertaken in accordance with BRE 365 or equivalent (as in our guidance Section 15 and 16) in areas of the site which has shown that infiltration is initially favourable (better than  $1 \times 10^{-6}$ ). Testing should be completed three times at each location at representative depths that infiltration devices may be proposed at allowing for 1.2m between a structure and seasonally high groundwater levels. We expect the drainage strategy to use infiltration drainage where this is achievable and identify those parcels of land where this can be proposed over discharge to a watercourse.
- An updated Drainage strategy to show how each parcel of land / sub catchment is proposed to drain. Including identification of which parcels are anticipated to have

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infiltration, what each sub catchment pre and post development runoff rates and runoff volumes are and how water quality will be managed.

- Details of management and maintenance proposals including “in principal agreements” from any authority who would consent discharge to a watercourse or who are anticipated to adopt any features including the Internal Drainage Board, Highways Authority or Anglian Water.

We welcome that blue green corridors are proposed as part of the development and will have multiple uses for biodiversity and public open spaces. However, we cannot accept or recommend that a condition be set for a greenfield runoff rate for the whole site. Each phase/sub catchment and location of discharge to a watercourse should have its own proposal of runoff rates and volumes proposed so each developer on each phase of the development can achieve detailed designs for those constraints.

The report titled “Water Quality and Flow Monitoring” referred to within the FRA that may contain some modelling of the ordinary watercourses has, as far as I am aware, has not been uploaded to the planning portal and I have not been able to obtain a copy within the timescales to provide a response to this application. We welcome that 12 months of water level monitoring of groundwater and flow monitoring of watercourses is proposed.

Further detailed comments can be found in the attached Annex.

Further guidance on the information required by the LLFA from applicants can be found at <https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers>.

If you, the Local Planning Authority review and wish to determine this application against our advice you should notify us, the Lead Local Flood Authority, by email at [llfa@norfolk.gov.uk](mailto:llfa@norfolk.gov.uk) so that appropriate conditions can be placed on the development.

Alternatively, if further information is submitted, we request we are re-consulted and we will aim to provide bespoke comments within 21 days of the formal consultation date.

Yours faithfully,

Elaine

Elaine Simpson  
Senior Flood Risk Officer

Lead Local Flood Authority

**Disclaimer**

*We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue.*

*Continued.../*

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## Annex: Norfolk County Council LLFA Additional Information to LPA



LPA Application Ref: 3PL/2017/0996/O	LPA: Breckland Council
LLFA Ref: FWP/17/3/5128	Applicant name: Attleborough Land Ltd
Site name/Description: Attleborough Strategic Urban Extension	Greenfield or Brownfield Development: Greenfield
Planning Stage: Outline	Summary of Surface Water Drainage Proposed: Overall drainage to suds basins potentially within flood envelopes of the watercourses. Construction of wetland and blue green corridors to improve biodiversity and amenity of the area.
<b>Local Flood Risk : Summary of Local Flood risks in the vicinity of the site</b>	
<ul style="list-style-type: none"> <li>• <i>Surface water</i> - There are areas of medium to high risk of surface water flooding within the development site boundary of 1 in 30 (3.33% annual probability) and 1 in 100 (1% annual probability) flood event as shown in the Environment Agency's Risk of <u>Flooding from Surface Water (RoFSW) maps</u>. These areas of flooding largely coincide with low topography associated with the watercourses on site. As the Environment Agency fluvial flood map can not model these small watercourses (under 3km<sup>2</sup>) the surface water map can be used as a proxy for flood zone 2 and 3 (see section 4.5 and 14 of our guidance). The watercourses flow through the site in a generally direction from a north east to a south west and are named watercourse A and B by the applicant. The majority of both watercourses fall within the management of East Harling Internal Drainage Board.</li> <li>• <i>Groundwater flooding</i> - The FRA indicates that groundwater levels vary under the site between 0.23 and 3.04m below ground. The very shallow groundwater has the capacity to rise and contribute to flooding in some areas of the site and the applicant will need to show where these risk areas are and how these will be considered within the design of the development.</li> <li>• <i>Sewers</i> – we have no records of sewer flooding in the vicinity of the site however other authorities (e.g. Anglian Water) should be approached to request any records of flooding which may be pertinent to the site.</li> <li>• <i>Artificial Waterbodies</i> – we are not aware of any artificial waterbodies within or adjacent to the site.</li> <li>• <i>Historical flooding incidences</i> – We are aware flooding that occurred in Attleborough in June and September 2016. Incidences were recorded on Station Road, Barley Way and Hargham Road. We, as the Lead Local Flood Authority, will be investigating the flooding on Station Road but this report has yet to be completed. It would be important to ensure that any discharges that were exiting the site into for Catchment 3 into the culverted system at Station Road are not made any worse</li> </ul> <p>The East Harling Internal Drainage Board (IDB) should be consulted for their opinion on this application.</p>	
<b>Policy: What we expect relating to site drainage and flood risk management.</b>	
The following national and regional policies apply to flood risk management within the planning framework.	

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- Paragraph 103 of the National planning policy framework (NPPF)
- Ministerial statement (HCWS161)
- Policies UC10 and UC11 of Lead Local Flood Authority Local Flood Risk Management Strategy

The Local Planning Authority will also have policies relating to flood risk management and applicants are recommended to have regard to these.

Specifically in Breckland Council the following policies apply:

Policy DC 13 (Flood Risk) of the Breckland District Council Core Strategy (2009) states that, "All development proposals in areas at risk of flooding will be expected to provide a Flood Risk Assessment commensurate with the scale of the flood risk and recognising all likely sources of flooding." In addition, Core Strategy Policy DC13 states that "suitable measures to deal with surface water arising from development proposals will be required to minimise the impact to and from new development. The preference is to manage surface water through the incorporation of SUDS unless this is not technically feasible, or where it can be demonstrated that ground conditions are unsuitable for such measures."

Core Strategy Policy CP 5 (Developer Obligations) states that, "all development in the plan area will be accompanied by appropriate infrastructure to meet site specific requirements and create sustainable communities. The infrastructure will be provided in tandem with the development and where appropriate arrangements will be made for its subsequent maintenance ... Site specific infrastructure requirements to be addressed through developer obligations may include ... Sustainable Drainage Systems (SUDS)".

Core Strategy Policy CP 8 (Natural Resources) states that "Development must not cause a deterioration in water quality" and that "All new development will be located in such a way as to minimise its own risk of flooding and new development should not materially increase the flood risk to other areas or increase the risk of flooding to European Habitats which are water sensitive. This will be minimised through the installation of infiltration and attenuation measures to dispose of surface water (SUDS)."

#### **Assessment:** Summary of assessment of flood risk and submitted drainage proposals

The Flood Risk Assessment (FRA) and Drainage Strategy for Attleborough Strategic Urban Extension – by MLM Consulting, Ref 666308-SBU-REP-004 revision 4 dated 21 July 2017 has been submitted with the planning application/ We have assessed this against the National Planning Policy Framework (NPPF), Planning Practice Guidance, the SuDS Non-Statutory Technical Standards (NSTS) (March, 2015) and the policies of the adopted Norfolk Local Flood Risk Management Strategy as follows:

- The local flood risk has not been fully assessed. The flood extents for the relevant return periods have not been modelled for the watercourses. As development, including drainage structures, are proposed near these watercourses, these flood zones need to be identified and avoided. This is particularly important near to station road where there are reports of flooding and the watercourse is culverted. We expect that appropriate flood modelling of the watercourses up to and including the 1 in 100 year flood event including climate change. Where watercourses are culverted or assumed to be culverted, assessment should be made of the capacity and how these would constrain flood flows. We suggest that QMed, 1 in 30 year and 1 in 100 year scenarios are also included to inform the development plan and show that SuDS storage areas are outwith areas at risk of flooding.

Continued.../

If it is intended that new watercourse crossings for roads (including major access roads which may be on a proposed embankment), constructed wetlands or realignment of the watercourse are proposed in areas of flooding, the pre and post development scenarios should be undertaken demonstrating that there is no increased risk of flooding elsewhere. **We require further information on this matter.**

- As groundwater has been encountered on parts of the site at 0.23m below ground, further information would be required to show what level of risk exists, where these areas of risk are expected and what additional mitigation and management would be required for groundwater flooding. **We require further information on this matter.**
- The SuDS discharge location hierarchy has not been followed. Some areas of the site show that infiltration testing is favourable ( $4 \times 10^{-4}$  to  $1 \times 10^{-6}$  m/s) however only one test at each location has been undertaken. Testing should be completed three times at each location at representative depths that infiltration devices may be proposed at allowing for 1.2m between a structure and seasonally high groundwater levels. We expect the drainage strategy to use infiltration drainage where this is achievable and identify those parcels of land where this can be proposed over discharge to a watercourse. **Further information is required to show that the first step of the SuDS discharge location hierarchy is or is not achievable and what areas these relate to.**
- The alternative plan if infiltration is not possible is for discharge of water to the Internal Drainage Board watercourse, we would request that 'in principal' agreement is provided that East Harling have been consulted on this proposal. **We require further information on this matter.**
- Proposed greenfield runoff rates and volumes are stated on plans 666308-SK-SBU-002 rev P3 Surface water catchment plan (dated 20/7/2017) and 666308-SK-SBU-005 rev P4 Proposed outline surface water strategy (dated 20/7/2017). The report summarises up the whole site pre development greenfield runoff rate but not this split down into catchments or parcels of land on plan 666308-SK-SBU-002 / 005. We request that each parcel of land pre and post development runoff rates are summarised in the report and identified on the plans. We would not agree to the discharge of water from each parcel of land at a 1 in 30 year return period if this is discharging direct to a watercourse or a SuDS basin in the flood zone. The watercourse cannot be used as a "strategic SuDS structure" with online basins unless significant pre and post flood modelling of any modifications to the watercourse system can show there is no increased risk of flooding elsewhere. **We require further information on this matter.**
- Consideration of runoff volume post-development needs to be shown to not increase the risk elsewhere. It should be stated if each parcel of land is using approach 1 or 2 (as per section 18.8 of our guidance) or how overall post runoff volume will be attenuated in larger strategic structures. This would clearly set out constraints each developer would be required to achieve and if any other phases rely on each other to enable discharge of water. We welcome that an 10% allowance has been added for Urban Creep but require confirmation that the dwellings will be  $\leq 25$  per hectare as per the LASOO guidance (see section 18.12 of our guidance). Phasing plans have also been submitted in Appendix L however, these are likely to need updating considering comments above. **We require further information on this matter.**
- The drainage strategy does not detail SuDS component elements for each phase but states these will be identified at a detailed stage from a list of options. We expect that infiltration and appropriate source control be proposed where possible to ensure that the development does not develop into a sewered surface water network discharging to large SuDS ponds. We welcome that blue green corridors are proposed as part of this development to improve local biodiversity and amenity.

Continued.../

- The applicant has not identified exceedance routes for flows in excess of a 1 in 100 year rainfall event. This will be expected at detailed design stage where the FRA states ground levels will be designed so water is shed away from properties. Consideration should be given to the expected depth/velocity of flood water to quantify any potential risks to people and property in the event of exceedance of the drainage inlets. It should be noted that we recommend 300mm freeboard above any source of flooding (including the drainage network) is added to any proposed finished floor level. We expect there to be a minimum of 150mm of freeboard between proposed finished floor levels and proposed ground levels. (see section 22 of our guidance).
- General maintenance outline plans have been provide in Appendix I of the FRA, however we have no confirmation from the East Harling IDB that they will accept the alterations to the watercourses and adopt any online water features proposed. Outline details of management and maintenance proposals including "in principal agreements" from any authority who would consent discharge to a watercourse or who are anticipated to adopt any features including the Internal Drainage Board, Highways Authority or Anglian Water.

#### **SuDS Standards:** Summary of alignment to relevant Non-Statutory Technical Standards for Sustainable Drainage systems

**S2** There is currently not enough information for each parcel of land on pre an post ruoff rates. **We require further information on this matter.**

**S4/S6 (Greenfield)** – Further information is required to show each parcel of land will not increase post development runoff and if they will use approach 1 or 2 (section 18.8 of our guidance). **We require further information on this matter.**

**S7** – Figure 13 of the FRA suggests that all drainage networks in each parcel of land and each phase will be designed to accommodate the 1 in 30 flood event, however this is not explicit within the text. **We require further information on this matter.**

**S8** – Figure 13 of the FRA suggest that the overall drainage for the whole site will attenuate the 1 in 100 plus 40% climate change event, however some of these structures are proposed to be online at the watercourses and so the volume of the structure may become overwhelmed by the combined watercourse flood water and site drainage water. **We require further information on this matter.**

**S9** – The applicant has not identified exceedance routes for flows in excess of a 1 in 100 year rainfall event. This will be expected at detailed design stage where the FRA states ground levels will be designed so water is shed away from properties. Consideration should be given to the expected depth/velocity of flood water to quantify any potential risks to people and property in the event of exceedance of the drainage inlets. It should be noted that we recommend 300mm freeboard above any source of flooding (including the drainage network) is added to any proposed finished floor level. We expect there to be a minimum of 150mm of freeboard between proposed finished floor levels and proposed ground levels. (see section 22 of our guidance).

#### **Advice to LPA:** Recommendations or objections

We **object** to this planning application in the absence of an acceptable Flood Risk Assessment (FRA) / Drainage Strategy relating to:

- The lack of consideration for the risk of flooding from the watercourses to the proposed developable area to ensure that all proposed development (including housing, roads and

*Continued.../*

SuDS features) is not at risk of flooding and does not increase the risk of flooding elsewhere

- Additional information on the risk of groundwater flooding in part of the site.
- The lack of sufficient detail for the drainage proposals to show how the drainage hierarchy has been achieved, each parcel of land will drain, specifically the location of infiltration and discharge points, greenfield runoff rates and volumes proposed to prevent an increased risk of flooding elsewhere.
- An adequate demonstration that the development is in accordance with the National Planning Policy Framework (NPPF) with regard to the risk of flooding.

**Reason**

To prevent flooding in accordance with National Planning Policy Framework paragraph 103 and 109 by ensuring the satisfactory management of local flood risk, surface water flow paths, storage and disposal of surface water from the site in a range of rainfall events and ensuring the surface water drainage system operates as designed for the lifetime of the development.



Breckland Council

## **Dereham Local Plan Transport Study**

### **Addendum**

Transport Addendum 1

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Executive Park  
Avalon Way  
Anstey  
Leicester  
LE7 7GR

A094136

7<sup>th</sup> March 2017

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## 1 Introduction

### 1.1 PREAMBLE

1.1.1 WYG was commissioned by Breckland Council to carry out a study of the transport impacts of proposed and potential land-use developments in Dereham and the surrounding area. The Dereham Transport Study Report has been adopted by the Council to support the Local Plan process.

1.1.2 Following this adoption various comments have been received by Breckland Council in response to the contents of the Transport Study report and WYG were asked to clarify certain issues that have been raised and make recommendations about further study work that may be required.

1.1.3 This addendum report is structured as follows:

- Section 2 – Summary of Key Issues Raised
- Section 3 – Assessment of Key Issues
- Section 4 – Conclusion



## 2 Key Issues Raised

2.1.1 Representations have been made to Breckland Council that relate to the Dereham Local Plan Transport Study report that WYG produced in support of the Local Plan process. The key issues raised have been reviewed and can be summarised as follows:

	Key Issue
1	Definition of the Study Brief is inconsistent and excludes some congested junctions
2	An assessment of conditions during the Saturday traffic peak has not been carried out
3	The road safety assessment does not consider vulnerable or non-motorised users
4	The forecast vehicle trip rates are inconsistent with trip rates for consented schemes and the rates are too low
5	The forecast distribution of trips does not take into account development in locations outside of Dereham
6	Future year traffic growth forecasts have been updated since the study was completed
7	Individual junction models have been used rather than an area-wide transport model
8	Proposed mitigation measures have not been adequately presented or tested and no alternative options have been assessed
9	Cost estimates of the mitigation measures exclude some significant additional costs



### 3 Assessment of Key Issues

- 3.1.1 This section presents an assessment of the key issues raised in relation to the Local Plan Transport Study.

#### STUDY BRIEF

- 3.1.2 The study brief included an assessment of the road infrastructure in and around the town and the key junctions were identified in the brief. One of the issues raised is the scope of the original study and whether the assessment should include additional junctions and time periods, e.g. Saturday traffic. Clearly more data and analysis would not be a bad thing but the question is whether additional assessment work would have a material impact on the findings of the baseline assessment and the additional impacts of development.

- 3.1.3 The brief that was set out at the start of the study was considered to be proportional to the extent of the transport issues. It was recognised that Transport Assessments will be required to support every individual development proposal but this study was intended to quantify the high level, cumulative impacts of the proposals on the highway network. The approach was to apply a consistent approach to all the proposed development sites but it was not intended to be a Transport Assessment that dealt with all the issues for every individual site. The Highway Authority were involved in developing the scope of work and they were satisfied that it was proportionate.

#### ASSESSMENT DAYS OF THE WEEK

- 3.1.4 There have been comments on the use of weekday peak hour traffic surveys that were used within the transport study and that an assessment of capacity during the Saturday peak period is also required.

- 3.1.5 The initial scope was designed and agreed with the Highway Authority to assess the key junctions at the busiest times. Weekday peaks are generally considered to be the worst case for the throughput of traffic and congestion so the data collection was targeted at these times. There are 10 weekday peaks during a standard week and only one Saturday peak so this is where the data collection effort and the capacity assessments were focussed.

- 3.1.6 Due to the concerns raised about the lack of capacity on a Saturday additional data has been collected that shows the variation in traffic flow at a number of links on the network across a whole



week, in order to quantify the differences between weekday and weekend traffic volumes. Surveys were carried out on 7 of the key links in the town (2nd-8th December 2016) that feed into the busiest part of the road network to the south of the town centre (Yaxham Road (3 survey sites), South Green Road, Station Road the A47 slip roads.

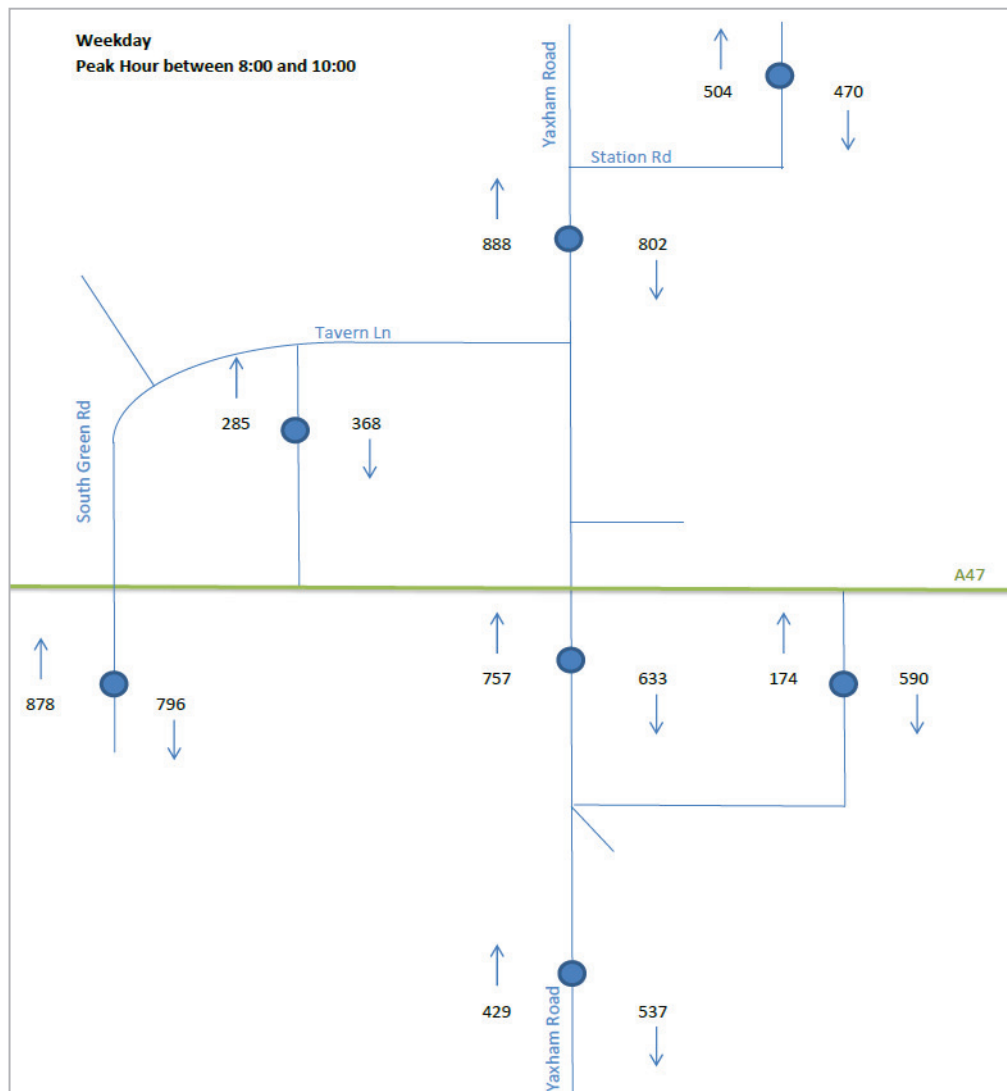
3.1.7 Roads carry traffic volumes that can fluctuate significantly between different days of the week and hours within the day and the busiest time periods can occur on different times each day. In addition, the survey sites can also show different patterns of traffic movements to each other, even at the same times of day and each direction of travel can also have a different pattern, even at the same site. We have extracted data that is considered to be representative of 'typical' conditions within the constraints of the data that is available. The use of data gathered in December is not ideal but it was considered that the data would show the relationship between Saturday and weekdays and that the effect of Christmas is still relatively limited on the 3<sup>rd</sup> December.

3.1.8 Figures 1 to 3 show peak hour traffic volumes at the surveys sites on different days, Figures 4-17 show traffic daily volumes at each site and Figure 18 shows the combined traffic volumes at all the surveyed sites. The main conclusions to be drawn from the data are:

- Total traffic volumes across the whole day on a Saturday were approximately 90% of the average weekday volume
- Half of the peak hour traffic volumes were significantly higher on a weekday than on a Saturday (7 out of 14 sites) while five of the sites had similar traffic volumes on a Saturday and a weekday
- Two links out of the 14 surveyed had significantly higher traffic volumes on Saturday than during the weekday peak. These were on Station Road Northbound and Yaxham Road Southbound, south of Greens Road heading towards the Tesco Roundabout
- Looking at individual survey sites gives fluctuating results in terms of traffic volumes at different times on different days but when the total traffic volume travelling through the network is considered for each hour it shows that the Saturday peak volume was lower than the weekday peak hours. Figure 18 shows the combined traffic volumes observed at all of the survey sites. It shows that the Saturday peak hour (11am) had 93% of the weekday peak traffic volume. There is an element of double counting in these figures because some vehicles will be counted at more than one site, but that effect is the same on each day and does not affect the comparison between different days.

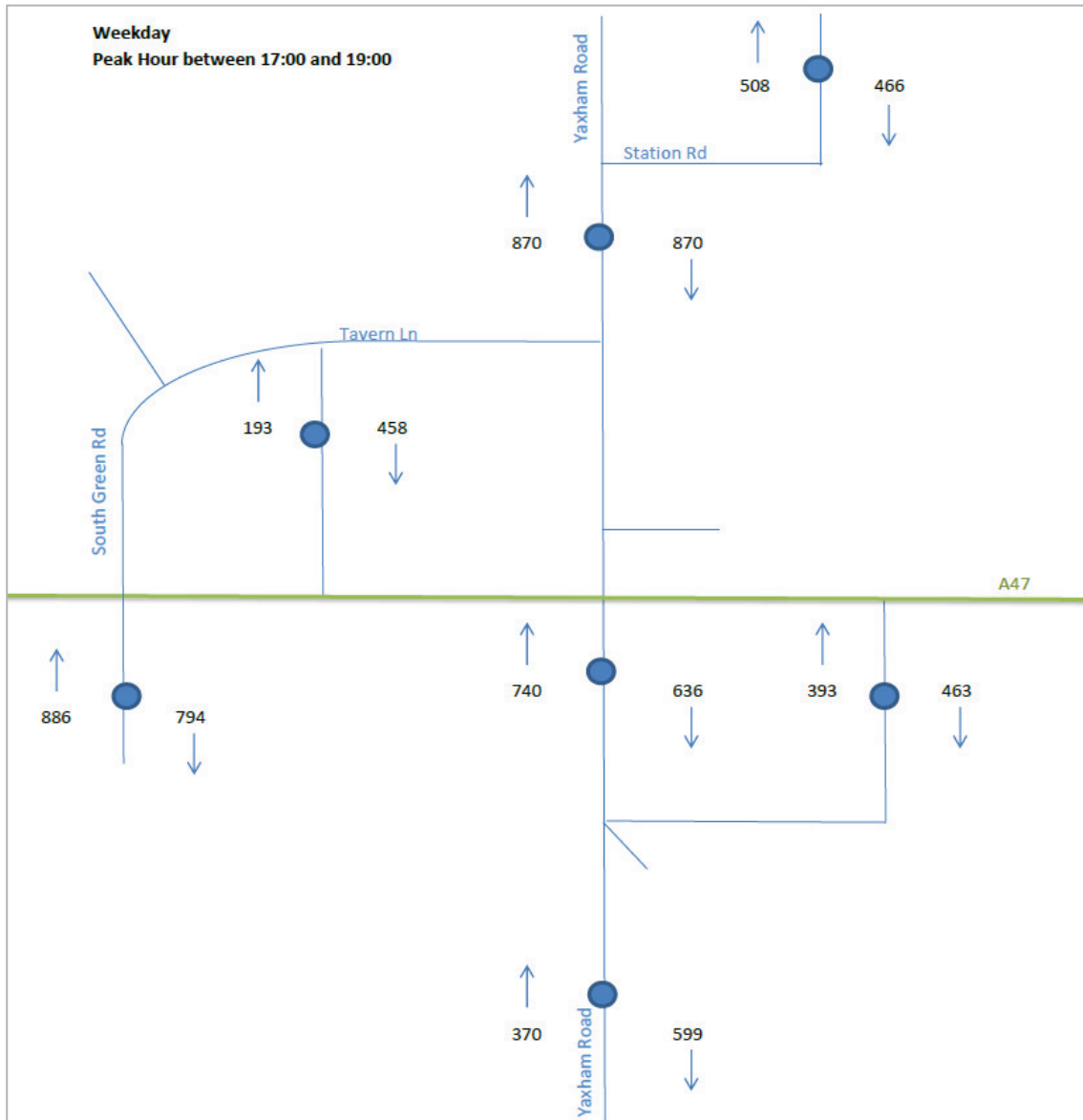


**Figure 1: Weekday AM Peak Hour Link Flows**



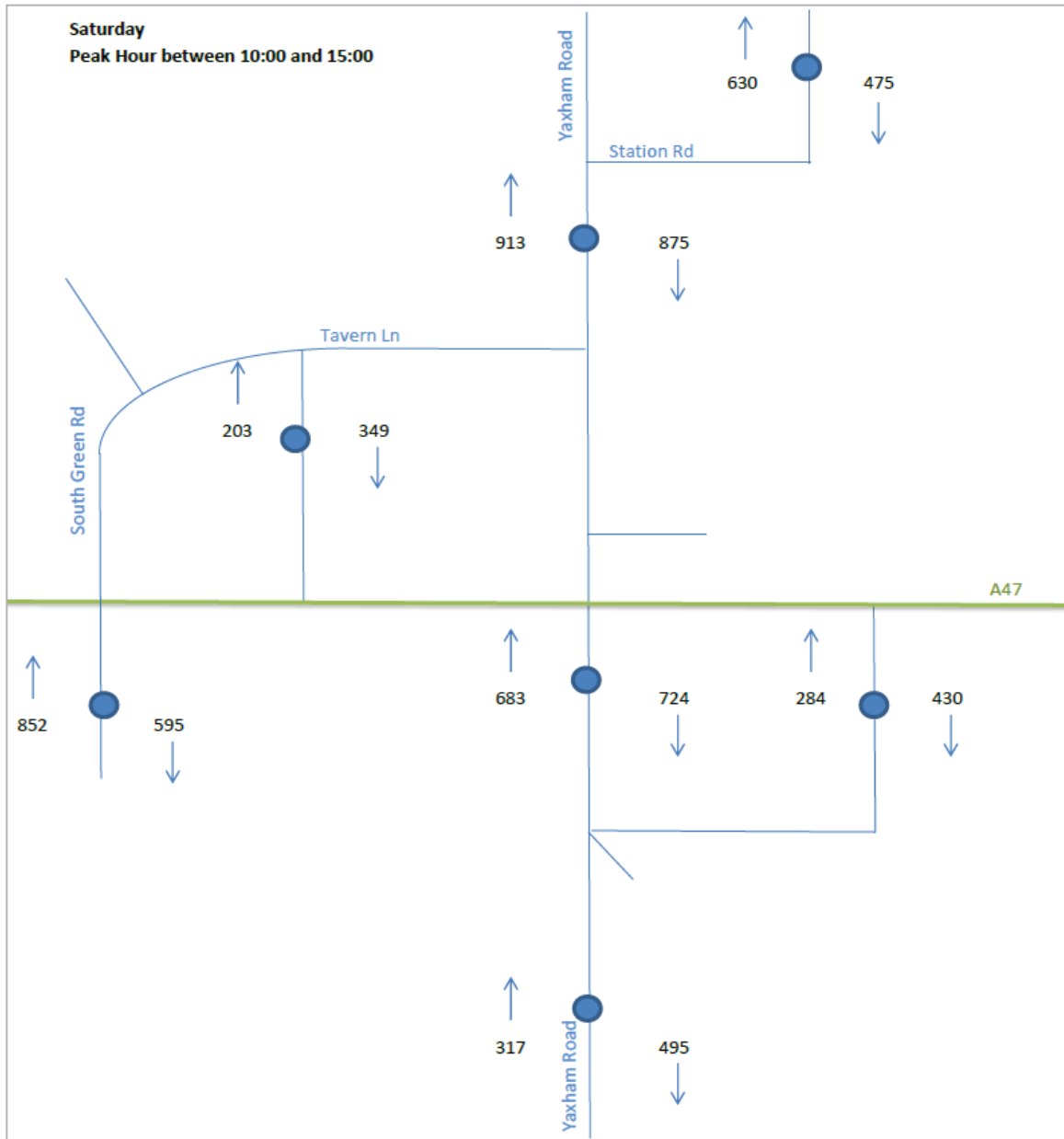


**Figure 2: Weekday PM Peak Hour Link Flows**





**Figure 3: Saturday Peak Hour Link Flows**



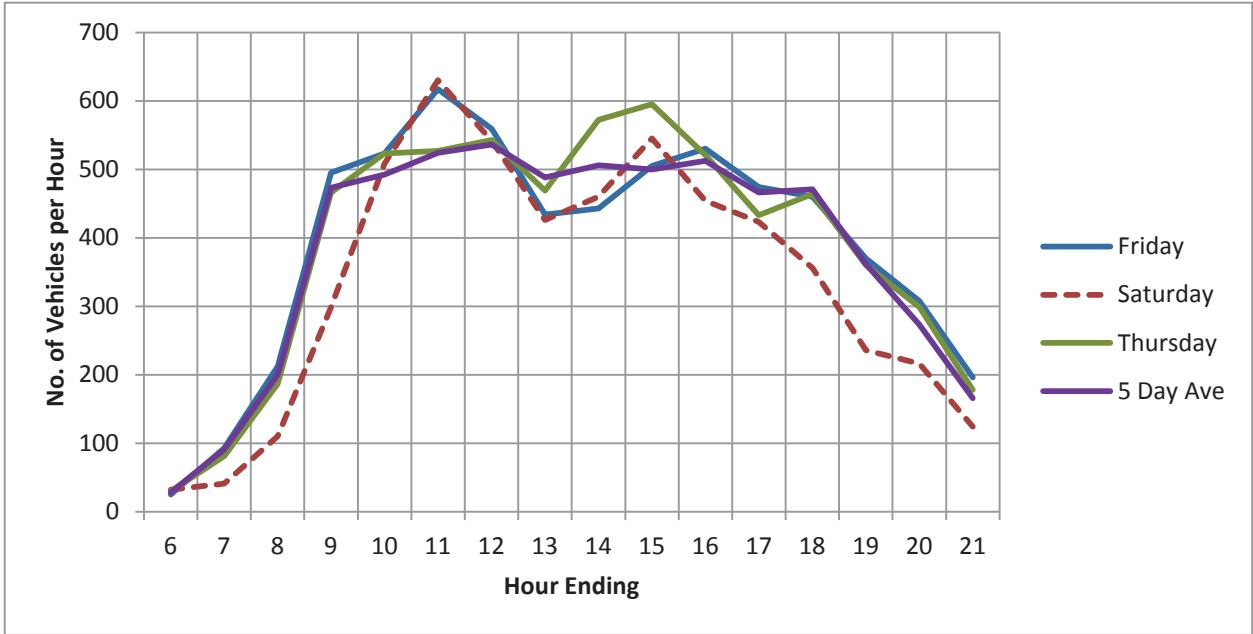


- 3.1.9 The previous figures show where traffic volumes were higher and lower on the Saturday and weekdays. Most links are either higher on a weekday or have a similar volume but two links are significantly higher on a Saturday (Station Road northbound (630) and Yaxham Road southbound (724)). The Yaxham Road figures could reflect the demand to access Tesco and/or Lidl on a Saturday but when all traffic entering the Tesco roundabout is combined it shows that the weekday peak is higher than Saturday because of the higher volumes on the A47 slip road and Yaxham Road to the south.
- 3.1.10 The combined traffic volumes presented in Figure 18 reduce the effects of all the variations between times of day, survey sites and directions to provide an overall comparison of each day of the week. It clearly shows that the Saturday peak is lower than both weekday peaks.
- 3.1.11 On this basis the recommendation is that the weekday junction capacity assessments that were carried out in the Local Plan Transport Study are an adequate base from which to develop mitigation measures for the additional traffic that will be generated by the proposed development. A Saturday highway capacity assessment would be informative but is not essential at this stage of the process. It is unlikely that the traffic volumes on a Saturday would require a significantly different set of junction mitigation measures because the traffic volumes are lower. The traffic signal timings could be adjusted in response to the different pattern of traffic movements on a Saturday.
- 3.1.12 One potential issue is the mini-roundabout junction of Station Road and Yaxham Road. Figure 5 shows that the volume of southbound traffic on Station Road at midday on weekdays and Saturday is lower than the rest of the working day. There are a number of reasons why this might have occurred and one explanation is that traffic cannot get through Station Road at midday because of congestion at the mini-roundabout. However, it is not clear why it does not occur during the weekday peak periods so there may be an alternative explanation. Further surveys of traffic volume and queues at this junction may show that additional capacity or facilities for pedestrians are required at the junction. New surveys would need to be done at a neutral time of year (e.g. March-June) to confirm this and a more detailed Transport Assessment would be expected to explore this issue in more detail.

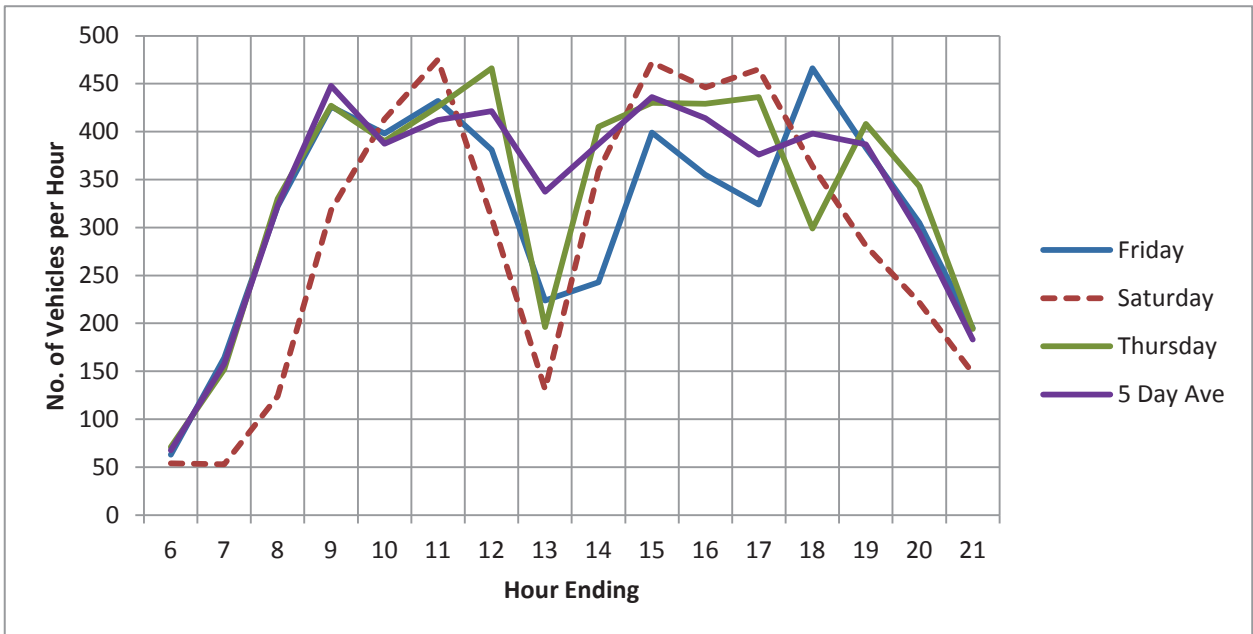




**Figure 4: Station Road Northbound Link Flows**

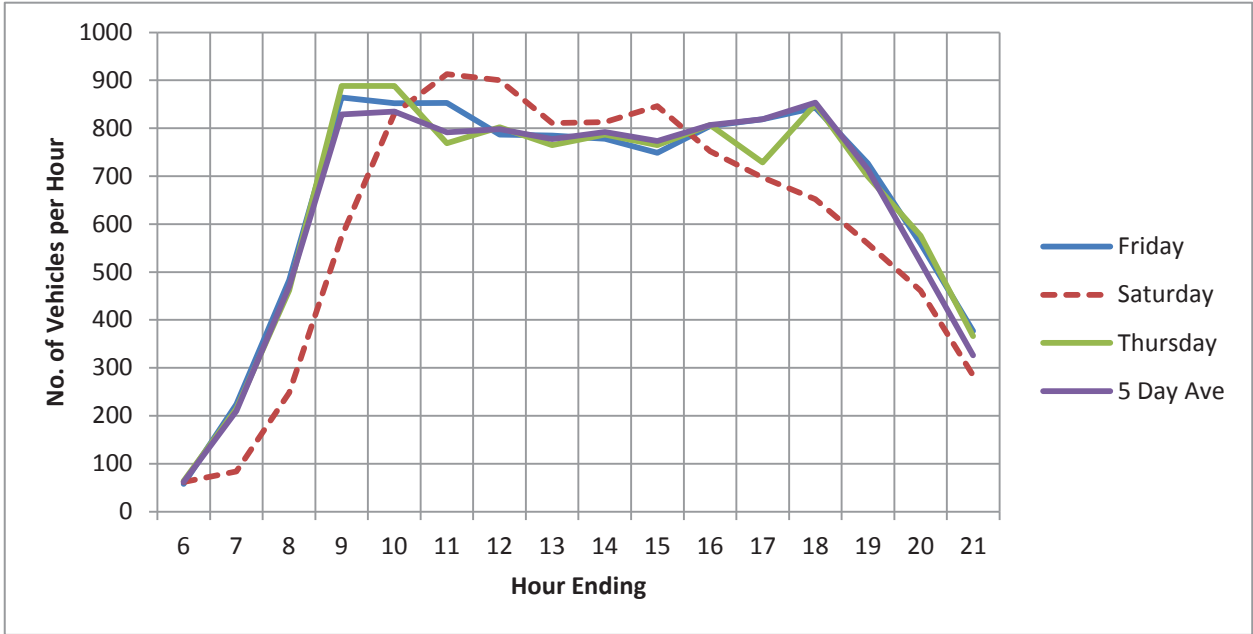


**Figure 5: Station Road Southbound Link Flows**

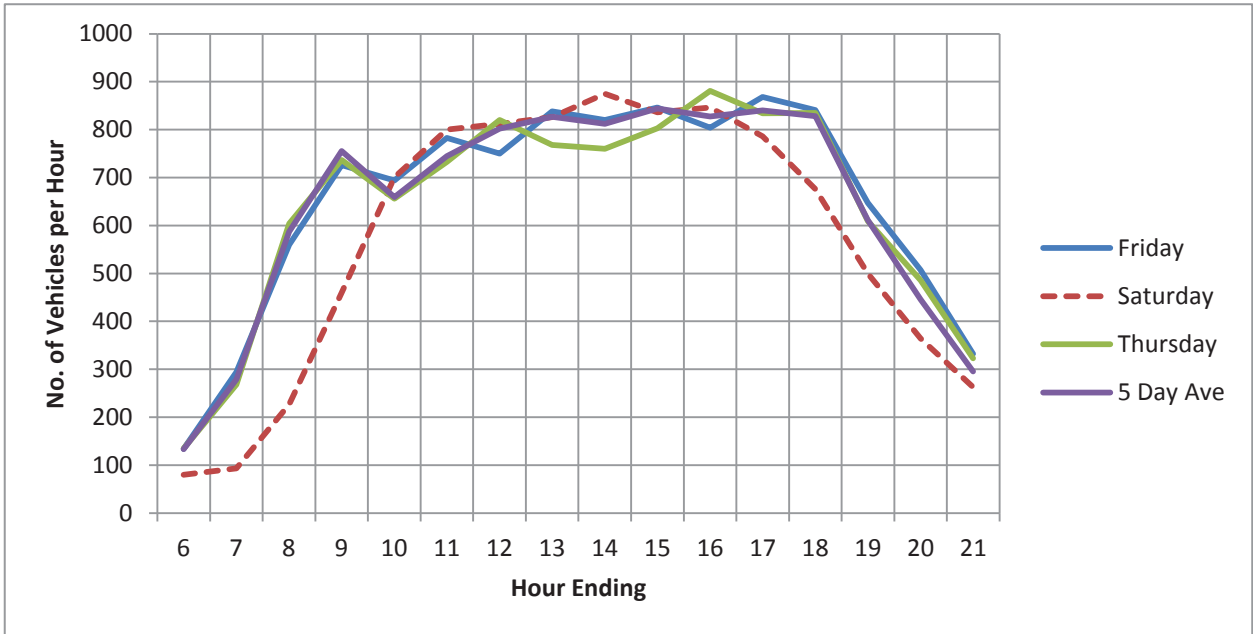




**Figure 6: Yaxham Road North Northbound Link Flows**

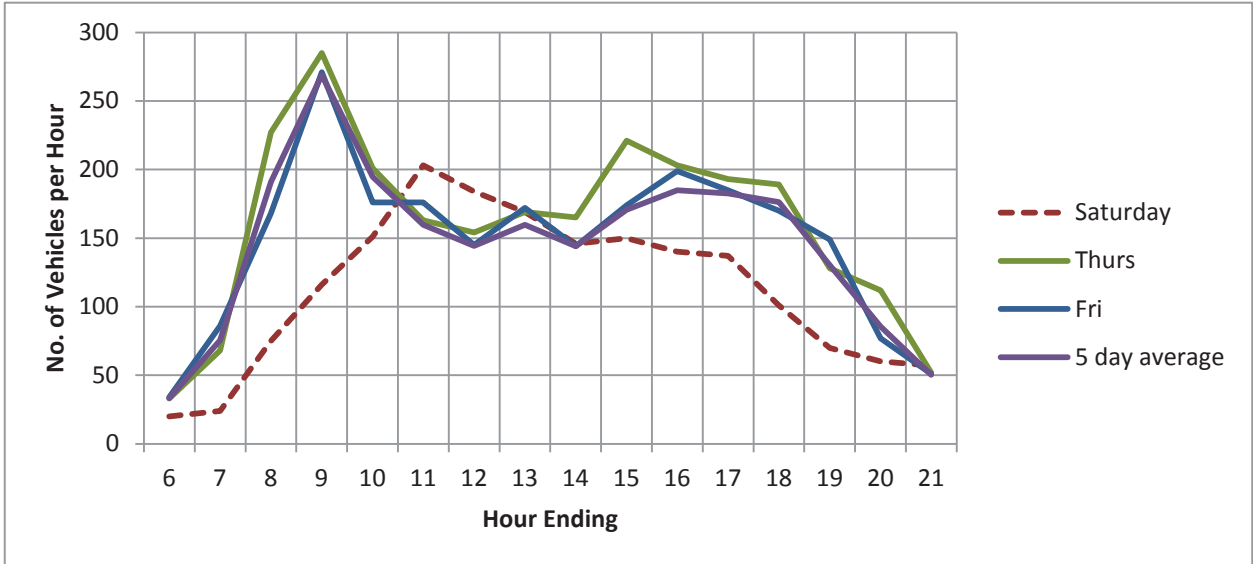


**Figure 7: Yaxham Road North Southbound Link Flows**

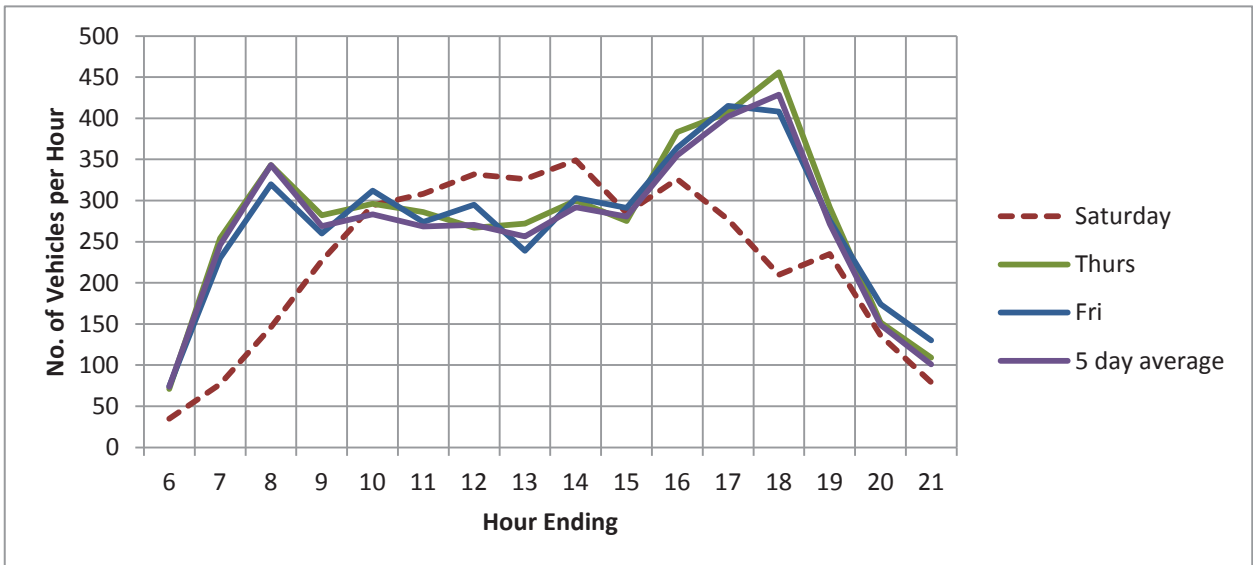




**Figure 8: A47 Eastbound Slip Roads Northbound Link Flows**

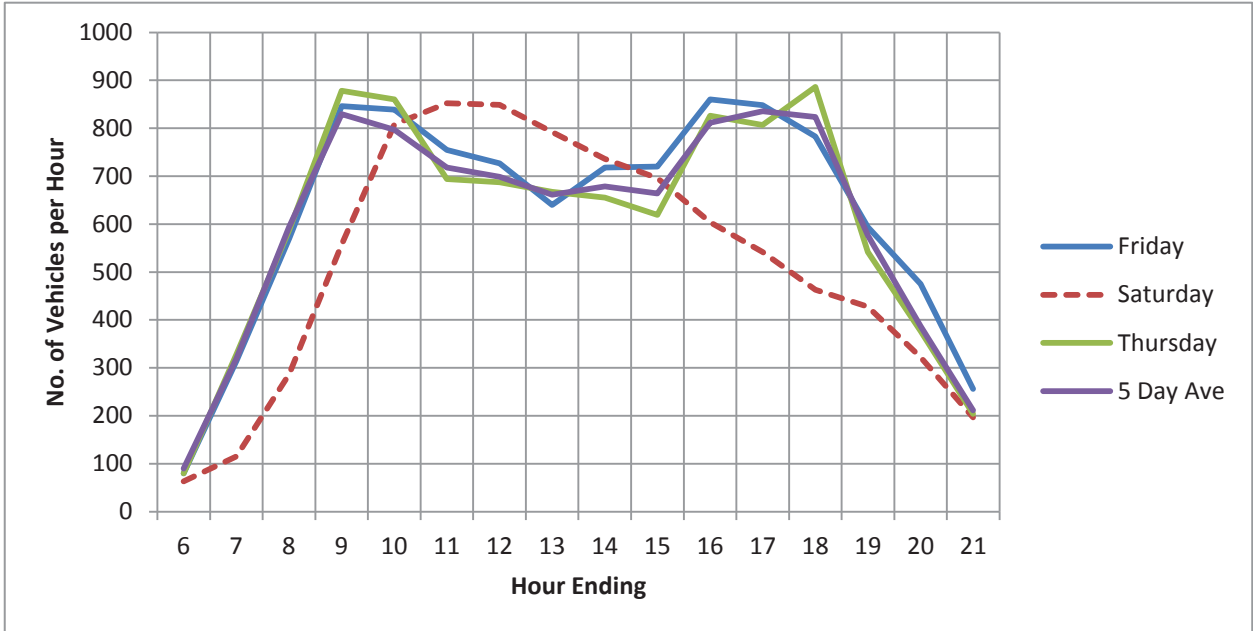


**Figure 9: A47 Eastbound Slip Roads Southbound Link Flows**

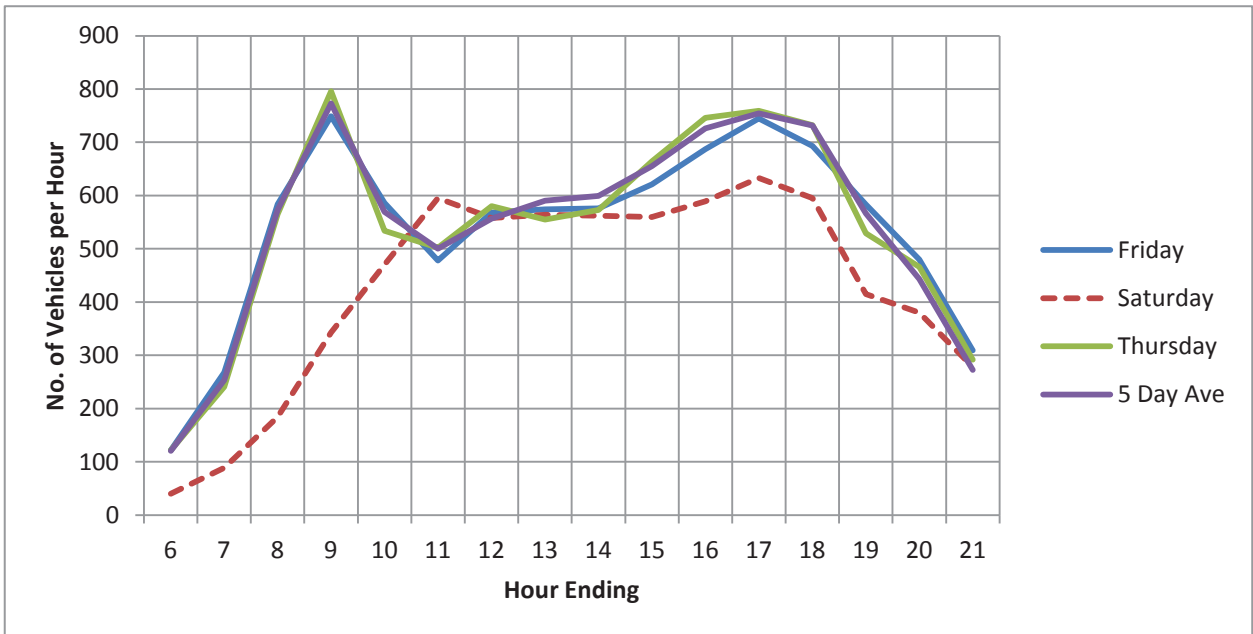




**Figure 10: South Green Road Northbound Link Flows**

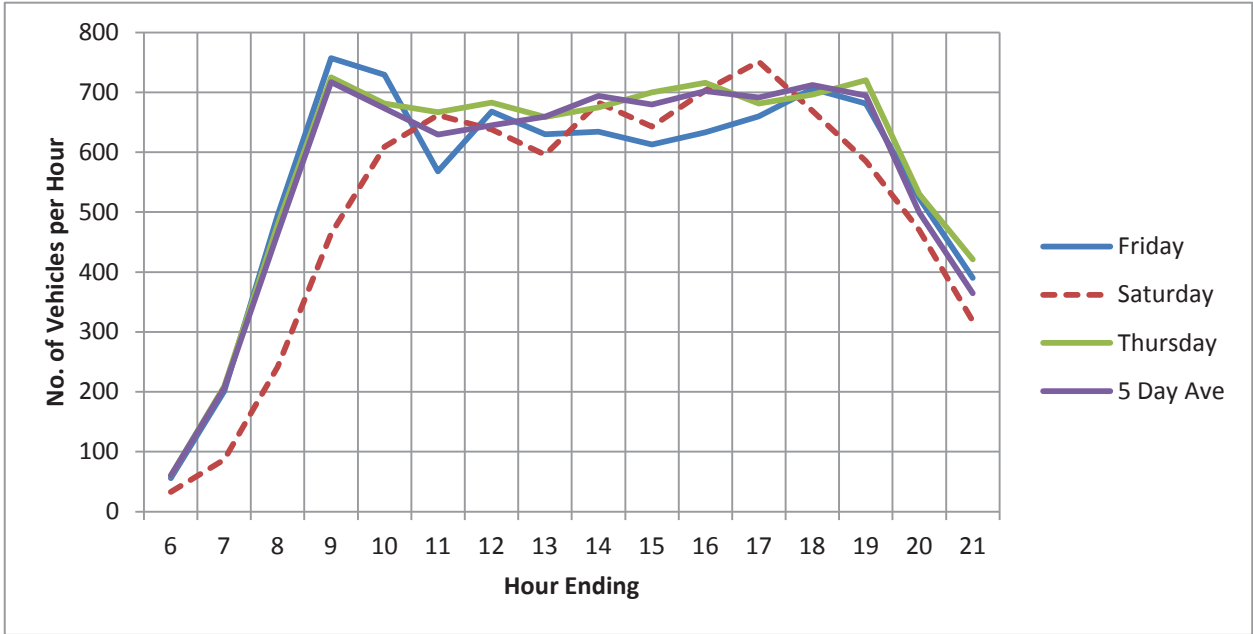


**Figure 11: South Green Road Southbound Link Flows**

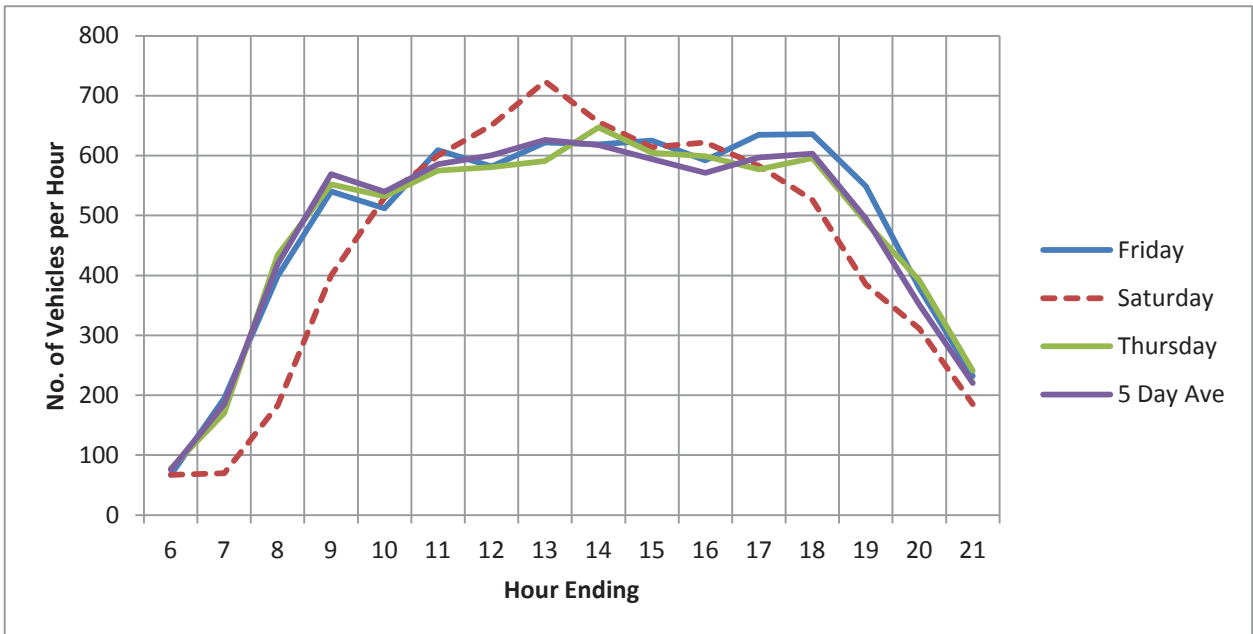




**Figure 12: Yaxham Road Central Northbound Link Flows**

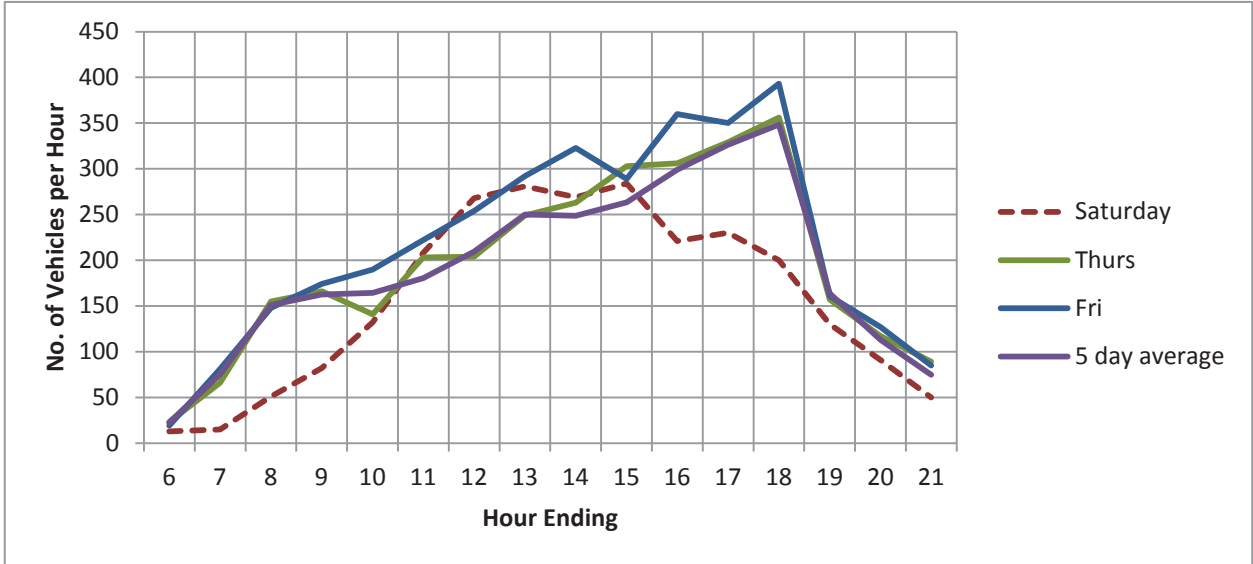


**Figure 13: Yaxham Road Central Southbound Link Flows**

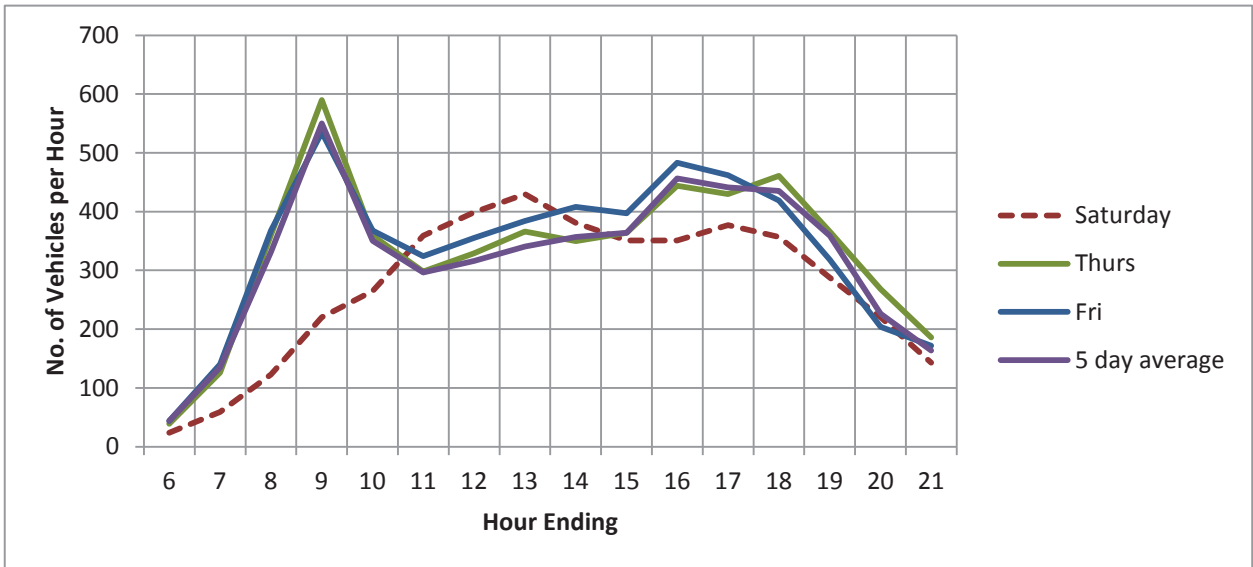




**Figure 14: A47 Westbound Slip Roads Northbound Link Flows**

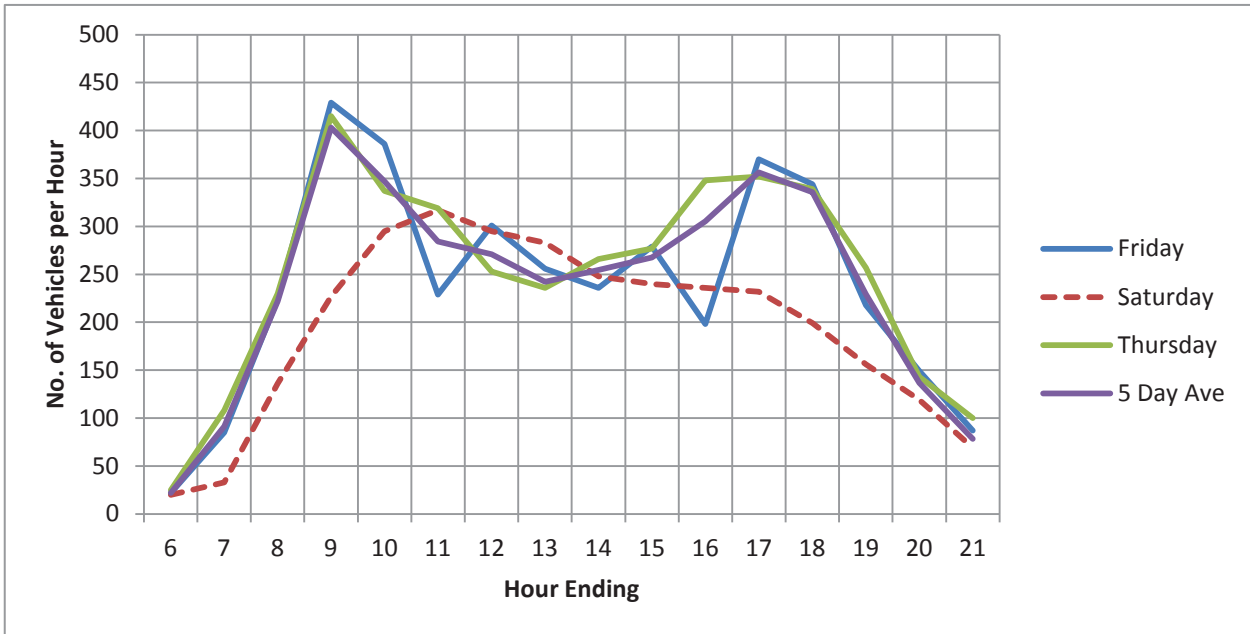


**Figure 15: A47 Westbound Slip Roads Southbound Link Flows**

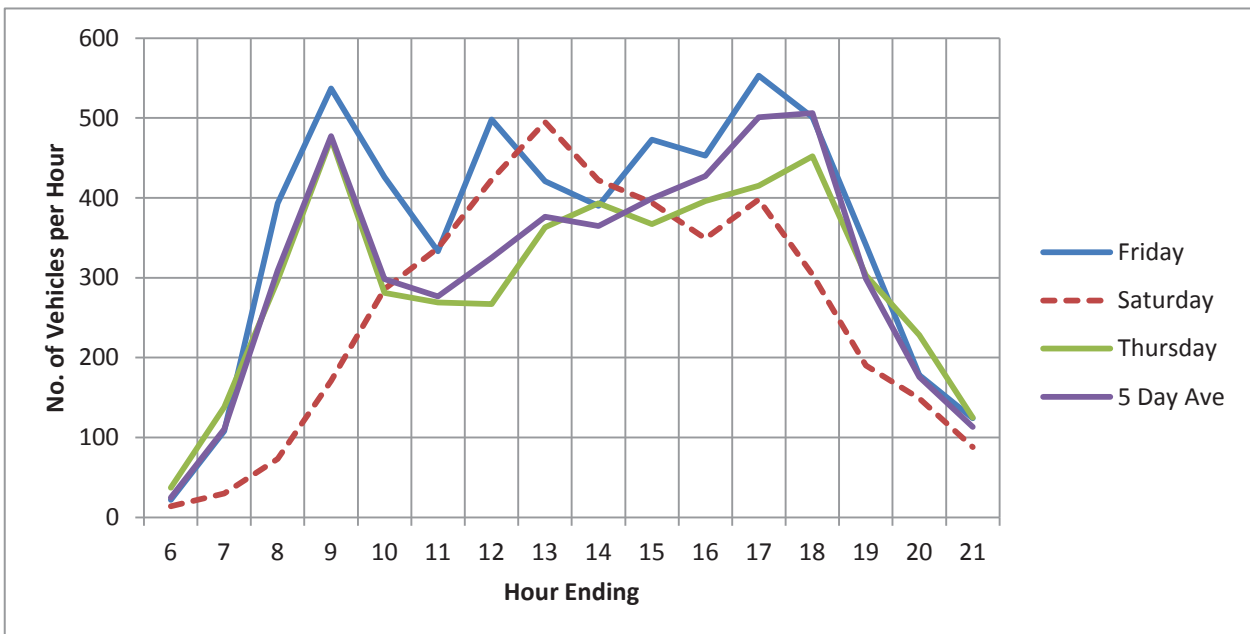




**Figure 16: Yaxham Road South, Northbound Link Flows**

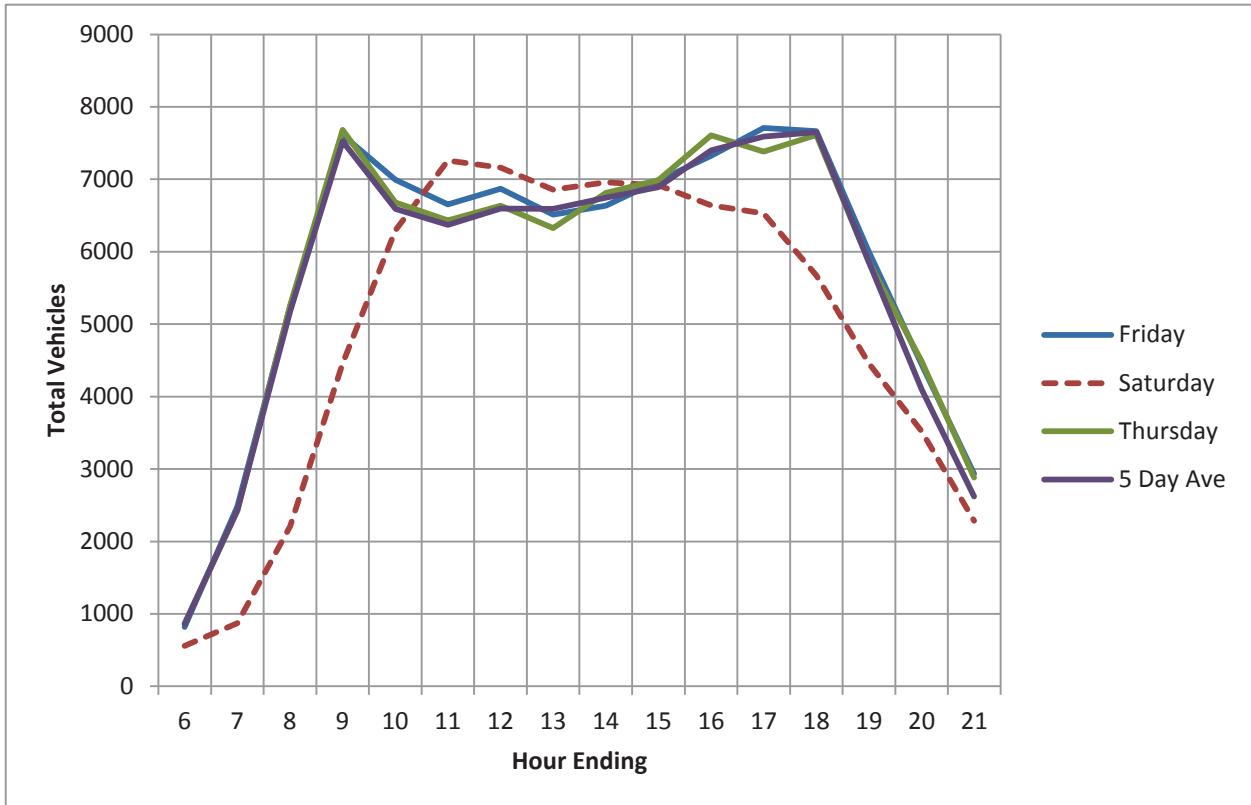


**Figure 17: Yaxham Road South, Southbound Link Flows**





**Figure 18: Combined Traffic Volumes at all survey sites**



**ROAD SAFETY**

3.1.13 The study is a strategic transport study and an assessment of road safety was not included in the study Brief. It was decided to provide a high level assessment of road safety issues and the detail regarding the existing road safety issues was limited to the number of accidents that occurred over a five year period on each of the key links in the study area in Dereham and Mattishall. These are summary figures and the report did not present all the accidents that occurred on the other roads in the town or highlight those accidents involving vulnerable road users. This information is available and can be presented if required. Road safety issues on the highway, site access and within each site will be addressed for each individual site allocation and planning application at the appropriate stage of development.





### FORECAST VEHICLE TRIP RATES

- 3.1.14 The same trip rates were used across all of the potential sites to ensure consistency of approach and to be fair to each site. Some sites have already proposed trip rates in their Transport Assessments but these are all different from each other so as a strategic study it was decided to use consistent trip rates across all sites rather than the specific ones for each site. NCC also agreed that the use of 85<sup>th</sup> percentile trip rates would not be necessary across all sites. By definition, a wide range of sites is more likely to generate average trip rates than 85<sup>th</sup> percentile ones and NCC were satisfied with this approach.
- 3.1.15 The Transport Study did state that the vehicle trip rate calculations taken from the TRICS database of previous developments excluded examples from Greater London, but the calculations presented in Appendix D showed that the sample of sites used did include examples from Greater London. The trip rates that we used in the report were approved by NCC and those figures excluded the London sites. Appendix shows the wrong sample of sites. There is a discrepancy between the text and the Appendix but the approved rates have been used throughout the report.

### FORECAST DISTRIBUTION OF TRIPS

- 3.1.16 There was some criticism of the way that the forecast trips were assumed to distribute across the road network and that proposed growth had not been taken account of.
- 3.1.17 The proposed distribution of traffic uses existing Census (2011) data to forecast which directions and routes people are likely to use in the future. The distribution has not been adjusted to take into account every possible housing development that may be built in the future because there is no certainty about whether they will be built and at what year they will be built. It is considered that the Census data provides a more reliable assessment of the location of development than different potential future year forecasts would. The numbers of potential houses involved are small compared to the existing housing and other development, so the impact of different land use assumptions would be minor and the distribution would also need to be adjusted for every future year scenario.

### BACKGROUND TRAFFIC GROWTH

- 3.1.18 The original forecasts of background traffic growth were extracted from the Department of Transport forecasts that were relevant to this area at the time of the study (DfT Area Ref. 33UB2), taken from their TEMPro software (v6.2). A new version of TEMPro was launched by the DfT in



August 2016 (v7.0) that forecasts much lower traffic growth, across the country as well as in Breckland. The changes in traffic growth forecasts that apply are shown in Table 1:

**Table 1: TEMPro Traffic Growth Forecasts**

Years		TEMPro v6.2	TEMPro v7.0
2015-2021	AM	4.6%	2.6%
	PM	5.0%	2.6%
2015-2026	AM	13.4%	7.1%
	PM	14.4%	7.0%
2015-2036	AM	28.1%	9.8%
	PM	30.5%	9.5%

- 3.1.19 The table shows that the latest traffic growth forecasts are significantly lower than those used in the original study. This means that the future year traffic forecasts could be somewhat lower than originally thought. The impact of this change on junction capacity and the potential mitigation measures could be quantified if necessary. It does mean that the proposed junctions are likely to have lower traffic volumes in the future than originally forecast and thus they will have more capacity.

## JUNCTION MODELLING APPROACH

- 3.1.20 The study Brief highlighted the need to assess the impacts of development at key junctions but did not propose a strategic traffic model that covered the whole town or a specific area of the town. Although it is recognised that there would be benefits from the development of an area-wide transport model it is not considered to be essential or proportionate to produce such a model to support the Local Plan process. The highway authority was satisfied that the approach taken was superior to previous cumulative transport assessment work in the town and did not recommend that an area wide model should be produced instead.

## MITIGATION MEASURES

- 3.1.21 Various alternative mitigation measures (e.g. sustainable transport and signing schemes) have been proposed in the representations that could provide some benefits by reducing demand or redirecting traffic but they are very unlikely to provide the scale of additional capacity or modal shift that will be required to mitigate the effects of the level of development that has been proposed. A package of sustainable transport solutions will be required from each development at the planning application



stage but there will inevitably be a need for additional highway capacity, given the presence of the existing capacity constraints.

### COST ESTIMATES

- 3.1.22 The preliminary cost estimates provided for the mitigation measures include contingency and optimism bias uplifts that are appropriate for schemes at this early stage of development. Contingency was assumed to be 15% of the capital cost and optimism bias was assumed to be 44%, in line with Department for Transport guidance. Assumptions have also been included for the cost of redirecting underground utilities for two of the proposed schemes but more investigation will be required at the next stage of design to produce a cost estimate for utilities with a higher level of confidence.
- 3.1.23 The largest mitigation scheme was the proposed signalised roundabout at the Tavern Lane/Yaxham Road junction and the cost estimate excluded the cost of the land that would be required for construction of that junction and any compulsory purchase process that might be required. Further work will be required to establish a cost estimate for the land required at the next stage of scheme development to establish what the land cost element is likely to be for this scheme.



## 4 Conclusions

- 4.1.1 This Addendum to the Dereham Local Plan Transport Study has explained the background to the key assumptions that were made within the study and used new traffic survey data to assess some of the issues that have been raised in relation to the study.
- 4.1.2 The Brief for the Transport Study was considered to be proportionate to support the Local Plan process. It was a strategic study that aimed to clarify the cumulative effects of the potential developments at key junctions on the road network. As such it does not include capacity assessments at every junction on the network, but the relevant Transport Assessments that will need to be prepared for each individual site are expected to include such calculations. Junctions were modelled individually as opposed to using an area-wide model. A strategic, area-wide model and study of the whole town and highway network would be possible and more thorough but is not considered to be essential for a Local Plan study. NCC agreed with the scope and methodology of the study at the outset.
- 4.1.3 In terms of highway capacity assessments, there is concern that the assessments that were carried out for the weekday peak periods do not address the traffic problems that arise on a Saturday. The study focussed on the peak periods that occur every weekday morning and evening, rather than the single Saturday peak period. As a result, new data was collected to quantify the difference between Saturday traffic volumes and weekday volumes.
- 4.1.4 The results show that conditions are busy during the Saturday midday peak, but there is no evidence to suggest that Saturdays are busier than the weekday peaks. Therefore the mitigation measures that have been proposed are likely to be adequate to cope with Saturday traffic volumes. The results of the recent surveys did indicate that Station Road could be congested at midday on weekdays and Saturday, potentially caused by traffic queues at the Station Road / Yaxham Road mini-roundabout. It is recommended that additional surveys of the operation and capacity of this junction will need to be assessed in more detail in the Transport Assessments for the development sites.
- 4.1.5 The Department for Transport have released updated future traffic growth forecasts since the study was produced. The forecasts of growth are significantly lower than the previous version. This suggests that the amount of traffic using the local network in the future may be somewhat lower



than was originally calculated and that the proposed mitigation measures will have more capacity than expected.

- 4.1.6 In terms of the mitigation measures that have been proposed, the study focussed on providing highway capacity to mitigate the cumulative impacts of the forecast traffic. Other schemes will also be required to ensure that the sites can be accessed by all modes and to reduce the impact of the proposals where possible. However, it must be recognised that there is a limit to the potential of public transport and active travel modes and that the sites will generate significant traffic and that capacity will need to be increased.
- 4.1.7 The scheme cost estimates did exclude land costs because that was beyond the scope of the study and will be subject to important local issues and discussions. Land costs will need to be added when further design work has been carried out. Contingencies were included in the cost estimates to cover the potential costs of underground utilities, general contingencies and optimism bias.