



Breckland
COUNCIL

Breckland Local Plan Full Update

Issues and Options Report for Consultation

March 2023

RESPONDING TO THIS CONSULTATION

The council is consulting on the Issues and Options between March 10 2023 and 19 May 2023.

Details of the consultation can be found at
You can see the document and supporting information online at:
<https://www.breckland.gov.uk/article/19942/Local-Plan-Full-Update>

Wherever possible, submissions should be emailed to us at:
planning.policyteam@breckland.gov.uk.

Alternatively, responses can be returned to us by post using the address below:

Breckland Council: Local Plan: Full Update Regulation 18 Issues and Options
Planning Department
Breckland Council
Elizabeth House,
Walpole Loke,
Dereham,
Norfolk, NR19 1EE

After this period there will be further consultation as new and updated evidence is made available that will help inform and refine the development of options.

All responses must be received by no later 5pm on 19 May 2023.
Any submissions received after this date may not be accepted and consequently not considered.

Copies of the consultation material can also be found in all Council libraries in Breckland and at the main Council offices in Dereham

1 INTRODUCTION: THE FULL UPDATE OF THE BRECKLAND LOCAL PLAN

- 1.1 This consultation document is the first stage of public consultation for the update of the Breckland Local Plan. It seeks views on a range of planning issues and proposed options for the future development of the district. The Local Plan will set out the strategy for the amount, location, and design of new development as well as strategies to protect our environment, contribute to a net zero carbon emissions and protect and enhance the districts heritage, character and natural capital. This consultation asks how you would choose to tackle some important planning issues and possible options for future development in Breckland over the next 25 years to 2046. It covers everything from climate change and affordable housing needs to supporting jobs and promoting biodiversity.
- 1.2 The document is drafted with full awareness of the ongoing impact of Covid-19, the fall out of the Ukraine invasion and its impact on energy, food supplies and the cost-of-living crisis as well as the possible implications arising from the Government's Levelling Up and Regeneration Bill, which may radically change the nature and process of preparing Local Plans in the future. Going forward the preparation of a new Local Plan for Breckland will seek to continue to respond to these and other changing circumstances.
- 1.3 The document provides an introduction and some background information about Breckland followed by 9 topic chapters: Introduction
1. About Breckland
 2. Vision and Objectives
 3. Housing Development Amount and Location
 4. Providing the Right Types of Housing
 5. The Economy
 6. The Built Environment
 7. The Natural Environment
 8. Climate Change
 9. Transport
 10. Infrastructure
- 1.4 For each key identified topic, there is a commentary on the background and some of the key issues followed by a question or set of questions allowing you to express your views and suggestions. Some of the questions are specifically open ended to allow you to do this and will help inform the Council on its approach to the local plan and its policies

Norfolk Strategic Planning Member Forum

- 1.5 The Norfolk Strategic Planning Member Forum oversees the production of the Norfolk Strategic Planning Framework (NSPF) document on behalf of all the local planning authorities in Norfolk. Local planning authorities, county councils and public bodies have a legal responsibility to work together on strategic matters when preparing Local Plans. This is called the Duty to Cooperate. The NSPF provides a structure for tackling these planning issues across the county, especially those which have a strategic impact across local authority boundaries. It includes guidance relating to housing, economic growth, infrastructure and the environment. The NSPF informs the Local Plans produced by all the authorities. The NSPF has been updated in parts to meet the new requirements and the forum considered the document at the January 2021 meeting. The latest version of the document was endorsed by all stakeholder authorities in 2021.
- 1.6 As part of the wider effort to foster a closer collaboration between local planning authorities, and other health service organisations to plan for future growth and to promote health, an engagement protocol has been produced between local planning authorities, the Norfolk and Waveney Sustainability and Transformation Partnership, Clinical Commissioning Groups, Health Partners and Public Health Norfolk and Public Health Suffolk.

National Planning Policy and Guidance

- 1.7 The Local Plan must also take account of the National Planning Policy Framework (NPPF) (2021) and Planning Practice Guidance (PPG). In accordance with the National Planning Policy Framework (NPPF) all local plans are expected to be reviewed every 5 years and the new Local Plan will run from 2021 to 2046 and once adopted will replace the current Breckland Local Plan (2011-2036).
- 1.8 The adopted Local Plan was examined against the 2012 NPPF which was current at the time it was submitted for Examination. Much of the adopted Local Plan meets the current 2021 NPPF requirements, including in relation to the protection of the Brecks Special Protection Area, communications and historic environment. However, some aspects of the 2021 NPPF are not fully reflected including in respect of updated housing need, town centre uses, biodiversity and design requirements.
- 1.9 The 2021 NPPF sets out that Local Plans should include strategic policies to address key strategic issues, as well as policies which help inform decision making on planning applications. It requires Local Plans to set out an overall strategy for the pattern, scale, and quality of development, and make sufficient provision for:

- Housing (including affordable housing and that required to meet the needs of gypsies, travellers and travelling show people), employment, retail, leisure and other commercial development;
 - Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and the provision of materials and energy (including heat).
 - Community facilities (such as health, education, and cultural infrastructure); and
 - Conservation and enhancement of the natural, built, and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.
- 1.10 The role of the Local Plan is to reflect the NPPF and set policies to bring forward sustainable development in the local context. The Local Plan will be revised to ensure that it is fully compliant with the latest NPPF.
- 1.11 The Levelling Up and Regeneration Bill currently being considered by Parliament proposes changes to the National Planning Policy Framework (NPPF), which will be subject to consultation. In December 2022 the Government set out some further measures under consideration. These include new measures to strengthen commitment to building enough of the right homes in the right places, reflecting local circumstances with the right infrastructure whilst ensuring the environment is protected and giving local people a greater say on where and where not to place new development; new penalties for slow developers failing to build already-approved homes and new powers to promote brownfield development and wider review to promote brownfield development.
- 1.12 The Bill introduces some major changes to the suite of documents that make up development plan documents and adds a new layer of national planning policy in the form of the National Development Management Policies (NDMP).
- 1.13 **Introduction of the standard method for assessing local housing need** : The Government has introduced a national standard method for assessing local housing need to help deliver a target of 300,000 new homes per year across England. The standard method uses a formula to identify the minimum number of homes expected to be planned for, using projected household growth and historic under-supply. It identifies a minimum annual housing need figure (currently 672 dwellings per year), but not a housing requirement figure for the Local Plan, which we will determine through a Housing Needs Assessment.
- 1.14 Then the Council will also need to consider addressing the identified housing needs of specific groups in our area. This includes whether a higher level of need than identified by the Government's standard method ought to be considered, whether the overall housing need can

be translated into a housing requirement figure for the plan period, and the anticipated deliverability of different forms of provision, having regard to viability. This need may be higher than the housing need figure calculated using the national standard method. This is because the needs of particular groups will often be calculated from the whole population of an area rather than the projected new households used for the standard method.

- 1.15 **Environment Act** – The 2021 Environment Act sets out the Government’s expectations for environmental improvement through a legal framework of governance and regulation, including key targets for Biodiversity Net Gain and the introduction of Nature Recovery Networks. This will introduce new regulations during 2022/3 so new requirements need to be reflected in plan policies. The Government has committed to reducing greenhouse gas emissions by 78% by 2035 (from 1990 levels) and achieving net zero by 2050, as recommended by the Climate Change Committee.
- 1.16 **First Homes** - First Homes are a specific kind of discounted market sale housing, introduced in 2021, which national planning policy states should account for a minimum 25% of affordable housing secured through planning obligations.
- 1.17 **Future Homes Standard - This** is a set of standards that will be enshrined in Building Regulations to ensure new homes built from 2025 will produce 75-80% less carbon emissions than homes delivered under current regulations. Existing homes and certain home improvements will also be subject to higher standards.
- 1.18 **Use Class Order** – The use of buildings and land is classified into different categories or ‘use classes’. Which category uses fall within depends on whether a change of use planning application is required, or whether that use can take place without it. The Use Class Order was significantly amended in 2020 and the Local Plan policies will need to be updated to reflect these.
- 1.19 **10% small sites** – Paragraph 69 of the NPPF requires the Plan to identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare, unless it can be demonstrated that there are strong reasons why this cannot be achieved. The adopted Local Plan did not need to meet this requirement as it was adopted before the latest NPPF was published. This will be addressed in the review unless there is strong evidence to justify why this cannot be achieved.
- 1.20 **National Design Guide/Codes** – Since the adoption of the Local Plan, the National Design Guide and National Model Design Code have been published. The NPPF requires Local Plans to provide maximum clarity about design expectations through the preparation of design codes or guides consistent with the National Design Guide and National Model

Design Code, and which reflect local character and design preferences. Design codes and guides can either form part of a plan or be supplementary planning documents.

Timetable for the production of the new Local Plan

- 1.21 The key stages for the production of the Full Update of the Local Plan are as follows:

Regulation 18 consultations

- Call for Sites and June 2022 – December 2022
- First Conversation Consultation (Issues and Options) January – April 2023
- Preferred Options and draft Plan Consultation October 2023 – January 2024

Regulation 19 consultation

- Publication Draft Plan consultation July 2024 –September 2024

Submission for examination December 2024

Examination: Q2 2025 – Q3 2026
Adoption Q4 2026

Relationship to Sustainability Appraisal

- 1.22 The Local Plan seeks to achieve each of the economic, social and environmental dimensions of sustainable development and net gains across all three. The NPPF states in paragraph 32 that 'Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)'. The council has a statutory obligation to carry out a sustainability appraisal of all plans and policies. For the Full Update of the Breckland Local Plan, an Integrated Assessment is being undertaken. The Integrated Assessment includes elements of an Equality Impact Assessment and Health Impact Assessment as well as a Sustainability Appraisal and Strategic Environmental Assessment. This integrated approach assesses the impact of the Plan on social, economic, environmental, health and equality objectives. The Integrated Assessment explains

how the preferred sites and policies will be chosen and will report the outcome of the assessment of all of the options considered.

- 1.23 The Integrated Assessment (IA) is therefore a key component of the development of a Local Plan. The Local Plan will be the subject of ongoing appraisal during this process. The IA sustainability appraisal includes assessment of social, economic and environmental impacts. An interim IA report will be prepared, and consulted upon, that will consider emerging options emerging from the consultation on this Issues and Options report, setting out the findings to-date. Comments received at consultation stage will help to inform a detailed IA to accompany the preferred options. The purpose of this is to ensure that as the policies are developed in the Local Plan, they are in keeping with the principles and aims of sustainable development. We would encourage you to comment on this document when it is published in the Spring of 2023.

Priorities and Development Viability

- 1.24 In setting the priorities and objectives underpinning the Local Plan, the Council must consider the potential impacts these may have in terms of the financial costs placed on new development. There is a risk if expectations and policy requirements are too high, that development may not be viable. The Local Plan policies should be clear so that developers do not pay too much for a piece of land and then calculate that they cannot afford to meet policy requirements. If the value generated by a development is less than the cost of developing it, then it is likely that development will not take place. A careful balance needs to be struck in this respect to ensure requirements are at a level that is viable for development to go ahead. The Local Plan will therefore be subject to a Viability Appraisal which measures the costs of the various policy requirements for planned growth balanced against essential costs and the factors of value of development.
- 1.25 Planning policy requirements can relate to essential infrastructure to support development, e.g., education, transport, health; contributions towards open space/recreation; affordable housing; addressing climate change crisis such as zero carbon aims, energy efficiency; requirements to deliver high quality design – materials and features; accessible and adaptable Homes as well as supporting nature recovery – net gains for biodiversity.
- 1.26 The local plan must be deliverable and viable to be found “sound” by the Planning Inspector. The conclusions of the Viability Appraisal may, therefore, affect the ability of the council to include higher standards and requirements set out in this Issues and Options paper.

What is sustainable development?

"Sustainable development is development that meets the needs of the present, without compromising the ability of future generations to meet their own needs."

- 1.27 Sustainable Development touches on every aspect of Local Plans from where housing is located and its design, to encouraging modes of transport such as public transport, cycling and walking and infrastructure to support it, to the environment with biodiversity, enhanced green infrastructure and protecting habitat sites, to supporting the long-term economic growth of the area without impacting environmental goals through to protecting and sourcing new energy and water resources.

2 ABOUT BRECKLAND

- 2.1 Breckland District is the largest rural district in England extending over an area of 1,300 sq.km (500 square miles). It is one of seven districts in Norfolk and is located centrally in the county and includes the five market towns of Attleborough, Dereham, Swaffham, Thetford and Watton, together with 114 villages. The district is served by the A11 and A47 trunk roads, and the towns of Attleborough and Thetford have direct and frequent rail links into Norwich and Cambridge. It is also home to one of the largest lowland forests in England- Thetford Forest and ancient heathland- the Brecks, which it shares with its neighbouring district of West Suffolk extending to over 1000 sq.km (393 square miles).

The Population in Breckland

- 2.2 The total population of Breckland is 141,500, which is an increase of 8.4% since 2011 (ONS 2021 Census) and by 2046 the number of households age 65+ is predicted to increase by 55%¹ However, the number of young people aged 0-15 is estimated to increase by only 2.2% and those people of working age between 16-64 it is estimated there will be a 2.3% increase².

Deprivation Information

- 2.3 Breckland ranks 142 out of 317 local authorities in England in the Index of Multiple Deprivation with 1 being most deprived and 317 being the least. Breckland is the least deprived district in Norfolk after South Norfolk and Broadland. Breckland scores poorly on Education at 35 and Housing at 64, however, scores well for Crime at 250, Employment at 163 and Living Environment at 167. ³

Housing

¹ (Study of demand for specialist retirement housing and accessible housing for older people in Norfolk March 2022.)

² Breckland Housing and Homeless Strategy 2017-2021

³ Norfolk Insight JSNA Briefing Paper on Deprivation 2019

- 2.4 There are 60,400 households in Breckland ,15% of which is affordable housing (2020 figures)⁴. Over the last five years 6,018 houses have been built in Breckland⁴. The average house price in Breckland in 2021 was £300,000, which is a 30.7% increase in a year compared to the average price of £252,500 in 2020 (based on ONS figures on the average price of a home in Hockering, Mattishall & Cranworth in Breckland.)⁵ The median house price to median salary ratio is 9.3 compared to 8.92 across England and Wales i.e., a Breckland resident with a middle size income needs 9.3 X their gross annual salary to buy a medium sized property in Breckland⁶

Economy

- 2.5 Breckland is the main economic gateway to Norfolk, the A11 technology corridor runs through the district to the major university research and developments centres in Cambridge and Norwich. The Cambridge - Norwich Tech Corridor will create over £500 million of innovation-led growth, investment in infrastructure, housing, and skills.⁷ The other major road is the A47 which is the main East/West link from Great Yarmouth and Lowestoft to Kings Lynn and Peterborough to the A1 leading to the Midlands and beyond. The district also benefits from railway links from Norwich to Ely and on to Cambridge and the Midlands.

Employment Sectors

- 2.6 The main employment sectors in the district are manufacturing, retail, health, business administration, construction, education with manufacturing being the highest at 16.1% compared with 10.7% for the rest of the county. The agricultural sector is also an important employee in the region, employing 4.6% across the district compared with 2.8% average within the county.⁶

Employment Levels

- 2.7 There is high employment in Breckland with a greater proportion of employees in full time employment in the district at 86.5% than any other district in Norfolk but with lower mean average wages at £29K than the rest of the UK at £38.1K. (Gross average salary for full time employees with the employee in the same job for 12 months)⁵

Disruption to growth

- 2.8 As yet the full impact of COVID 19, the Ukraine Invasion and increasing energy costs are yet to be fully understood across the district.

⁴ Breckland Monitoring report 2020

⁵ Norfolk Live July 2022

⁶ (Ipswich Average salary, unemployment rates in graphs and numbers report comparison with neighbouring authorities (plumplot.co.uk)

⁷ Invest Breckland 2022)

However, according to the World Bank, global growth is expected to decelerate markedly from 5.7% to 4.1%.⁸ This reflects the continued disruption of the pandemic and supply chain bottlenecks. Furthermore, these coupled with the increase in food and energy prices has pushed up headline inflation in many countries. (World Economic Forum 2022) ONS forecasts for the UK Economy for 2023 sees GDP growth contracting to between -1.9 and -2.1 and inflation is currently running at 10.6% (July 2022)⁹. This is against a backdrop of changing trade relationships with Europe and the rest of the world following the UK's departure from the EU.

3 VISION AND OBJECTIVES

The Strategic Vision: The Issues

- 3.1 All Local Plans begin with a strategic vision for their planned area and in the current Local Plan Breckland's Strategic Vision states:

“By 2036 Breckland’s settlements and its wider rural area will have developed in a sustainable manner appropriate for the rural nature of the District; building on its achievements and strengths to deliver an improved quality of life for its next generation of residents, an improved experience for its visitors, and will be better placed to attract investment and jobs into the District. Breckland’s communities will be more sustainable, prosperous, safe, healthy and vibrant. The economy will be diversified and well connected, with a growing number of skilled workforce and population. New growth will be balanced, ensuring that the District adapts to, and mitigates against the impacts of climate change.

New development will be directed to locations that are co-ordinated with transport provision, have good access to support existing services, community facilities and open space. Outside the strategic growth locations of Attleborough and Thetford, a more balanced approach to housing development between rural and urban areas will have taken place allowing for improved housing land supply from rural areas to help in facilitating planned growth and this infrastructure required to support development so that communities can grow in a sustainable and cohesive matter.

New employment will not only be located to take advantage of the improved transport links offered by the A11 and A47 corridors and partnership work with adjacent local authorities but be directed to the most sustainable locations where they assist in providing the right balance between the local rural economy and that of the wider District and that of Greater Norwich. Local

⁸ Global Economic Prospects (The World Bank) June 2022

⁹ Forecasts for the UK Economy: A Comparison of Independent Forecasts HM Treasury (July 2022)

distinctiveness will be reflected through positive approaches towards the rural economy where appropriate development will be helping to sustain local services and identities allowing them to grow and assist in helping communities adapt and thrive.

Services and facilities will be supported and prized in rural villages. A sense of local community and belonging will be maintained and reinforced with decision made at community level reflected in development proposals through the consideration of Neighbourhood planning

Breckland will continue to cherish the natural, built and historic environment which make the District unique, and will protect them not only for their own sake but also as a means of attracting investment and visitors to the area. Breckland's towns and villages will have retained the characteristic that provide their character."

Through working with stakeholders and partners, strong working relationships will be delivering improved health care and wellbeing to meet the needs of communities"¹⁰

Strategic Vision: The Options

Question 1: Breckland has a vision that seeks for our residents and business to thrive. Do you think this is still the right Strategic Vision for Breckland? Y/N

Please suggest any changes that you think should be made to the Vision for the Local Plan Update

Strategic Objectives: The Issues

3.2 In addition to the vision, the Local Plan Update must also include a clear set of strategic objectives. Objectives are a way of translating ideas and aspirations into reality. The objectives will help narrow the focus onto the most practical methods of achieving the vision. There are 19 objectives in the current Local Plan and we would welcome comments on whether these remain valid or where changes should be made.

3.3 The 19 strategic objectives in the current Plan are:

Development in the Right Place

1. Contribute to sustainable development through the reflection of the vision and aspirations of the local communities for Breckland;

¹⁰ Breckland Local Plan 2011 to 2036 adopted November 2019

2. Assist in the creation and maintenance of inclusive, environmentally sustainable communities making the best and most efficient use of already developed land, buildings and natural resources.
3. Make sure the majority of development is focused into areas where services are available, and where facilities can be supported.
4. To adapt and mitigate against the impacts of climate change.

Meeting the Housing Need

5. Deliver housing that meets the needs of the community and local economy through the concentration of development in the Strategic Urban Extensions of Attleborough and Thetford and where services and facilities can be supported within or adjacent to the market towns of Dereham, Swaffham and Watton and the local service centres, whilst giving recognition to the need for small scale and appropriate development in rural areas to support rural communities and services.
6. Support the development and maintenance of a balanced housing market and a variety of decent, affordable housing which meets the needs of all local people and supports economic and community development;
7. To encourage high quality, sustainable and safe design for places and spaces, in both the private and public realm, and which respects the character and local distinctiveness of Breckland's communities;

A Strong Economy

8. Promote and support economic growth in sustainable and accessible locations in a flexible manner, diversifying the urban and rural economic base of the District to enable a prosperous mix where investment is encouraged, skills are developed and retained and new and existing businesses are supported;
9. Enable the full potential of the A11 gateway and A47 corridor to contribute to economic growth of the District through investment, partnership work with neighbouring authorities and inward investment.
10. Develop the local economy and meet local employment needs by providing a sufficient number and variety of employment locations and opportunities, at the same time ensuring the specific qualities of the local environment are not damaged.
11. Promote the vitality and viability of town centres, including the night time economy and support the retention of existing rural services.

12. Provide for improved broadband connections, especially in rural areas.

A Rich Environment

13. Contribute to the positive management of change in the historic environment, protecting, enhancing and maintaining the unique qualities and character of Breckland, the wider landscape and setting, and its designated and non-designated heritage assets for the future.
14. Promote a safe and healthy environment, and high quality design minimising the impacts of development and ensuring quality of life and sense of place.
15. Protect, conserve and enhance the natural environment, valuing green infrastructure for the many functions it performs.
16. Ensure the ongoing protection of key habitats for protected species.

Thriving Communities

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

Question 2: These objectives are based on the existing adopted Local Plan.

Do you think these objectives are still relevant? If not, please explain why and how you think they could be improved.

4 HOUSING: THE ISSUES

Amount and Location

- 4.1 In this section, we will look at the amount of housing and where it should be located in the district and what methodology should be used to consider the amount and location of housing development. The Local Plan Update will need to identify locations for housing and other development to meet identified needs up to 2046. The required level of new housing, employment and other development has not yet been determined, but will be identified through the background evidence that the Council is currently collecting. In particular, the Council has commissioned a Housing and Economic Development Needs Assessment (HEDNA), which will quantify future housing and employment requirements and provide more information on the range of needs that should be planned for. The Council's 'call for sites' during Summer/Winter 2022 will also provide potential sites for further development.

Housing Numbers

- 4.2 The government's 'standard method' (the 2014 based minimum housing requirement) indicates a starting point for annual housing need of 672¹¹ dwellings per annum (d.p.a.) for the updated Plan compared to the 612 d.p.a. set out in the current Plan. It is important to note that this housing figure is subject to change and remains variable until the point the Local Plan is submitted for examination in 2024. Affordable housing is often provided as a percentage of the total number of dwellings of a development, consequently, the greater the housing growth the more affordable housing can be delivered. Equally, economic growth is supported by greater housing growth.
- 4.3 The Government's expectation is that Local Planning Authorities (LPAs) would use the standard method to establish the local housing need figure for their area. Guidance also reiterates that the use of the standard method is not mandatory and that an alternative approach could be applied but only in exceptional circumstances. Nevertheless, it is noted that LPAs can expect the application of an alternative approach to be scrutinised more closely at examination.
- 4.4 The government guidance stresses that these figures provide a minimum starting point in determining the number of homes needed in an area, and that it might be appropriate to plan for a higher housing need figure in certain circumstances. This could include where there are funded growth strategies, planned strategic infrastructure improvements or where agreements are in place to take on unmet need from neighbouring authorities. Guidance also references the need to consider whether assessment of previous levels of housing delivery

¹¹ March 2022: Figure. Revised figures are published annually when new affordability ratios are published.

in an area or needs assessment indicate a higher level of local housing need is required than the standard method. Whilst we do not consider these circumstances currently exist, there is a significant affordable housing need across Breckland and we will need to consider the consequences of these minimum housing need figures on affordable housing delivery. We will examine this as the Local Plan progresses. The Council has commissioned a Housing and Economic Development Needs Assessment to consider different growth scenarios and the implications for future housing need.

- 4.5 Turning back to the use of an alternative model for assessing local housing need, guidance sets out instances whereby this might be considered acceptable. This includes in the preparation of joint-plans and where Local Authorities have re-organised. In each of these circumstances however, it is clear that the expectation is that the standard method will feature in those calculations. The only deviation from the standard method that Guidance is clear on, is where strategic policy-making authority boundaries do not align with local authority boundaries or where data is not available. Examples of where this might be applicable are given as National Parks and the Broads Authority. The use of an alternative model is therefore not considered appropriate for Breckland.
- 4.6 The plan period will be 2021 – 2046, therefore, any sites with planning permission and remaining allocations in the adopted local and neighbourhood plans at the beginning of the plan period (2021) date will contribute to the overall delivery of housing across Breckland. Table 1 in Appendix 1 sets out this position by parish.
- 4.7 The urban extensions at Attleborough and Thetford are actively progressing, and benefit from planning permission, but are still in their early stages. At Attleborough, construction is yet to start and Thetford is still in its infancy. The relatively long lead time for delivery for these sites is primarily due to their size and complex infrastructure needs. However, there have been significant completions within the market towns of Dereham, Swaffham and Watton and at Local Service Centres. Based on the Table in Appendix 1 if the Local Plan Update set a local housing requirement figure of at least 672 dwellings per annum. then this would require 16,800 dwellings to be provided between 2021 and 2046. On the assumption that 9,734 are on existing sites with permission or allocations then this would mean that sites for an additional 7,066 dwellings would be needed (or c8,126 dwellings with a 5 - 15% buffer- a buffer is usually required in order to provide flexibility in the event that some sites do not come forward as expected).

In a rural district, such as Breckland, some development will come forward on 'windfall sites'. These are sites which are not formally included or allocated in a local plan but which subsequently are granted permission for development. These are usually small sites. Windfall

sites can be considered as a source of future housing supply but must be supported by firm evidence in order to demonstrate that they are a reliable source of supply in the future. At the moment the Council considers that 100 dwellings per annum are on windfall sites and this will need to be included in the calculation for new sites as part of the Full Update of the Plan.

HOUSING AMOUNT: THE OPTIONS

Question 3: As a minimum do you think the Local Plan Update should plan for Breckland's full objectively assessed housing needs based upon the most up to date Standard Methodology published by MHCLG (672 per annum) or do you think there are any issues affecting housing growth in Breckland that may justify a higher figure for example, to support any identified strategic infrastructure, greater levels of affordable housing or an opportunity to maximise economic growth?

Please give your reasons

Housing Location

The Settlement Hierarchy

4.8 The settlement hierarchy with Policy GEN 03 in the current Local Plan is as follows:

- **Key Settlements:** Attleborough and Thetford
- **Market Towns:** Dereham, Swaffham and Watton
- **Local Services Centres:** Ashall, Banham, Bawdeswell, Garboldisham, Great Ellingham, Harling, Hockering, Kenninghall, Litcham, Mattishall, Narborough, Necton, North Elmham, Old Buckingham, Shipdham, Sporle, Swanton Morley, Weeting
- **Villages with Boundaries:** Beeston, Beetley, Carbrooke, Caston, Gressenhall, Griston, Hockham, Lyng, Mundford, North Lopham, Rocklands, Saham Toney, Thompson, Weasenham, Shropham, Eccles Road (Quidenham), Clint Green and Yaxham.
- **All other villages are categorised as Villages without boundaries**

4.9 The Local service centres were identified within the current local plan where they satisfied **all** of the following 5 qualifying criteria:

- Access to public transport with a frequency of service to a higher settlement and during normal hours
- Provision of a community facility e.g., village hall, pub, café
- Provision of some employment in the village
- Provision of a Shop/Post Office

- Provision of a School

4.10 The level of development for Local Services Centres was set at 10% of the estimated number of households from 2011 base data.

4.11 Villages with boundaries have some of the services identified above and were deemed capable of some development equivalent to 7% of their estimated number of households with limited development for all other villages and hamlets mainly centred around infilling and rounding off and conversions.

SETTLEMENT CRITERIA: (THE OPTIONS)

Question 4: Do you think the settlement categories as defined in the hierarchy above should be carried forward into the Local Plan Update? Y/N

Please provide further comments.

Question 5: Are there any settlements that you think should be added, removed, or moved into a different category?

Please indicate which settlements and give reasons.

Question 6: Do you agree with the methodology for classifying Local Service Centres? Y/N

Please explain your answer.

Question 7: Would you add, add to or remove any of the five qualifying criteria: Access to public transport, provision of community facility, employment, shop and school? Y/N

Please explain your answer.

Question 8: Do you think that all 5 criteria need to be met to be classified as a Local Service Centre? Y/N

Please explain your answer.

Question 9: Do you think that some villages could be considered together around key services they share? Y/N

If so, which ones?

THE LOCATION OF NEW HOUSING (DEVELOPMENT STRATEGY): (THE ISSUES)

4.12 In the current local plan, housing aims *“to meet the needs of the community and local economy through the concentration of*

development in the Strategic Urban Extensions of Attleborough and Thetford and where services and facilities can be supported within or adjacent to the market towns of Dereham, Swaffham and Watton and the local service centres, whilst giving recognition to the need for small scale and appropriate development in rural areas to support rural communities and services”.

- 4.13 The current development strategy was based on a settlement hierarchy which was used to help identify sustainable locations which have existing infrastructure, services, and resources for the purposes of locating new development. The greatest amount of development is proposed higher up the settlement hierarchy.
- 4.14 The effects of the pandemic have been far reaching on people’s habits and in some ways escalated changes which were already beginning to take place pre-2020¹². There has been an increase in people moving away from their main urban location to neighbouring towns and villages with London seeing the largest proportion of movers leave their region, with 12% leaving for locations in the south-east and 8% heading further afield into the East region.¹³ This migration to more rural areas is partly due to high house prices within some city locations particularly London, the desire for more green space but also due to the opportunities to work from home. The ONS figures from February 2022 show that around a 1/3 of working adults do their job from home, and many employers are planning to continue with a hybrid model of working from home and office going forward.¹⁴ This has led to an increase in a working population living and working in our villages and rural outskirts of market towns
- 4.15 Overall rural areas had a higher rate of home working (25 per cent) compared with urban areas (16 per cent)¹⁵. In turn this had led to an increase in alternative meeting/working spaces provided by cafes and meeting hubs in market towns.
- 4.16 Shopping habits have also changed with a quarter of retail sales being purchased online including food, and this rose to 36% during the final lockdowns of 2021 and the convenience of online shopping offers many advantages to rural residents¹⁶. However, its climate change benefits are hotly debated due to the fleet vans required and the logistics of delivering across the country¹⁷.
- 4.17 The village shop is still a valued asset to communities in providing additional provisions, social interaction and community services, and this became more apparent during the pandemic as they often took on

¹² Coronavirus and the Social Impacts on Great Britain ONS April 2022

¹³ The green green grass of homeworking families swap the city for country living Experian April 2022

¹⁴ Is Hybrid working here to stay? ONS May 2022

¹⁵ Rural Working From Home Statistics DEFRA 2022

¹⁶ How our spending has changed since the end of coronavirus (COVID19) restrictions ONS July 2022

¹⁷ Is online or in-store food shopping better for the planet? The Grocer 21st June 2021

the role of bringing communities together. New businesses have grown in rural areas including static and travelling farm shops as more people become interested in locally produced food, some 64% of farm shops expect sales to increase further in 2022 and a third of all farm shops have opened in the last 10 years.¹⁸

- 4.18 Village pubs have been declining over a number of years, however, some have survived by diversifying their activities to include the village shop, post office or host community events with the government's funding under "the pub is the hub" initiative.¹⁹ They have also been shown to increase house prices within a village²⁰.
- 4.19 It is well documented that rural bus services have been in decline resulting in greater car dependency in rural areas and this trend has been further exacerbated by working from home, increase in online shopping so less trips to urban centres and the pressures on Local Government Finances. Between 2012 and 2017 patronage on supported rural bus services fell in the UK by 40%²¹. However, for many rural residents particularly the elderly they are the lifeline to accessing the services they need. There are a number of initiatives being considered through the Norfolk Bus Forum including Flexibus schemes. These various trends and changes to habits may impact the methodology upon which we base decisions on settlement growth.
- 4.20 A key part of this Issues and Options stage of the Plan making process is how the Plan should approach planning for an appropriate level of small and medium-scale growth in rural villages and settlements. This work will help us focus on maximising the benefits of development, and enhancing the sustainability of our rural communities. As part of this, we want to understand, protect and enhance the natural and heritage assets that make such a valuable contribution to the unique character of our villages and settlements.
- 4.21 Through the existing Plan, the majority of the planned growth of homes, jobs and infrastructure has been focused on the communities of the 5 market towns and in particular Attleborough and Thetford. Beyond these areas, a comparatively small amount of development has come forward in our rural villages and settlements through the planning application process, and it has been mostly limited to infill within existing settlement boundaries with allocations limited to larger villages. A disadvantage of this approach is that the historic pattern of incremental investment in the sustainability of our rural communities that comes from growth, has been disrupted. Because of this, progressively, the benefits of well-planned growth haven't been felt in our rural villages and settlements. Planned development can provide

¹⁸ First of its kind survey shows impact of UK Farm Shops Farming UK 2nd March 2022

¹⁹ More Funding to Boost Services in village pubs and bring communities together MHCLG September 2018

²⁰ Public Houses and House Prices in Great Britain: a panel analysis European Planning Studies 2021

²¹ The Future of Rural Bus Services in the UK. Bettertransport.org 2018

local market and Affordable Housing, new employment opportunities, improved infrastructure, including walking, cycling and public transport upgrades and it can also support local services and facilities.

- 4.22 In more recent years some of our rural villages and settlements have also been the focus of ‘speculative’ development proposals, which are usually promoted through planning applications. This growth and change has not been arrived at through a plan-led strategy, and often, without a comprehensive understanding of the needs of, or support from, the communities in which they are proposed.
- 4.23 Our rural areas include many natural assets, like sites designated for their ecological value, area with distinctive landscape character and a range of nature conservation designations as well as green infrastructure – which is important to create a sense of place that connects communities to the countryside and provides space for wildlife to thrive in. Our rural areas are also home to a wide range of heritage assets, including conservation areas, listed buildings and sites of archaeological value. There are also landscape features, all of which help to create valuable, historic landscapes and distinctive places. As we consider our approach to planning for our rural areas, and the villages and settlements in them, we need to balance all of these issues and considerations, and make choices about where new homes, jobs and facilities should go, so that our rural communities can thrive.
- 4.24 The COVID-19 outbreak immediately caused the closure of schools and offices, emptied out public transport and in some cases, restricted residents to a tight perimeter around their homes. These restrictions have resurrected discussions around 15-minute neighbourhoods that involve a menu of policy actions that provide residents access to most, if not all, of their needs within a short walk or bike ride from their home. 15-minute policies transform urban spaces into connected and self-sufficient (or ‘complete’) neighbourhoods. Reducing car use and encouraging active travel are central to delivering the 15-minute vision. The 15-minute neighbourhood serves as an organising principle for urban development and urban life that makes life more liveable for residents, by improving air quality and making neighbourhoods safer, quieter, more diverse, inclusive and economically vibrant. In the UK, there are relatively few examples of planning policies and interventions that nurture 15-minute neighbourhoods, but the low traffic neighbourhoods being pioneered in Waltham Forest and Sheffield – and those planned for Bristol, Bath, Manchester and other cities – are tentative first steps. The Plan could consider applying this approach if larger strategic developments are to be developed. The NPPF states that larger scale developments such as new settlements or significant extensions to existing villages and towns can be considered and if these are to form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

4.25 The Council has undertaken a call for sites consultation. The 'Call for Sites' is an early opportunity for individuals, landowners and developers to suggest sites within the District for development over the next 25 years. The site suggestions received by us will be used to inform the preparation of the updated Local Plan. Approximately 400 sites have been suggested for development and a further 80 for protection as local green space. These can be viewed at the Commonplace platform

<https://brecklandlocalplan.commonplace.is/>

DEVELOPMENT PRINCIPLES: OPTIONS

Question 10: Which of the spatial principles listed below do you consider are most important in developing a strategy for development in the Local Plan? Please rank (1) for most important and (12) for least important

1. **Maximise re-use of previously developed (brownfield) land**
2. **Focus development in locations where there is greatest accessibility to employment, local services and facilities**
3. **Respect the character of the existing settlement pattern including maintaining gaps between settlements**
4. **Focus development in locations where there is greatest potential to maximise sustainable travel (public transport, walking and cycling)**
5. **Locate development to minimise its impact on protected or locally important landscapes, heritage and biodiversity**
6. **Focus on locations and development that will deliver or contribute most to infrastructure and local facilities**
7. **Focus on sites that can be delivered quickly to ensure a flexible development supply**
8. **Provide new housing and facilities to help sustain rural settlements**
9. **Locate development to maximise use of existing available infrastructure capacity (e.g., transport, wastewater treatment)**
10. **Focus on sites that can be delivered quickly to ensure a flexible development supply**
11. **Focus on locations and development that will deliver or contribute most to infrastructure and local facilities**
12. **Seek to increase development densities in locations close to local facilities or with good public transport links**

Please provide your ranking and comments below

DEVELOPMENT LOCATIONS: OPTIONS

Question 11: Do you think development should be concentrated within the market towns? Y/N

If so which ones and why?

Question 12: Do you think more housing should be dispersed within rural areas/villages? Y/N

Please explain

Question 13: Should there be a new settlement Garden Town/Village developed within Breckland? Y/N

Please explain

Question 13A: Should the 15 minute neighbourhood concept be introduced?

Question 14: Should development be concentrated on the main transport routes (A47, A11 or others)? Y/N

Please explain

Other options? – Please explain

Settlement Boundaries the issues

4.26 Breckland Council has relied on the planning policy tool of drawing up settlement boundaries to limit development beyond the settlements into the 7A policy with settlement boundaries:

- provides clearer rigid policy framework for elected members and Planning Committee.
- provides certainty for parish councils, local people and landowners.
- will be likely to result in fewer appeals.
- allows for a clearer policy stance for exception affordable housing schemes.
- makes it easier for the Council and other organisations to plan future infrastructure and service delivery.
- prevents intrusion into the countryside through incremental growth.
- ensures that new development is sympathetic in scale and location to the form and character of settlements.
- prevents the coalescence of neighbouring settlements.

4.27 But:

- could result in village cramming and intensification of land use within confines (back garden development);
- could result in pressure on undeveloped land, or changes of use of land within boundaries that may be locally important.

- as development within boundaries, the amount of land with development potential reduces.
- limits the scope for new employment/retail/community development because land with development potential is more valuable for residential.
- is prescriptive, as it does not allow for the consideration of changes in circumstances in settlements, for example the closing of a local shop or the provision of more public transport or local housing needs;
- could result in artificially high land values for land within boundaries and higher house prices.

4.28 A criteria-based policy could provide an alternative approach to the definition of settlement boundaries. All applications would be considered on their merits, and criteria would cover key issues such as sustainability, layout, design, form, etc. Such a policy would provide a mechanism by which proposals may be assessed against their impact on identified features and characteristics of the settlement, but which also provides flexibility to allow for changes in the surroundings to be taken into account. It would support new development where it enhances the sustainability of settlements and where it would not harm the open character of the countryside, provided that development meets a number of criteria. These criteria could require new development to:

- be adjacent to the existing footprint of the settlement; maintain the compact nature of the settlement.
- respect the historic core.
- respect the settlement character and form; provide access to services and facilities.
- respect natural boundaries such as trees, hedges, rivers and streams.
- not result in the loss of important open spaces within the settlement.
- not result in the coalescence of settlements.
- and prevent the sprawl of new development into open countryside.

SETTLEMENT BOUNDARIES: THE OPTIONS

Question 15: Do you think that the Local Plan should continue to define settlement boundaries or rely on a criteria-based policy / Y/N.

What are your reasons for your answer?

Question 16: If settlement boundaries are to be retained should they still be applied to the villages set out in paragraph 4,9 of this Report or should some be removed or added?

If so which settlements should be changed?

PROVIDING THE RIGHT TYPES OF HOMES: THE ISSUES

- 4.29 It is important that we not only have development in the right place but that it is also the right type and tenure of houses which meets our District's needs. The Council will commission a Housing and Economic Development Needs Assessment that will help inform the Local Plan on this. The NPPF requires policies to plan for different groups in the community (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes) In the current local plan, policies were included for affordable housing, specialist housing for an elderly population, conversion of buildings in the countryside, gypsy & traveller pitches.

Affordable Housing

- 4.30 Affordable homes are homes that are for sale or rent which are provided for eligible households who cannot afford to buy or rent in the area. There are several different types of affordable housing such as shared ownership and social rent. The government has also introduced a new affordable housing product called First Homes
- 4.31 There is a significant need for affordable homes across Breckland and the Central Norfolk Strategic Housing Market Assessment 2017²² identified that 220 affordable dwellings per annum were required in Breckland. From the table below, it can be seen that delivery has fallen short by 42% over the last 6 years, where 1,320 affordable houses should have been delivered but only 778 have. For every 100 affordable houses which are not built within the District there is a cost to the Council in the region of £1 million in temporary accommodation.

Breckland Affordable Housing Delivery (Target 220 dwellings per annum)

Year	No. of affordable dwellings
2016/2017	143
2017/2018	86
2018/2019	168
2019/2020	172
2020/2021	57
2021/2022	152
2016/2017	143

- 4.32 The Current Local Plan states that all qualifying developments delivering 10 or more units for a site of 0.5ha or more are required to

²² Central Norfolk Strategic Housing Market Assessment 2017

provide 25% affordable homes. The government has set out that 25% of affordable homes provided should be First Homes, which are offered at a discounted sales price. We will use our evidence on affordable housing need to work out what type of affordable housing should be provided alongside First Homes. Alternatively, affordable housing can be delivered via rural exception sites which are small patches of land outside a village boundary that would not otherwise get planning permission for housing, but the landowner provides the land at below market value on the basis that the land is used to build affordable homes for local people.

- 4.33 The Council's Housing and Economic Development Needs Assessment will examine the amount and the different sizes and types of affordable homes needed, and this will inform future policy development that will be subject to future consultation.

Providing homes for older people and those with disabilities

- 4.34 Norfolk, in common with the rest of the UK faces an ageing population. The number of older person households (65+ years) in Breckland will have increased by 55%, this will equate to an increase from 22,137 to 37,358 people by 2046²³ and this will result in an increase in demand for specialist retirement housing of an additional 3,933 dwellings by 2046.

“Across the whole of Breckland in 2020, there is an unmet need for 504 units of extra care housing (comprising 60 units for rent and 444 units for sale or shared ownership) and 1,300 units of sheltered housing (comprising -28 units (an oversupply) for rent and 1,328 units for sale or shared ownership)”²⁵

Custom and Self Build

- 4.35 Self-build and custom housebuilding cover a wide spectrum; from projects where individuals are involved in building or managing the construction of their home from beginning to end, to projects where individuals commission their home, making key design and layout decisions, but the home is built ready for occupation ('turnkey').
- 4.36 There are currently 505 individuals but no groups on the custom/self-build register for the District with 80% of these claiming to have a connection to the District i.e. live, work or have family in Breckland.

PROVIDING THE RIGHT TYPES OF HOMES: THE OPTIONS

Question 17: Do you have any views on the particular types of homes which are required in your locality? Please explain here.

²³study of demand for specialist retirement housing and accessible housing for older people in Norfolk March 2022

Question 18: Would you support the allocation of site or policies that would allow for the development of the following types of housing where a local need or connection could be identified? Y/N

Please state which and why

- **Housing solely for Build to Rent**
- **that provides specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for service families, the elderly or students);**
- **to be developed by people who wish to build or commission their own homes; or**
- **is exclusively for affordable housing, an entry-level exception site or a rural exception site**

PROVISION OF PITCHES FOR GYPSIES, TRAVELLERS, AND TRAVELLING SHOW PEOPLE: THE ISSUES

- 4.37 It is a Government requirement for Councils to make provision for all people requiring housing. This includes meeting the needs of Gypsies and Travellers and Travelling Show people. Government advice says that councils have to ensure that through their plan making process, sites are identified for Gypsies and Travellers to meet any requirements, which have been identified in an accommodation needs assessment. The Council will commission a study on the additional pitches needed for Breckland. If there is an identified need for permanent residential and/or transit pitches for gypsies, travellers and travelling show people, then we would need to consider how this is met.
- 4.38 Government policy does not advise on the most appropriate design solution that would be considered conducive in providing an appropriate living environment for the Gypsy or Traveller community. The DCLG Designing Gypsy and Traveller Sites: Good Practice Guides (2008), which has been withdrawn, does not provide specific guidance on minimum site size thresholds. The guidance does contain information relating to site design requirements and indicates that 0.2 hectares can be used as a minimum size threshold which would accommodate approximately 4 pitches. These thresholds include capacity for the delivery of private pitches and the associated shared facilities.
- 4.39 Selecting the right location for a site is a key element in supporting good community relations and maximising its success. As with any other form of housing, poorly located sites, with no easy access to major roads or public transport services, will have a detrimental effect on the ability of residents to
- Seek or retain employment

- Attend school, further education or training
- Obtain access to health services and shopping facilities.

4.40 In determining site sizes, consideration needs to be given to the need to:

- Provide sufficient sites to allow those who wish to live together in groups and those who wish to live separately from other groups.
- Ensure site size will take into account the specific site circumstances, including the surrounding population and density.
- Consider the effect of family make up and potential family growth on site size options to prevent overcrowding and potential displacement.

PROVISION OF PITCHES FOR GYPSIES, TRAVELLERS, AND TRAVELLING SHOW PEOPLE: THE OPTIONS

Question 19: What parts of the District should be considered for this type of development?

Should sites be included as part of any future allocations for housing?

Are you aware of any suitable sites in Breckland?

What size sites do you consider to be the most appropriate?

Please provide information?

INTERNAL AND EXTERNAL SPACE STANDARDS: THE ISSUES

4.41 The NPPF requires that new development contributes to ‘*sustainable development*’. It defines sustainable development in terms of economic, social and environmental dimensions. It supports ‘strong, vibrant and healthy communities’ (para 8), and in paragraph 119 states that *planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions*²⁴. The Council considers that access to adequate private outdoor space can play an important role in the physical and mental health and wellbeing of people. Access to daylight, fresh air, space to dry washing, to socialise, to play in, to enjoy wildlife and a place to grow plants/vegetables etc can add significantly to the quality of life of residents of all ages. The Council is therefore keen to ensure, that in a place like Breckland, which is characterised predominantly by its suburban and rural areas, that all new residents are provided with such

²⁴ NPPF

opportunities to support healthy communities. The new plan could consider including a policy that proposes minimum external space standards.

4.42 The NPPF states that planning policies for housing should make use of the Government's optional nationally described space standard and technical standards for accessible and adaptable housing, where this would address an identified need for such properties. The current nationally described space standard was set by the government in 2015. It is important to note that the nationally described space standard is for local authorities to decide whether or not to adopt. This decision is based on a number of considerations. Planning Policy Guidance recommends that local councils take the following factors into account when determining whether or not to adopt the space standard:

- Need: assessing the size and type of what is currently being built in the area, to ensure that the impacts of adopting the standard are properly understood.
- Viability: looking at the potential impact of adoption on housing supply and affordability; and
- Timing: investigating whether or not there should be a transition period following policy adoption, so that the impacts can be factored into future land acquisitions.

4.43 Following Government consultation in 2020, it is intended that all new dwellings in future should meet the accessibility standards as outlined in Building regulations M4(2) as a minimum mandatory requirement. Based on current evidence, the need for M4(3) dwellings in Breckland as a proportion of the annual housing target would be 8%.

- M4 (2) housing is accessible and adaptable housing which allows reasonable access for disabled and older people and for adaptations to be made as needs change over time.
- M4 (3) is housing for wheelchair use which includes that easy access to the building and surrounding curtilage for a wheelchair user, key parts of the accommodation are wheelchair adaptable e.g., kitchens lowered, wide doors, access to WC and bathrooms and low wall mounted plugs and sockets ²⁵

INTERNAL AND EXTERNAL SPACE STANDARDS: THE OPTIONS

²⁵ Part M4 Building Regs 2015 with 2016 amendments

Question 20: Which criteria do you think is the most important when considering development? Please rank (1) for most important and (5) for least important

- 1. The provision of sufficient affordable housing to meet Breckland's housing needs**
- 2. The provision of sufficient retirement housing to meet Breckland's housing needs**
- 3. Raising standards of design in the District**
- 4. Meeting the challenges of climate change**
- 5. Protecting and Enhancing the Environment including green space, biodiversity, river and air quality**

Please explain your answer

Question 21: Do you think the Plan should include locally evidenced based accessibility standards that require higher standards than those required by Part M4 of the Building Regulations?

Do you think the Plan should set minimum standards for outdoor amenity space for new housing? Y/N

If so what should these be?

5 THE ECONOMY: THE ISSUES

- 5.1 Breckland's size and dispersed nature presents a significant challenge in delivering balanced economic growth. There are less prosperous pockets in parts of the District that require better investment and improved accessibility to opportunities in the towns. Breckland is strategically well placed for economic growth due to its location on the Cambridge – Norwich Tech corridor with train links to Ely, Cambridge and the Midlands and the key road links of the A11 and A47.
- 5.2 The A11 Tech Corridor is important for the region as it is predicted to grow employment by 40% particularly in the advanced manufacturing and engineering sector but also in energy, ICT, life sciences and logistics. Attleborough, Snetterton and Thetford are perfectly situated along the A11 Corridor and are able to offer significantly lower property values to businesses than the overheated commercial property market of Cambridge. They also provide easy access to Europe through Felixstowe, Stansted, and Norwich airports as well as the research and development opportunities at Hethel, Norwich Research Park and links to Cambridge University and the University of East Anglia.²⁶
- 5.3 The A47 links the increasingly important port of Great Yarmouth to the Midlands and beyond and the scheduled road improvements of the

²⁶ A11 Growth Corridor Feasibility Study. Delivering the Economic Growth Potential of the A11 corridor Bruton Knowles

dualling of the A47 and Norwich Western Link road (NWL) will boost the economies of Dereham and Swaffham.

- 5.4 The Council is currently commissioning a Housing and Economic Development Assessment which will further inform the Economic Policies for the District. In March 2021 a major new initiative to support the long-term success of Breckland began. 'Future Breckland: Thriving People & Places' provides a robust evidence base through extensive research and engagement and presents a compelling shared vision for the future of the district. Focusing on the five market towns, Attleborough, Dereham, Swaffham, Thetford and Watton, the project has identified significant, deliverable, and transformational projects that will benefit the whole district. This shared vision and future proofing will allow Breckland Council and its partners to leverage new external funding and direct our shared resources in a more effective way.

Employment Statistics for Breckland

- 5.5 In Breckland there is very low unemployment at only 3.2%, which is lower than the average for the rest of Britain. Wages are still lower than the rest of Britain by 15% and education qualifications are lower than the average elsewhere in the country with only 28.5% being qualified to NVQ4+ level compared to the average of 43.5% for the rest of the country and 39.6% in the East of England. The proportion of people engaged in higher quality occupations is on par with the rest of the country with 48.5% of working people in managerial, professional, and associate professional roles and with more skilled trades at 12.7% compared to 8.8% across the rest of the country, however, many commute out of the district for this higher quality and/or income employment. Unskilled work is proportionally higher at 8.8% compared to 5.5%.²⁷ The feedback from residents in the Future Breckland Project was that opportunities were being held back by low wages, low quality jobs and low skilled labour force.²⁸

Key Employment Sectors

- 5.6 The top employment sectors in the district are manufacturing, retail, health, business administration and education. Breckland has the highest proportion of people employed in manufacturing of the county's districts, at 16.1 per cent. This compares with the county rate of 10.7 per cent.
- Agriculture, forestry and fishing is a more dominant employee sector in Breckland than it is in Norfolk overall, employing 4.6 per cent across the district compared with the 2.8 per cent average within the county.¹⁸ Both wholesale and transport and storage are more dominant employment sectors in

²⁷ NOMIS Official Census and Labour Market Statistics

²⁸ Future Breckland

Breckland than they are in any of the other Norfolk districts, or regionally and nationally. The combined sectors employ 11 per cent of people in the district, a third higher than their combined proportions at county level, a tenth higher than at regional level and 16 per cent more than the national proportions¹⁸.

- The most dominant sector in terms of local units is construction, with 15 per cent of local units in the district. Other dominant sectors include retail (10.8 per cent) and professional, scientific, and technical (10.6 per cent).³¹
- The proportion of businesses in Breckland employing 10 or fewer people is 86.4 per cent. The proportion of businesses in Breckland employing less than 50 people is currently 97.4 per cent. 2.6 per cent of businesses in the district employ 50 or more people. This proportion is higher than Broadland, North Norfolk and South Norfolk.²⁹
- Breckland district's economic activity rate is 82.3 per cent compared to 80.2 per cent regionally and 77.7 per cent in England as a whole.³⁰

Economic Growth Strategy

- 5.7 Economic development is closely linked to housing growth, it is widely recognised that the local economy has the potential to provide sufficient jobs to support the level of required housing growth. On the other hand jobs growth will also depend on housing growth. Jobs and employment potential should be the key priorities when considering any form of development, especially rural development. A fine balance will need to be achieved between job growth and housing growth. If housing growth cannot match the level of job growth, the job market will be constrained or it will lead to higher in-commuting from beyond the district thus being unsustainable. Vice versa, if there are not enough jobs for local workforce, then the area may suffer from a higher unemployment rate or unsustainable commuting beyond the district. Through the development of its evidence base the Council will be exploring different growth scenarios including different levels of both housing and economic growth. For example, this will examine the economic growth needed to sustain an increase in housing need based on the current minimum 672 dwellings per annum requirement as well as higher growth scenarios.
- 5.8 The current local plan seeks to deliver 64 Hectares of employment land over the plan period. This is concentrated on sites in Dereham, Swaffham, Attleborough, Snetterton and Thetford. This increase in employment provides a balanced approach across the District over the plan period.

²⁹ Invest Breckland

³⁰ Norfolk Insight

5.9 According to ONS research published in June 2022, the proportion of adults working from home has increased to 37% with work-life balance being cited as a main benefit. However, of those currently homeworking 85% stated that they wanted to use a “hybrid” approach of both home and office working. Research also showed that 24% of businesses intend to increase homeworking going forward.³¹ Due to homeworking trend, there has been an increase in areas such as coffee shops becoming unofficial offices “the coffice” with free wifi, warmth, company and caffeine on tap, this has led to café-style businesses including community centres adapting to benefit from this trend.³²

THE ECONOMY: THE OPTIONS

Question 22: Should the Council plan for the minimum economic growth needs required to meet the minimum increase in housing need or seek to increase or maximise inward investment and local employment opportunities by planning for across the plan period?

Question 23: Do you agree with the current approach of concentrating industrial space in the market towns and Snetterton? Y/N Please explain your response

Question 24: Are there any other locations which should be considered for industrial space? Please state which ones and why?

Question 25: Considering the trends in working and the rural nature of the district, do you think our policies on types of office space and location should be different Y/N.

Question 26: Do you have any suggestions on the location and types of office space which should be provided in the district?

How to attract businesses to Breckland?

5.10 In the A11 Growth Feasibility study³³ it states the following criteria are used by businesses when considering relocation. In the recent Future Breckland report³⁴ many of the same criteria were identified as lacking in our market towns. The Plan could seek to align these criteria and aspirations with the spatial strategy.

³¹ Home working in the UK- Regional Patterns 2019 to 2021

³² BBC Worklife Report

³³ A11 Growth Corridor Feasibility Study - https://www.breckland.gov.uk/media/13748/A11-Growth-Corridor-Feasibility-Study/pdf/A11_Growth_Corridor_Feasibility_Study.pdf?m=637520996326530000

³⁴ Future Breckland [Future Breckland - Breckland Council](#)

Question 27: From the criteria below please rank which ones you think are the most important in attracting high quality employment to the area (1) being most important and (10) least important.

- 1. Improve digital connectivity across the district. Breckland has some of the lowest average download speeds 0 to 26mbps compared to Norwich which has 44 to 55+mbps**
- 2. Improve road and rail connectivity across the district**
- 3. Improve public transport connectivity of rural areas to market towns and between market towns**
- 4. Improve active travel connectivity around market towns (cycle/walkways)**
- 5. More flexible office space and industrial space in our market towns**
- 6. Better access to higher education and vocational training in Breckland to increase skills levels**
- 7. More facilities for meeting and socialising in town centres**
- 8. Proximity of employment to housing**
- 9. More leisure facilities within town centres**
- 10. Other please specify**

Please provide any additional comments

Question 28: Do you have any other comments with regards your answers or further suggestions on how Breckland can attract more businesses to the area?

The Rural Economy: Agricultural Development and Diversification: The Issues

- 5.11 The Breckland landscape is largely shaped by farming and land management practices and these make a significant contribution to the district's economy. It encompasses a range of businesses particularly in industrial, agricultural, tourism and service sectors.
- 5.12 Agriculture is a significant part of Breckland's economy and is important in protecting UK food production. Local agricultural production, processing and sale helps to reduce food miles and maintains the working character of the countryside. Well-managed, active farming is also a cost-effective means of achieving environmental and landscape management objectives.
- 5.13 It is recognised that Breckland has large areas of the best and most versatile agricultural land which is of high value for food production and in most cases agricultural activity should be retained on those higher quality soils. Therefore, when considering the sustainability of a development proposal, the value of the land for agriculture will be considered and areas of high grade agricultural land should preferably be avoided. The importance of wildlife habitats will also be considered and increased recreational use should only be facilitated where no significant environmental damage will result.

- 5.14 Agricultural production has intensified over many years as the world population has grown and continues to grow, requiring more food, changes to consumption habits requiring better quality, higher protein diets in developing countries and more diverse and any time vegetable produce. The Russian Invasion has brought food production into focus with an increasing desire to be more self-sufficient and less reliant on grain from Russia and the Ukraine. However, further intensification impacts on the environment by increased waste in supply chains affecting wildlife habitats, water and air quality, furthermore it puts pressure on rural roads with large agricultural machinery.
- 5.15 Some farmers may need to diversify their activities to ensure the continued economic viability of their farm enterprise. Farm diversification schemes should bring long-term benefits, including employment, to individual farm operations and the wider rural economy. Farm diversification schemes may consist of non-agricultural commercial activity, schemes relating to new forms of agriculture or food processing of crops produced on the farm enterprise, however, agricultural operations should remain the dominant land use. Well-conceived farm diversification projects will be of an appropriate scale for the location and fit into the landscape. A proposal for a farm shop will be assessed to ensure that it is intended to be a genuine retail outlet for goods produced on the holding or a group of local holdings; conditions will be applied to limit the type of goods sold and the proportion of externally sourced goods.
- 5.16 Diversification will, in most cases, involve changing the use of land and/or re-using (or redeveloping) existing buildings. All opportunities to reuse existing buildings should be explored before redevelopment or new build may be justified particularly where redevelopment of a building of historic or architectural value is proposed. Development on new sites will be discouraged unless it enables the clearance and replacement of a badly-sited or inappropriate structure or is small in scale and carried out in an exceptionally environmentally sensitive manner.
- 5.17 Agricultural buildings generally do not require planning permission and therefore the policy is not directed at them. The Council is supportive of farm diversification schemes that are being promoted on a comprehensive basis to retain a viable agricultural unit by seeking additional incomes from other sources which still relate to the countryside.
- 5.18 Most agricultural operations are either not classed as development or are permitted without the need for formal planning permission. However, above certain thresholds, some farm buildings and structures do require consent because of their size and potential environmental impact. The role for planning policy is to help farmers and land managers find the best locations, designs, materials and solutions to meet their operational requirements but with the least harmful impact

on the special qualities of the area. This is usually successful, and most farm businesses are able to develop a range of buildings and structures to undertake their modern operational requirements.

- 5.19 Across the District there will be a continued demand for land for development as a result of population and societal changes. This will place pressures on non-protected and agricultural land resulting in soil loss and damage. Nevertheless, there is a need to consider the biodiversity values of brownfield sites as some have higher biodiversity levels than some agricultural land. It is likely that there will be an increased loss of open spaces within the built environment resulting from development pressures including requirements for high density housing. At the same time, it is likely that there will be an increased demand for allotments and community growing areas as a means for ensuring communities become more self-sufficient in food production.
- 5.20 The need to ensure food security and supply will increase the demand for land for food production. This will result in soil becoming a more important issue as land is used for other purposes. It is likely that agricultural intensification will occur not only as demand for development land continues, but as a result of land being taken out of food production to enable biofuels to be grown. This will lead to an increased risk of erosion and pollution.
- 5.21 There are a number of ways the Local Plan could help to promote Breckland's rural economy. The current local plan has policies for farm diversification EC06, which in summary allows for appropriate diversification. The Plan will need to consider whether a greater relaxation of controls of business in rural areas is appropriate or not and to balance the potential economic benefit versus any potential environmental / sustainability cost.

The Council could investigate some or all the following options:

- **Option A:** Continued support for the reuse of rural buildings to encourage new places for work including those unconnected to the farm holdings business
- **Option B:** Extend the policies around farm diversification to include all types of rural businesses regardless of their connection to the original business e.g., farm shops, glamping, employment connected to ecoservice provision e.g., ecologists, small artisan businesses
- **Option C:** Promoting improvements to communications infrastructure, such as better broadband and better public transport connectivity between rural areas and market towns
- **Option D:** Including planning policies for the support and development of key sectors such as tourism

- **Option E:** Support more work/ home space- shared office space.

5.22 The NPPF states that policies should enable:

- a. the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings.
- b. the development and diversification of agricultural and other land-based rural businesses.
- c. sustainable rural tourism and leisure developments which respect the character of the countryside; and
- d. the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.

It also considers that appropriate and sensitively planned sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.

Question 29: Which, if any, of the above options do you think the Plan should seek to include?

Question 30: Should the Council adopt a more flexible approach towards allowing appropriate economic development in the rural areas by allocating sites or through positive enabling policies?

Question 31: Are there any alternative options you think should be considered?

RETAIL- ADAPTING OUR HIGH STREETS AND RETAIL AREAS: THE ISSUES

5.23 Town centres are the heart of the community and provide for a range of community, shopping, employment, and leisure uses. They are also popular places to live as well as key transport and service hubs for their rural hinterlands. The council also recognises the importance of retail development in contribution to sustainable development, consumer choice, helping to retain expenditure in local communities and reducing the need to travel.

The Retail Hierarchy

5.24 National policy requires that development plans establish a hierarchy of centres in the District, and that new development is proportionate with the position of the centre in the retail hierarchy. The retail hierarchy in

the current local plan is as follows and reflects the amount of convenience, comparison retail and food and beverage space required in each town with Thetford expecting the most high-street growth and Swaffham & Watton the least followed by the service centre villages

- Thetford Key centre for development and change with significant growth.
- Dereham Main Centre and Administrative Centre serving mid-Norfolk
- Attleborough Medium Town Centre for substantial growth, serving a wide rural catchment
- Swaffham and Watton Medium Town Centre providing a range of services for local residents and their rural catchments
- Service Centre Villages -provide for basic or everyday local needs for their immediate rural catchment

5.25 The Local Plan seeks to maintain and enhance the vitality and viability of the five main town centres in Breckland and maintain the local shopping facilities within smaller villages. The strategy is to focus retail and leisure development within town centres in the primary shopping areas and restrict retail and leisure development outside these defined centres where it fails the sequential and /or impact tests, except where it serves a local need in a smaller village. The current boundaries are in the Local Plan (<https://www.breckland.gov.uk/local-plan/adoption>)

Question 32: Do you think that the retail hierarchy and defined town centre boundaries reflect the proposed role and function of each of the towns in Breckland? Y/N.

Do you have any suggestions for changes to the hierarchy or boundaries?

Future Challenges for Town Centres

5.26 Our market towns face considerable future challenges including the growth of online shopping, changing social habits, shift in consumer expectations, collapse in multiples, rise of out-of-town shopping and rising business units, coupled with the impact of COVID and more recently the increase in energy costs leading to inflation and the cost-of-living crisis.

5.27 The following findings came out of the Future Breckland³⁵ work:

- The positive benefits of a weekly market as seen in Dereham, Swaffham and Watton
- The increase in town centre vacancy rates across the District but particularly in Swaffham and Watton and most strongly in

³⁵ Future Breckland

comparison retail stores (Norfolk Market Town Centre Report 2021)³⁶

- There is a requirement for a broader demographic of quality places for people to meet to relax, unwind, and socialise so people spend longer time in the market towns. There is particularly a lack of evening venues e.g., restaurants, bars etc
- There is an increase in charity shops in many of Breckland's market towns which can provide a variety of goods and sustainable consumerism benefits, but too many charity shops can detract from the attractiveness of the town centre and reduce the opportunities in premises for cafes, restaurants, and other retail/leisure provisions.
- There are a large number of low-quality retail chain stores "rather than facilities, services, activities and experiences that the modern consumers demand."²⁴
- Many of our market towns provide for wider rural hinterlands for example 200,000 people live within 20km of Thetford and nearby visitor attraction of Thetford Forest.
- Lack of attractive green space in market town centres
- Too much traffic and untidy car parking provision in market town centres
- Not enough cycling and walking routes within our market town centres
- Lack of residential dwellings within town centres

Question 33: Which of the following approaches do you believe would most enhance market town centres? Please rank in importance (1) being most important to (11) least important

- 1. Increase in after 6pm venues in our market towns**
- 2. Increase in restaurants, cafes and meeting spaces for businesses and visitors in market towns**
- 3. Less traffic within market towns**
- 4. More quality green space in our market towns**
- 5. More cycling and walking routes within our market towns**
- 6. More convenience shops in our market towns**
- 7. More comparison retail shops in our market towns (comparison goods are products which are usually higher value and purchased infrequently, such as vehicles, household goods or clothing)**
- 8. Better transport links to the market towns from the rural hinterlands**
- 9. A weekly market**
- 10. Restrictions on conversions of retail units into residential dwellings**
- 11. More residential dwellings mixed with commercial premises within our town centres**

³⁶ Norfolk Market Town Centre Report 2021

Please provide your ranking and comments below

6 ASSETS OF COMMUNITY VALUE: THE ISSUES

- 6.1 The Assets of Community Value Regulations 2012³⁷ enables communities to nominate buildings and other assets within their locality for the purpose of furthering the social wellbeing or social interests of the community. This allows communities to put in a bid to purchase the asset if sold, although it does not give them first refusal. With regards to protecting valued facilities such as rural public houses, services and local shops, the Council could develop policies to assist along the lines of a sustained period of marketing, no longer any demonstrable need for the use and viability reasons. Any policies would have to retain an element of flexibility to be in accord with the NPPF as a whole, and any policies would have to ensure that redevelopment or change of use remained possible subject to a set of criteria being met.

ASSETS OF COMMUNITY VALUE: THE OPTIONS

Question 34: Do you think the Council should develop policies towards providing greater protection for the rural community facilities such as public houses and local shops and valued facilities?

7 THE BUILT ENVIRONMENT: THE ISSUES

- 7.1 Breckland's built environment has been influenced by several different but inter-related social, economic, and environmental factors. These include the character of the landscape, availability of materials, the original function of the settlement, the economy and national trends or fashions in style, materials and construction methods of the time. "Up until the 19th century locally available materials influenced methods of construction, however during the 19th century improvements in industrial processes and transport weakened these local inter-relationships and by the mid-20th century local vernacular traditions had been completely overtaken by national trends and fashions."³⁸
- 7.2 Today, Breckland district still displays many of the characteristics of the local vernacular in terms of materials, building forms and methods of construction. In some settlements, however, this character has been diluted by the scale, form, and characteristics of 20th century development. The resulting rural and urban vernacular architectural character is varied but is also more subtle and fragile than other places across the country where the character is highly distinctive and consistent.³⁶
- 7.3 Breckland District Council has commissioned consultants who will develop a Breckland District Design Guide based on the work from

³⁷ Assets of Community Value Regulations 2021 Legislation.gov

³⁸ Breckland Landscape and Settlement Character Assessment April 2022

Breckland District Landscape and Settlement Character Study³⁶, Future Breckland work³⁹ and the Norfolk Strategic Planning Framework (NSPF) Climate Change Topic Paper⁴⁰. Public consultation will be an essential part of this work and will allow residents to provide input on how they would like future development to be designed in their localities. The Design Guide will also inform the local plan on its design policies.

- 7.4 National planning policy recognises that achieving high quality places and buildings through good design is an integral part of good planning and the design policies in National Planning Policy Framework were strengthened to further these aims with Chapter 12 emphasising the need to create beautiful places which reflect local aspirations and are grounded in an understanding and evaluation of each area's defining characteristics, with a mandatory requirement for local authorities to prepare design guides for their areas. To support the commitment to good design, the government has also adopted the National Design Guide and its ten principles for good design and the National Model Design Code, which describes the process of developing design guides and codes.

Health and Wellbeing: The Issues

- 7.5 There are many influences upon people's health and wellbeing. Some, such as old age cannot be changed, but there are other features, including the design of our neighbourhoods, homes, places of work, streets and open space that can all help to support good mental and physical health. National planning policy is clear that the planning system should promote healthy communities and this theme runs throughout this document.
- 7.6 Well-designed neighbourhoods reduce social isolation by greater social interaction, encourages physical exercise with good walking and cycling routes, improves mental health with access to good quality green space and prevents crime with neighbourhood surveillance.
- 7.7 The quality of our homes in the provision of good amount of space, daylight, privacy and comfort can be achieved by considering the layout, orientation and room sizes, which also provide health and wellbeing benefits.
- 7.8 The most recent principles of best practice in planning for health and wellbeing are contained in the NHS sponsored 'Building for a Healthy Life'⁴¹ and the 12 principles are summarised below. Within this guidance is a traffic light scoring system used for evaluating a development against these 12 principles.

³⁹ Future Breckland

⁴⁰ NSPF Climate Change Topic Paper

⁴¹ Building for a Healthy Life

1. **Natural Connections** - well integrated places into their wider natural and built surroundings.
2. **Walking Cycling and Public Transport**- Integrate into design the ability to make short trips (up to 3 miles) by bicycle or on foot.
3. **Facilities and Services**- Provision of social and recreational opportunities in walking and cycling distance from homes.
4. **Homes for everyone**- Provision of a range of homes, mixture of tenures and types which meet the needs of the community
5. **Making the Most of What's There**: Understand a site and Identify opportunities.
6. **A Memorable Character**- Create a locally inspired place with distinctive character
7. **Well defined streets and spaces**- Create a network of streets which are enclosed by buildings or structural landscaping and ensure front doors face streets and public spaces
8. **Easy to Find your Way Around**- Legible features in streets for orientation
9. **Healthy Streets**- Movement of vehicles are balanced with the movement of people
10. **Cycle and Car Parking**- Attractive streets which encourage walking. Integrated car parking
11. **Green and Blue Infrastructure**- Create green and blue spaces which residents can interact with
12. **Back of Pavement, Front of Home**- Clear demarcation between public and private spaces. Encourage personalisation of private space

7.9 Some Local authorities have incorporated these principles into their Local Plans as a means of evaluating the success of their development.

Health and Wellbeing: The Options

Question 35: Do you think the Building for a Healthy Life approach to design should be incorporated into the Design Guide and the Local Plan's design policies as a means of evaluating the success of development?

Question 36: Can you suggest any other ways to evaluate the success of new development?

Question 37: Besides local preferences, the local character, climate change and health and wellbeing, is there anything else that should be considered in Breckland's Design Policies?

7.10 There will be further opportunities to express your views on design during the development of the Breckland Design Guide.

Preserving and Enhancing our Heritage Assets: The Issues

- 7.11 Our built heritage is part of the character of Breckland and preserving our heritage is an important part of planning that has many benefits for culture, wellbeing, the economy and in creating a more unique sense of place.
- 7.12 The NPPF states that plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:
- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.
 - b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring.
 - c) the desirability of new development making a positive contribution to local character and distinctiveness; and
 - d) opportunities to draw on the contribution made by the historic environment to the character of a place.
- 7.13 There are many pressures on heritage assets to modernise or demolish historic buildings, change their uses, develop within heritage conservation areas, and remove landscaping. Given the irreplaceable contribution heritage assets make the government makes it clear that it is important that heritage assets and their settings are preserved or enhanced as a reminder of the history and evolution of the area.
- 7.14 The Council realises the importance of Breckland's heritage and in March 2021 worked with Historic England on developing a Heritage Action Zone (HSHAZ) programme for Swaffham aiming to revitalise Swaffham's high street and maximize the potential of local character and natural assets. The project includes a town centre improvement masterplan, reappraisal of the town centre's conservation area and a building improvement scheme.⁴²
- 7.15 Development that takes place outside settlements or in the wider landscape can introduce urban elements into a predominantly rural landscape, risking the loss of local landscape features such as trees, field ponds and hedgerow patterns. Additionally, development can threaten the function of the landscape, undiscovered or un-designated heritage assets and can be a threat to biodiversity. Overall, such development is likely to change the character of the landscape.

Preserving and Enhancing our Heritage Assets: The Options

Question 38: Do you think there are non-designated sites in your locality which require protection through local policy? Please state which.

⁴² Swaffham HAZ project

Question 39 Do you think the council should introduce special controls that prevent the demolition of non-designated, locally important heritage assets? Y/N

Question 40: Do you think the Plan should refresh and update local policy further in line with the NPPF including a strategic policy for the conservation and enhancement of the built and historic environment including resourcing and updating the historic environment evidence base including conservation area management plans and appraisals and identified assets of local historic importance?

8 THE NATURAL ENVIRONMENT

Protection of Habitats and Species: The Issues

8.1 Breckland is a diverse district for biodiversity, geodiversity, and landscape qualities. The District is characterised by mixed landscape characters of settled and plateau farmland to the north. The landscape changes to the west and south of the district, where the Brecks contains extensive areas of heathland within a forest and arable context. A significant proportion of the Brecks is designated a protected site, forming the largest terrestrial protected area in Norfolk. The region is a biodiversity hotspot, supporting an extraordinary assemblage of rare and threatened species, some of which are found nowhere else on Earth. The heathland serves as an important habitat for internationally important bird species, particularly Stone Curlew, Woodlark and Nightjar as well as over 100 species of rare plants e.g., the prostrate perennial knawel which exists only in The Brecks along with other unique animals such as the Wormwood Moonshiner beetle and *Oxyptila Scabricular* spider.⁴³

8.2 Breckland contains a wealth of other protected areas such as Redgrave and South Lopham Fen which is one of only four sites within Norfolk designated under the Ramsar Convention of Wetlands of International Importance. Breckland is also home to four sites of international importance for biodiversity known as Special Area of Conservation (SAC) which are the most important wildlife sites in the country. These are the Norfolk Valley Fens, River Wensum and Waveney and Little Ouse Valley Fens. Within Breckland, there are three Local Nature Reserves (LNR), at Litcham Common (area of varied heathland), Great Eastern Pingo trail situated between Stow Bedon and Hockham (a mix of wetlands, woodlands, and grasslands) and grass heathland at Barnham Cross Common in Thetford. The latter is also designated as a Site of Special Scientific Interest (SSSI), SAC and located within the Breckland Special Protection Area (SPA).

⁴³ Shifting Sands- Back from the Brink Natural England

- 8.3 Parts of the district are characterised by river valleys including the Wensum, Norfolk Valley Fens, Waveney and the Little Ouse Valley Fens which have extensive areas of wetland habitats, comprised mainly of grazing marsh with areas of fenland reedbed. Many of these rivers are chalk streams and protected habitat sites and identified as a SAC. Furthermore, the district contains arable landscape features comprising of distinctive Scots Pine Shelterbelts, hedgerows, copses and field margins. These features are key components of the ecological network at a local scale, and collectively they amount to a significant biodiversity resource.
- 8.4 The environment has taken on a greater importance in national policy with the passing of the Environment Bill in November 2021⁴⁴, which introduced legally binding targets for air quality, waste and resource efficiency, water and nature, the creation of local recovery strategies, a mandatory 10% Biodiversity Net Gain and the new Office of Environmental Protection.
- 8.5 There are substantial pressures on Breckland's protected sites and these include: climate change, water and air pollution, impact of development itself including an increase in visitor pressures and the scarcity of resources such as water and soil nutrients. Currently, there are policies to help alleviate these pressures e.g., policy ENV03 in the Local Plan which identifies 1500m development buffer zone around the Brecks SPA to support Stone Curlew populations and 400m buffer zone for Woodlark and Nightjar populations with a requirement for a Habitat Regulation Assessment to be conducted on any development in proximity of these buffer zones. This was based on research conducted in 2011-2015. The Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy⁴⁵ also provides mitigation against the impact of visitor pressures on the Brecks with suggested alternative green infrastructure and a tariff to support onsite mitigation schemes. There are also a number of local initiatives such as Natural England's Shifting Sands Back from the Brink Project which restores habitat for those species most at risk of extinction and the RSPB and EU-Life Project which monitors Stone Curlew Populations.
- 8.6 The Council will need to ensure the development strategy in the Local Plan avoids harm to the protected habitat sites in Breckland and any policies will be informed and supported by an up-to-date Habitats Regulation Assessment which will review existing policies.

Protection of Habitats and Species: The Options

Question 41: Considering the sensitivities of The Brecks and particularly the smaller other protected sites in Breckland, do you think policies should go further to support these protected sites?

⁴⁴ The Environment Act 2021

⁴⁵ The Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy

Question 42: Do you have any suggestions in how the Council can protect these areas even further?

Biodiversity: The Issues

- 8.7 Biodiversity and well-functioning ecosystems are vital to human existence, economic prosperity and quality of life. The decline in global biodiversity and environmental degradation poses a threat to food security, increases the risk of transmission of zoonotic diseases and makes areas more vulnerable to flooding. In the Government's report Biodiversity UK Bloom or Bust Report 2020-2021⁴⁶ it states that the global picture of devastating decline of Biodiversity is reflected in the trends observed in the UK, which is one of the most nature depleted countries in the world. Since the 1970s 41% of all UK species surveyed have declined, while 15% of species within the UK are said to be threatened with extinction. The abundance of the species of greatest conservation concern; the UK's priority species have declined by 61%.
- 8.8 The Environment Act⁴⁷ introduced a mandatory requirement from November 2023 that all development must demonstrate a net increase in Biodiversity of at least 10% after following the mitigation hierarchy: first avoid harm to any habitats on a site, then mitigate for any harm caused and finally compensate for any harm caused. An increase in biodiversity should be initially sought on site and failing this by the purchase of biodiversity net gain credits from a supplier within the area. Breckland District Council is currently working with several Eco-service providers to supply enough credits for development. There is the option for Councils to set Biodiversity provision at a higher percentage than 10%

Biodiversity: The Options

Question 43: Do you consider that a higher biodiversity percentage than the statutory minimum of 10% should be delivered by new development in the district?

If so what % and give reasons for your answer

Green Infrastructure: The Issues

- 8.9 The Council will commission a Habitat Regulation Assessment as part of the evidence base for the Local Plan to inform any policies around Green Infrastructure. The Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy indicated that there were deficiencies in green infrastructure to the Mid and Northwest of the District and particularly at Dereham based on the

⁴⁶ Biodiversity UK Bloom or Bust First Report of Session 2020-2021

⁴⁷ The Environment Bill 2021

ANGSt data (Accessible Natural Greenspace Standard) and the Norfolk Green Infrastructure Map. The report put forward opportunities for improving green infrastructure at Thetford Loops, River Nar Project at Swaffham, additional Forestry England Site at Thetford Forest and the Wendling Beck outside Dereham. Additional work is currently being carried out by Norfolk County Council on Local Network Recovery Networks which will provide further information about opportunities to improve on green infrastructure which will help benefit the recovery and enhancement of nature networks across the district.

Green Infrastructure: The Options

Question 44: Should the Local Plan designate any green infrastructure proposals within your local area? If so please indicate where they should be?

Water Quality: The Issues

- 8.10 On March 16th Natural England advised Breckland District Council that the River Wensum and the Broads SAC were in an “unfavourable condition” due to nutrient (nitrogen and phosphorus) pollution. Increased nutrients cause eutrophication and the loss of oxygen in the water therefore killing native water plants and animals and affecting the water quality for people as well. Nutrient pollution is caused by human waste from development, in-efficient wastewater treatment works and modern agricultural practices. The poor state of the rivers has led to a moratorium on some planning applications within Breckland until mitigation measures are in place to curb any further nitrogen and phosphorus from development entering the water ways.
- 8.11 A ministerial statement in July this year has proposed via the future Levelling Up Bill that a statutory duty is placed on Water Companies to ensure that relevant Wastewater Treatment works are upgraded to filter out all nutrient pollutants from development to the highest technical achievement, which should alleviate some of the nutrient pressures on these protected water ways. Furthermore, Water Resources East’s research⁴⁸ shows that the Eastern region faces a gap between supply and demand of water of 750 mega litres of water a day, which is further hindered by the reduction in extraction licences. This severe water shortage needs to be met by not only increasing supply with a new reservoir and desalination plants proposed in the region but also for a decrease in water demand from new development. Local Plans can introduce policies which can help water quality and usage, and Breckland already has policies on a requirement for water usage on new development to be 110l per person per dwelling. . Water usage and quality policies can be extended further including improved use of SUDS on development sites, greater restrictions on water consumption

⁴⁸ Water Resources East

in development and restrictions on commercial and agricultural development involving livestock.

Water Quality: The Options

Question 45: Do you think that the Local Plan should introduce specific policies including ones around agricultural development to help address issues over water quality of our rivers? Y/N. Please explain what these should be.

Question 46: Do you think the Local Plan should introduce further policies around water usage? Y/N. Please explain what these should be.

Flooding: The Issues

- 8.12 Government guidance sets out how the planning system should help minimise vulnerability and provide resilience to the impacts of climate change. Predicted future rises in sea levels because of climate change, combined with the predicted increases in frequency of severe rainfall events, make more areas vulnerable to the risk of flooding. Our evidence shows that the main types of flooding in the Breckland area occur from rivers (fluvial), surface water (pluvial) and groundwater flooding.
- 8.13 The government sets strict tests to protect people and property from flooding with a general approach of directing development into the areas at lowest risk from flooding. However, exemptions can exist and strategic policies in Local Plans are expected to be informed by strategic flood risk assessment, considering the cumulative impacts in local areas susceptible to flooding. We will be producing a new Strategic Flood Risk Assessment for the area
- 8.14 The impacts of flooding are likely to be increased by climate change. The Local Plan can provide an opportunity to reduce surface water flooding through reduction in impermeable surfaces and ensuring the use of sustainable drainage systems in new development.
- 8.15 In line with government guidance, we propose to direct the majority of development to areas of lowest flood risk. If any development has to take place in an area at risk of flooding because there is no alternative location, we will ensure that appropriate flood risk alleviation measures are provided. We also propose to require the provision of sustainable drainage systems in new developments.

Flooding: The Options

Question 47: Do you agree with the proposed approach set out in paragraph 8.15 above. Y/N

If not please explain what your preferred approach would be?

9 Tackling Climate Change: The Issues

- 9.1 Rising levels of carbon dioxide and other greenhouse gases, such as methane, in the atmosphere create a 'greenhouse effect', trapping the Sun's energy and causing the Earth, and in particular the oceans, to warm. Carbon dioxide levels have increased by about 45% since before the industrial revolution.⁴⁹ The increase is mainly caused by:
- burning of fossil fuels for energy
 - agriculture and deforestation
 - the manufacture of cement, chemicals and metals
- 9.2 About 43% of the carbon dioxide produced goes into the atmosphere, and the rest is absorbed by plants and the oceans. Deforestation reduces the number of trees absorbing carbon dioxide and releases the carbon contained in those trees back into the atmosphere.
- 9.3 Measurements show that the average temperature at the Earth's surface has risen by about 1°C since the pre-industrial period. 17 of the 18 warmest years on record have occurred in the 21st century and each of the last 3 decades have been hotter than the previous one. The UK is already affected by rising temperatures, with the most recent decade (2008-2017) being on average 0.8 °C warmer than the 1961-1990 average⁵⁴
- 9.4 Breckland is one of the lowest CO2 emitters in Norfolk with 0.6kt of CO2 per sq km in 2019 with a reduction of 27% since 2005⁵⁰. The main CO2 emitters in Breckland are vehicular transport, domestic energy use followed by industry with emissions being worse in the more rural parts of the district where there is a high dependency on car use.⁵¹ However, the ONS is yet to publish its latest figures which might reflect changes to CO2 emissions as a result of COVID and the reduction in car usage.
- 9.5 A range of legislation exists which requires us to contribute to mitigating and adapting to climate change and move towards a low carbon, green economy. Mitigation is the action we need to take to reduce greenhouse gas emissions and adaptation increases the ability of the environment to be resilient to climate change. Government planning policy encourages local authorities to adopt a proactive strategy to deal with climate change impacts including flood risk
- 9.6 Breckland District Council declared a climate emergency on 19 September 2019. Since then, the council has committed to be net zero as an organisation by 2035 and to reducing the level of greenhouse gases emissions overall within the District. The Council has also developed a sustainability strategy focusing on three main themes:

⁴⁹ Climate Change Explained Gov UK

⁵⁰ UK local authority and regional carbon dioxide emissions National statistics 2005 to 2019 Gov UK

⁵¹ Place-based carbon calculator

- Reducing its own impact as an organisation on the environment.
 - Using its regulatory powers to influence behavioural change (including planning, waste and recycling, environmental protection).
 - Enabling communities to take action for themselves on climate change.⁵²
- 9.7 Breckland can take an active approach to reducing carbon emissions from transport as part of its Transport Strategy, which is discussed in the next chapter and by ensuring that new buildings are built to reduce their energy use and minimise carbon emissions through our design policies and design guidance.
- 9.8 The government hosted a public consultation in October 2019 to February 2020 on proposed changes to the Building Regulations and in response to this consultation the Future Homes Standard will come into effect from 2025 to ensure new homes produce 75%-80% fewer carbon emissions than they do today.⁵³
- 9.9 To help lay the groundwork for the Standard's introduction, the government introduced major Building Regulations changes in June 2022)Part L (Conservation of fuel and power)⁵⁴, with new homes in England now needing to produce around 30% less carbon emissions compared to the old regulations.
- 9.10 In the Norfolk Strategic Planning Policy⁵⁵ Framework all Local Authorities committed to Agreement 19 – *“Norfolk Planning Authorities agree that climate change is an urgent, strategic cross boundary issue which will be addressed at the heart of Local Plans. To do this, the Authorities agree to consider to the approaches contained in the NSPF Climate Change research paper⁵⁶ when the relevant policies are next being reviewed and updated as part of the Local Plan process and their appropriateness considered against local factors including viability of developments”*.
- 9.11 Some proposed policies contained within the Climate Change Research Paper are as follows:
- **Construction Standards:** Provision of energy statements with development proposals to explain and justify approach to energy use within a development using an energy hierarchy. Developments should reduce energy need in the first place (design and orientation of development), energy efficiency and conservation, and then maximise use of sustainable energy (for example non fossil fuel-based alternatives and local energy networks).

⁵² Breckland 2035

⁵³ Future Homes Standard

⁵⁴ Building Regulations: Approved Documents L,F and Overheating Gov UK

⁵⁵ Norfolk Strategic Planning Policy Framework

⁵⁶ NSPF Climate Change Topic Paper

- **BREEAM: British Research Establishment Environmental Assessment Method:**⁵⁷ To use BREEAM assessments in planning policies for non-residential development. BREEAM is a sustainability assessment method of master planning projects, infrastructure and buildings which provides a rating of pass, good, very good, excellent and outstanding on new development based on its entire lifecycle from construction to finished product
- **Live Work Units and working from home:** Provide policies which encourage Live/Work dwellings and working from home
- **Electric Vehicles:** Provision of electric charging points on all new development
- **Promote Cycling and Walking on new developments to reduce car use**
- **Energy improvements on extensions:** All extensions required to provide a 10% improvement to the energy use of the existing building
- **Embodied energy in buildings-**restrictions on demolitions to encourage reuse of old buildings
- **Light Pollution-**Protection of dark skies. Badly designed or too much lighting is a waste of energy resources as well as impacting wildlife
- **Modern Methods of Construction-** Offsite manufacture of buildings characterised by modular and pre-fabricated construction reduces energy required during construction
- **District Heat and Power –** Heat networks could be an important contribution to making net zero a reality in the UK. In high density urban areas, they are often the lowest cost, low carbon heating option. Schemes can reduce carbon emissions, be very cost effective and could help alleviate fuel

⁵⁷ BREEAM

poverty. The main initial 'disadvantages' of a combined heat and power system is that it is capital intensive and requires space for the central hub. It is usually only a feasible option for larger developments.

- **Greywater:** Water used in homes has long been thought of in terms of clean drinking water (known as potable water) coming into the house from the mains and sewage going out. However, the wastewater from baths, showers, washing machines, dishwashers and sinks fits somewhere in-between and this is referred to as greywater, which typically makes up between 50-80% of a household's waste water. If recycled properly, greywater can save approximately 70 litres of potable water per person per day in domestic households, therefore greywater recycling is one of a number of water solutions that could be considered in the design of new homes.

- 9.12 The Plan could explore whether we should allocate land for other land uses such as large-scale renewable energy generation sites, such as solar and wind, and areas specifically for new tree and/or woodland planting.
- 9.13 The Plan could require new trees to be planted for every new home and ensure that new streets are tree lined. This will assist in meeting the requirements of paragraph 131 of the NPPF, which recognises the importance of incorporating trees in developments to assist in mitigating and adapting to climate change and enhancing the character and quality of urban environments. It would also assist in combating the climate emergency
- 9.14 The Government is committed to bring all greenhouse gas emissions to net zero by 2050. In June 2022, changes to the Part L Building Regulations ("Part L") were introduced as a step towards achieving net zero carbon homes. Part L deals with the conservation of fuel and power for all new dwellings and will have an impact on the construction of new homes to ensure they are built to a minimum standard of energy performance. This applies on a plot-by-plot basis, as opposed to the whole of a development. From 15 June 2022, changes to building regulations mean that new-build homes will need to produce at least 31 per cent less carbon emissions. The installation of electric heating systems combined with renewable energy sources such as solar are both seen as enablers for doing so. In addition, new non-domestic builds will need to produce at least 27 per cent less carbon emissions with similar low energy measures to the previous in place. The Plan could seek a more ambitious target and require developments to be compliant with our target of net zero by 2035.

Tackling Climate Change: The Options

Question 48: Would you be supportive of any of the above proposals within Breckland's development and design policies? Y/N.

Please state which ones and reasons why.

Question 49: Are there any other climate change policy proposals we should consider?

Please state which ones and reasons why.

10 A Safe and Convenient Transport Network: The Issues

10.1 Achieving the full economic potential of the area is dependent on improved connectivity, including the implementation of key transport priorities whilst maintaining and enhancing the environment and quality of life in the area.

10.2 The concept of sustainable development remains at the heart of the planning system. Transport policies also have an important role to play in facilitating sustainable development and can contribute to wide sustainability and health objectives

10.3 The Transport East Strategy⁵⁸ which includes the areas of Norfolk, Suffolk, Essex, Southend on Sea and Thurrock has identified four key strategic four objectives:

- **Greener Transport cleaner, greener and healthier transport options** aimed at reducing emissions to net zero to reduce climate change and poor air quality.
 - To support development in locations which reduce the need for travel,
 - Reduce the need for carbon intensive trips through local living and access to local employment and improved digital connectivity
 - Switching modes of transport from private car to active and passenger transport
 - Switching from fossil fuels to alternatives e.g., electric and hydrogen
- **Connecting growing businesses** providing enhanced links between our fast-growing places and businesses clusters enabling the area to function as a coherent economy.
 - Improved access and connections within our urban centres through better walking and cycling routes
 - Faster and reliable links between growth areas and rest of UK

⁵⁸ Transport Strategy- Transport East

- Fully integrated transport networks
- **Better connections to global gateways** – better connected ports and airports to help to boost the nation’s economy through greater access to international markets and foreign direct investment.
 - Provision of sustainable travel options for freight, employees, and passengers
- **Energised coastal and rural areas**- supporting and connecting our rural and coastal communities.

The Norfolk Local Transport Plan 4 Strategy 2021-2036⁵⁹

- 10.4 This plan highlights the key transport infrastructure priorities for the area as being: A47 improvements including dualling schemes at Blofield to Burlingham and Easton to Tuddenham, as well as major junction upgrades in Norwich and Gt Yarmouth, the Norwich Western Link which joins the Norwich Distributor Road to the A47 which is scheduled to start construction in 2023 and the Great Yarmouth Third River Crossing which is currently being built.
- 10.5 Included in the Norfolk Local Transport Plans are improvements to the major rail links to London, Cambridge and Peterborough at Ely junction and Trowse bridge along with increased frequency of trains, further electrification of the network and improved rolling stock and stations. It also proposes more active and passenger transport links to the stations creating transport hubs at key locations.
- 10.6 The Strategy also refers to the impact of the Covid-19 pandemic which has resulted in many changes to people’s everyday life i.e., increased working from home with increased flexibility around working hours and practices and more online shopping.
- 10.7 The NPPF⁶⁰ sets the principle of sustainable transport and promotes it in a number of ways including identifying and protecting sites and routes which could be critical in developing infrastructure to widen transport choices. Reflecting on the guidance and local circumstances, the key consideration of delivering sustainable transport is to reduce the reliance on the private car and reduce the number of journeys made and promote active transport and passenger travel. However, it is recognised that for some more rural communities public transport, walking and cycling are not realistic options.
- 10.8 The dispersed settlement pattern of Breckland and the high dependency on commuting to employment means that ensuring sustainable access to services is amongst the most challenging spatial

⁵⁹ Norfolk Local Transport Plan 4 Strategy 2021-2036

⁶⁰ NPPF Chapter 9 Promoting Sustainable Transport

issues that the Council and other service providers must address. The settlement pattern has resulted in a high dependency on travel by car, exacerbated in part by difficulties of providing effective public transport services in rural catchment areas.⁶¹

- 10.9 There are a number of possible options that the Council could consider to support a sustainable transport strategy.

A Safe and Convenient Transport Network: The Options

Question 50: Which of the following options do you consider to be the most important for a sustainable transport strategy? Please rank 1 for most important and 8 for least important.

- 1. Development should seek to minimise the need to travel i.e., be located to facilities and services**
- 2. More electric charging points including all new development to provide facilities for electric vehicle charging**
- 3. Promotion of shared community ‘pool’ vehicle schemes on some developments**
- 4. Improved digital connectivity**
- 5. Improved, realistic and safe cycle and walking routes within market towns and from rural villages to market towns within a reasonable distance**
- 6. Promote “uber-style” bus services for rural areas similar to those seen in Warwickshire¹ and Wales BwCaBus¹**
- 7. Enhance the role of market towns, increasing their retail/service function to support the rural hinterland.**
- 8. Other options**

Please provide your ranking and comments below

Question 51: Do you have any other suggestions to provide more sustainable transport options in Breckland?

Local Cycling and Walking Infrastructure Plans: The Issues

- 10.10 A local cycling and walking infrastructure plan (LCWIP) identifies and prioritises improvements which can be made to the cycling and walking network. These improvements encourage people to choose active travel as they make cycling and walking more attractive, safe and convenient.
- 10.11 LCWIPs are strongly encouraged by the Department for Transport and meet the ambitions of the Government’s Gear Change Vision⁶². Norfolk County Council has recently been awarded funding to develop cycling and walking plans across the county. Plans have already been created

⁶¹ Breckland Local Plan 2019

⁶² Gear Change A bold vision for cycling and walking Department of Transport 2020

for Greater Norwich, Kings Lynn and Great Yarmouth. The Council is working with Norfolk County Council to develop a Local Cycling and Walking Infrastructure Plan for Breckland.

Local Cycling and Walking Infrastructure Plans: The Issues

Question 52: Do you have any options for walking and cycling routes in your locality?

11 Providing infrastructure which supports development, local communities, and businesses

11.1 We want to ensure that there is sufficient and appropriate infrastructure in place to support the planned growth of housing and employment development. Infrastructure covers a wide variety of services and facilities provided by public and private organisations that are needed to support daily activities for residents and the general economy. Some of these have already been discussed in previous chapters but include:

- transport infrastructure: rail, transport interchanges, bus facilities, cycle routes, footpaths/pedestrian links, roads, electric vehicle charging points.
- flood risk measures: strategic flood defences, flood management schemes, Sustainable Drainage Systems (SUDS).
- telecommunications infrastructure, including broadband and 5G.
- utilities: energy supplies including renewable energy, water supply and treatment, and waste disposal.
- habitats regulations mitigation: interventions necessary to mitigate the effects of development on nature conservation sites such as Suitable Alternative Natural Greenspace (SANGs) and Heathland Infrastructure Projects.
- green infrastructure: open spaces, recreation areas, green networks/corridors, allotments, tributaries, rivers and coastlines.
- community facilities and services: education, health, sports and leisure facilities, emergency services, libraries, cultural facilities, cemeteries.
- town and local centre improvements: enhancements and new public facilities.

11.2 The Norfolk Strategic Infrastructure Delivery Plan 2020⁶³ (NSIDP) pulls together information on the key infrastructure needed to deliver economic growth in Norfolk. The NSIDP sets out the Norfolk wide high-level strategic infrastructure priorities for the next 10 years including those priorities for Breckland e.g., road improvements such as dualling of the A47, the Attleborough Link Road, improved power infrastructure at Thetford, Snetterton energy supply, Attleborough town centre

⁶³ Norfolk Strategic Infrastructure Delivery Plan 2020

improvements, improved rural digital connectivity schemes (Rural Gigabit Connectivity programme), Better mobile signals via Shared Rural Network and new schools for Attleborough and Thetford to support the development at the urban extensions.

- 11.3 The government requires us to include strategic policies which make sufficient provision for infrastructure and to engage with infrastructure providers to determine where additional infrastructure is necessary. We are advised to identify what infrastructure is required, how it can be funded and delivered, and how future ongoing maintenance requirements will be managed.
- 11.4 Breckland are in the process of preparing an Infrastructure Delivery Plan (IDP), setting out the key infrastructure required at a local level over and above that already provided in the Norfolk Strategic Infrastructure Delivery Plan and Norfolk Transport Plan 4, also additional evidence will be gathered on water, energy, telecommunications, education, community facilities, health, community safety and green infrastructure to support the level of planned growth across the area. Views will also be sought from statutory consultees including Norfolk County Council in respect of highways and education and the Norfolk and Waveney Integrated Care System Estates Group, which are the new NHS body for interfacing with local authorities on planning policy and proposals⁶⁴ This will be published alongside the Local Plan at the next stage of consultation. It will identify details of the infrastructure needed to support the Local Plan.
- 11.5 A combination of funding mechanisms are used to deliver new and improved infrastructure in Breckland; the primary source of funding coming from developers and landowners through legal agreements accompanying the grant of planning permissions. Other sources of funding include the New Anglia Local Economic Partnership, public funding, and private investment. Major developments are phased to ensure that essential infrastructure is delivered, or funding provided prior to completion

Power: The Issues

- 11.6 According to the UK Energy Brief 2022⁶⁵, primary oil (crude and Natural Gas Liquids) accounted for 42% of total energy production, natural gas 29%, primary electricity (consisting of nuclear, wind, solar and hydro) 16%, bioenergy and waste 12% while coal accounted for the remaining 1%. Since 2000, oil and gas production levels have fallen by 68% and 71% respectively but energy consumption rose in 2021 by 5.9% post the pandemic.

⁶⁴ Norfolk Planning and Health Protocol

⁶⁵ UK Energy Brief Department of Business, Energy & Industrial Strategy 2022

- 11.7 Our energy requirements are still very dependent on oil and gas and the Russian invasion of the Ukraine has added to the shortages of these fuels, at the same time for us to meet our carbon reduction targets, we need to wean ourselves off oil and gas.
- 11.8 The NPPF supports the transition to a low carbon future and supports the development of renewable energy sources as it is central to the economic, social, and environmental dimensions of sustainable development. The current local plan currently has policies in place for the development of solar energy and wind energy and anaerobic digestion with requirement that there is no impact (including cumulatively) on local landscape or townscape, residential amenities, loss of agricultural land or designated wildlife sites.

Power: The Options

Question 53: Do you think the current policies are working to encourage more renewable energy development in Breckland? Y/N

If no, what other options should the Plan consider?

Please explain your answer.

Question 54 Are you aware of any suitable sites for the development of renewable energy, including solar and wind farms, within Breckland?

12 Open Space, Sport and Recreation: The Issues

- 12.1 Open space is defined in the Town and Country Planning Act 1990⁶⁶ as 'land laid out as a public garden, or used for the purposes of public recreation, or land which is a disused burial ground', it also includes allotments. Open space should be taken to mean all open space of public value, not just land but areas of water e.g., rivers, lakes, reservoirs, and canals which offer opportunities for sport and recreation and visual amenity value. Policy ENV04 in the current local plan restricts the loss of designated open space, it being only permitted if it can demonstrate that there is an excess of open space, or if recreational facilities can be improved by the proposed development or alternative better open space is being provided. All new residential development of 11 or more dwellings is expected to contribute towards outdoor playing space equivalent to 2.56 hectares per 1000 population⁶⁷.

Open Space, Sport and Recreation: The Options

⁶⁶ Town and Country Planning Act 1990 Legislation.gov

⁶⁷ Breckland Local Plan 2019

Question 55: What are your views on the current provision and future need of open space within the parish you live?

Question 56: Please provide details including any proposed sites within your parish?

Question 57: Do you think the current policies for open space provision are working? Y/N if not please explain your answer.

Question 58: With reference to the key infrastructure areas below, do you have any further views on the infrastructure needs for your locality? Please explain what and why?

- Health and medical facilities
- Education
- Community Facilities
- Town and Local Centre improvements
- Green space including Open space
- Power
- Water
- Digital connectivity

Question 59: Do you have any views or suggestions for how the planning, phasing and delivery of infrastructure can be improved?

13 Any other issues or Options?

Question 60: Do you have any additional views or suggestions with regards the Local Plan and the issues it should address?

About you

- 1. Are you**
 - A: a resident- Please state town or village**
 - B: a councillor-Please state town/parish/ward**
 - C: employer- Please state which sector**
 - D: Other- Please state which**

- 2. Are you**
 - A: Female**
 - C: Male**
 - D: Rather not say**
 - E: N/A**

- 3. What age range are you?**
 - A: Up to 18**
 - B: 19 to 25**
 - C: 26 to 40**
 - D: 41 to 64**
 - E: 65 upwards**

- 4. Please state what your main interest is in Breckland's Local Plan?**

Thank you for completing this questionnaire, your views are important to shaping the future development of Breckland.

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Appendix 1: Housing Completions and commitments (March 2022)

Parish	Completions 2021/22	Permissions April 2022	Allocations (Local and Neighbourhood Plan)	Totals	Completions by 2046
Towns					
Attleborough	67	755	0	822	822
Attleborough SUE	0	4000	0	4000	2200 ⁶⁸
Dereham	58	513	190	761	761
Swaffham	101	402	126	629	629
Thetford	12	94	0	106	106
Thetford SUE	24	4,903	0	4,927	2,400 ⁶⁹
Watton	92	281	160	533	533
SUB TOTAL TOWNS	354	10948	476	11778	7451
HOU 03 parishes					
Ashill	12	5	20	37	37
Banham	2	49	42	93	93
Bawdeswell	0	0	0	0	0
Garboldisham	2	14	28	44	44
Great Ellingham	83	307	0	390	390
Harling	1	103	0	104	104
Hockering	0	2	13	15	15
Kenninghall	0	9	15	24	24
Litcham	0	8	0	8	8
Mattishall	18	85	0	103	103
Narborough	1	14	40	55	55
Necton	3	111	15	129	129
North Elmham	1	35	0	36	36
Old Buckenham	3	9	0	12	12

⁶⁸ Estimated at 100 completions per year from 2024\25

⁶⁹ Estimated at 100 completions per year from 2022\23

Parish	Completions 2021/22	Permissions April 2022	Allocations (Local and Neighbourhood Plan)	Totals	Completions by 2046
Shipdham	6	156	55	217	217
Sporle	1	5	35	41	41
Swanton Morley	42	57	120	219	219
Weeting	1	33	0	34	34
SUB TOTAL HOU 03 PARISHES	176	1002	383	1561	1561
HOU 04 parishes					
Beeston	10	5	0	15	15
Beetley	4	14	0	18	18
Carbrooke	3	16	0	19	19
Caston	4	7	0	11	11
Gressenhall	3	4	0	7	7
Griston	10	41	0	51	51
Hockham	4	20	0	24	24
Lyng	0	6	0	6	6
Mundford	2	2	0	4	4
North Lopham	1	28	0	29	29
Quidenham	0	27	0	27	27
Rocklands	4	13	0	17	17
Saham Toney	13	25	66	104	104
Shropham	10	16	0	26	26
Thompson	0	9	0	9	9
Weasenham	7	1	0	8	8
Yaxham	22	54	0	73	73
SUB TOTAL HOU 04 PARISHES	97	288	66	448	448
Other parishes					
Beachamswell	0	3	0	3	3
Besthorpe	0	14	0	14	14
Billingford	1	0	0	1	1
Bintree	4	0	0	4	4
Blo Norton	0	0	0	0	0
Bradenham	1	1	0	2	2
Bridgham	0	4	0	4	4
Brisley	4	0	0	4	4
Bylaugh	0	1	0	1	1
Colkirk	2	26	0	28	28
Cranworth	1	1	0	2	2

Parish	Completions 2021/22	Permissions April 2022	Allocations (Local and Neighbourhood Plan)	Totals	Completions by 2046
Croxton	4	1	0	5	5
East Tuddenham	5	12	0	17	17
Foulden	0	1	0	1	1
Foxley	7	1	0	8	8
Fransham	6	24	0	30	30
Garvestone	5	11	0	16	16
Gateley	0	0	0	0	0
Gooderstone	0	1	0	1	1
Guist	0	7	0	7	7
Hardingham	0	2	0	2	2
Hilborough	1	0	0	1	1
Hoe	0	3	0	3	3
Holme Hale	1	7	0	8	8
Horningtoft	1	0	0	1	1
Ickburgh	1	12	0	13	13
Lexham	1	1	0	2	2
Little Cressingham	2	2	0	4	4
Little Dunham	2	0	0	2	2
Longham	0	1	0	1	1
Mileham	1	11	0	12	12
New Buckenham	0	1	0	1	1
North Pickenham	1	12	0	13	13
Oxborough	0	1	0	1	1
Riddlesworth	4	4	0	6	6
Roudham	1	6	0	7	7
Scarning	2	5	0	7	7
Scoulton	0	2	0	2	2
South Lopham	0	2	0	2	2
Stow Bedon	1	4	0	5	5
Twyford	0	1	0	1	1
Whissonsett	4	10	0	14	14
Whinburgh	0	8	0	8	8
Wretham	7	3	0	10	10
SUB TOTAL OTHER PARISHES	70	206	0	274	274
TOTALS	697	12444	925	14061	9734

