



Integrated Assessment of the Breckland Local Plan

Scoping and Initial Options Appraisals

Breckland Council

Final report

Prepared by LUC

January 2024

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Chapter 1

Introduction

1.1 Breckland Council commissioned LUC in July 2023 to undertake an Integrated Assessment (IA), comprising Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA) for the Full Update of their Local Plan. For the purposes of this report, we refer to the IA of the Breckland Local Plan which should be taken as incorporating SA/SEA, HIA and EqIA. IA is an assessment process designed to consider and report upon the significant sustainability issues and effects of emerging plans and policies, including their reasonable alternatives. IA iteratively informs the plan-making process by helping to refine the contents of such documents, so that they maximise the benefits of sustainable development and avoid, or at least minimise, the potential for adverse effects.

1.2 The purpose of this Scoping Report is to provide the context for, and determine the scope of, the IA of the Breckland Local Plan and to set out the assessment framework for the IA. The report also contains an appraisal of some initial options that the Council will be consulting on from January to February 2024, in **Chapter 11**.

1.3 It should be noted that this report is in an 'Accessible format', which means it has been formatted to meet the requirements of the Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations (2018), as set out in the Web Content Accessibility Guidelines (WCAG 2.1). This means it must have larger font, larger spacing between lines and headings, less information presented in tables, 'alt text' provided for all figures and it is able to be read by screen-reading software.

Breckland District

1.4 Breckland is situated in mid-Norfolk in the East of England. It is a predominantly rural district covering some 1,035km². The 2021 Census reported the District as having a population of 141,500 people [\[See reference 1\]](#). Breckland is bordered by King's Lynn and West Norfolk Borough, North Norfolk District, Broadland and South Norfolk District and West Suffolk District.

1.5 The District contains the five market towns of Attleborough, Dereham, Thetford, Swaffham and Watton as well as 113 villages, the majority of which have populations under 500 and are well dispersed across Breckland. To the south-west of the District bordering West Suffolk, the Breckland Special Protection Area (SPA) covers 39,437ha and comprises an important area of gorse covered sandy heath which gives its name to the District. Parts of the Breckland site are also designated as a Special Area of Conservation (SAC). The District also contains parts of or is close to a number of additional internationally designated biodiversity sites including Waveney and Little Ouse Valley Fens SAC, River Wensum SAC, Rex Graham Reserve SAC, Norfolk Valley Fens SAC and Redgrave and South Lopham Fens Ramsar.

1.6 Breckland is in the heart of the A11 Tech corridor between Norwich and Cambridge and has growth aspirations to benefit from this. Equally, rural businesses are growing in the area and diversifying, building on technological advances in agriculture and sustainable farming. Agriculture is still a key employment sector in the area. The market towns have benefited in recent years from a growth in engineering and technology and food manufacturing businesses, namely Attleborough and Thetford. The area also benefits from the railway link from Norwich to Cambridge onto Stansted Airport and the upgrades to the A11 and A47.

Relationship with other relevant plans and programmes

1.7 Schedule 2 of the SEA Regulations requires the SA Report (in this case IA Report) to provide:

(a) “an outline of the contents and main objectives of the Plan and its relationship with other relevant plans or programmes”

1.8 The Council is at an early stage in the development of the new Local Plan. The Council’s updated Local Development Scheme has been approved by Cabinet [\[See reference 2\]](#) and sets out the timetable for the delivery of Council produced planning policy documents, including the new Local Plan. The Local Plan is a District-wide plan to coordinate the development and growth requirements of Breckland over the period 2021-2046.

1.9 An initial Issues and Options Consultation Paper (2023) [\[See reference 3\]](#) was published for consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 in May 2023. The Issues and Options Paper comprises a number of themed sections, setting out options for how the Council could approach various policies. As the Local Plan is developed further it will set out the strategy for the amount, location and design of new development, as well as strategies to protect the environment, contribute to net zero carbon emissions and protect and enhance the District’s heritage, character and natural capital. Once adopted, the new Local Plan will replace the existing Breckland Local Plan 2019 (as Updated 2023) [\[See reference 4\]](#).

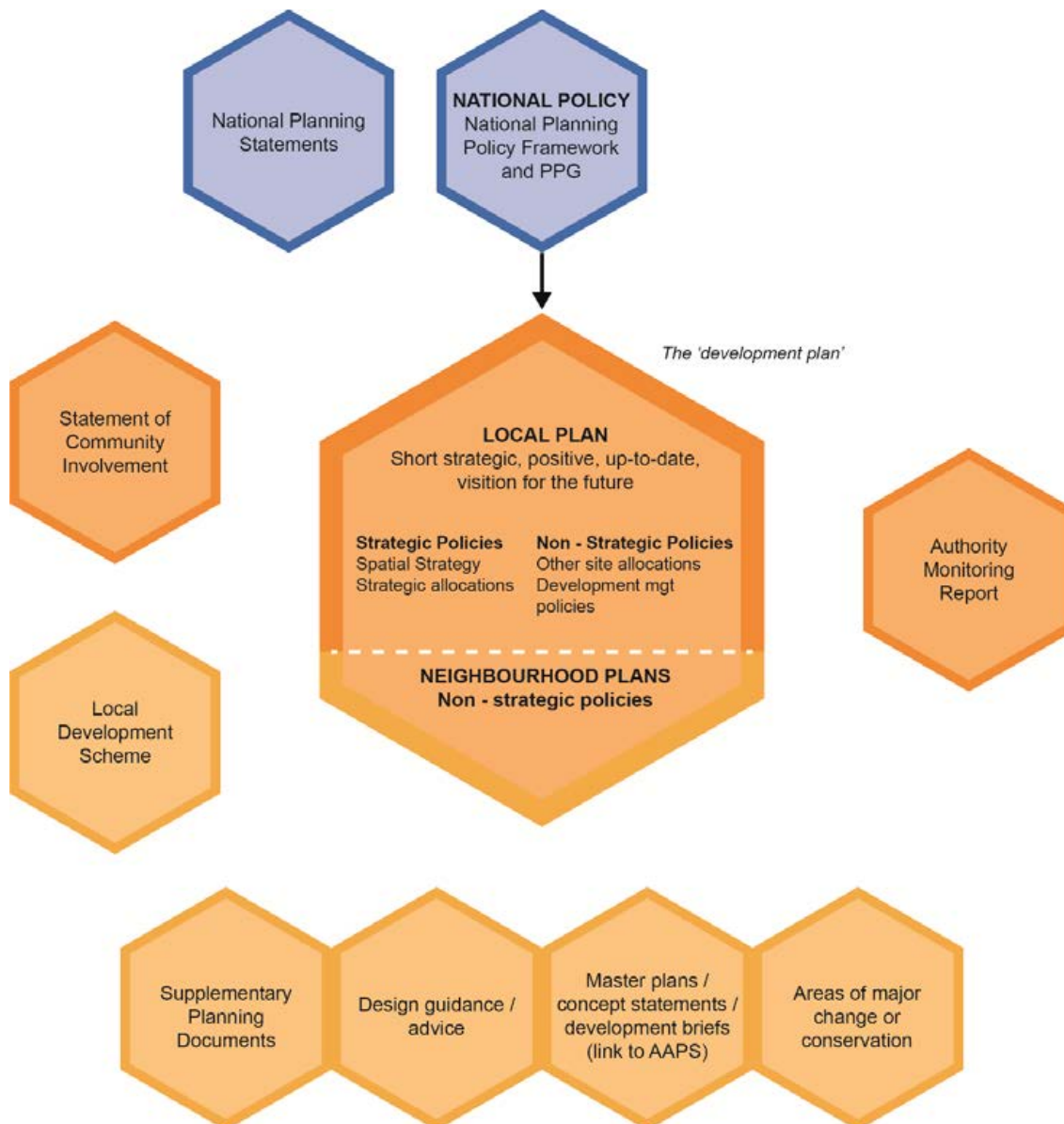
1.10 The Norfolk Strategic Planning Member Forum oversees the production of the Norfolk Strategic Planning Framework (NSPF) on behalf of all local planning authorities in Norfolk. Duty to Cooperate requirements mean that local planning authorities, county councils and public bodies have a legal responsibility to work together on strategic matters when preparing Local Plans. 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 should inform preparation of the new Breckland Local Plan.

1.11 Future plan-making will need to take full account of the adopted Norfolk Minerals and Waste Development Framework [\[See reference 5\]](#), which comprises three Development Plan Documents (Core Strategy and Minerals and Waste DPD, Minerals Site Specific Allocations DPD and Waste Site Specific Allocations DPD) and the emerging Norfolk Minerals and Waste Local Plan Review, which will consolidate all three DPDs into a single Local Plan. Within the District, there are thirteen designated Neighbourhood Plan Areas, nine of which have 'made' neighbourhood plans and so form part of the statutory development plan: Attleborough: Croxton, Brettenham and Kilverstone; Dereham; Mattishall; New Buckenham; Saham Toney; Swaffham; Swanton Morley; and Yaxham.

1.12 The relationship between the Local Plan and other relevant planning policy and supporting documents is shown in **Figure 1.1**. The wider policy context within which the Local Plan and IA must operate is described in **Chapter 2**.

Figure 1.1: Relationship between Local Plan and other planning documents



Sustainability Appraisal and Strategic Environmental Assessment

1.13 The Planning and Compulsory Purchase Act 2004 [\[See reference 6\]](#) requires Local Plans to be subject to SA. SA is designed to ensure that the plan

preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely environmental, social and economic effects of the policies and proposals within a plan from the outset of its development.

1.14 SEA is also a statutory assessment process, originally required under the European SEA Directive [See reference 7], transposed in the UK by the SEA Regulations and amended by the Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232). As set out in the explanatory Memorandum accompanying the Brexit amendments [See reference 8], they are necessary to ensure that the law functions correctly following the UK's exit from the EU. No substantive changes were made by this instrument to the way the SEA regime currently operates. Therefore, the SEA Regulations remain in force, and it is a legal requirement for the Breckland Local Plan to be subject to SA and SEA throughout its preparation.

1.15 The SA process comprises several stages, with scoping being Stage A as shown below:

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope.

Stage B: Developing and refining options and assessing effects.

Stage C: Preparing the Sustainability Appraisal (or 'IA') Report.

Stage D: Consulting on the Local Plan and the SA (IA) Report.

Stage E: Monitoring the significant effects of implementing the Local Plan.

1.16 On 26 October 2023, the Levelling-up and Regeneration Bill received Royal Ascent and became an Act of Parliament [\[See reference 9\]](#). The Act sets out in detail the Government’s proposals for reforming the planning system. Amongst other things, the Act sets the stage for the reform of current system for strategic environmental assessments by providing instead for “Environmental Outcome Reports” (EORs) designed to streamline the process for identifying and assessing the environmental impact of plans and projects. The specific requirements will be set out in forthcoming legislation, along with information about transition arrangements but for now, the requirement for SEA remains, as set out in existing legislation. Any changes to the legal framework for carrying out SA/SEA will be addressed as appropriate as the Local Plan is prepared.

Health Impact Assessment

1.17 HIA is a non-statutory process that identifies the health and wellbeing impacts (both positive and negative) of a plan or development proposal. It ensures that the effect of development on both health and health inequalities is considered and responded to during the planning process.

1.18 Public Health England’s 2020 guidance on ‘Health Impact Assessment in spatial planning’ outlines that, as the SEA Regulations require consideration of ‘human health’ as a topic, it is possible to integrate HIA within SA/SEA, although it is for the local authority to judge whether a standalone HIA is needed or whether an integrated assessment is more appropriate [\[See reference 10\]](#). For the assessment of the Local Plan, it is considered that an integrated assessment is appropriate to consider the environmental, social (including health) and economic effects of implementation of the Local Plan. The HIA can help discharge Breckland Council’s legal duty to take appropriate actions to improve the health of local people under the Health and Social Care Act 2012.

Equalities Impact Assessment

1.19 The requirement to undertake formal EqIA of development plans was introduced in the Equality Act 2010 but was abolished in 2012. Despite this, authorities are still required to have regard to the provisions of the Equality Act, namely the Public Sector Duty which requires public authorities to have due regard for equalities considerations when exercising their functions.

1.20 In fulfilling this duty, many authorities still find it useful to produce a written record of equality issues having been specifically considered. Therefore, an EqIA is being carried out as part of the IA, setting out how the Local Plan is likely to be compatible or incompatible with the requirements of the Equalities Act 2010.

Habitats Regulations Assessment

1.21 The requirement to undertake Habitats Regulations Assessment (HRA) of land-use plans was confirmed by the amendments to The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007 [\[See reference 11\]](#). The currently applicable version is The Conservation of Habitats and Species Regulations 2017, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 [\[See reference 12\]](#) (hereafter referred to as the “Habitats Regulations”). When preparing a land-use plan, the competent authority is therefore required by law to carry out an HRA. The competent authority can commission consultants to undertake HRA work on its behalf which is then reported to and considered by the competent authority.

1.22 The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European site and to ascertain whether it would adversely affect the integrity of that site. The competent authority will consider the HRA and may only progress the land-use plan if it considers that it will not adversely affect the integrity of any European site or have a significant effect on

qualifying habitats or species for which the European sites are designated, or if Imperative Reasons of Overriding Public Interest (IROPI) are identified.

1.23 The HRA will be undertaken separately but the findings, once available, will be considered in the IA where relevant, for example to inform judgements about the likely effects of potential development locations on biodiversity.

Approach to scoping

1.24 The main tasks associated with the scoping stage of the IA (Stage A) are as follows:

- Stage A1: Setting out the policy context for the IA of the Local Plan, i.e., key policies and strategies that influence what the local Plan and the IA need to consider.
- Stage A2: Setting out the baseline for the IA of the Local Plan, i.e., the current and environmental, social (including health and equalities), and economic conditions in Breckland and their likely evolution in the absence of the Plan.
- Stage A3: Drawing on A1 and A2, identify the sustainability problems and/or opportunities ('issues') that the Local Plan and IA should address.
- Stage A4: Drawing on A1, A2 and A3, develop a framework of IA objectives and assessment criteria against which to appraise the constituent parts of the Local Plan in isolation and in combination.
- Stage A5: Consulting on the intended scope and level of detail of the IA.

1.25 This Scoping Report sets out the intended scope and level of detail of the IA of the Local Plan for consultation with the relevant environmental authorities. It fulfils the requirements set out above and provides the foundations for appraisal of the likely effects of constituent parts of the Local Plan, as plan-making progresses. In accordance with the Government's Planning Practice Guidance on SEA/SA, the Scoping Report is proportionate and relevant to the Local Plan, focussing on what is needed to assess likely significant effects **[See**

reference 13]. It also takes account of the National Planning Policy Framework (NPPF) and the emphasis it places on achieving sustainable development.

1.26 This SA Scoping Report follows key legislation, policy and guidance including:

- Directive 2001/42/EC on the assessment of the effects of certain plans, and programmes on the environment i.e., the SEA Directive **[See reference 14]**;
- The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633) **[See reference 15]**, as amended by the Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232) **[See reference 16]**;
- Strategic Environmental Assessment and Sustainability Appraisal National Planning Practice Guidance **[See reference 17]**;
- A Practical Guide to the Strategic Environmental Assessment Directive **[See reference 18]**;
- Guidance on Integrating Climate Change and Biodiversity into Strategic Environmental Assessment **[See reference 19]**;
- Guidance on Strategic Environmental Assessment / Sustainability Appraisal and the Historic Environment **[See reference 20]**;
- Strategic Environmental Assessment: Improving the effectiveness and efficiency of Strategic Environmental Assessment / Sustainability Appraisal for land use plans **[See reference 21]**;
- Draft Guidance on Assessing Health Impacts in Strategic Environmental Assessment **[See reference 22]**; and
- Health Impact Assessment in spatial planning: A guide for local authority public health and planning teams **[See reference 23]**.

Where the SEA Regulations are addressed in this Scoping Report

1.27 The text in this section signposts the relevant sections of the Scoping Report that are considered to meet the SEA Regulations requirements (the remainder will be met during subsequent stages of the IA of the Local Plan). This section will be updated and included in the full IA Report at each stage of the IA to show how the requirements of the SEA Regulations have been met through the IA process.

Regulation 12 and Schedule 2

1.28 The SEA Regulations require the responsible authority to prepare, or secure the preparation of, an ‘environmental report’, which in this case will comprise the IA report. The environmental report must identify, describe and evaluate the likely significant effects on the environment of implementing the plan or programme and reasonable alternatives, taking into account the objectives and geographical scope of the plan or programme (Regulation 12). The information required by Schedule 2 of the SEA Regulations is set out below, indicating which part(s) of the IA Scoping Report provide that information:

- An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.
 - Covered in **Chapters 1 and 11** of this Scoping Report.
- The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.
 - Covered in **Chapters 2 to 9** of this Scoping Report.
- The environmental characteristics of areas likely to be significantly affected.
 - Covered in **Chapters 2 to 9** of this Scoping Report.

- Any existing environmental problems which are relevant to the plan or programme including those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.
 - Covered in **Chapters 2 to 9** of this Scoping Report.
- The environmental protection objectives established at international, community or national level that are relevant to the plan or programme and the way those objectives and any environmental considerations have been considered during its preparation.
 - Covered in **Chapter 2 to 9** of this Scoping Report. **Chapter 10** describes the IA Framework, which shows how the objectives have been considered.
- The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape, and the interrelationship between these issues.
 - Covered in **Chapter 11** of this Scoping Report. **Chapter 10** describes the method by which significant effects will be identified.
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.
 - This requirement will be met at a later stage in the IA process.
- An outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken, including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.
 - This requirement will be met at a later stage in the IA process.
- A description of measures envisaged concerning monitoring in accordance with Regulation 17.

- This requirement will be met at a later stage in the IA process.
- A non-technical summary of the information provided under the above headings.
- This requirement will be met at a later stage in the IA process.

1.29 The report shall include the information that may reasonably be required considering current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process, and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Reg. 12(3)).

- This is addressed throughout the Scoping Report.

1.30 When deciding on the scope and level of detail of the information that must be included in the environmental report, the responsible authority shall consult the consultation bodies (Reg. 12(5)).

- Consultation will be undertaken on the IA Scoping Report from January to February 2024, including with the three statutory consultation bodies (Environment Agency, Historic England and Natural England).

Regulation 13

1.31 Authorities with environmental responsibility and the public shall be given an effective opportunity within appropriate timeframes to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Regulation 13).

- Public consultation on the Local Plan and accompanying IA reports will take place as the Local Plan develops in accordance with the Council's Local Development Scheme (the timetable for preparing the Local Plan).

Regulation 14

1.32 EU Member States must be consulted where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Regulation 14).

- The Breckland Local Plan is not expected to have significant effects on EU Member States.

Regulation 16

1.33 Provision of information on the decision: When the plan or programme is adopted, the public and any countries consulted under Reg. 14 must be informed and the following made available to those so informed:

- The plan or programme as adopted;
- A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report, the opinions expressed, and the results of consultations entered have been considered, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
- The measures to be taken to monitor the likely significant effects of the plan or programme.
 - To be addressed after the Breckland Local Plan is adopted.

Regulation 17

1.34 Monitoring of the significant environmental effects of the plan's or programme's implementation.

- To be addressed after the Breckland Local Plan is adopted.

Quality assurance

1.35 Environmental reports should be of a sufficient standard to meet the requirements of the SEA Regulations.

- This Scoping Report has been produced in line with current guidance and good practice for SEA/SA and this section has demonstrated where the requirements of the SEA Regulations have been met.

Structure of the Scoping Report

1.36 This chapter has described the background to the production of the Breckland Local Plan and the requirement to undertake SA and other assessment processes. The remainder of this Scoping Report is structured into the following sections:

- **Chapters 2 to 9** present a review of the policy context and baseline conditions within which work for the Local Plan and the IA is being undertaken. This review is presented across a number of relevant sustainability topic areas. The analysis of the relevant policy context and baseline conditions in each chapter allows for the identification of key sustainability issues for each topic area and the development of related IA objectives against which the effects of the policy and site options considered for the emerging Local Plan will be considered.
- **Chapter 10** brings all IA Objectives together (i.e. the IA Framework) and describes how they will be used to appraise the effects of the Local Plan.
- **Chapter 11** provides an appraisal of the options being consulted on, namely:
 - alternative development strategy scenarios; and
 - approaches to defining settlements and protecting the countryside from development.

- **Chapter 12** describes the next steps to be undertaken in the IA of the Breckland Local Plan.

Chapter 2

Population, health and wellbeing

Policy context

2.1 The following section presents the most relevant documents identified in the policy review for the purposes of the new Local Plan. The key targets emerging from the review are summarised below.

Population, health and wellbeing policy context

International

- 2030 Agenda for Sustainable Development [\[See reference 24\]](#), published by the United Nations Department of Economic and Social Affairs in 2015
- Johannesburg Declaration on Sustainable Development [\[See reference 25\]](#), published by the United Nations in 2002
- Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters [\[See reference 26\]](#), published by the United Nations in 1998

National

- National Planning Policy Framework [\[See reference 27\]](#), published by the Department for Levelling Up, Housing and Communities (DLUHC) in 2023
- Levelling-up and Regeneration Act [\[See reference 28\]](#), published by the Department for Levelling Up, Housing and Communities (DLUHC) in 2023

- 25 Year Environment Plan [\[See reference 29\]](#), published by the Department for Environment, Food and Rural Affairs in 2023
- Homes England Strategic Plan 2023 to 2028 [\[See reference 30\]](#), published by Homes England in 2023
- Levelling Up White Paper [\[See reference 31\]](#), published by DLUHC in 2022.
- Build Back Better: Our Plan for Health and Social Care [\[See reference 32\]](#), published by Department of Health and Social Care in 2022
- Planning Practice Guidance [\[See reference 33\]](#), published by DLUHC in 2021
- National Design Guide [\[See reference 34\]](#), published by Ministry of Housing, Communities and Local Government (MHCLG) in 2021
- Using the Planning System to Promote Healthy Weight Environments [\[See reference 35\]](#) and Addendum [\[See reference 36\]](#), published by Public Health England in 2021
- Health Equity in England: The Marmot Review 10 Years On [\[See reference 37\]](#), published by the Institute of Health Equity in 2020
- PHE Strategy 2020 to 2025 [\[See reference 38\]](#), published by Public Health England in 2019
- Planning for Sport Guidance [\[See reference 39\]](#), published by Sport England in 2019
- Housing Delivery Test Measurement Rule Book [\[See reference 40\]](#), published by MHCLG in 2018
- Spatial Planning for Health [\[See reference 41\]](#), published by Public Health England in 2017
- Planning Policy for Traveller Sites [\[See reference 42\]](#), published by DLUHC in 2015
- Technical Housing Standards – Nationally Described Space Standard [\[See reference 43\]](#), published by DLUHC in 2015

- Select Committee on Public Service and Demographic: Ready for Ageing? [\[See reference 44\]](#), published by the Authority of the House of Lords in 2013
- Health and Social Care Act 2012 [\[See reference 45\]](#), published by HM Government in 2012
- Laying the Foundations: A Housing Strategy for England [\[See reference 46\]](#), published by MHCLG in 2011
- Healthy Lives, Healthy People: Our Strategy for Public Health in England [\[See reference 47\]](#), published by Department of Health and Social Care in 2010
- Equality Act 2010 [\[See reference 48\]](#), published by HM Government in 2010
- The Environmental Noise (England) Regulations 2006 [\[See reference 49\]](#), published by HM Government in 2006
- Housing Act 2004 [\[See reference 50\]](#), published by HM Government in 2004
- Countryside and Rights of Way Act 2000 [\[See reference 51\]](#), published by HM Government in 2000

Sub-national

- Planning Obligation Standards [\[See reference 52\]](#), published by Norfolk County Council (NCC) in 2023
- Better Together for Norfolk: Norfolk County Council Strategy 2021-25 [\[See reference 53\]](#), published by NCC in 2021

2.2 The 2030 Agenda for Sustainable Development presents 17 Sustainable Development Goals, all of which are relevant to the Local Plan. The UN's Declaration on Sustainable Development (the 'Johannesburg Declaration') sets out a broad framework for sustainable development, including building a humane, equitable and caring global society aware of the need for human dignity for all, renewable energy and energy efficiency, sustainable consumption

and production and resource efficiency. In line with these, the Local Plan should seek to achieve sustainable development.

2.3 The new Local Plan will need to have regard to the NPPF, which includes as part of its objective the promotion of “strong, vibrant and healthy communities” by “ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural wellbeing”. Ultimately, planning policies should “aim to achieve healthy, inclusive and safe places”.

2.4 The document states that strategic policies should set out the pattern, scale and quality of development and make sufficient provision for “housing (including affordable housing) ... [as well as] community facilities (such as health, education and cultural infrastructure)”. Policies should reflect “the size, type and tenure of housing needed”. This policy approach is to include but should not be limited to housing requirements relating to affordable homes, families with children, older people, students, people with disabilities, service families, travellers, those who rent their homes and people wishing to commission the construction of their own homes. Major developments that involve the provision of new housing planning policies and decisions should expect at least 10% of the total number of homes to be delivered for affordable home ownership subject to conditions and exemptions.

2.5 To help to diversify opportunities for builders, the Local Plan should promote a better mix of site sizes and increase the number of schemes that can be built-out quickly to meet housing need. The NPPF states that at least 10% of the sites allocated for housing through a local authority’s plan should be half a hectare or smaller.

2.6 The NPPF promotes a theme of enhancing healthy and safe communities, which is to be achieved by creating places which “promote social interaction (and) enable and support healthy lifestyles”. As part of this approach, social, recreational and cultural facilities and services that the community needs should

be guided by planning policies that “plan positively provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services; support the delivery of local strategies to improve health, social and cultural wellbeing for all sections of the community; help prevent unnecessary loss of valued facilities and services”. The NPPF is supported by planning practice guidance relating to the housing supply and delivery, the housing needs of different groups, including older and disabled people, and healthy and safe communities.

2.7 The Levelling Up and Regeneration Act makes a range of legislative changes associated with the Government’s “levelling up” agenda, which intends to reduce geographical, economic, social and health inequalities. The Bill includes extensive changes to the planning system, which the new Local Plan must respond to.

2.8 Spatial Planning for Health is a resource developed by Public Health England sets out the linkages between spatial planning and health, based on the findings from an umbrella literature review. The review also highlights the inextricable link between the built and natural environment and health. Key findings of the review include:

- Improving neighbourhood walkability and infrastructure designed to promote walking and cycling in neighbourhoods, was found to be associated with numerous positive health outcomes.
- Areas of mixed land use, diverse housing types and high quality public transport were found to be associated with positive health outcomes such as increased physical activity levels and reduced risk of pedestrian injury.
- Good quality housing and affordable housing was associated with a variety of positive health outcomes.
- Among vulnerable groups provision of affordable housing was associated with improved quality of life, mental health and clinical health-related outcomes.
- Improvement to air quality, prioritisation of neighbourhood tree planting, and provision of open and green spaces, was associated with increased

physical activity, increased environmental cooling, and improved general physical health outcomes.

- Provision of infrastructure to support walking and cycling and increased access to buildings and facilities was associated with increased physical activity and improved social engagement among older adults.
- flooding was associated with a number of health related issues including carbon monoxide poisoning and poor mental health outcomes.
- The provision of open and green space, high quality public transport and improved air quality was associated with numerous positive health outcomes.

Baseline information

Population

2.9 The population of Breckland District was 141,500 in 2021, reflecting an 8.4% increase from 130,500 in 2011. This is higher than the overall increase for England (6.6%) and slightly higher than the increase for the East of England (8.3%). There are 60,400 households in Breckland [\[See reference 54\]](#). The population of Breckland is ageing, with the highest proportion of people being between the ages of 45-74, with a comparatively low amount of young people as illustrated by **Figure 2.1**. **Figure 2.2** highlights the areas of the District having a higher proportion of older people.

Figure 2.1: Age pyramid for Breckland (2020) [See reference 55]

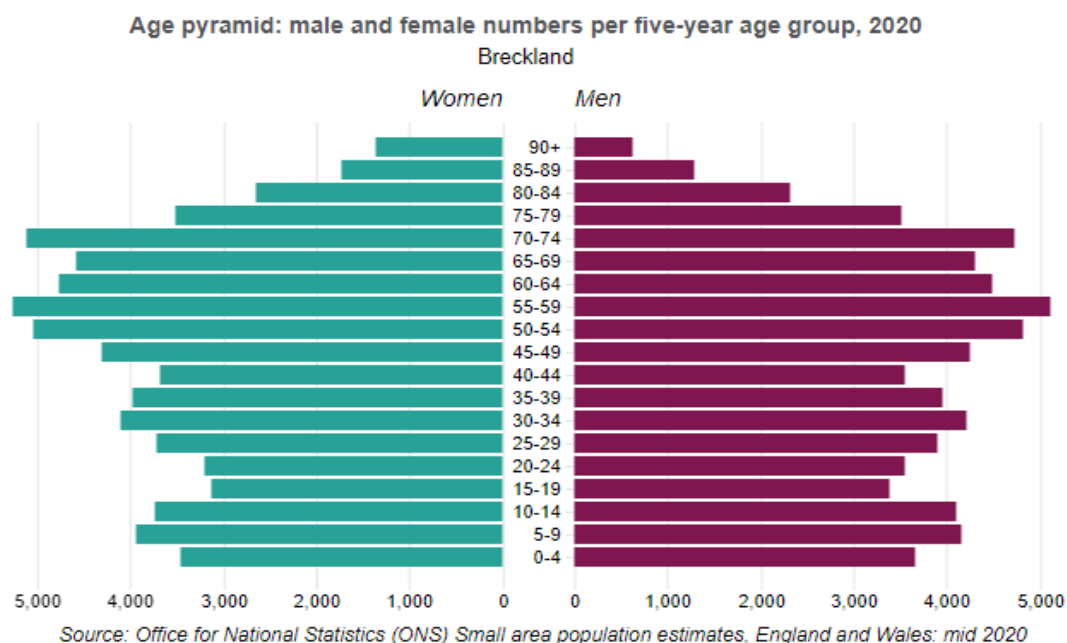
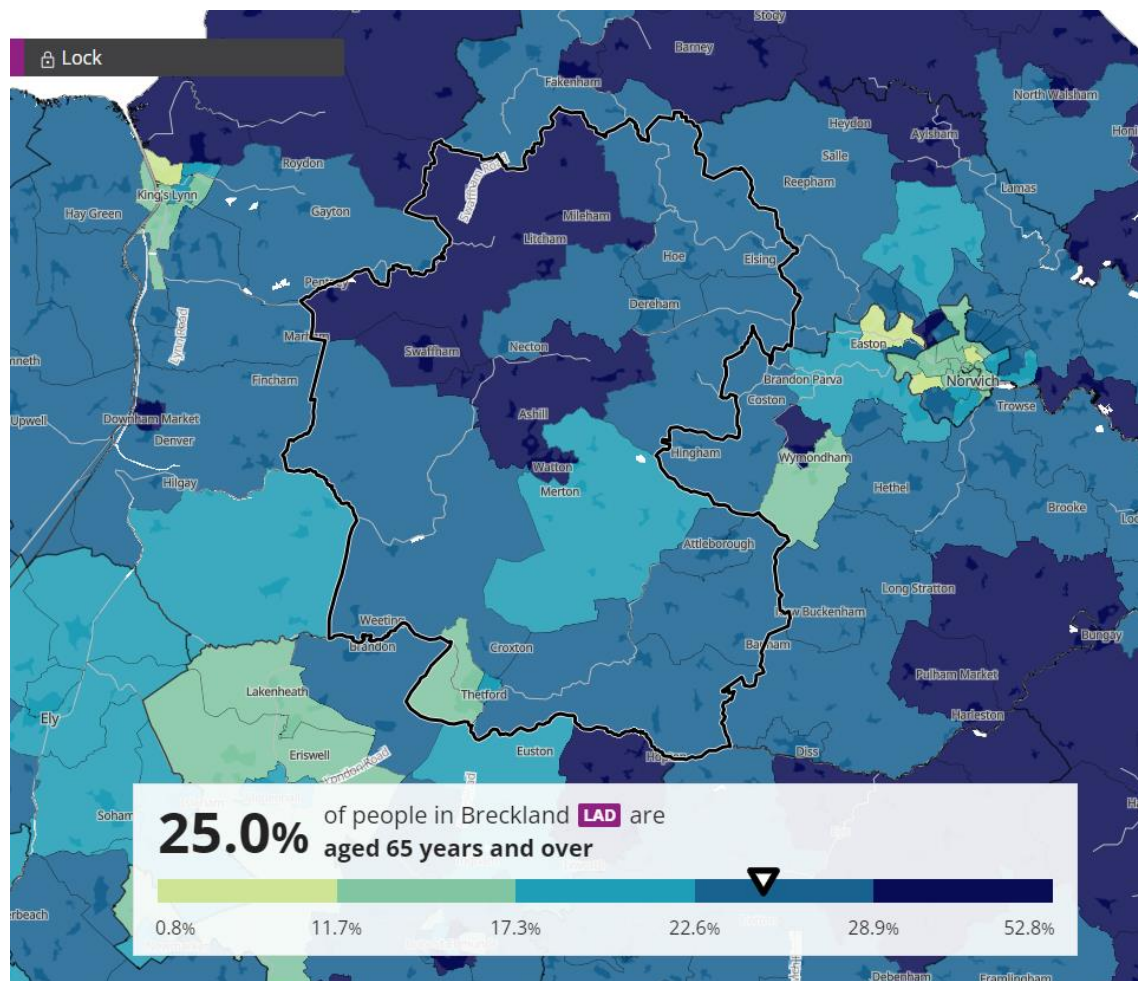


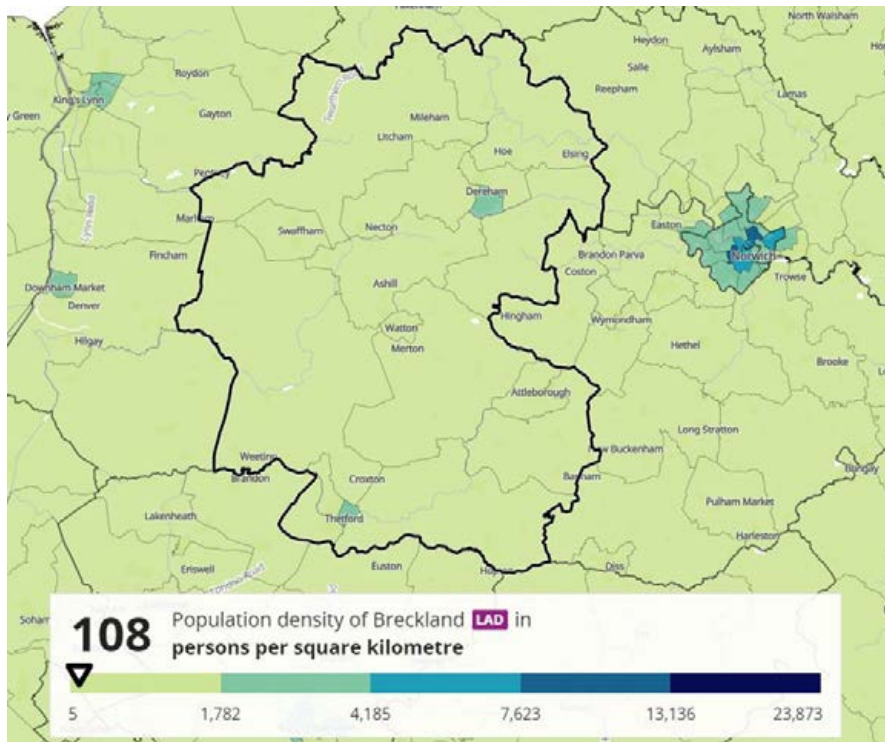
Figure 2.2: Proportion of people aged 65+ in Breckland (2021)

[See reference 56]



2.10 Breckland is one of the largest rural Districts in England and is centred round the five market towns of Attleborough, Dereham, Swaffham, Thetford and Watton. Half of the current residents live in one of the market towns with the remainder living in rural village homes [See reference 57]. The District therefore has a low population density, as illustrated by **Figure 2.3**. Breckland is the third least densely populated of the East of England's 45 local authority areas [See reference 58].

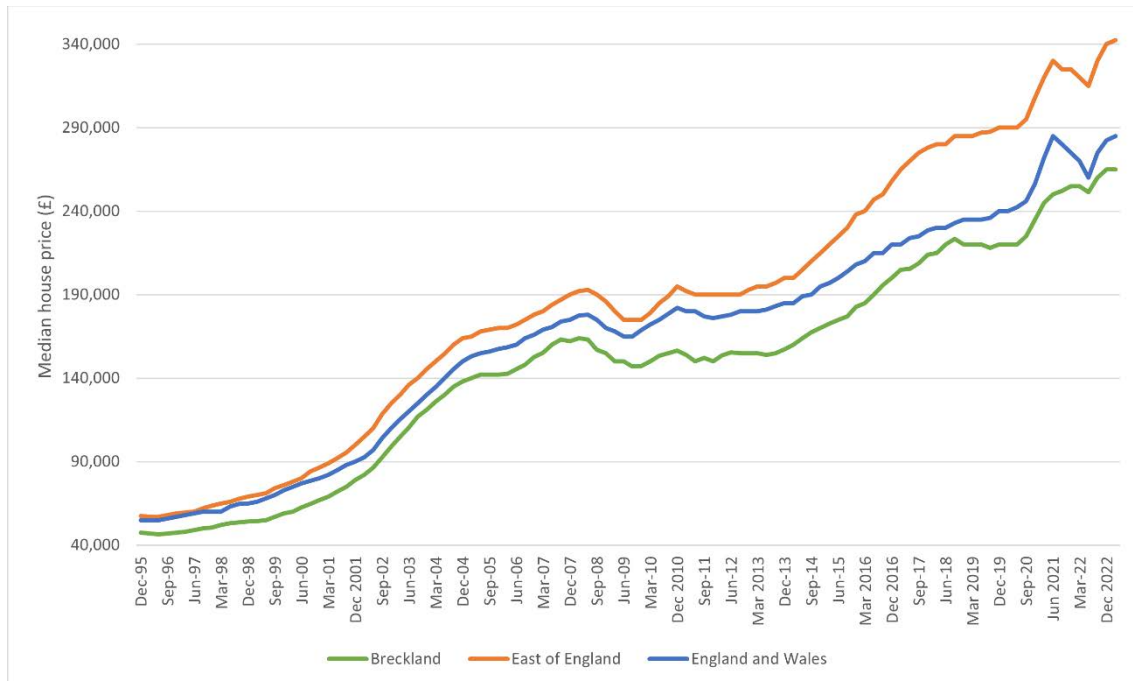
Figure 2.3: Population density in Breckland (2021) [See reference 59]



Housing

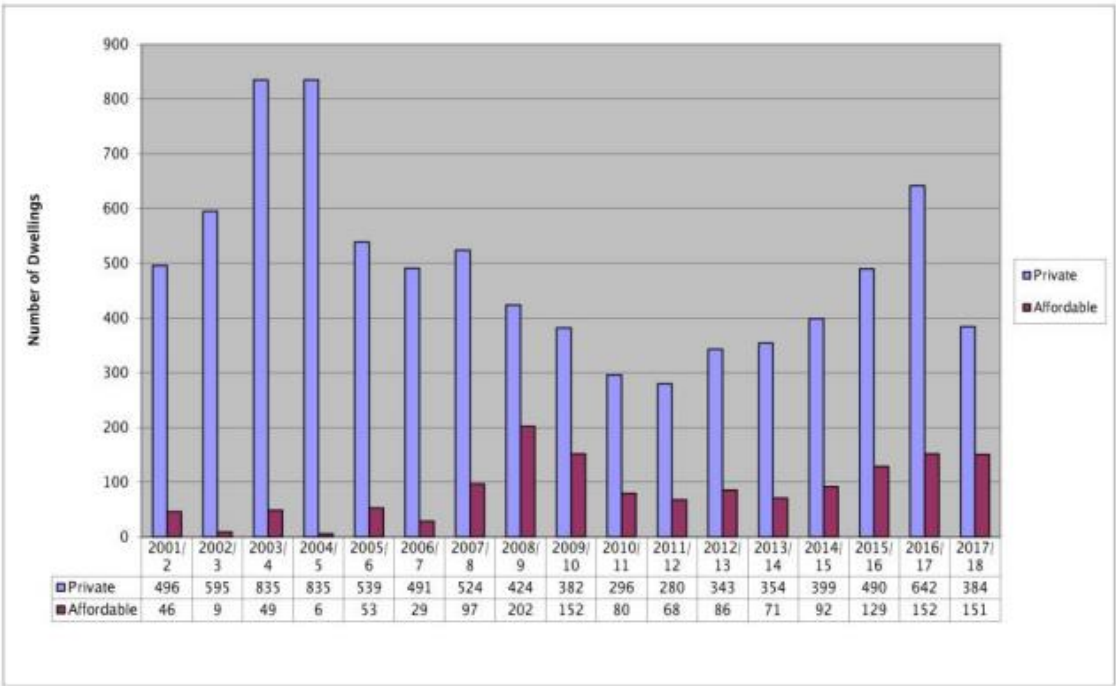
2.11 The median house price in Breckland as of 2023 is £265,000, this has increased by 71% over the past 10 years. However, house prices in Breckland are more affordable than both the East of England region and England and Wales, as illustrated by **Figure 2.4** [See reference 60]. While house prices in many areas of Breckland are comparatively low compared to the average for England, affordability remains a significant challenge locally [See reference 61]. Breckland's median property price-to-earnings ratio is 8.65, lower than regionally (9.46), though higher than nationally (8.10) [See reference 62].

Figure 2.4: Change in median house prices 1995-2023 [See reference 63]



2.12 In 2017/18 a net figure of 151 dwellings completed in Breckland were affordable. This equates to approximately 28.2% of all dwellings completed. **Figure 2.5** shows completions by tenure from 2001/2 to 2017/18.

Figure 2.5: Completions by tenure [See reference 64]



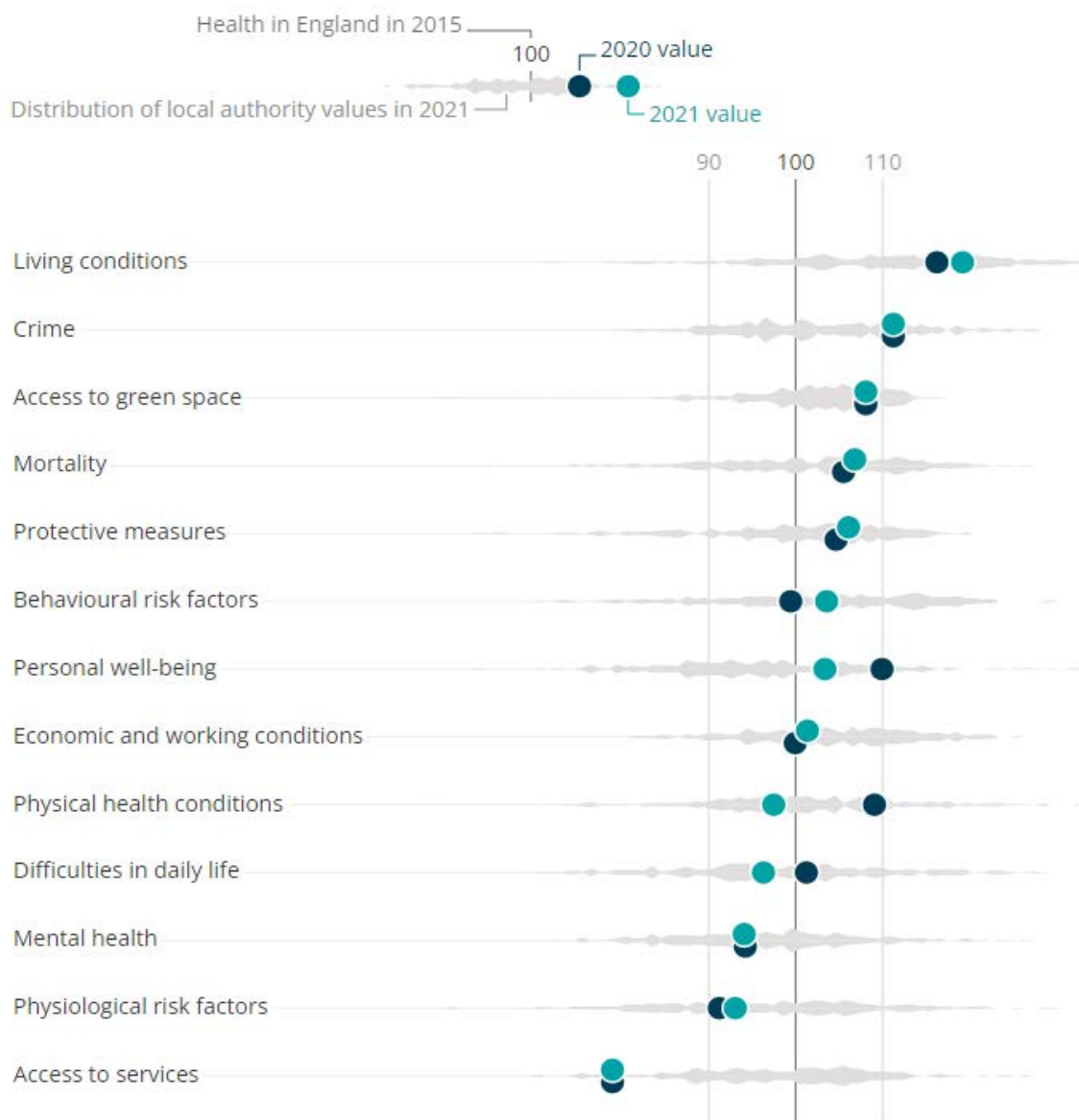
2.13 The Central Norfolk Strategic Housing Market Assessment (CNSHMA) [See reference 65] considers existing unmet affordable housing need and projected future affordable housing need. It concludes that there is a need to provide additional affordable housing across the housing market area over the period 2012 - 2036. It identifies a target of 35.7% for Breckland, this is equivalent to 220 dwellings per year. The report recommends a target of 25% affordable housing in the Local Plan, which reflects the viability modelling work including consideration of financial contributions to infrastructure. While below the target need identified in the CNSHMA, it is considered by Breckland Council that the higher target cannot consistently be achieved due to implications on viability and deliverability and this is demonstrated by historical completions records in the District [See reference 66].

Health

The Health Index for England is a new measure of the health of the nation. It uses a broad definition of health to provide a single value for the health of each local authority area that can be broken down into various measures within three broad domains: health outcomes; health-related behaviours and personal circumstances; and wider drivers of health that relate to the places where people live. Breckland has an overall Health Index of 103.2, which is down 0.9 points compared with the previous year. Breckland ranked around average among local authority areas in England for health in 2021 [\[See reference 67\]](#). As shown in **Figure 2.6**, health in Breckland is strongest for the "living conditions" subdomain, which looks at air pollution, household overcrowding, noise complaints, road safety, and rough sleeping. Breckland's worst score is for "access to services".

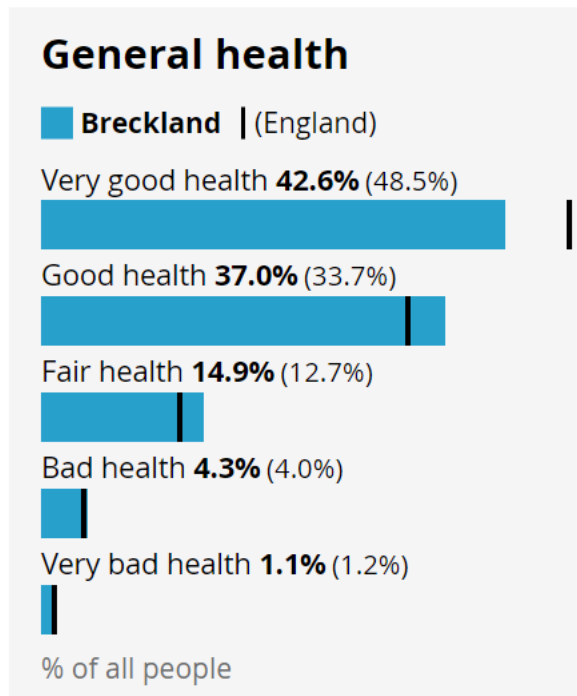
Figure 2.6: Health Index values for each subdomain in Breckland (2021) [See reference 68]

Health Index values for each subdomain, Breckland, 2021



2.14 As illustrated by **Figure 2.7**, a significant majority of people in Breckland rate themselves as having “very good” or “good” health .

Figure 2.7: Self rating of general health for individuals in Breckland [See reference 69]



2.15 Life expectancy for males in Breckland is 79.8, which is lower than the regional value (80.2) and slightly higher than the national value (79.4). Life expectancy for females in Breckland is 84.0 which is higher than both regional and national values (83.8 and 83.1 respectively) [See reference 70].

2.16 While levels of childhood obesity in Breckland are slightly lower than national averages (see **Figure 2.8**, below), the proportion of adults who are overweight or obese (68.9%) is significantly higher than regional and national averages, as shown in **Figure 2.9**.

Figure 2.8: Children's weight indicators for Breckland (2017 to 2018, to 2019 to 2020) [See reference 71]

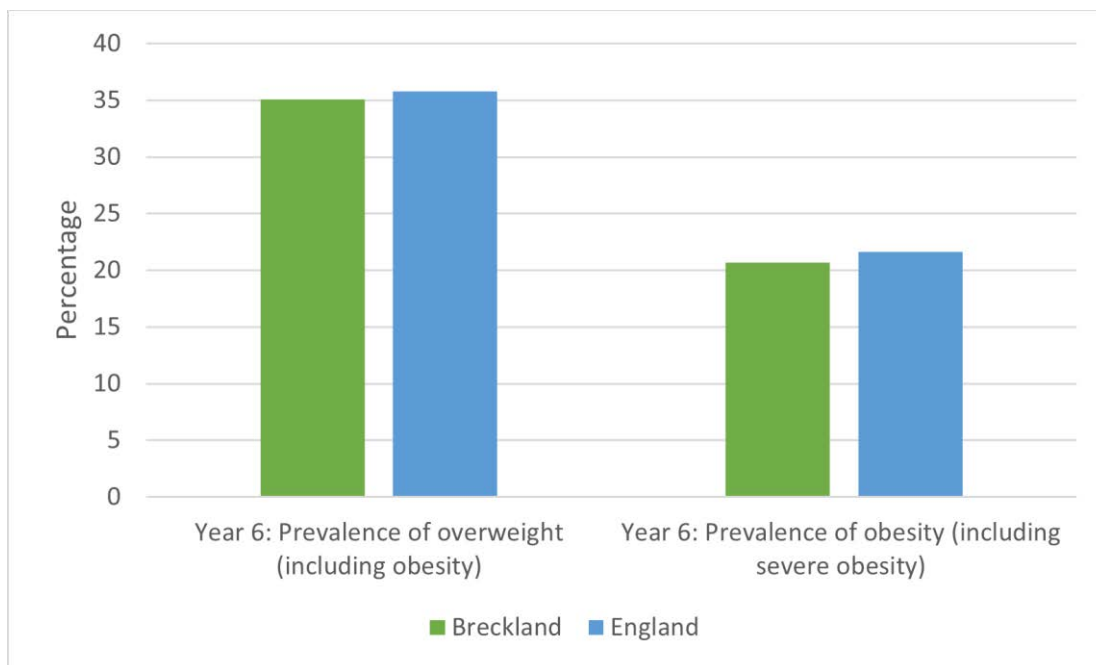
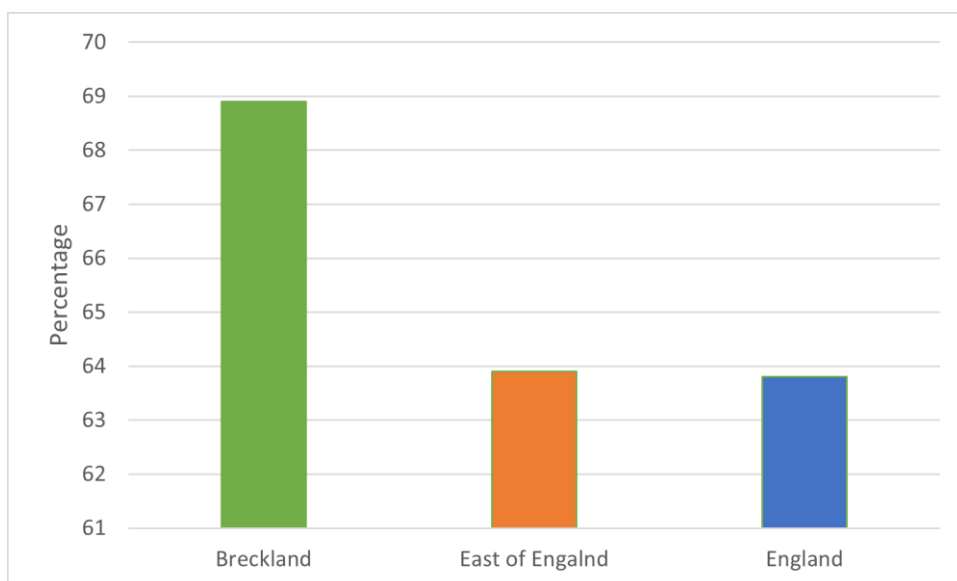
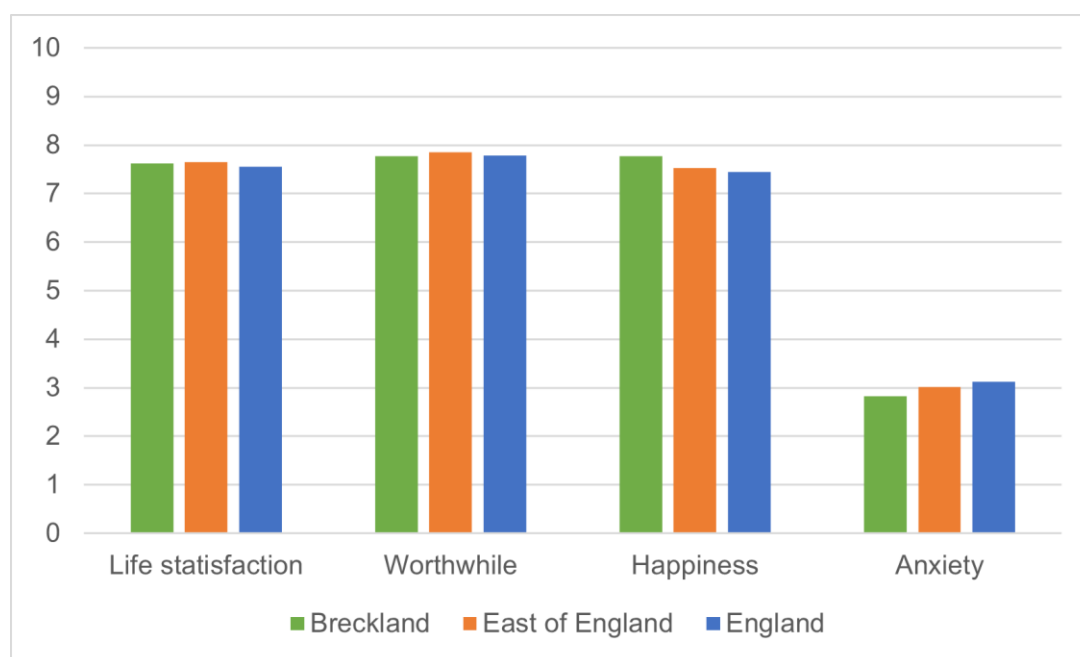


Figure 2.9: Adults classified as overweight or obese (2021/22) [See reference 72]



2.17 Residents of the District reported having lower levels of anxiety and higher levels of happiness than regional and national values, as shown by **Figure 2.10**.

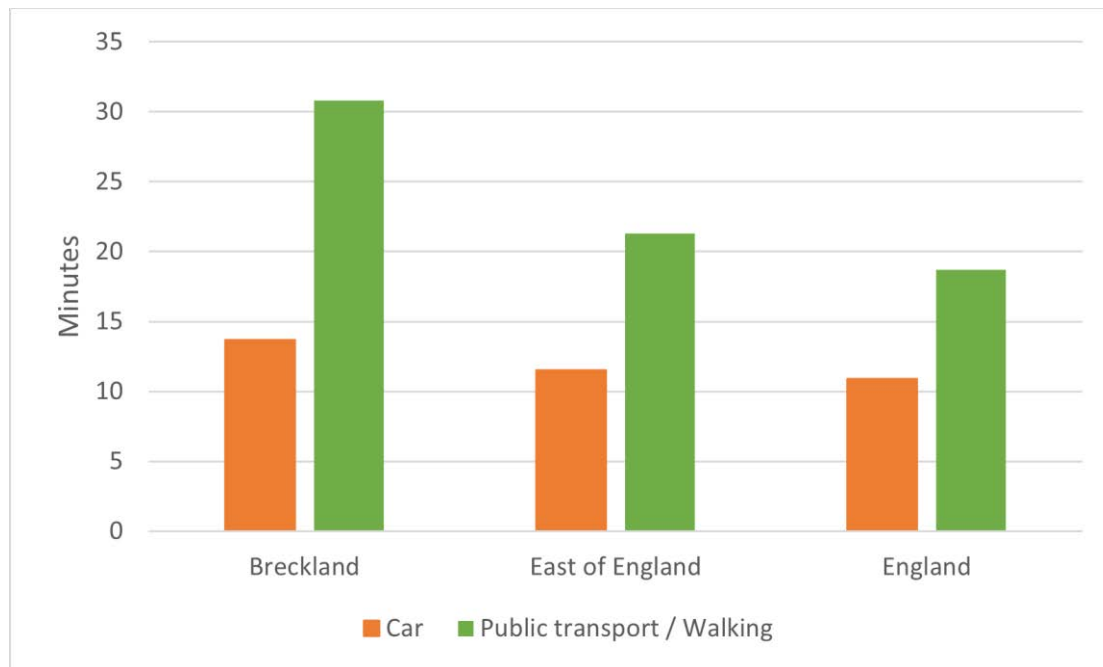
Figure 2.10: Annual personal well-being estimates (April 2021-March 2022) [See reference 73]



Access to services and facilities

2.18 Access to services is the subdomain Breckland scores worst in the Health Index, followed by access to green space [See reference 74]. This is borne out by statistics on the average time taken for Breckland residents to reach the nearest key services (employment centres, primary and secondary schools, further education, GPs, hospitals, food stores and town centres) by public transport or on foot. These are significantly higher than the regional average and national averages, as shown in **Figure 2.11**, although average journey times by car are only slightly longer.

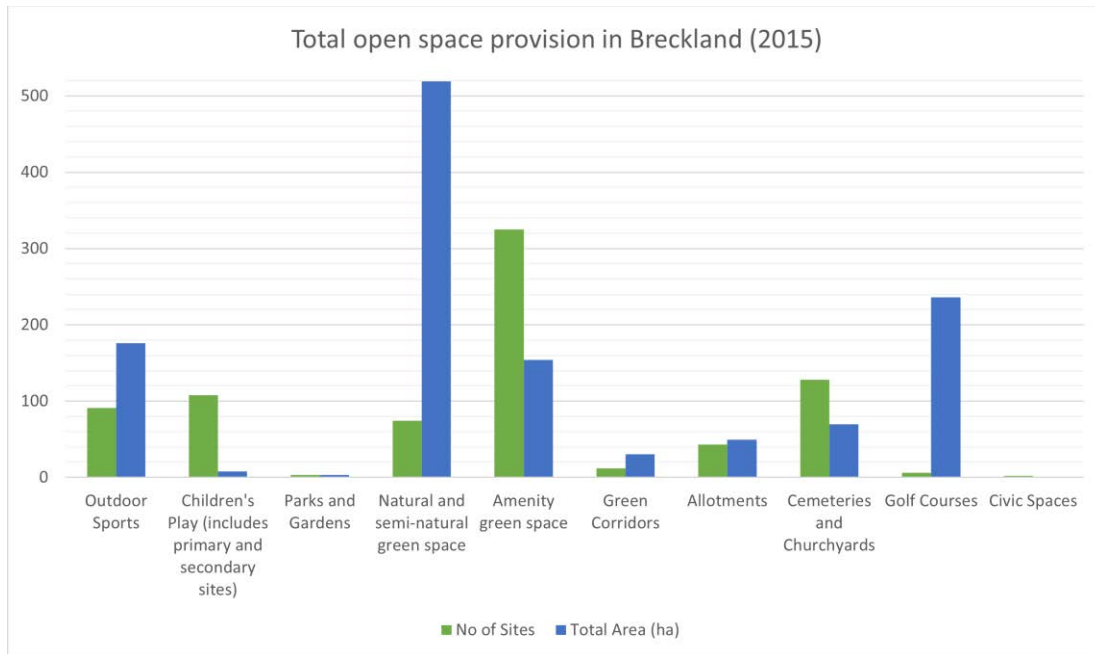
Figure 2.11: Average minimum travel time to reach the nearest key services by mode of travel (2019) [See reference 75].



Open spaces, sports and recreation

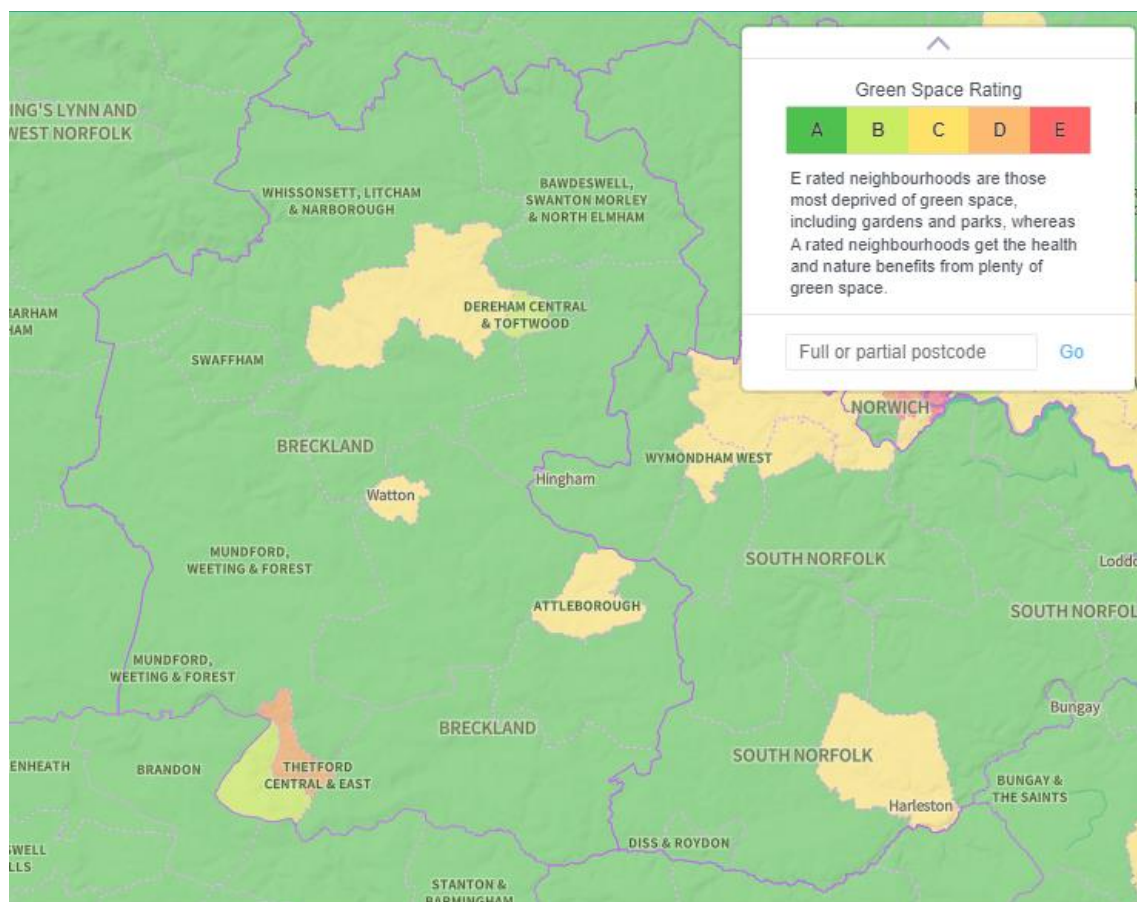
2.19 Breckland's 2015 Open Space Assessment [See reference 76] identified that 70% of the parishes in the District do not meet the identified standard of open space provision. With the exception of the parish of Lexham, every parish across the District is deficient in children's play space and the five market towns of Attleborough, Thetford, Dereham, Swaffham and Watton have the largest deficiencies in total playing space. Further to this, 60% of parishes in Breckland are deficient in outdoor sports provision. Based on 2012 sub-national population projections, there will be a need for approximately 393 hectares of total play space to the year 2037 (including existing and any future provision that might be made). The open space assessment identified a total of 792 sites, making up an area of 1245 ha, the breakdown of this by site type is shown in **Figure 2.12**.

Figure 2.12: Total open space provision in Breckland (2015)
 [See reference 77]



2.20 However, the more recent Friends of the Earth green space map reproduced in **Figure 2.13** [See reference 78] indicates that the majority of Breckland is rated A, and therefore has plenty of green space. It identifies Thetford North as the most deprived area in the District for green space provision, with a D rating.

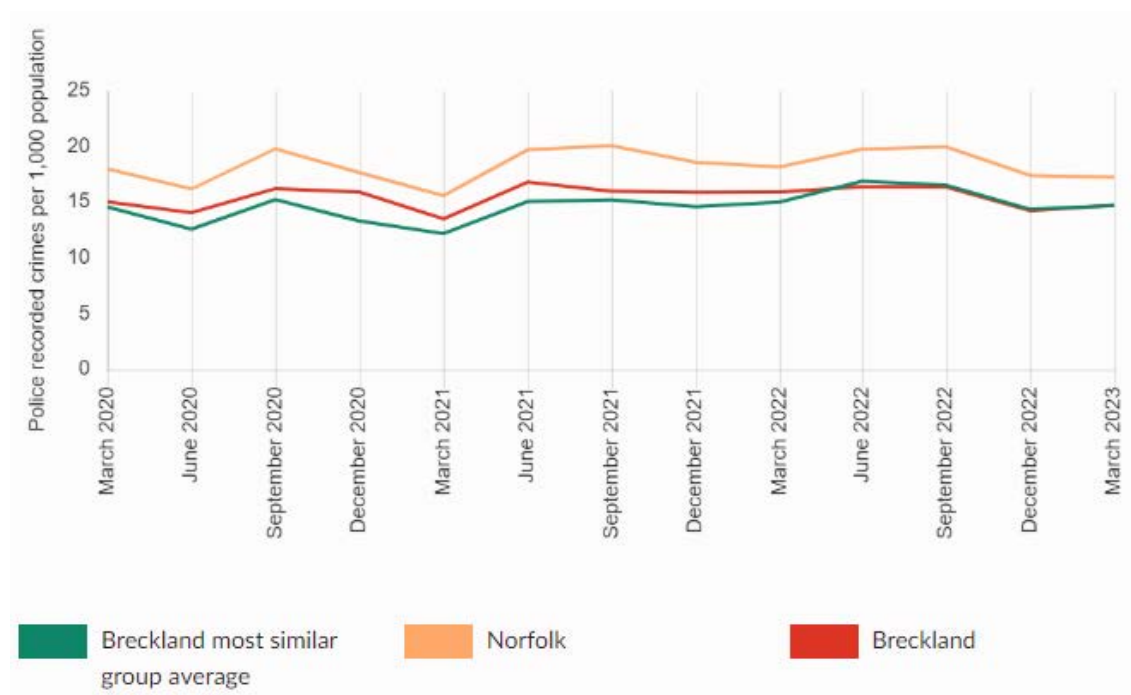
Figure 2.13: Green space in Breckland [See reference 79]



Crime

2.21 In the Health Index, crime is the subdomain Breckland scores second best in [See reference 80]. **Figure 2.14** shows that in the quarter ending March 2023, crime rates were down in both Breckland and the Norfolk force area compared with the corresponding quarter in 2022 and were lower than the average for Norfolk.

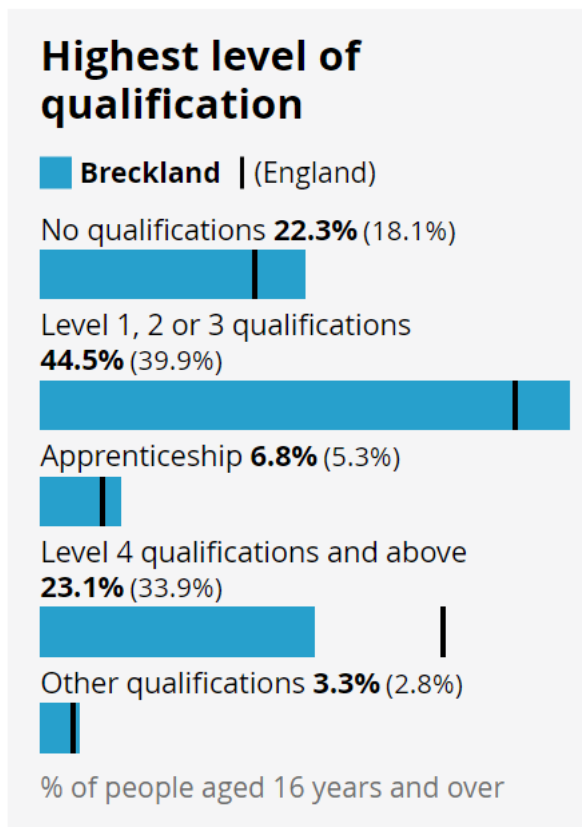
Figure 2.14: Crime rates (2023) [See reference 81]



Education

2.22 The majority (44%) of Breckland's population (aged 16 years and over) have level 1, 2 or 3 qualifications as their highest level of qualification, 23.1% have level 4 qualifications as their highest level of qualification, 22.3% have no qualifications, and 6.8% have an apprenticeship as their highest level of qualification. As shown in **Figure 2.15**, the number of people whose highest level of qualification is Level 4, is significantly lower in Breckland than in England as a whole.

Figure 2.15: Highest level of qualification (2021) [See reference 82]

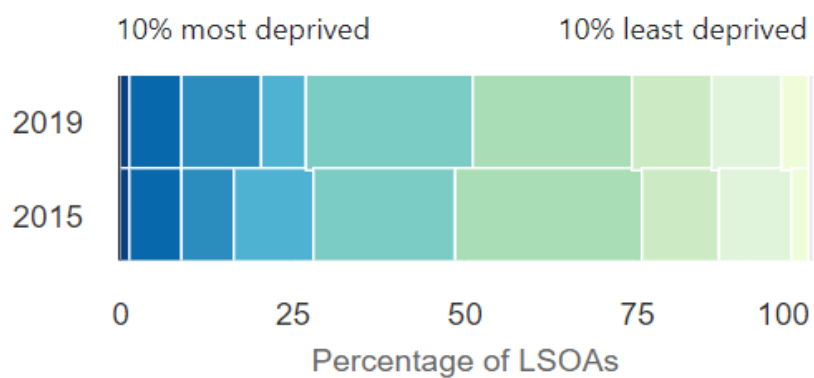


Deprivation

2.23 In the IMD 2019, Breckland District ranked 127 out of 317 local authorities in England (1 being the most deprived) in terms of overall deprivation. There are 78 Lower-level Super Output Areas (LSOAs) in Breckland District, with one being amongst the 10% most deprived in England and 6 (8%) amongst the most deprived 20%. Three LSOAs in Breckland are amongst the 20% least deprived neighbourhoods. The full distribution and the changes since 2015 are shown in **Figure 2.16**.

2.24 As shown in **Figure 2.17**, levels of deprivation vary spatially across the District with the main settlements experiencing higher levels of deprivation than rural areas.

Figure 2.16: Percentage distribution in 2019 and 2015 of LSOAs within Breckland, in each decile of the IMD [See reference 83].



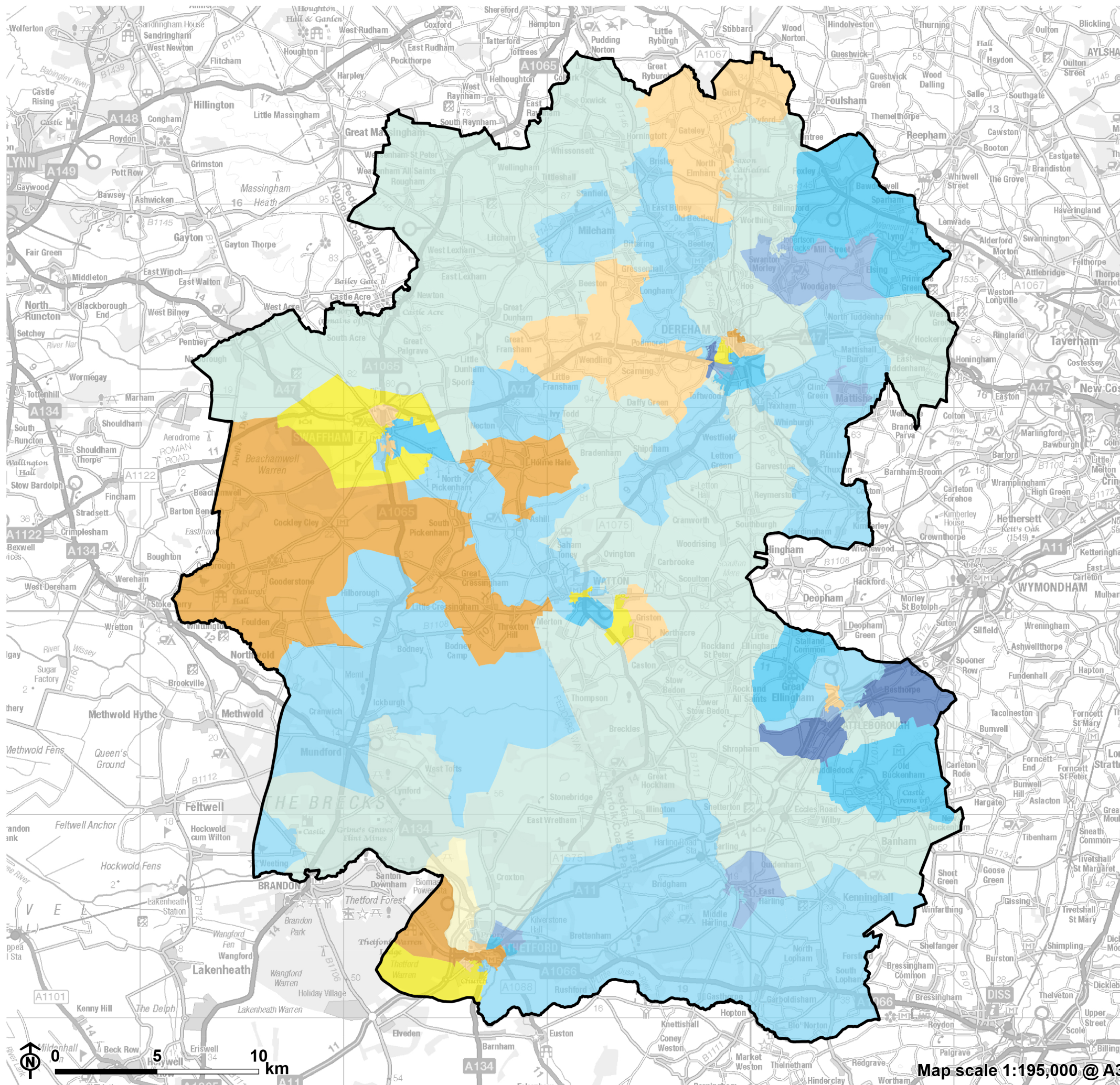
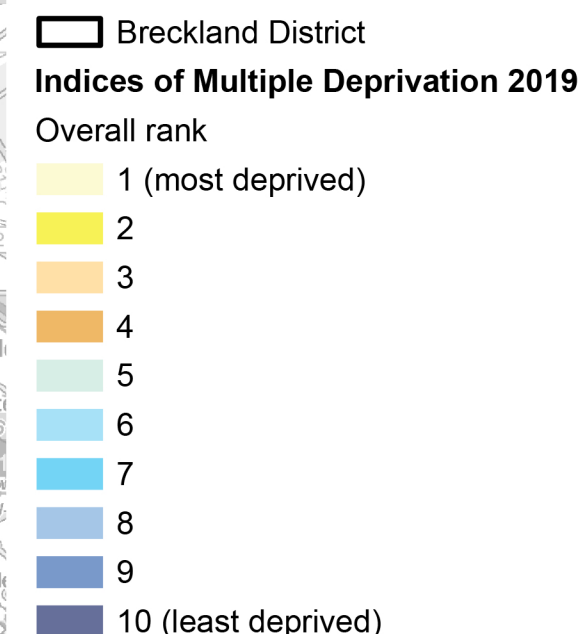


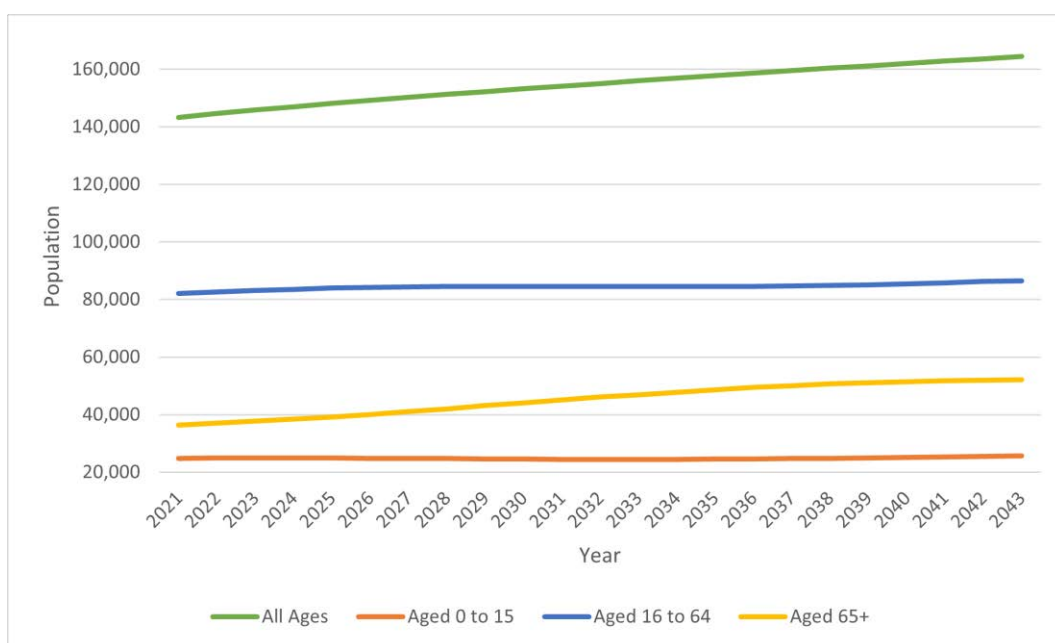
Figure 2.17: Index of Multiple Deprivation



Future baseline and likely evolution without the Local Plan

2.25 As shown by **Figure 2.18**, by 2043, the population of Breckland District is forecast to increase to 164,432, an approximately 16.2% increase from 2021 Census levels. The population of people over the age of 65 is estimated to be 52,212 in 2043, which would make up around 31.8% of Breckland District's population, demonstrating a significant growth in older population, which is likely to place additional pressures on housing and social services.

Figure 2.18: Population projections for Breckland District [See reference 84]



2.26 In line with the standard method for calculating housing need set out in the Planning Practice Guidance [See reference 85], and as part of the preparation

of the 2019 Local Plan, the Council commissioned a Strategic Housing Market Assessment (SHMA) to establish the housing need for the District. The 2017 SHMA concluded that the housing need for the District is some 612 dwellings per annum or 15,300 units between 2011 and 2036. Breckland Council considers this figure to represent the most appropriate figure against which to assess housing supply [\[See reference 86\]](#). To inform preparation of the Local Plan Full Update, a new study – the Housing and Economic Development Needs Assessment (HEDNA) – has been commissioned. Once published this will review evidence of housing needs. Presently, engagement on the Council's Issues and Options consultation has noted that the standard method for calculating housing needs would require the delivery of 661 dwellings per annum.

2.27 Breckland has an overall Health Index score of 103.2, which is down 0.9 points compared with the previous year [\[See reference 87\]](#). Breckland's Health Index value for "mortality" (which addresses avoidable mortality, infant mortality, and life expectancy) improved by 5.4 points in the six years between 2015 and 2021. As such, Breckland went from being close to average to being in the top 40% for this subdomain during this period. The change was largely driven by a decrease in infant mortality and improvements in in mortality from all causes.

2.28 Crime rates in Breckland have improved in 2023 compared to 2022 [\[See reference 88\]](#). In addition, according to its Health Index score for "crime", Breckland has been performing more favourably than the average for England [\[See reference 89\]](#). The Health Index score for "crime" in Breckland increased from 109.8 in 2015 to 111.2 in 2021.

2.29 Breckland District's has improved from being the 125th most deprived local authority in England in 2015, to 127th in 2019 (1 being most deprived) has per the overall deprivation measure presented in the Indices of Multiple Deprivation [\[See reference 90\]](#). Whether these trends will continue is uncertain.

Key sustainability issues and opportunities for the Local Plan to address them

2.30 Analysis of the baseline information has enabled a number of key sustainability issues facing Breckland to be identified. These are outlined below, in addition to the opportunities the Local Plan presents to address them.

Population

- Increasing population (at a higher rate than regionally and nationally) and the subsequent demand for new housing to meet the needs of a growing population.
- Ageing population and the need for suitable accommodation for all types of residents with a range of care needs.

2.31 Population growth and demographic change is likely to place additional demand on key services and facilities such as health, education and social care. Additionally, an ageing population will place additional pressures on housing, health and social care services. Without the Local Plan Review it is likely that services and facilities will still be delivered. However, it is less likely that these will be in appropriate locations, or of sufficient quality and quantity to keep pace with demand arising from new residential development. The Local Plan Review offers an opportunity to deliver these in a coherent, sustainable manner alongside development.

Housing

- Increasing house prices.

- Affordability of housing (property price-to-earnings ratio is 8.65, higher than nationally).
- Unmet need for affordable housing.

2.32 There is a need to provide for housing to meet the needs of the growing and ageing population, such as lifetime homes, adaptable dwellings and supported living. Without the Local Plan Review, the objectively assessed need for new housing and the appropriate mix of housing types in Breckland will not be delivered and the current trends will continue. The Local Plan Review offers the opportunity to facilitate and expedite the delivery of a variety of housing, including affordable housing and housing to meet the needs of an ageing population. The Local Plan Review also offers the opportunity to target residential development in areas where the barriers to housing are greatest.

Health

- Adult obesity is significantly higher than regional and national values.
- Relatively long journey times to access key services, particularly via public transport/walking.
- Low Health Index scores for access to services and access to green space.
- Lack of open space provision, including children's play spaces.

2.33 The Local Plan Review has an important role to play in encouraging active lifestyles through the provision of accessible and high quality open spaces/recreational resources and active travel routes. The Local Plan Review can support developments that are accessible to residents, particularly by active travel. The Local Plan Review also offers the opportunity to ensure that the accessibility and quality of open spaces remains high and new green and blue infrastructure is planned alongside new development.

Education

- Number of people with Level 4 qualifications as their highest level of qualification significantly lower than the national average.

2.34 The Local Plan Review presents an opportunity to improve the accessibility and provision of high-quality education and training facilities in the District. By improving levels of educational attainment there is potential for wider social benefits and improvements to the local economy to result.

Deprivation

- Breckland District ranked 127 out of 317 local authorities in England (1 being the most deprived) in terms of overall deprivation.
- Breckland contains one of the 10% most deprived LSOAs in England and six of the 20% most deprived. Conversely three LSOAs in Breckland are amongst the 20% least deprived in England.

2.35 There is a need to reduce inequality between those living in the most deprived areas of Breckland District and those living in the least deprived areas of the District.

2.36 The Local Plan Review presents an opportunity to close the gap between the most and least deprived areas in the District through spatial planning, particularly with a view to encouraging new development that will provide jobs, raise income levels, support education/skills/training, reduce crime, and barriers to housing and services.

IA objectives

2.37 Based on the key sustainability issues discussed above, it is proposed that the IA framework should include the following objectives and appraisal questions.

- Ensure all groups have access to affordable, decent and appropriate housing that meets their needs and reduces disparity.
 - Would the policy ensure an appropriate mix of types, tenures and sizes of properties in order to meet current and projected housing needs?
 - Would the policy support a reduction in the number of unfit homes across the District?
 - Would the policy support the delivery of the required number of houses to meet local need, including the need for affordable housing?
- Promote equality of opportunity, improve health and wellbeing and reduce levels of deprivation and disparity.
 - Would the policy ensure equality of opportunity and equal access to services and facilities / infrastructure for all?
 - Would the policy avoid differential negative impacts based on 'protected characteristics' as defined in the Equality Act 2010 and redress inequalities related to age, gender, disability, race, faith, location and income?
 - Would the policy reduce the proportion of people living in deprivation?
 - Would the policy foster good relations between different groups of people?
 - Would the policy support healthier lifestyles and improvements in determinants of health?
 - Would the policy reduce health inequalities?

- Would the policy promote healthy lifestyles by encouraging and facilitating walking and cycling?
- Would the policy promote health and wellbeing by maintaining, connecting and creating multifunctional open spaces, green infrastructure, and recreation and sports facilities?
- Would the policy protect health and wellbeing by preventing, avoiding and mitigating adverse health effects associated with air and noise pollution, vibration and odour?
- Improve the quality, range and accessibility of essential services, facilities, green infrastructure and open space.
 - Would the policy improve accessibility to key local services and facilities, including health, education and leisure?
 - Would the policy improve accessibility to shopping facilities?
 - Would the policy support the delivery of new and improve access to green infrastructure and key open space such as play areas, parks and sports provision?

Chapter 3

Economy

Policy context

3.1 The following section presents the most relevant documents identified in the policy review for the purposes of the new Local Plan. The key targets emerging from the review are summarised below.

Economic policy context

International

- 2030 Agenda for Sustainable Development [\[See reference 91\]](#), published by United Nations Department of Economic and Social Affairs in 2015
- Johannesburg Declaration on Sustainable Development [\[See reference 92\]](#), published by United Nations in 2002

National

- National Planning Policy Framework [\[See reference 93\]](#), published by Department for Levelling Up, Housing and Communities (DLUHC) in 2023
- National Design Guide [\[See reference 94\]](#), published by Ministry of Housing, Communities and Local Government (MHCLG) in 2021
- Build Back Better: Our Plan for Growth [\[See reference 95\]](#), published by HM Treasury in 2021

- Agriculture Act 2020 [\[See reference 96\]](#), published by UK Parliament in 2020
- Agricultural Transition Plan 2021 to 2024 [\[See reference 97\]](#), published by Department for Environment, Food and Rural Affairs in 2020
- UK Industrial Strategy: Building a Britain fit for the future [\[See reference 98\]](#), published by HM Government in 2018

Sub-national

- Norfolk Climate Strategy 2023 [\[See reference 99\]](#), published by Norfolk County Council (NCC) in 2023
- Norfolk Strategic Infrastructure Delivery Plan 2022 [\[See reference 100\]](#), published by NCC in 2022
- Norfolk and Suffolk Economic Strategy [\[See reference 101\]](#), published by New Anglia in 2022
- Better Together for Norfolk: Norfolk County Council Strategy 2021-25 [\[See reference 102\]](#), published by NCC in 2021

3.2 As described in relation to the policy context for the earlier topics in this Scoping Report, the UN's Declaration on Sustainable Development (the 'Johannesburg Declaration') is of relevance to the Local Plan's approach to supporting sustainable development. As part of this approach the plan should support sustainable economic growth that contributes to reduced inequalities in the District.

3.3 The new Local Plan will also need to have regard to the NPPF, which includes as part of its three overarching objectives for the planning system building "a strong, responsive and competitive economy". Significant weight should be placed on the need to support "economic growth and productivity, taking into account both local business needs and wider opportunities for

development”. Furthermore, planning policies should “create the conditions in which businesses can invest, expand and adapt”.

3.4 The document states that strategic policies should “set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth”. Policies should “set criteria, or identify strategic sites, for local and inward investment”, “seek to address potential barriers to investment” and be flexible to “enable a rapid response to changes in economic circumstances”. This policy approach should recognise and address the specific locational requirements of different sectors.

3.5 Build Back Better: Our Plan for Growth sets out the government’s plans to support economic growth through significant investment in infrastructure, skills and innovation. The plan focusses on three pillars of growth: high quality infrastructure, providing skills to succeed and innovation to drive economic growth and create jobs. Each pillar is supported by specific actions, and the growth the plan supports is set out to levelling up the whole of the UK, support transition to net-zero and support the vision of a global Britain.

Baseline information

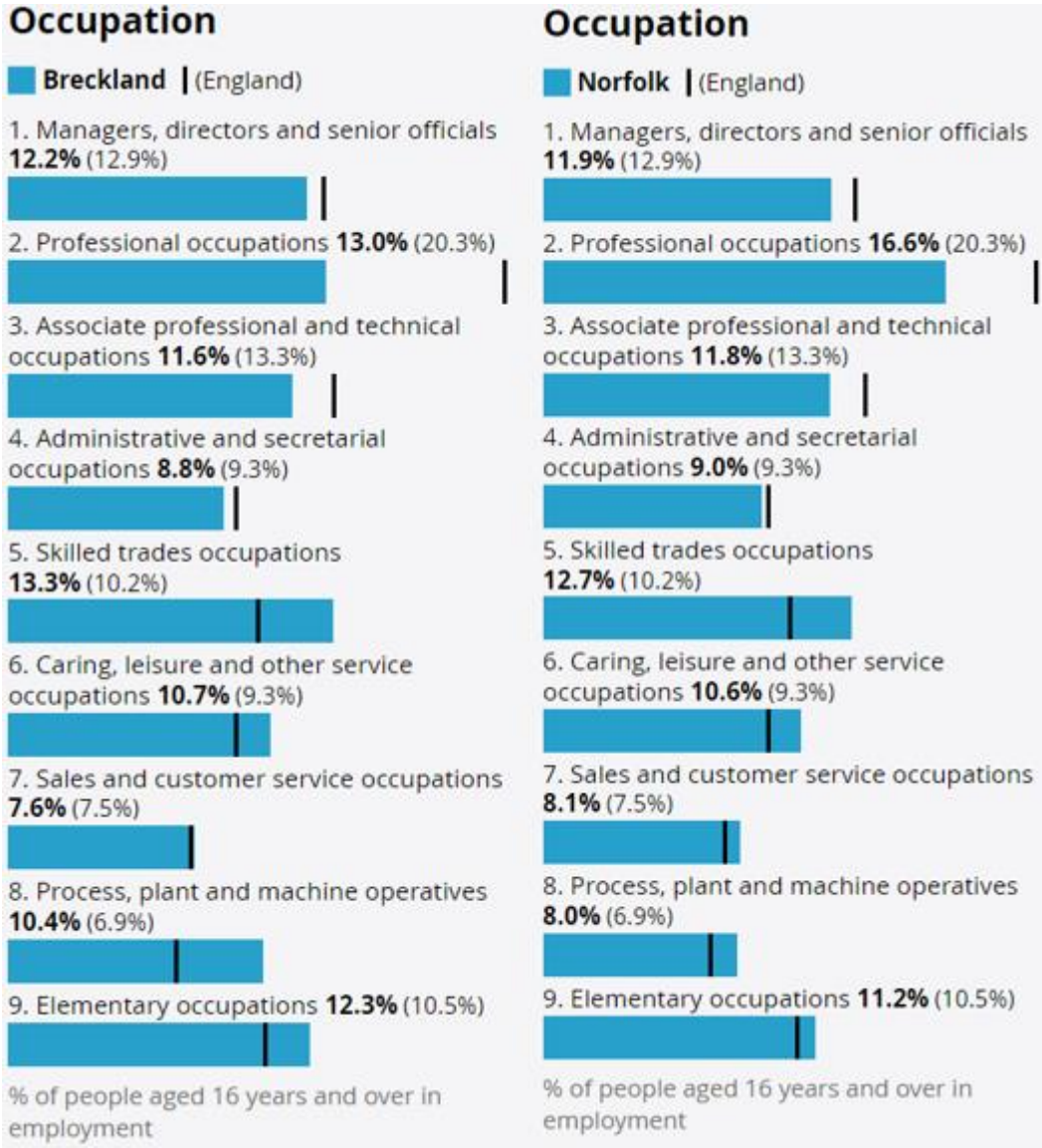
3.6 At the time of Census 2021, 58% of the population in Breckland were in employment, 2.4% were unemployed and 39.6% were economically inactive (see Figure 3.1) The reported figure for those in employment for Norfolk for the same period was 53.9% and for England was 57.4%.

Figure 3.1: Breckland and Norfolk economic activity status [See reference 103], [See reference 104]



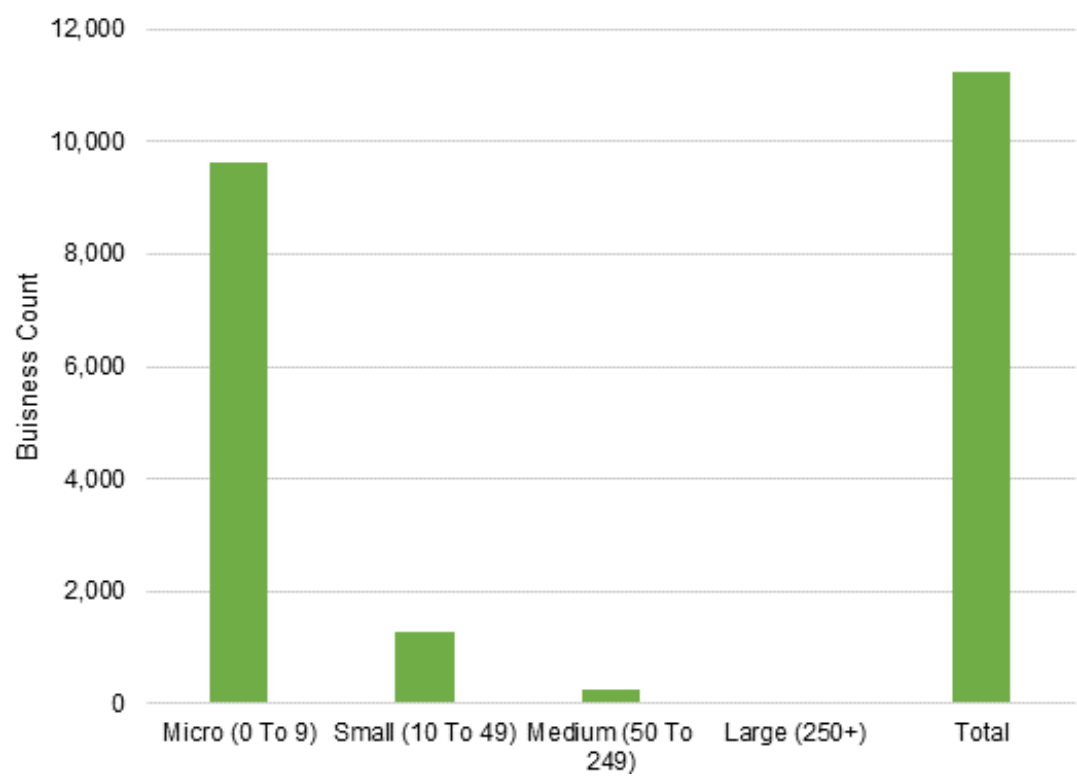
3.7 As a rural area, agriculture and the processing of food and other agricultural products are important components of the local economy, with concentrations of industrial areas around the larger market towns. This work in these sectors is often low-paid and low skilled and there is a reliance on seasonal and migrant workers. This is reflected in high percentage of Breckland’s population who are employed in skilled trades occupations (**Figure 3.1**). This is higher than the County (12.7%) and national (10.2%) figures (**Figure 3.1**).

Figure 3.2: Breckland and Norfolk occupations [See reference 105], [See reference 106]



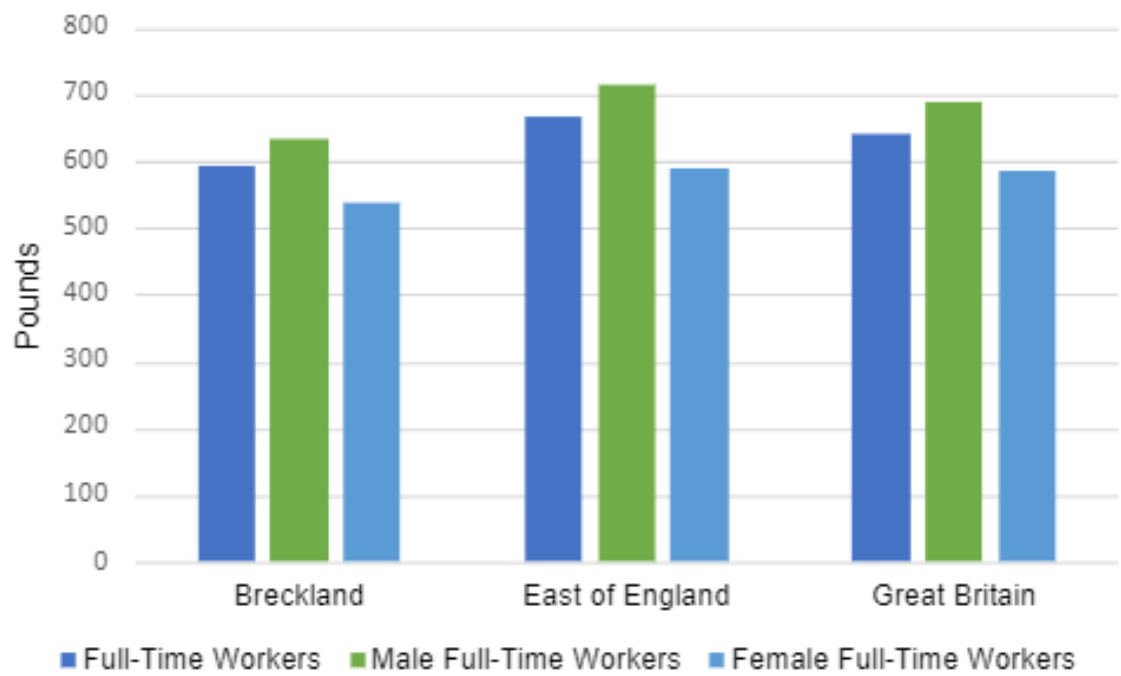
3.8 Demand for employment space in Breckland is focused on small and medium-sized businesses [See reference 107]. Self-employment rates are higher in the District (16.9%), compared to the East (9.9%) and nationally (9.3%) [See reference 108]. As of 2023, there are a reported 11,235 businesses in Breckland, of which 9,640 are micro businesses (Figure 3.3).

Figure 3.3: Breckland buisness count (2023) [See reference 109]



3.9 In recent years, the region has experienced population growth, rising wages and low unemployment rates. However, average wages in Breckland remain comparatively low with an average gross weekly pay of £593.70 compared to £667.60 in the East and £642.20 in the UK (**Figure 3.4**).

Figure 3.4: Weekly earnings by place of residence (2022) [See reference 110]



3.10 Breckland benefits from good road connections via the A47 and A11, although challenges of north-south congestion persist [See reference 111]. The challenge of traffic congestion is present within the District’s historic market towns and these areas have also experienced declining retail footfall in recent years. The outlying villages and settlements also encounter issues related to limited sustainable and active transportation, connectivity to important market towns and employment centres, and lack of access to ultrafast broadband speed [See reference 112].

3.11 The East of England's strategic importance is underscored by its central location within the Cambridge-Norwich Tech Corridor, a 100km innovation corridor connecting technology and life sciences research clusters. This corridor plays a vital role in supporting economic growth in East Anglia by linking research centres with regional manufacturing and engineering businesses. Snetterton Commercial Hub is one of Breckland’s largest strategic employment

areas lying both north and south of the A11 dual carriageway on the Tech Corridor. The hub is also part of Breckland's "Growth Zone" which offers businesses enhanced support.

3.12 Breckland has a fairly ageing stock of employment space and lack of modern business premises relative to other parts of the region. Overall vacancy levels for both office and industrial space are below a 'normal' market average, suggesting a relatively tight supply of space that is being marketed relative to demand [\[See reference 113\]](#). The vacancy rates historically have been particularly high in Swaffham and very low in Attleborough [\[See reference 114\]](#) – the continued nature of this will be confirmed as the Council completes updating its evidence base to inform the Local Plan. Although retail vacancy rates are increasing as footfall declines, vacant premises could help to accommodate growth [\[See reference 115\]](#).

Future baseline and likely evolution without the Local Plan

3.13 It is uncertain how the job market will change without the implementation of the Local Plan Review. The degree of change in local circumstances will be influenced by economic issues at the national and international level. This includes the uncertainties posed by Brexit and slow economic growth in the UK economy [\[See reference 116\]](#).

3.14 Policy GEN01 of the current Local Plan supports the sustainable development of Breckland including directing jobs and growth to the most sustainable locations. The plan also includes a suite of economy and employment policies that are set to support the achievement of an appropriate level of economic development in Breckland, delivering this development in appropriate locations and promoting development in sectors of most importance to the local economy [\[See reference 117\]](#).

Key sustainability issues and opportunities for the Local Plan to address them

3.15 Analysis of the baseline information has enabled a number of key sustainability issues facing Breckland to be identified. These are outlined below, in addition to the opportunities the Local Plan presents to address them.

- Few high-wage sector opportunities.
- Congestion and connectivity issues.
- Retail vacancy increase

3.16 Breckland needs to ensure a future supply of jobs and continued investment to ensure identified employment development opportunities are taken forward and issues of income deprivation are better addressed.

3.17 The Local Plan Review should support the sustainable growth of the local economy, by providing for the required level of economic land and supporting development in appropriate locations. It should also include policies that will help to address traffic congestion and digital connectivity that will be necessary to make employment sites in Breckland more attractive to potential investors. These measures are likely to help ensure increased employment opportunities and promote wage growth. The new Local Plan may also support opportunities for economic growth related to the Cambridge-Norwich Tech Corridor

IA objectives

3.18 Based on the key sustainability issues discussed above, it is proposed that the IA framework should include the following objective and appraisal questions.

- Improve the efficiency, competitiveness and adaptability of the local economy and help people gain access to satisfying work appropriate to their skills, potential and place of residence.
 - Would the policy support Breckland-based businesses in higher-wage sectors and enhance competitiveness?
 - Would the policy support diversification of employment sectors to facilitate areas of growth?
 - Would the policy provide an adequate supply of land and promote the delivery of essential infrastructure to help meet the District's forecast employment needs?
 - Would the policy provide for new and improved education and training facilities leading to a work ready population of school and college leavers?
 - Would the policy help to reduce levels of unemployment?
 - Would the policy improve access to employment, including by means other than the private car?
 - Would the policy increase the vitality and viability of town centres?

Chapter 4

Climate change mitigation and adaptation

Policy context

4.1 The following section presents the most relevant documents identified in the policy review for the purposes of the new Local Plan. The key targets emerging from the review are summarised below.

Climate change mitigation and adaptation policy context

International

- United Nations Paris Climate Change Agreement [\[See reference 118\]](#), published by United Nations in 2015
- 2030 Agenda for Sustainable Development [\[See reference 119\]](#), published by United Nations Department of Economic and Social Affairs in 2015
- Johannesburg Declaration on Sustainable Development [\[See reference 120\]](#), published by United Nations in 2002

National

- National Planning Policy Framework [\[See reference 121\]](#), published by Department for Levelling Up, Housing and Communities (DLUHC) in 2023
- National Planning Practice Guidance (PPG) [\[See reference 122\]](#), published by Department for Communities and Local Government in 2023
- The Carbon Budget Delivery Plan [\[See reference 123\]](#), published by Department for Energy Security and Net Zero in 2023
- UK Climate Change Risk Assessment [\[See reference 124\]](#), published by Department for Environment, Food and Rural Affairs in 2022
- The British energy security strategy [\[See reference 125\]](#), published by Department for Business, Energy and Industrial Strategy and Prime Minister's Office, 10 Downing Street in 2022
- The Industrial Decarbonisation Strategy [\[See reference 126\]](#), published by Department for Business, Energy and Industrial Strategy in 2021
- The Environment Act 2021 [\[See reference 127\]](#), published by HM Government in 2021
- The Net Zero Strategy: Build Back Greener [\[See reference 128\]](#), published by Department for Business, Energy and Industrial Strategy in 2021
- The Energy Performance of Buildings Regulations [\[See reference 129\]](#), published by HM Government in 2021
- The 25 Year Environment Plan [\[See reference 130\]](#), published by HM Government in 2018
- Flood and Water Management Act [\[See reference 131\]](#), published by HM Government in 2010
- The UK Renewable Energy Strategy [\[See reference 132\]](#), published by HM Government in 2009

- Climate Change Act 2008 [\[See reference 133\]](#), published by HM Government in 2008
- Planning and Energy Act [\[See reference 134\]](#), published by HM Government in 2008

Sub-national

- Norfolk Climate Strategy 2023 [\[See reference 135\]](#), published by Norfolk County Council (NCC) in 2023
- Net Zero 2030 Strategy and Climate Action Plan [\[See reference 136\]](#), published by North Norfolk District Council in 2021
- Local Transport Plan 4 Strategy 2021-2036 [\[See reference 137\]](#), published by NCC in 2021
- Better Together for Norfolk: Norfolk County Council Strategy 2021-25 [\[See reference 138\]](#), published by NCC in 2021

4.2 As described in relation to the policy context for the earlier topics in this Scoping Report, the UN's Declaration on Sustainable Development (the 'Johannesburg Declaration') is of relevance to the Local Plan's approach to supporting sustainable development. As part of this approach the plan should support development that contributes to addressing climate change and its impacts.

4.3 The new Local Plan will need to have regard to the NPPF, which includes as part of its environmental objective a requirement to mitigate and adapt to climate change, "including moving to a low carbon economy". The document also states that the "planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change." To achieve these aims new development should be planned to ensure appropriate adaptation measures are included (including green infrastructure) and should be designed, located and orientated as to help to reduce greenhouse gas emissions.

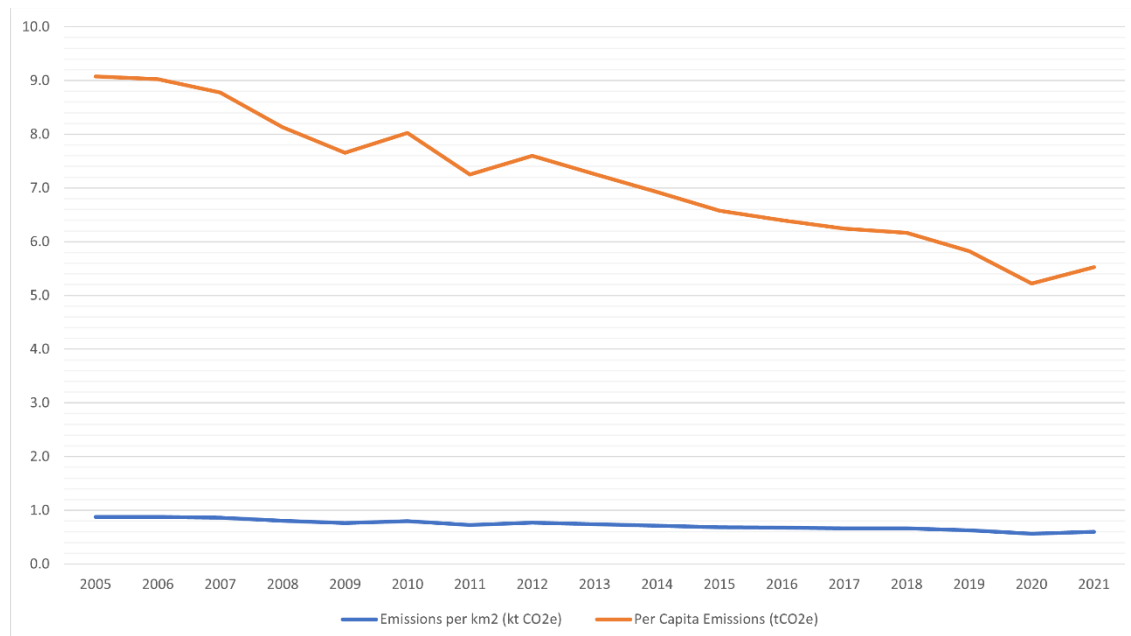
4.4 The National Planning Practice Guidance provides guidance on how to identify suitable mitigation and adaptation measures in the planning process to address the impacts of climate change. Guidance is also provided about how to take account of and address the risks associated with flooding and coastal change.

Baseline information

4.5 Climate change presents a global risk, with a range of different impacts likely to be felt within Breckland across numerous receptors. The Intergovernmental Panel on Climate Change (IPCC) special report on global warming outlines that, under emissions in line with current pledges under the Paris Agreement, global warming is expected to surpass 1.5°C, even if these pledges are supplemented with very challenging increases in the scale and ambition of mitigation after 2030. This increased action would need to achieve net zero CO₂ emissions in less than 15 years [\[See reference 139\]](#).

4.6 As shown in **Figure 4.1**, Breckland's CO₂ emission per capita have decreased year-on-year for most years since 2005.

Figure 4.1: CO₂ emissions per capita and per km² in Breckland 2005-2021 [See reference 140]



4.7 In light of the IPCC work, Breckland District Council declared a Climate Emergency in September 2019. The Council also published the Breckland 2035 Sustainability Strategy, the ‘strategic pillars’ of which are to:

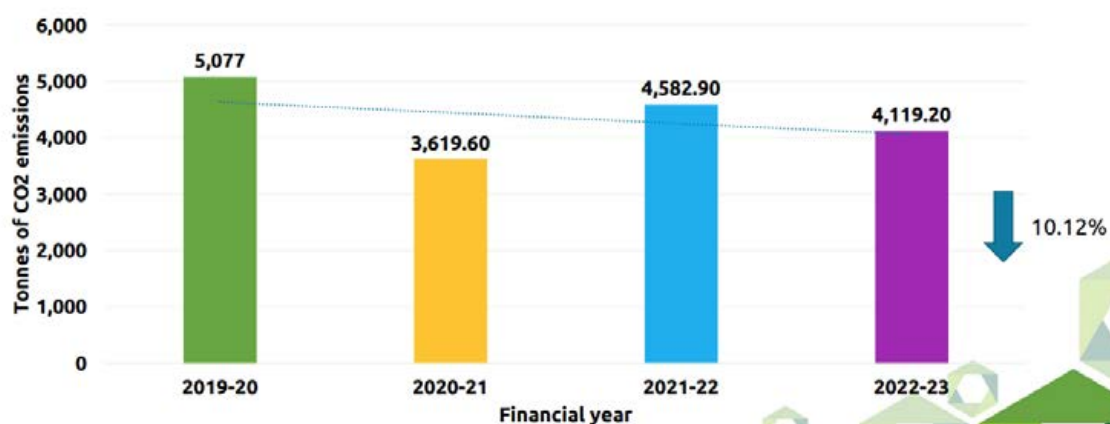
- Reduce their own impact as an organisation on the environment.
- Use their regulatory powers and resources to influence behavioural change and drive positive changes around the environment.
- Enable their communities to take action for themselves.

4.8 The strategy sets out the Council’s current commitments, key stakeholders for engagement, and the activities to support the delivery of the strategy and monitoring of its progress [See reference 141].

4.9 Following the declaration of a climate emergency in the District, the Council declared its commitment to becoming a net zero organisation by 2035. The Council achieved a 463.70 tCO₂e reduction on the previous year, with its

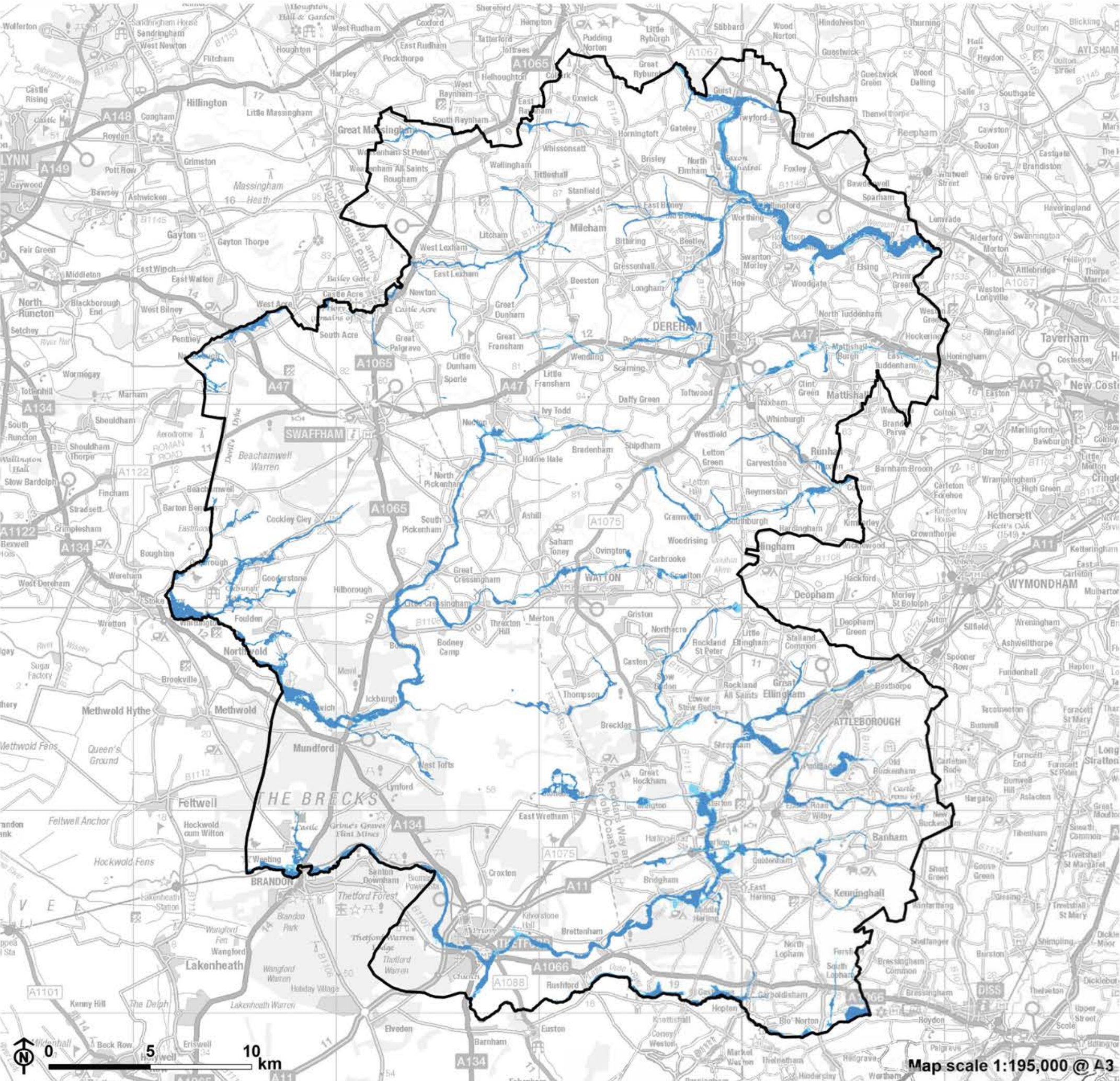
current total carbon emissions equating to 4,119.20 tCO₂e. The total emissions consider those from Scopes 1 (emissions from sources the Council owns or control directly), 2 (direct emissions – energy bought from energy providers) or 3 (emissions created by others in the supply chain. (see **Figure 4.2**).

Figure 4.2: Total tonnes of CO₂ emissions per annum Scope 1 + 2 + 3 [See reference 142]



4.10 Parts of Breckland are subject to risk from fluvial flooding due to the lowland nature of the landscape. The floodplains associated with principal watercourses in Breckland are relatively broad. There are large extents of Flood Zone 2 and 3 associated with the River Thet within the south of the District, extending from the area to the south-west of Attleborough, through Snetterton, Harling, Brettenham and Thetford. The floodplain associated with the River Wensum is also relatively broad. The river flows through Guist, North Elmham, to the north of Swanton Morley and Lyng, and then out of the District towards Norwich (see **Figure 4.3**). The risk of flooding associated with waterbodies could be intensified as a result of climate change [See reference 143].

Figure 4.3: Flood Risk Zones in Breckland

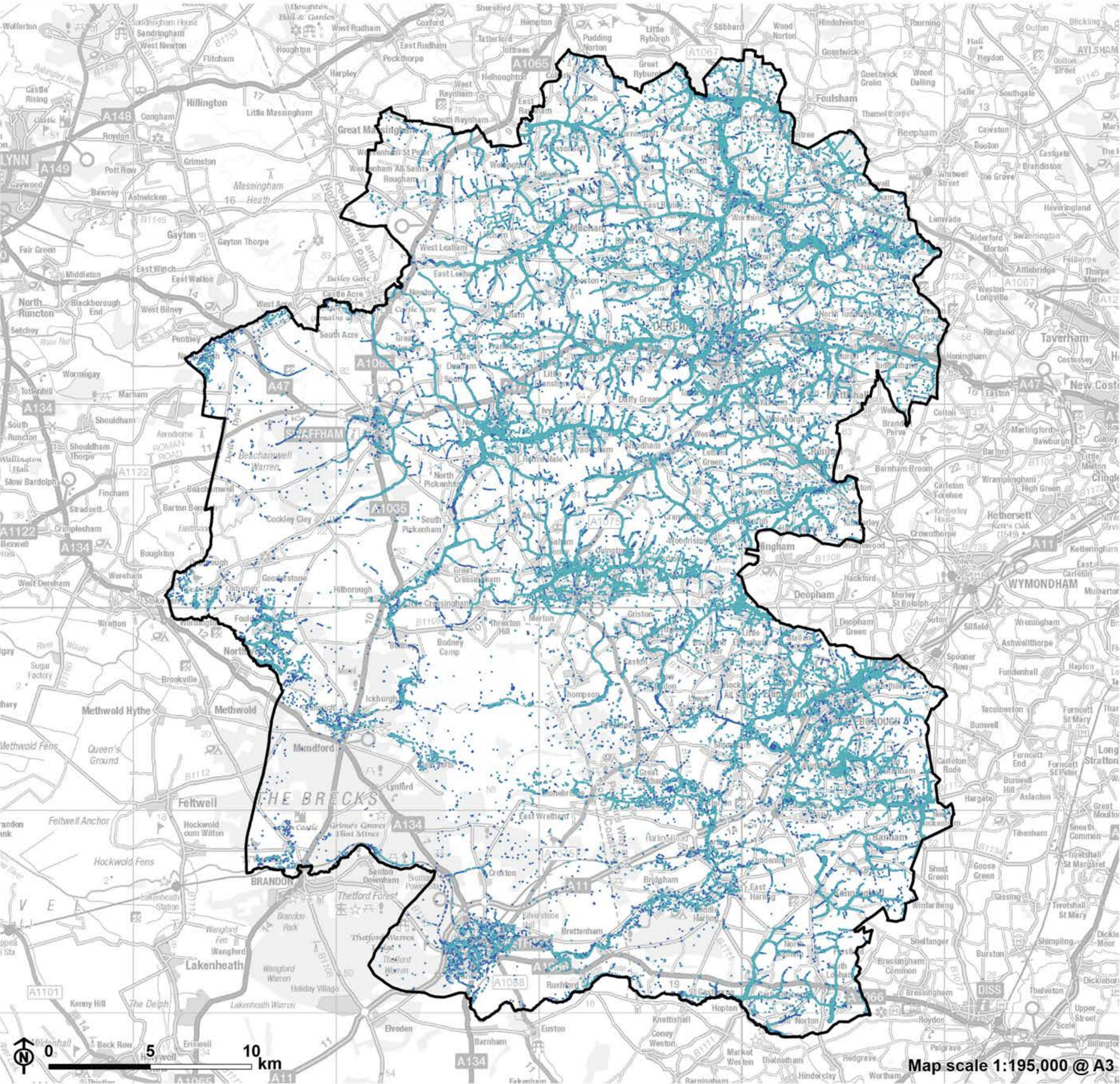


4.11 The most significant flood events reported to have affected the District occurred in:

- Little Ouse, September 1968 and March 1947.
- Black Bourn, September 1968 and March 1947.
- River Wissey, March 1947.
- River Thet, March 1947 and September 1968.
- River Nar, November 1993 **[See reference 144]**.

4.12 There are areas in Breckland with a high probability of being affected by flooding from surface water (i.e. greater than 3.3% AEP) along Walton Brook, the River Yare, the River Wissey, Wendling Brook, the River Tud, the River Wensum and the River Whitewater.

Figure 4.4: Surface water flood risk in Breckland



- Breckland District
- Risk of 1 in 30 year surface water flooding
- Risk of 1 in 100 year surface water flooding

Future baseline and likely evolution without the Local Plan

4.13 There is potential for the District to be subject to more frequent extreme weather events as well as increasing potential for flood risk as a result of climate change. Without the Local Plan, sites for development may be located in areas that are prone to the effects of climate change, such as in areas with a higher chance of flooding.

4.14 Without the Local Plan, sustainable design and construction techniques may not be adopted in new build development, whilst development sites may be located in inaccessible locations that increase reliance on private vehicles, although the shift to electric vehicles may help reduce emissions associated with private vehicles. Carbon emissions associated with buildings may be reduced, in response to the amended Building Regulations 2010 and implementation of the Future Buildings Standard from 2025 that require CO₂ emissions from new build homes and other buildings, including offices and shops, to be 30% lower than current standards. This will be achieved through the installation of low carbon technology, such as solar panels and heat pumps, and using materials in a more energy efficient way to keep in heat.

4.15 The Council will continue to have an obligation to reduce carbon emissions with or without the Local Plan Review. Its commitment to achieve net zero as an organisation by 2035 as provided for through the declaration of the climate emergency, will also continue to apply.

Key sustainability issues and opportunities for the Local Plan to address them

4.16 While the Local Plan Review is unlikely to influence the occurrence of extreme weather events, it can support the incorporation of appropriate adaptation measures through design. This may include tree planting and shelter in the public realm to allow local people to take refuge from the effects of extreme weather events.

4.17 The Council has an obligation to contribute to national carbon reduction targets through measures such as the generation of low carbon and renewable energy, encouraging energy efficiency measures in new and existing buildings and promoting travel by more sustainable modes. The new Local Plan can include updated policy to promote development that supports energy from low carbon and renewable sources. It can also require new developments to incorporate more energy efficient design and support travel by sustainable modes through the incorporation of appropriate infrastructure and by directing development to more sustainable locations.

4.18 The Local Plan Review is also unlikely to reduce the likelihood of fluvial flooding. However, alongside national policy, it is likely to present opportunities to locate development in sustainable locations that are less likely to be significantly impacted by flooding and to ensure it is designed to be flood resilient where appropriate.

IA objectives

- Reduce contributions to climate change.
 - Would the policy help to avoid, minimise and mitigate the effects of poor air quality?

- Would the policy give consideration to the impact of development on AQMAs in Breckland and the surrounding area?
- Would the policy encourage traffic management measures that contribute to reduced congestion?
- Would the policy encourage more active and sustainable transport modes that are less polluting (including by low / zero emissions vehicles)?
- Would the policy reduce the emissions of greenhouse gases?
- Would the policy lead to an increased proportion of energy needs being met from renewable sources?
- Would the policy incorporate sustainable design and construction into development?
- Would the policy provide roadside green infrastructure, particularly trees, which could help absorb carbon dioxide?
- Adapt and respond to the implications of a changing climate.
 - Would the policy minimise inappropriate development in areas prone to flood risk and areas prone to increasing flood risk elsewhere, taking into account the impacts of climate change?
 - Would the policy minimise flood risk by promoting the use of Sustainable Drainage Systems (SuDS) and flood resilient design?
 - Would the policy reduce the risk of damage to people, property and infrastructure from extreme weather events?
 - Would the policy ensure that buildings and public spaces are designed to respond to winter and summer temperatures, i.e. ventilation, shading and landscaping?

Chapter 5

Biodiversity and geodiversity

Policy context

5.1 The following section below presents the most relevant documents identified in the policy review for the purposes of the new Local Plan. The key targets emerging from the review are summarised below.

Biodiversity policy context

International

- Declaration on Forests and Land Use [\[See reference 145\]](#), published by United Nations in 2021
- 2030 Agenda for Sustainable Development [\[See reference 146\]](#), published by United Nations Department of Economic and Social Affairs in 2015
- International Convention on Biological Diversity [\[See reference 147\]](#), published by United Nations in 1992
- International Convention on Wetlands [\[See reference 148\]](#), published by UNESCO in 1976

National

- National Planning Policy Framework [\[See reference 149\]](#), published by Department for Levelling Up, Housing and Communities (DLUHC) in 2023

- 25 Year Environment Plan [\[See reference 150\]](#), published by Department for Environment, Food and Rural Affairs (DEFRA) in 2023
- Green Infrastructure Framework [\[See reference 151\]](#), published by Natural England in 2023
- Environment Act [\[See reference 152\]](#), published by HM Government in 2021
- The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations [\[See reference 153\]](#), published by HM Government in 2019
- Biodiversity Offsetting in England Green Paper [\[See reference 154\]](#), published by DEFRA in 2013
- England Biodiversity Strategy Climate Change Adaptation Principles [\[See reference 155\]](#), published by DEFRA in 2008
- Natural Environment and Rural Communities Act [\[See reference 156\]](#), published by HM Government in 2006

Sub-national

- Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy [\[See reference 157\]](#), published by Norfolk County Council in 2021
- Tree Planting and Resilience Strategy [\[See reference 158\]](#), published by Norfolk County Council in 2020
- Norfolk County Council's Environmental Policy [\[See reference 159\]](#), published by Norfolk County Council in 2019

5.2 As described in relation to the policy context for the earlier topics in this Scoping Report, the UN's Declaration on Sustainable Development (the 'Johannesburg Declaration') is of relevance to the Local Plan's approach to supporting sustainable development. As part of this approach the plan should support development that contributes to the protection, restoration and promotion of ecosystems and halting biodiversity loss.

5.3 As discussed earlier in this Scoping Report, the Environment Act 2021 sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. It also establishes the Office for Environmental Protection which will act as an impartial and objective body for the protection and improvement of the environment. The Act sets out legislation which covers local air quality management frameworks and the recall of motor vehicles.

5.4 A requirement of the NPPF's (2023) environmental objective is that the planning system should contribute to protecting and enhancing the natural environment including helping to improve biodiversity and using natural resources prudently. In support of this aim the framework states that Local Plans should "identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks" and should also "promote the conservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity."

5.5 In England, biodiversity net gain is becoming mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Developers must deliver a biodiversity net gain of 10%. This means a development will result in more or better quality natural habitat than there was before development.

5.6 The NPPF also requires that plans should take a strategic approach in terms of "maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries".

5.7 The 25 Year Environment Plan sets out government policy to help the natural world regain and retain good health. Key areas related to biodiversity are set out in the plan around which actions are to be focussed. These include:

- Recovering nature and enhancing the beauty of landscapes:

- Develop a Nature Recovery Network to protect and restore wildlife and provide opportunities to re-introduce species that have been lost from the countryside.
- Securing clean, healthy, productive and biologically diverse seas and oceans:
 - Achieve a good environmental status of the UK's seas while allowing marine industries to thrive and complete our economically coherent network of well-managed marine protected areas.
- Protecting and improving our global environment:
 - Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.
 - Support and protect international forests and sustainable agriculture.

5.8 The Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GI-RAMS) [See reference 160] sets out strategic mitigation in relation to potential recreational pressures on designated European sites arising from increased housing across the Norfolk area. It recommends that each authority within Norfolk:

- Commits to deliver enhanced GI with multiple benefits which is accessible locally to all Norfolk residents and tourists;
- Works flexibly and look beyond boundaries for strategic delivery of GI and RAMS measures at a range of levels;
- Commits to consulting conservation bodies regarding visitor engagement, seeking creative management options and acting on the results of monitoring;
- Delivers strategic and Local Plan policies in relation to new residential and tourist accommodation and work towards an aspirational target for enhanced GI within large scale developments;
- Secures developer contributions from all new residential development across Norfolk based on the evidenced tariff based approach, to make a

substantial contribution to mitigating adverse impacts arising from planned housing growth at Habitats sites

- Implements the key projects and priorities to encourage appropriate recreational behaviour in line with the GI-RAMS Action Plan.

5.9 Norfolk County Council's Environmental Policy takes as its starting point the Government's 25 Year Environment Plan and is structured to reflect the key environmental concerns embodied in that plan. The policy reflects the areas that the Council sees as key to protecting and maintaining the health of Norfolk's distinctive environment and its occupants. Key aims set out in the policy of most relevance to the topic area of biodiversity include:

- Using and managing land sustainably.
- Recovering nature and enhancing the beauty of landscapes.
- Securing clean, healthy, productive and biologically diverse seas and oceans.
- Protecting and improving our global environment.

5.10 Work is presently being undertaken on the Norfolk County Local Nature Recovery Strategy as required by the Environment Act 2021. The preparation of similar strategies across the country will eventually result in a national Nature Recovery Network being identified. The strategy in Norfolk will aim to identify opportunities and priorities for nature restoration and will consist of:

- A habitat map showing where valuable areas for nature are currently located.
- A statement of biodiversity priorities - a locally-agreed list of priority areas where new and improved habitats would bring the most benefit.
- A map of locations and actions showing where and how habitats can be created and connected, and how the wider environment and economy can benefit.

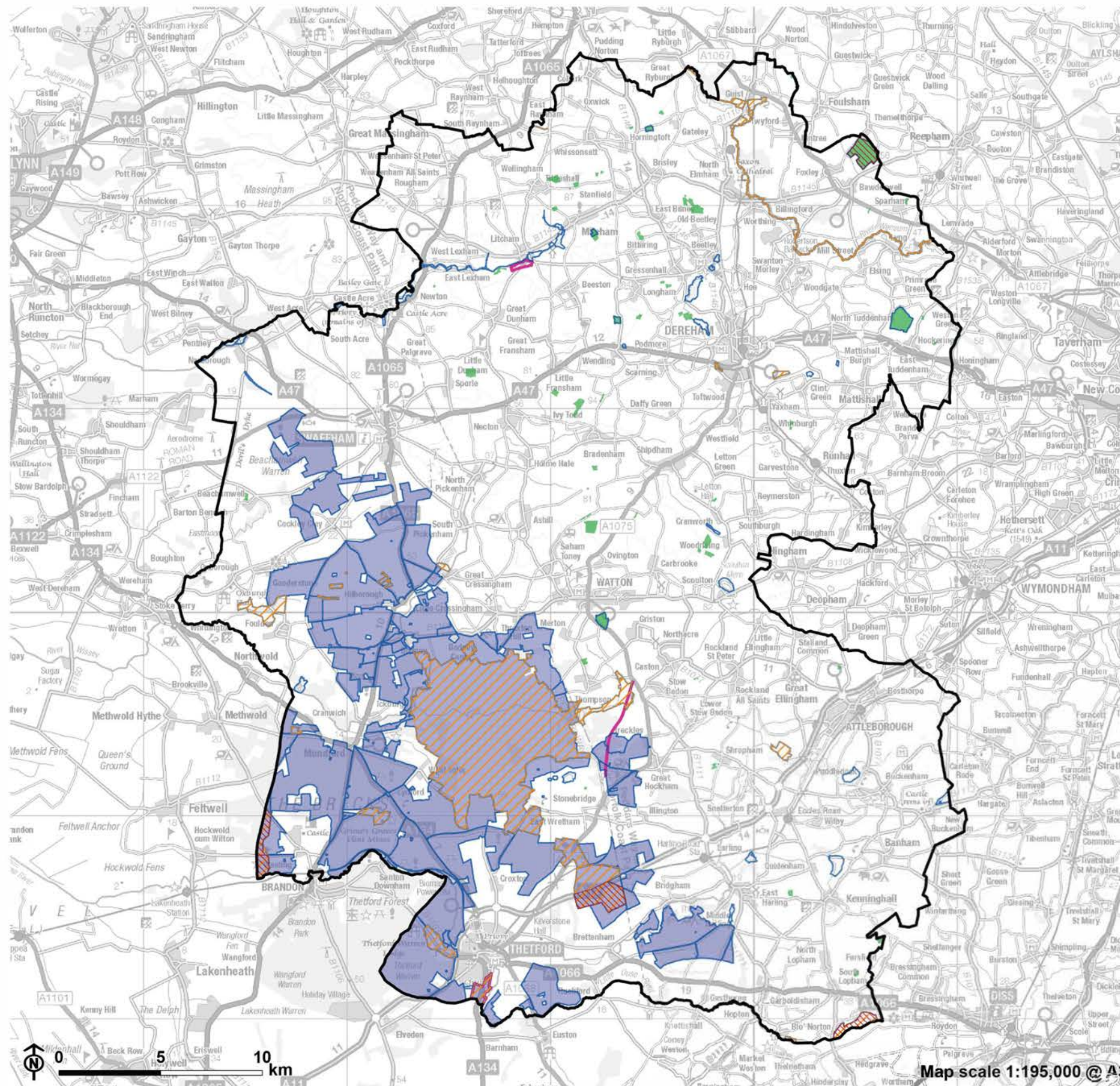
Baseline information

5.11 Breckland District contains one SPA (Breckland), four SACs (Breckland, Norfolk Valley Fens, River Wensum, and Waveney and Little Ouse Valley Fens), one Ramsar site (Redgrave and South Lopham Fens) and 52 Sites of Special Scientific Interest (SSSI). It also contains four National Nature Reserves (NNR) and three Local Nature Reserves (LNR). There are 80 areas of ancient woodland in the District, 42 of which are ancient and semi-natural woodland sites and 38 of which are ancient, replanted woodland sites. **Figure 5.1** illustrates the location and extent of the designated biodiversity sites in Breckland District.

5.12 Designated sites for conservation cover 40% of Breckland's land area. The District contains 13% of the SSSIs in the East of England [\[See reference 161\]](#). Many of the designated sites in Breckland comprise entirely heathland or contain a substantial heathland element.

5.13 As shown in **Figure 5.2**, as of 2018 the majority of SSSIs within Breckland were either within a favourable condition, or if they were in an unfavourable condition, they were recovering. The percentage of SSSIs in a favourable condition remained fairly static between 2014 and 2018.

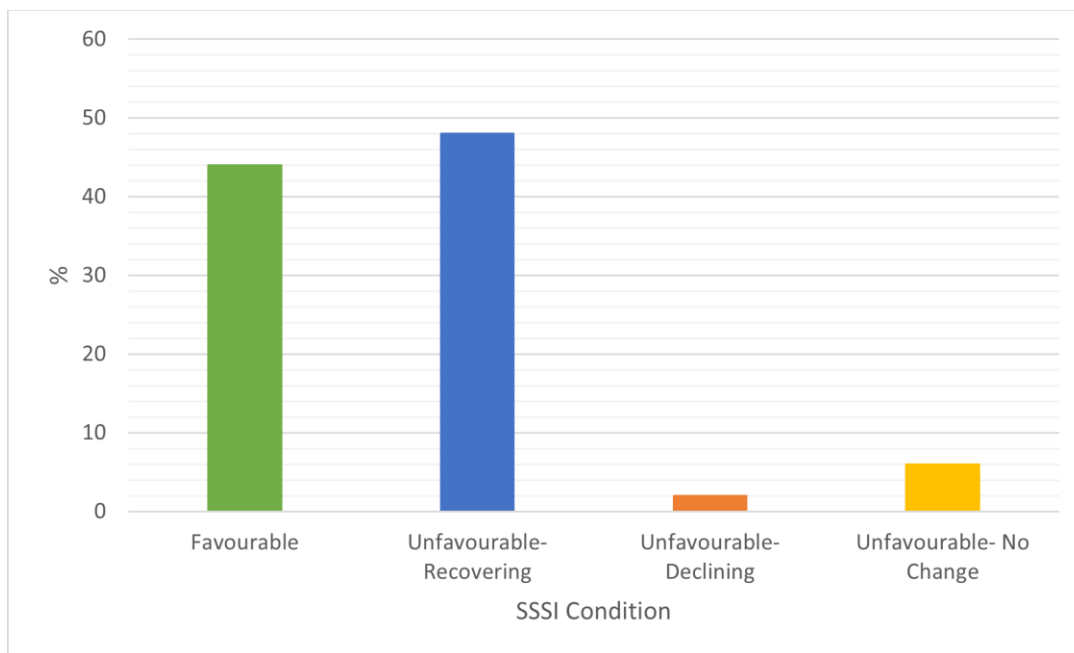
Figure 5.1: Natural environment in Breckland



- Breckland District
- Special Area of Conservation
- Special Protection Area
- Site of Special Scientific Interest
- National Nature Reserve
- Local Nature Reserve
- Ancient Woodland

Figure 5.2: Condition of SSSIs in Breckland (2018)

[See reference 162]



5.14 Breckland is home to over 120 nationally rare and threatened plant species. Due to the specific climate found in Breckland, many of these species are only found within the District. The area has therefore received international recognition as an Important Plant Area (IPA) [See reference 163].

5.15 The Securing Biodiversity in Breckland report [See reference 164] highlighted that Breckland is of major importance for biodiversity within the UK, identifying that in the Breckland National Character Area:

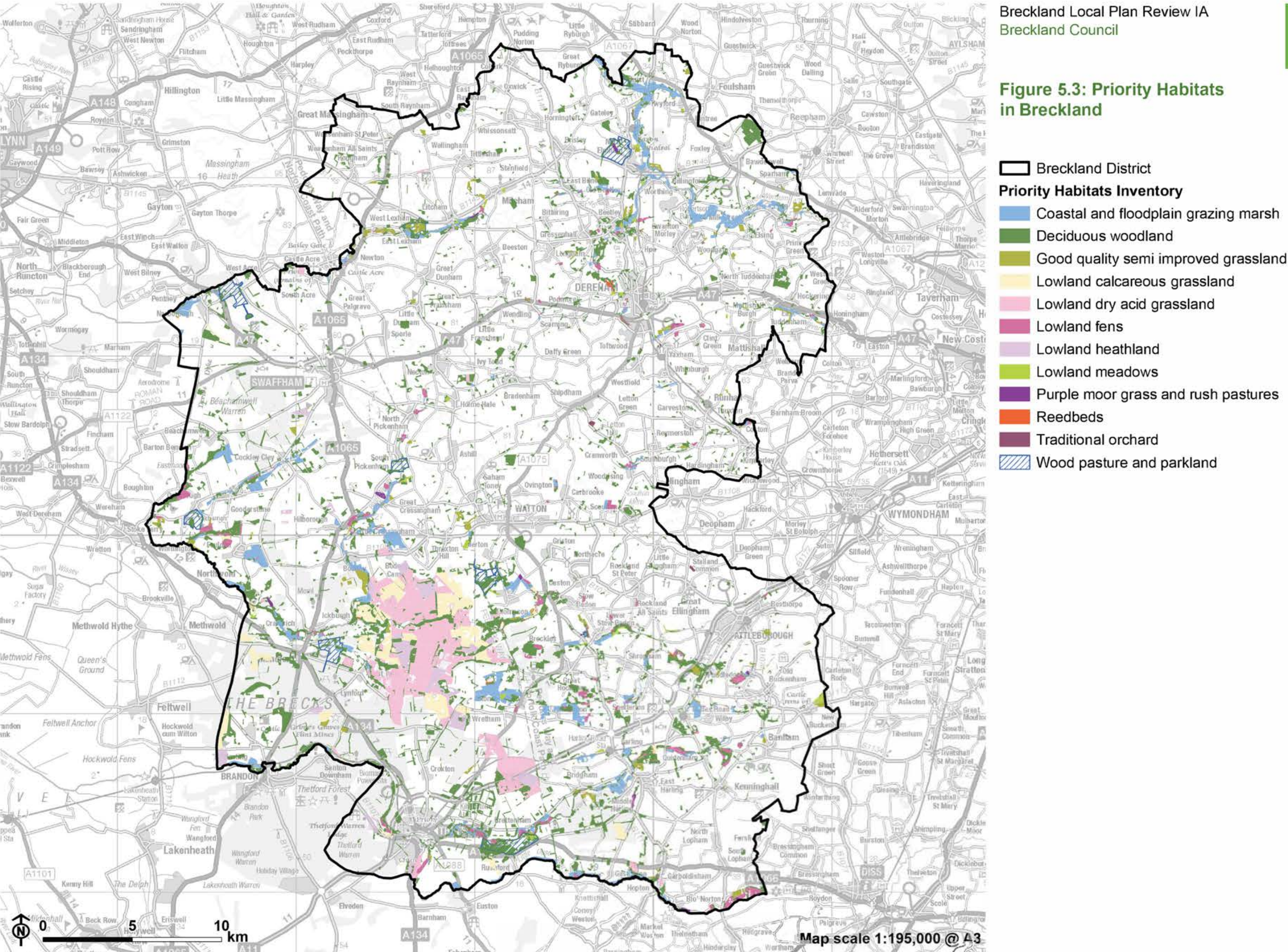
- At least 12,845 species have been recorded from Breckland.
- Of these, 2,149 are priority species for conservation in Breckland.
- 28% of all the priority BAP species in the UK occur in Breckland.
- 72 species have their UK distribution restricted to or have a primary stronghold in Breckland.

5.16 The report also concluded that there have been worrying extinctions and recent declines in some priority species in Breckland. In some instances the remaining habitat is fragmented, species are isolated in small sites and the landscape is hostile to the pattern of dispersal that has resulted. Climate change and nitrogen deposition are also both severe threats to species. The report identified that in the Breckland NCA:

- 15 species previously recorded in Breckland are believed to be extinct in the UK or England
- A further 25 species are thought to have been lost from the region (locally extirpated) although they persist elsewhere in the UK.
- For seven well monitored vascular plant taxa restricted to Breckland, more than half of the populations (54%) have been lost (since 1985).

5.17 Figure 5.3 shows priority habitats within Breckland.

Figure 5.3: Priority Habitats in Breckland



Future baseline and likely evolution without the Local Plan

5.18 At UK level, the publication of the State of Nature Report [\[See reference 165\]](#) provides an overview of the health of the country's wildlife and how human impacts are driving sweeping changes in the UK. It considers 50 years of monitoring to see how nature has changed since the 1970s. At the national level during this period, there has been a reported 13% decline in the average abundance of wildlife in the UK, with key drivers for change being agricultural productivity, climate change and increasing average temperatures, urbanisation and hydrological changes. The report finds that on average, metrics suggest that decline in species abundance and distribution of species has continued in the UK throughout the most recent decade. While Breckland is noted to be important for biodiversity, given its support for nationally rare species and the location of a number of nationally and internationally important sites within its boundaries, the trend of declining biodiversity is also reported at the local level. These trends are likely to continue in the absence of concerted action given the need for growth in the District. The Environment Act 2021 will, however, help address habitat loss and fragmentation through biodiversity net gain.

5.19 Even without the Local Plan Review, some important habitats and biodiversity sites will continue to receive statutory protection. However, without the Local Plan Review it is possible that development could be sited inappropriately and adversely impact biodiversity sites.

Key sustainability issues and opportunities for the Local Plan to address them

5.20 Analysis of the baseline information has enabled a number of key sustainability issues facing Breckland to be identified. These are outlined below, in addition to the opportunities the Local Plan presents to address them.

- Biodiversity decline – just as reported at the national level there have been recent declines in some priority species in Breckland.
- Habitat fragmentation – development continues to place pressures on habitat connectivity in Breckland.
- Species and habitats in Breckland continue to be threatened by climate change and nitrogen deposition.
- The District contains and is in close proximity to a wide variety of both designated and non-designated natural habitats and biodiversity. This includes a number of internationally designated biodiversity sites.

5.21 The Local Plan Review provides opportunities to incorporate updated policy to support the management, conservation and enhancement of biodiversity in connection with new development in Breckland. New policy also provides an opportunity to manage the sensitivities of biodiversity sites and networks, for example by locating development away from the most sensitive locations and providing for new green and blue infrastructure. There will also be opportunities for policy to support the achievement of biodiversity net gain at new development in line with the national policy approach and to support the achievement of the emerging Local Nature Recovery Strategy.

IA objectives

- Protect, conserve, enhance and expand biodiversity and promote and conserve geodiversity.

Chapter 5 Biodiversity and geodiversity

- Would the policy protect and enhance sites designated for their nature conservation interest?
- Would the policy protect and enhance the quality, diversity and connectivity of species, habitats and green infrastructure and avoid harm to protected species?
- Would the policy support the achievement of biodiversity net gain?
- Would the policy protect and enhance geodiversity?

Chapter 6

Air, land and water resources

Policy context

6.1 The following section presents the most relevant documents identified in the policy review for the purposes of the new Local Plan. The key targets emerging from the review are summarised below.

Air, land and water resources policy context

International

- 2030 Agenda for Sustainable Development [\[See reference 166\]](#), published by United Nations Department of Economic and Social Affairs in 2015
- Johannesburg Declaration on Sustainable Development [\[See reference 167\]](#), published by United Nations in 2002

National

- National Planning Policy Framework [\[See reference 168\]](#), published by Department for Levelling Up, Housing and Communities (DLUHC) in 2023
- National Planning Practice Guidance (PPG) [\[See reference 169\]](#), published by Department for Communities and Local Government in 2023
- The Air Quality Strategy for England [\[See reference 170\]](#), published by Department for Environment, Food and Rural Affairs in 2023

- 25 Year Environment Plan [\[See reference 171\]](#), published by Department for Environment, Food and Rural Affairs in 2023
- The waste prevention programme for England: Maximising Resources, Minimising Waste [\[See reference 172\]](#), published by Department for Environment, Food and Rural Affairs in 2023
- The Environment Act 2021 [\[See reference 173\]](#), published by HM Government in 2021
- Waste Management Plan for England [\[See reference 174\]](#), published by Department for Environment, Food and Rural Affairs in 2021
- The Waste (Circular Economy) (Amendment) Regulations [\[See reference 175\]](#), published by HM Government in 2020
- Clean Air Strategy 2019 [\[See reference 176\]](#), published by Department for Energy Security and Net Zero in 2019
- The Water Environment Regulations [\[See reference 177\]](#), published by HM Government in 2017
- UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations [\[See reference 178\]](#), published by Department for Environment Food and Rural Affairs and Department for Transport in 2017
- The Water Supply (Water Quality) Regulations [\[See reference 179\]](#), published by HM Government in 2016
- National Planning Policy for Waste (NPPW) [\[See reference 180\]](#), published by Department for Communities and Local Government in 2014
- Safeguarding our Soils – A Strategy for England [\[See reference 181\]](#), published by Department for Environment, Food and Rural Affairs in 2009
- Future Water: The Government’s Water Strategy for England [\[See reference 182\]](#), published by HM Government in 2008
- The Air Quality Strategy for England, Scotland, Wales and Northern Ireland [\[See reference 183\]](#), published by Department for Environment Food and Rural Affairs in 2007

Sub-national

- Norfolk Climate Strategy 2023 [\[See reference 184\]](#), published by NCC in 2023
- Norfolk Minerals and Waste Local Plan Publication [\[See reference 185\]](#), published by NCC in 2022
- Norfolk Strategic Infrastructure Delivery Plan 2022 [\[See reference 186\]](#), published by NCC in 2022
- Norfolk Local Transport Plan 4 Strategy 2021-2036 [\[See reference 187\]](#), published by NCC in 2021

6.2 As described in relation to the policy context for the earlier topics in this Scoping Report, the UN's Declaration on Sustainable Development (the 'Johannesburg Declaration') is of relevance to the Local Plan's approach to supporting sustainable development. As part of this approach the plan should support development that contributes to responsible use of land resources, as well as the protection of air and water quality and water resources. These processes should form part of the approach of protecting the health and wellbeing of residents in Breckland and its surroundings.

6.3 The new Local Plan will need to have regard to the NPPF, which states that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued soil and the economic and other benefits of the best and most versatile agricultural land. Policies should also prevent new and existing development from "contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution."

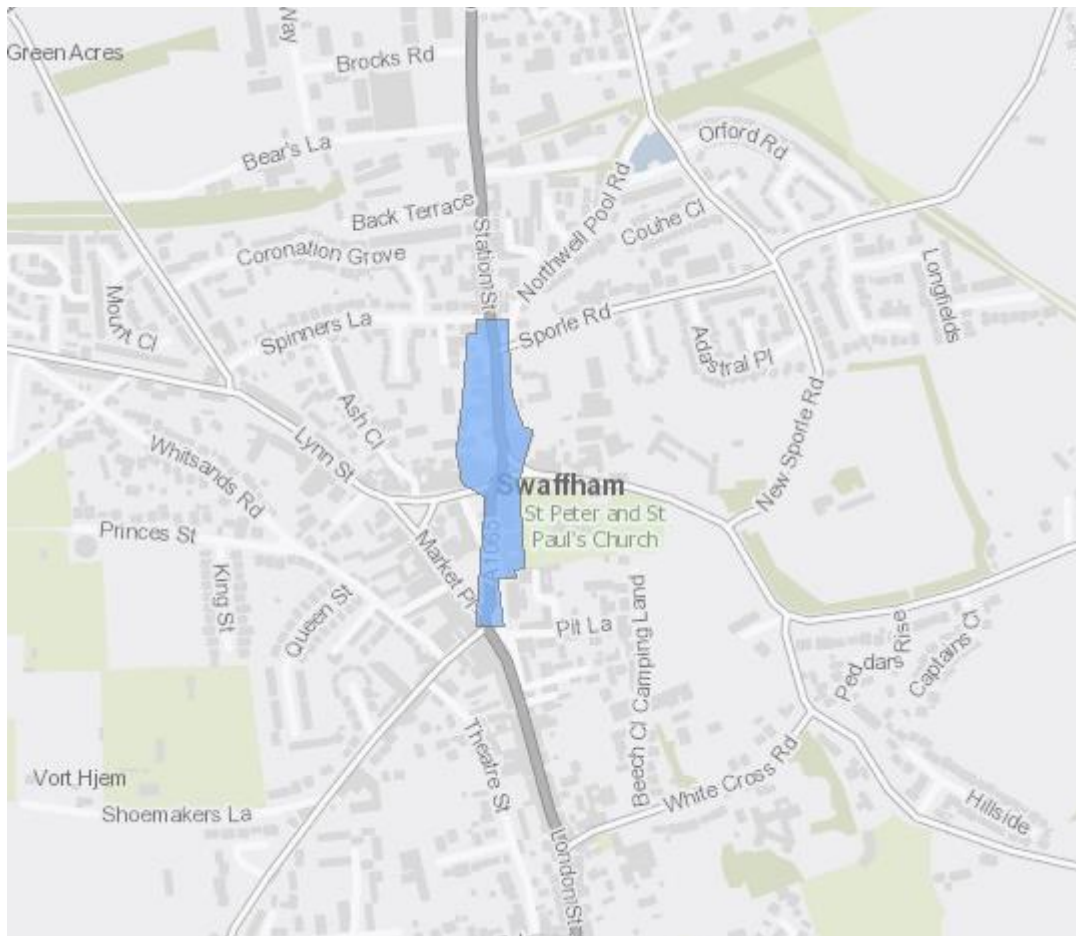
6.4 The framework also states that strategic policies should set out a clear strategy to meet local needs in a way that makes as much use as possible of previously developed or 'brownfield' land. Furthermore, policies should "support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land".

6.5 The National Planning Practice Guidance provides guidance on how planning can take account of the impact of new development on air quality. It also sets out advice about how planning can help to ensure water quality and the delivery of adequate water and wastewater infrastructure. Guidance is included which addresses mineral extraction and the related application process.

Air quality

6.6 The town of Swaffham in Breckland faces challenges with air quality due to traffic congestion along the A1065, a key route for both local traffic and traffic travelling towards and out of North Norfolk. The resulting elevated concentrations of Nitrogen Dioxide (NO₂) prompted the declaration of an Air Quality Management Area (AQMA) in Swaffham in May 2017 (see **Figure 6.1**). There have been no exceedances within the AQMA since its declaration in 2017. The Council is actively monitoring air quality at this location and is considering options to enhance the town centre transport network in collaboration with Norfolk County Council. It is also assessing the need for further improvements within the designated AQMA [\[See reference 188\]](#).

Figure 6.1: AQMA in Breckland District [See reference 189]

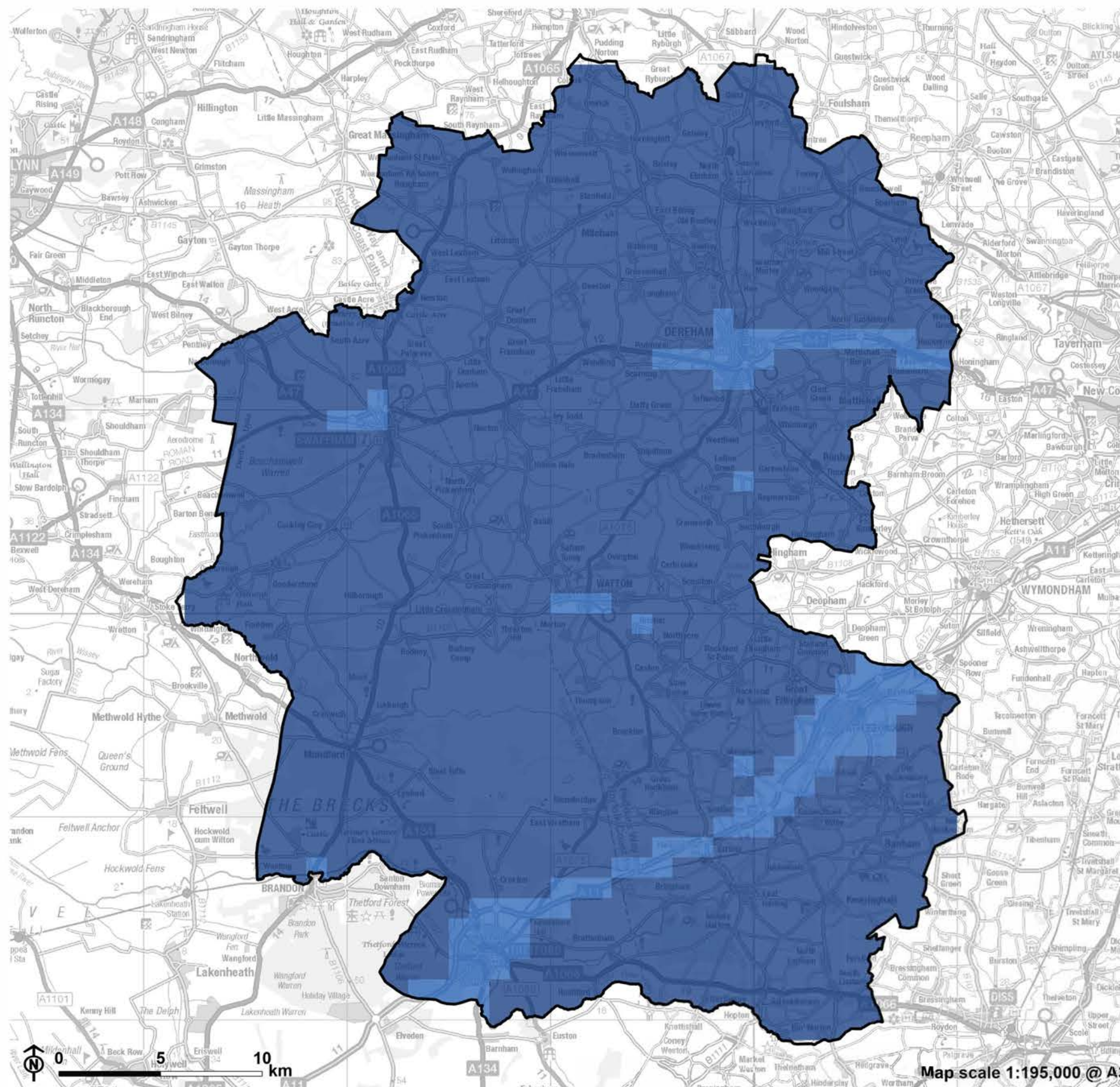


6.7 While NO₂ concentrations have generally remained below the annual mean Air Quality objective of 40µg/m³ within the 28 monitoring sites in Breckland, ongoing efforts include an Air Quality Action Plan (AQAP) initiated in 2018. The AQAP prioritises improvements in traffic flow, proposing actions like removing traffic lights at specific junctions, promoting public transport use, and reviewing car parking enforcement and the town centre one-way system. Progress has been made in the installation of infrastructure that may help to promote improved air quality, such electric vehicle charging points including fast charging points. The first private vehicle electric taxi licences introduced in Breckland have been operational since 2021.

6.8 **Figure 6.2** and **Figure 6.3** show areas of highest concentrations of NO_x in Breckland in 2018 and projected to 2030 [reference 190 and reference 191].

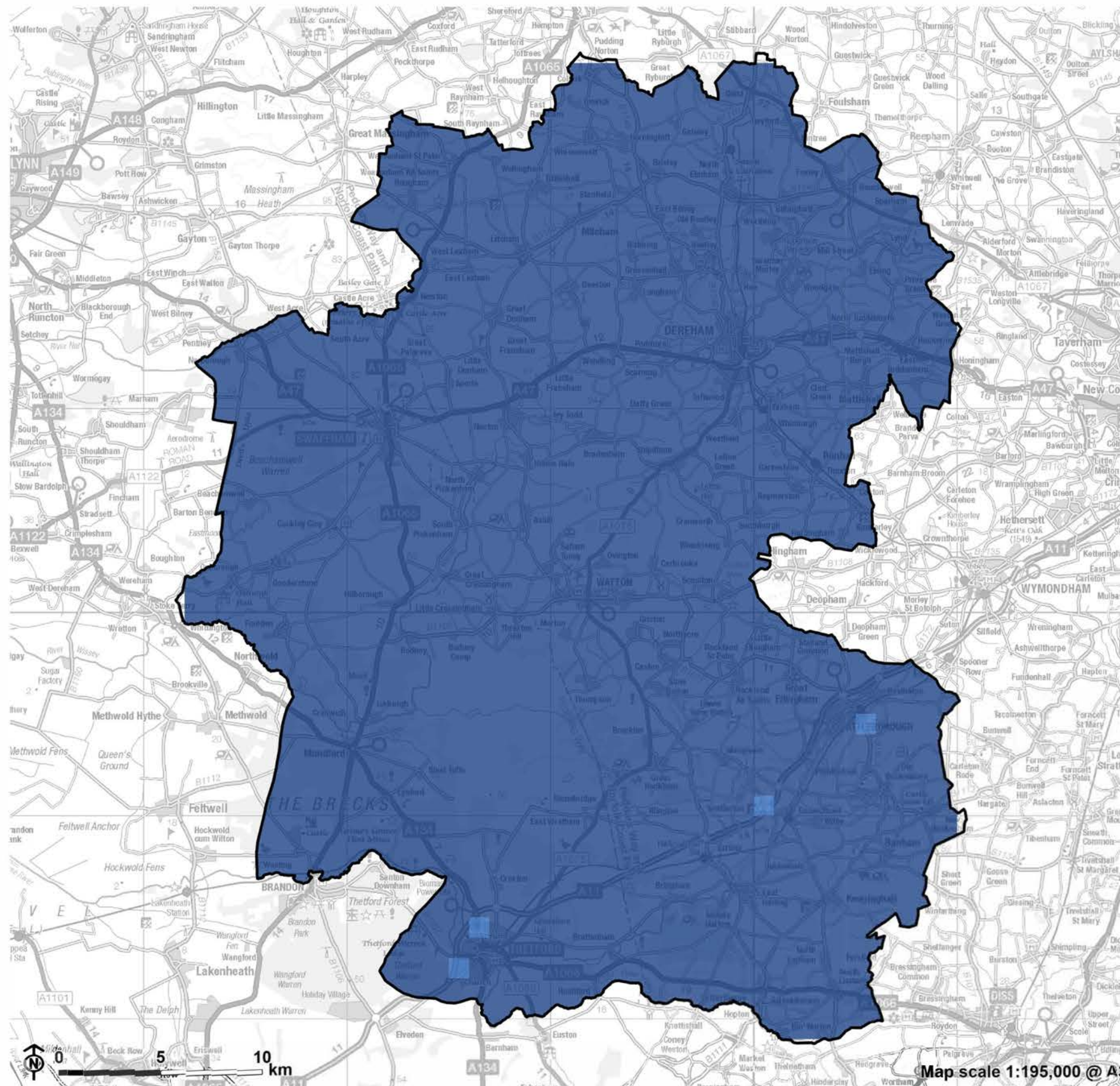
Areas of highest concentrations of NO_x in 2018 were along the A11, along the A47 towards Swaffham and Dereham and along the B1108 towards Watton

Figure 6.2: Breckland air pollution baseline – NO_x (2018)



□ Breckland District
NO_x 2018
µg m⁻³
≤10
11 - 20

Figure 6.3: Breckland air pollution
projected future baseline – NO_x (2030)



□ Breckland District
NO_x projected future baseline (2030)
µg m⁻³
■ ≤10
■ 11 - 20

6.9 In 2021, at monitoring site East Wretham (BRE01), data capture was high at 99.1%, and the measured annual mean PM₁₀ concentration was 13 µg/m³, significantly below the PM₁₀ objectives for the annual mean and the lowest in the past five years. No daily mean exceedances of 50µg/m³ were recorded within the site in 2021. Although there is no monitoring of PM_{2.5} within Breckland District Council, the concentration was estimated using a nationally derived correction ratio of 0.7 applied to the PM₁₀ concentration of 13 µg/m³ at the automatic monitoring site. The estimated PM_{2.5} concentration in 2021 at the site was 9.1 µg/m³, below the obligatory air quality objective of 25 µg/m³ (see **Figure 6.4** and **Figure 6.5**) [\[reference 192\]](#).

Figure 6.4: Breckland air pollution baseline – PM10 (2018)

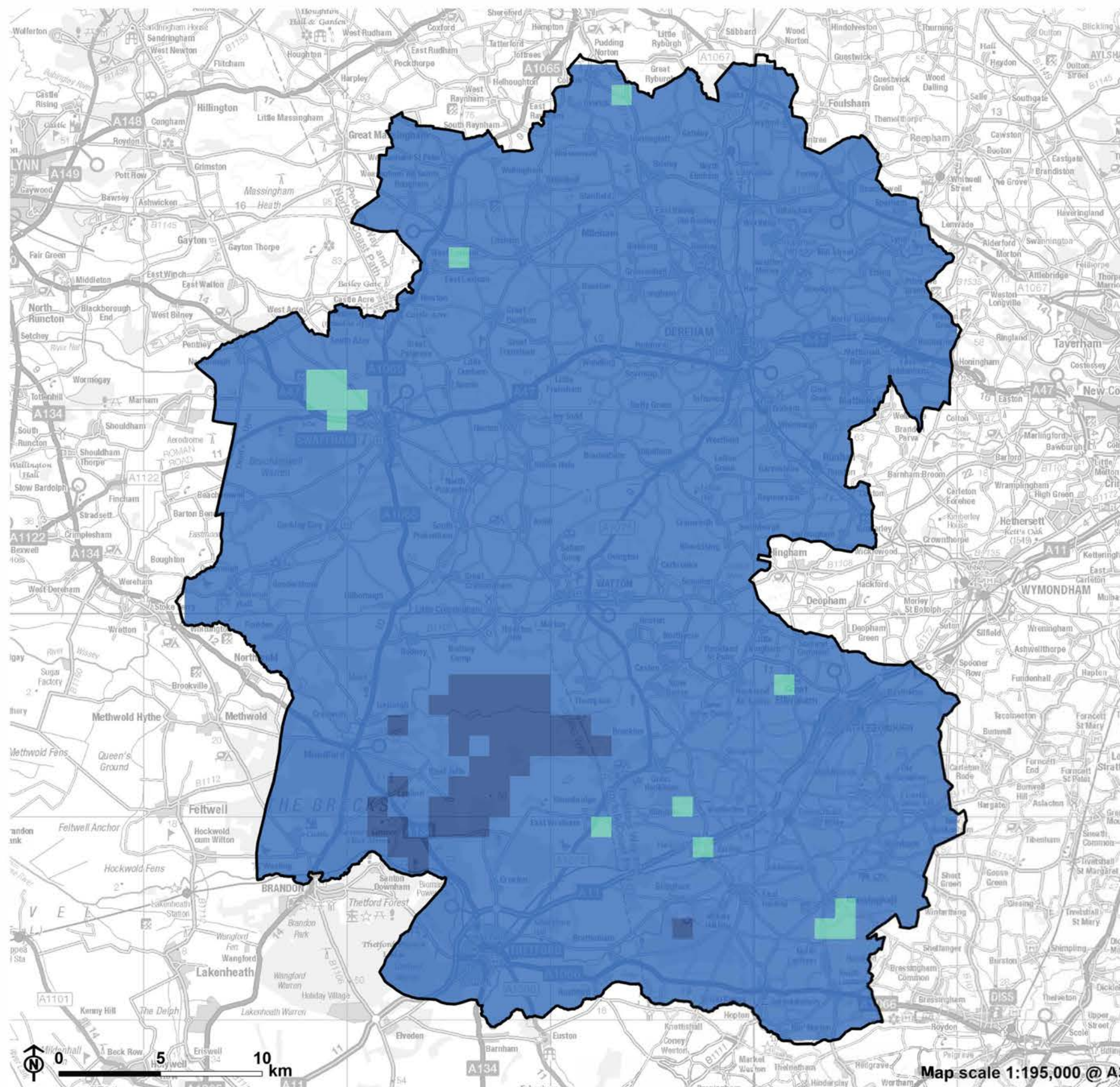
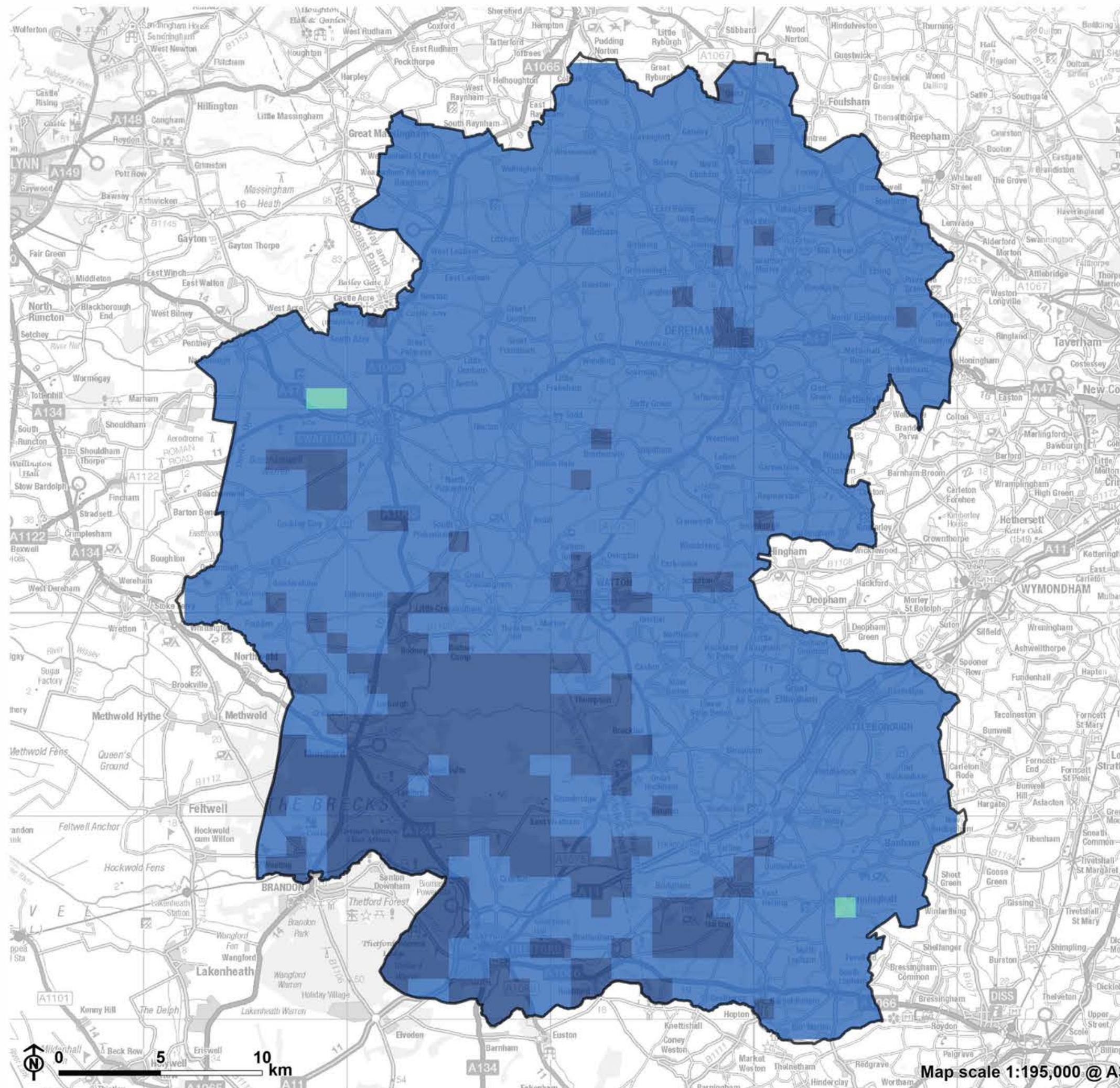


Figure 6.5: Breckland air pollution projected future baseline – PM10 (2030)



□ Breckland District

PM10 projected future baseline (2030)

µg m⁻³

■ ≤13

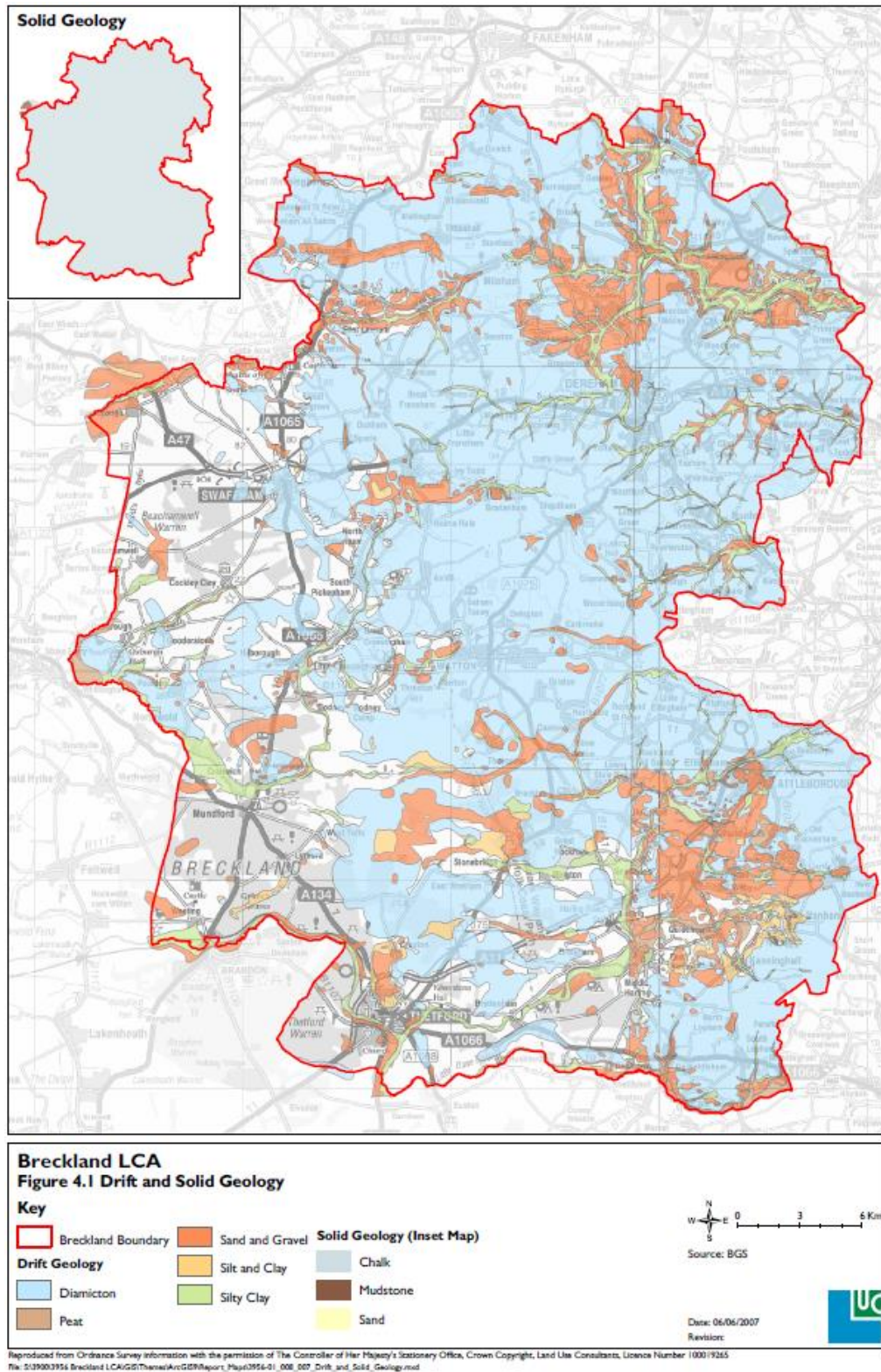
■ 14 - 17

■ 18 - 20

Geology and minerals

6.10 The underlying bedrock of the entire District is chalk, which was deposited during the Cretaceous period between 144 and 65 million years ago. In Breckland, the overlying drift deposits of chalky boulder clay, sand, diamicton and alluvium contribute to local variation within the landscape (**Figure 6.6**).

Figure 6.6: Breckland Landscape Character Assessment (LCA)
 [See reference 193]



6.11 There are six Mineral Safeguarding Areas within Breckland, in the Norfolk Minerals and Waste Local Plan. Areas for sand and gravel and chalk deposits are safeguarded by the Minerals and Waste Local Plan.

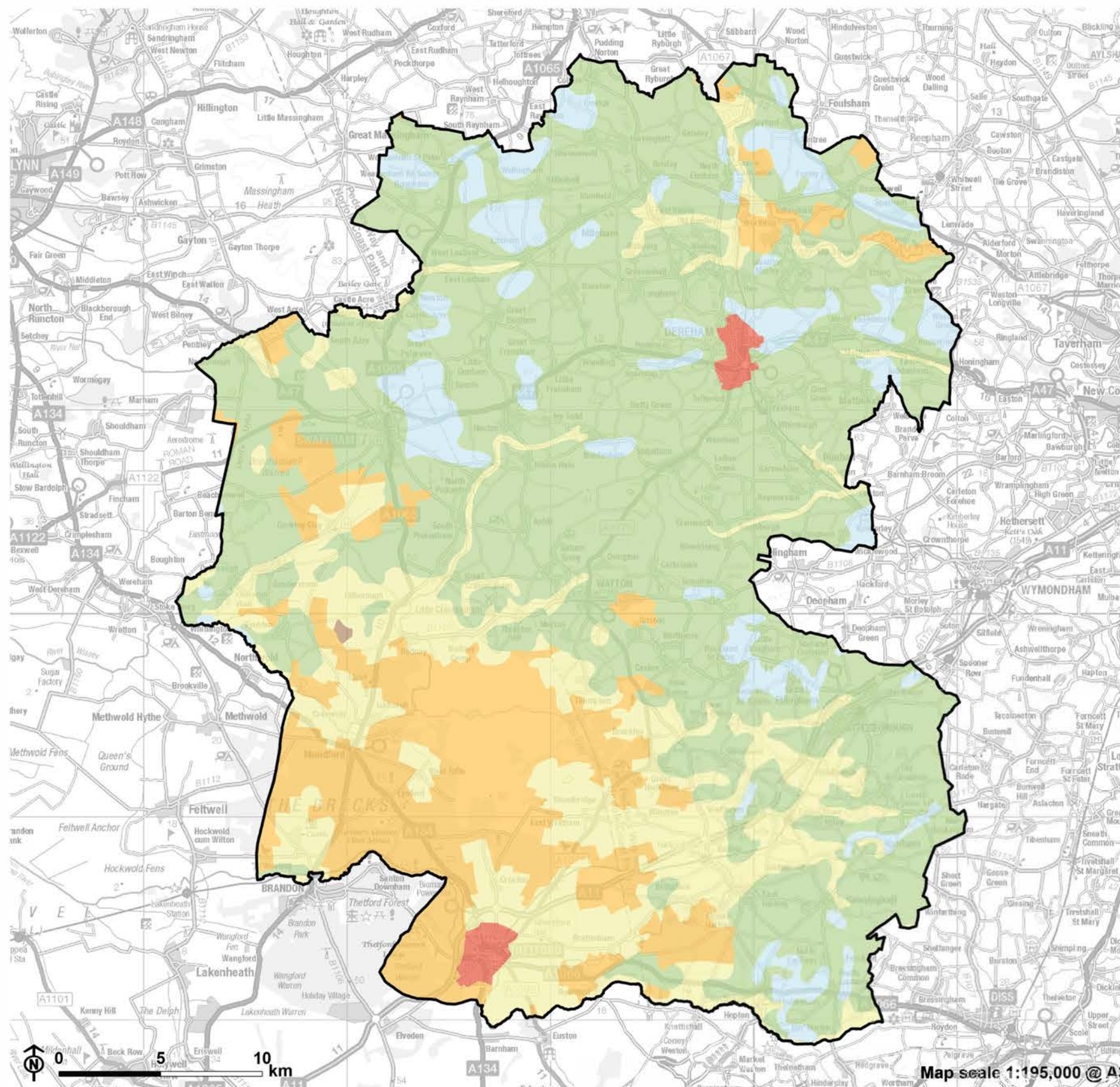
Soils

6.12 The Agricultural Land Classification (ALC) system classifies agricultural land in five categories according to versatility and suitability for growing crops. As shown in **Figure 6.7**, Breckland District contains a large amount of productive agricultural land:

- The majority of land in Breckland District is Grade 3 (i.e. good to moderate agricultural quality land).
- There are small areas of the higher quality Grade 2 agricultural quality land, with the majority towards the north and east of the District.

6.13 Land around the main settlements at Thetford and Dereham is classified as 'urban'. A number of areas around the market towns comprise 'non-agricultural' and 'poor' quality land.

Figure 6.7: Breckland Agricultural Land Classification



- Breckland District
Agricultural Land Classification
 Grade 2 (very good)
 Grade 3 (good to moderate)
 Grade 4 (poor)
 Grade 5 (very poor)
 Non agricultural
 Urban

Contaminated land

6.14 In accordance with Section 78R of the Environmental Protection Act 1990, the Council is required to maintain a public register of contaminated land, which serves as a permanent record of all regulatory action undertaken to ensure remediation of any site that has been classified as contaminated. Due to the rural nature of the District, there are few contaminated sites in Breckland. There are currently no contaminated sites on the Contaminated Land Register [\[See reference 194\]](#).

Waste

6.15 Sixteen waste management sites within the District are identified in the Norfolk Minerals and Waste Local Plan [\[See reference 195\]](#).

6.16 In 2021, Breckland Council collected 55,324 tonnes of waste, 99% of which was from households. The amount of waste collected in Breckland has increased by 8% (from 51,253 tonnes) since 2018/19. In the same year, 21,240 tonnes of household waste were recycled – a rate of 38%, this is an increase of 11% (from 19,075 tonnes) since 2018/19 [\[See reference 196\]](#).

6.17 There are presently four household waste recycling centres in Breckland, all with full recycling and reuse facilities and facilities for the disposal of household waste. These centres are located at Thetford, Snetterton, Ashill and Dereham [\[See reference 197\]](#).

Water

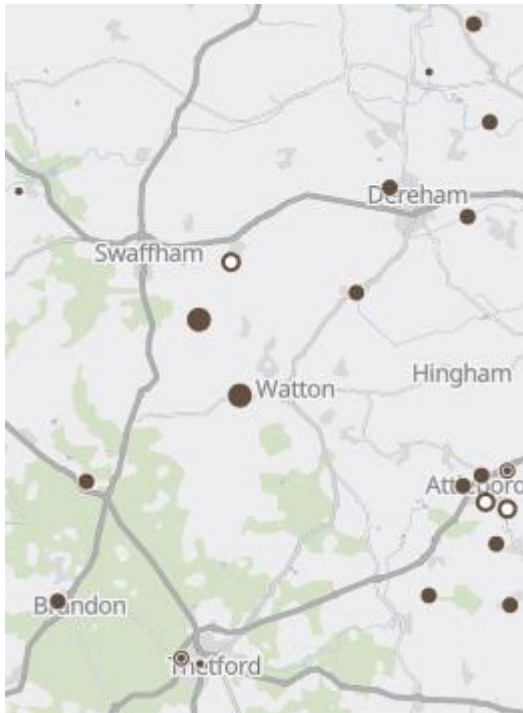
6.18 The Water Framework Directive, transposed by the Water Framework Regulations, aims to achieve high or good status for surface water by 2027. The

main catchment areas in Breckland are Little Ouse and Thet Operational Catchment, Wissey Operational Catchment, and Wensum Operational Catchment. The majority of water bodies within the catchment areas were of 'moderate' ecological status in 2019. The chemical status of the waterbodies was 'fail'. Reasons for not achieving 'good' ecological and chemical status are largely related to contamination from poor nutrient management and land drainage from agriculture and rural land management, and sewage discharge from water industry [\[See reference 198\]](#).



6.19 Anglian Water is responsible for water supply and sewerage in Breckland District and across the East of England, which includes East Anglia. East Anglia as a whole has been identified as the most water-stressed region in the country and has the lowest average rainfall in the UK. Some residents in Breckland depend on private water supplies that may come from a variety of sources including wells and boreholes which Breckland Council is responsible for monitoring.

6.20 The Rivers Trust has produced a map of sewerage network discharges and overflows of untreated sewage and storm water in England which was last updated in 2022. In 2022, water companies discharged raw sewage into rivers and coastal waters in England 372,533 times, a slight reduction on the previous year [\[See reference 199\]](#). Monitoring was carried out in 2022 at 19 of the 22 storm overflows in Breckland District, which recorded 145 spills for a total duration of 522 hours. These incidents contributed to pollution within the District's waterways. It is uncertain whether the situation is improving or deteriorating as monitoring of storm overflows is not consistent (see **Figure 6.8**).

Figure 6.8: Rivers Trust map of sewerage network discharges and overflows of untreated sewage and storm water in Breckland in 2022 [See reference 200]



6.21 Source Protection Zones (SPZs) are defined around large and public potable groundwater abstraction sites, and they provide additional protection to safeguard drinking water quality by constraining the proximity of activities that can impact the quality of drinking water. The location of the SPZs are shown alongside the main watercourses in the District in **Figure 6.9** and **Figure 6.10**.

 Breckland District
 Watercourses and waterbodies

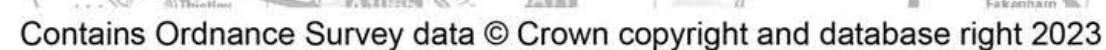
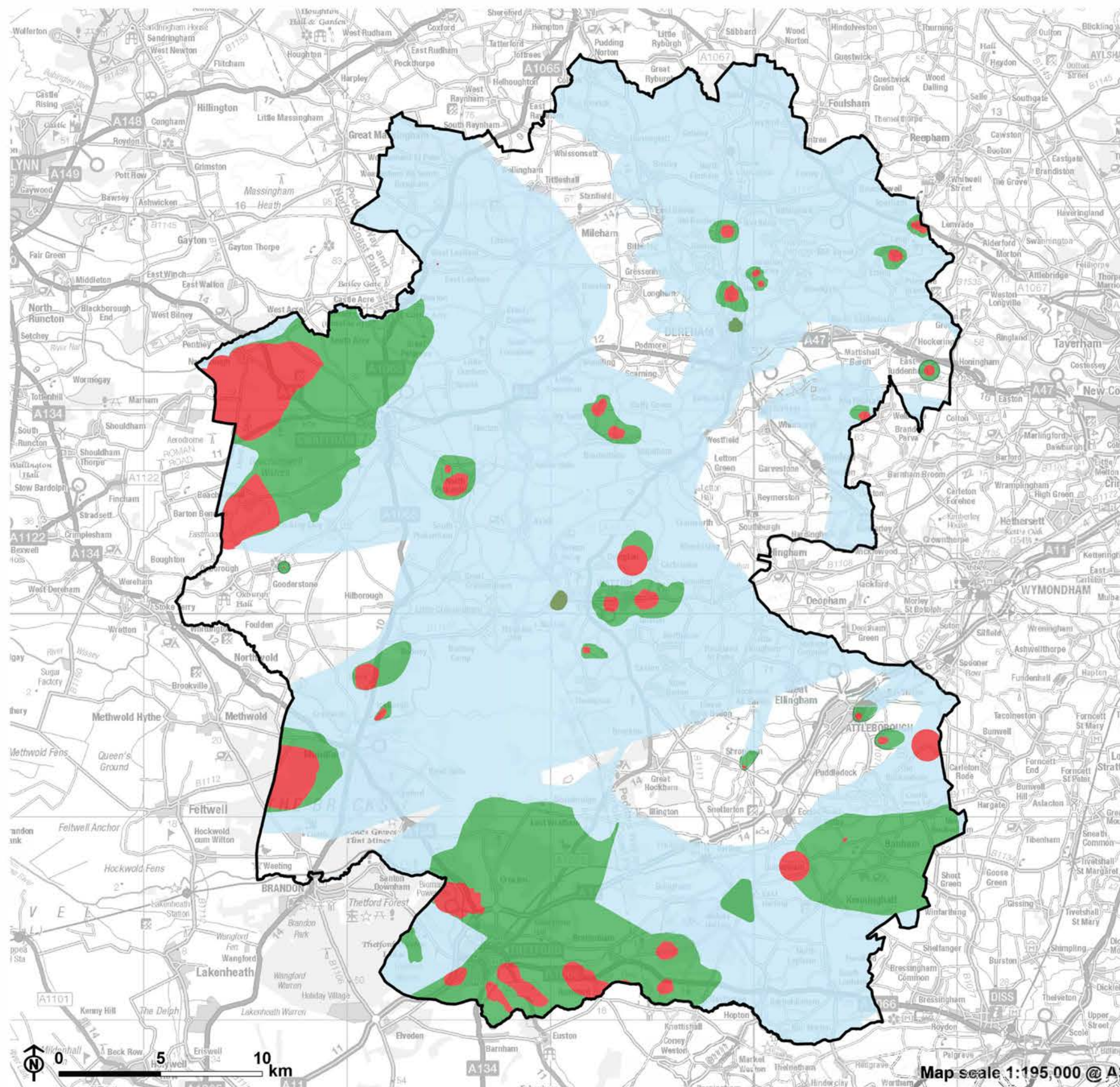


Figure 6.10: Source Protection Zones in Breckland



Future baseline and likely evolution without the Local Plan

6.22 Breckland has an AQMA that is focussed along the A1065 within Swaffham, which has been designated because this area exceeds the annual mean Air Quality Strategy objective for NO₂, caused primarily by road traffic emissions. How air quality will change in the absence of a Local Plan Review is partly unknown, given that the District accommodates a high volume of through traffic. However, without the new Local Plan, development in Breckland is less likely to be directed to the most sustainable locations. This approach is considered unlikely to greatly reduce dependency on travel by car and limit the potential for improvements in air quality within the AQMA and at other locations in the District. There is also potential for new development to have impacts on air quality within AQMAs in neighbouring authorities. This reflects the connections between the District and Norwich and King's Lynn, both of which contain land that is designated as AQMAs. Further to this, the Government's commitment to ban the sale of all new petrol and diesel cars by 2035 and the subsequent increase in electric vehicles, could help reduce air pollution.

6.23 The District contains a mix of classified agricultural land, the majority being of Grade 3, with small areas of Grade 2 present, which, where possible, should not be lost or compromised by future growth. Some water bodies in Maidstone are failing to meet the Water Framework Directive objective of 'good' status. Without the new Local Plan there is greater potential for development to come forward in locations that could compromise the higher value agricultural soils in the District as well as its safeguarded mineral resources. This approach to development is also more likely to result in detrimental impacts on water quality within the District's waterbodies.

6.24 In terms of how waste arisings are managed, recent trends are predicted to continue; with increases in total waste collected. Recycling trends since 2018/19 suggest the recycling rates will continue to increase. These projections

are also highly dependent on other variables, including population growth, implementation of large regeneration and infrastructure projects, and the amount of waste that is imported from outside the District.

6.25 The District contains water bodies that do not meet 'Good' status. Pollution sources responsible for this include transport drainage and wastewater discharged. Without the Local Plan, it is possible that unplanned development could be in areas that could lead to further water quality issues and risks to the natural environment. However, existing safeguards such as the Water Framework Directive would help to reduce the potential for this to occur. Without the Local Plan, it is likely that East Anglian will continue to be seriously water stressed.

Key sustainability issues and opportunities for the Local Plan to address them

6.26 Analysis of the baseline information has enabled a number of key sustainability issues facing Breckland to be identified. These are outlined below, in addition to the opportunities the Local Plan presents to address them.

- Dependence on the private car and traffic congestion contribute to air pollution.
- Part of the town of Swaffham lies within an AQMA.
- Breckland contains areas of higher value Grade 2 and 3 agricultural land.
- There are six Mineral Safeguarding Areas designated within Breckland.
- Recycling rates were approximately 38% in 2021, which is lower than both the 2020 national target of 50% and the average recycling rate in England of 45%.
- The majority of water bodies within the catchment area are failing to reach 'good' ecological and chemical status.

- Breckland is one of the driest areas in the England and is in the most water stressed region of the country.

6.27 Recent national policies and the emergence of new technologies are likely to improve air pollution, for example, through cleaner fuels/energy sources. Alongside these advancements the Local Plan Review provides an opportunity to contribute to improved air quality in the District through the sustainable siting of development and the promotion of alternative travel modes to the motorised vehicle, in line with national policy aspirations. The Local Plan Review provides further opportunity to ensure that higher value agricultural soils are not lost or compromised, by prioritising development at brownfield sites and at those which comprise lower quality soils. The spatial strategy for the new Local Plan also provides an opportunity to affirm an approach that would help to limit development that results in the loss of access to or sterilisation of mineral resources in Breckland. Additionally, the Local Plan Review provides an opportunity to require developments to use low environmental impact products in design and construction and ensure sufficient land is available in appropriate locations for waste management facilities. The Local Plan Review will also provide the opportunity to ensure that development is located and designed to take into account the sensitivity of the water environment. New development over the plan period will also need to be considerate of existing pressures on wastewater infrastructure and the potential for supporting any new infrastructure needed.

IA objectives

- Reduce localised air pollution **[See reference 201]**.
 - Would the policy help to avoid, minimise and mitigate the effects of poor air quality?
 - Would the policy give consideration to the impact of development on AQMAs in Breckland and the surrounding area?
 - Would the policy encourage traffic management measures that contribute to reduced congestion?

- Would the policy encourage more active and sustainable transport modes that are less polluting (including by low / zero emissions vehicles)?
- Would the policy lead to an increased proportion of energy needs being met from renewable sources?
- Would the policy incorporate sustainable design and construction into development?
- Would the policy provide roadside green infrastructure, particularly trees, which could help absorb carbon dioxide?
- Conserve and protect land and soil, minimise the loss of agricultural land, whilst reducing land contamination.
 - Would the policy use land that has been previously developed?
 - Would the policy use land efficiently?
 - Would the policy protect and enhance the best and most versatile agricultural land?
 - Would the policy bring contaminated land back into effective use?
- Minimise the production of waste and encourage the recycling/reuse of onsite resources.
 - Would the policy reduce the levels of waste going to landfill, including through increasing levels of waste going to composting and/or recycling?
 - Would the policy promote the use of locally and sustainably sourced, and recycling of materials in construction and renovation?
- Limit water consumption to the capacity of natural processes and storage systems, ensure the sustainable reuse of water to accommodate growth and maintain and enhance water quality.
 - Would the policy help to reduce water consumption and promote more efficient use of water?

- Would the policy seek to avoid deterioration and where possible improve the water quality of the District's rivers and groundwater resources?
- Would the policy minimise inappropriate development in Source Protection Zones?
- Would the policy ensure there is sufficient wastewater treatment capacity to accommodate the new development?

Chapter 7

Landscape and townscape

Policy context

7.1 The following section presents the most relevant documents identified in the policy review for the purposes of the new Local Plan. The key targets emerging from the review are summarised below.

Landscape and townscape policy context

International

- The European Landscape Convention [\[See reference 202\]](#), published by Council of Europe in 2000

National

- National Planning Policy Framework [\[See reference 203\]](#), published by Department for Levelling Up, Housing and Communities (DLUHC) in 2023
- 25 Year Environment Plan [\[See reference 204\]](#), published by Department for Environment, Food and Rural Affairs (DEFRA) in 2023
- The Environment Act 2021 [\[See reference 205\]](#), published by HM Government in 2021
- Countryside and Rights of Way Act 2010 [\[See reference 206\]](#), published by HM Government in 2010
- National Parks and Access to the Countryside Act 1949 [\[See reference 207\]](#), published by HM Government in 1949

Sub-national

- Tree Planting and Resilience Strategy [\[See reference 208\]](#), published by Norfolk County Council in 2020
- Norfolk County Council's Environmental Policy [\[See reference 209\]](#), published by Norfolk County Council in 2019

7.2 At the international level, the new Local Plan should have regard to the European Landscape Convention which seeks to promote landscape protection, management and planning. The Convention's focus extends beyond those landscapes which might be considered to be of outstanding value and sets out the value of living landscapes.

7.3 The NPPF (2023) includes as part of its overarching objective of protecting the natural environment, recognition for the value of landscape. Planning policies are required by the framework to recognise the intrinsic character and beauty of the countryside, and the wider benefits to be secured from natural capital. Great weight is to be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty (AONB). As part of the approach to achieving well-designed places the NPPF states that planning policies and decisions should ensure that developments "are sympathetic to local character and history, including the surrounding built environment and landscape setting".

7.4 Improving the beauty of nature is included as one of the environmental goals set out in the 25 Year Environment Plan. The plan seeks to enhance beauty, heritage, and engagement with the natural environment and to ensure that people can enjoy the country's landscapes and beauty.

7.5 Norfolk County Council's Environmental Policy takes as its starting point the Government's 25 Year Environment Plan and is structured to reflect the key environmental concerns embodied in that plan. As discussed in relation to the biodiversity topic area earlier in this Scoping Report, the policy reflects the areas that the Council sees as key to protecting and maintaining the health of Norfolk's distinctive environment and its occupants. The recovery of nature and

enhancement of the beauty of landscapes is included as one of the key aims for the policy.

Baseline information

7.6 Breckland District is located in the East of England, forming part of the County of Norfolk, covering approximately 131,000 hectares. Thetford, Dereham, Swaffham, Watton and Attleborough are the principal towns in the District, together with a wide range of other settlements including the large villages of Necton, Swanton Morley, East Harling and Shipdham **[See reference 210]**.

7.7 Breckland is a lowland rural landscape comprising a simple, large scale mosaic of mixed and coniferous plantations, arable agriculture and lowland heathland, crossed by a series of broad, shallow river valleys with associated floodplains and grazing pastures. These river landscapes form part of a gently undulating ridge and valley landform, with tributaries associated with transitional landform and arable farming, and more elevated farmed plateaux to the ridges **[See reference 211]**.

7.8 The Breckland District Landscape Character Assessment identifies six Landscape Types within Breckland District:

- River Valleys
- Settled Tributary Farmland
- Brecks Plantation
- The Brecks Heathland with Plantation
- Plateau Farmland
- Chalk River Valley

7.9 The landscape of Breckland falls within three National Character Areas (NCS). These are:

- NCA 83: South Norfolk and High Suffolk Claylands' [\[See reference 212\]](#)
- NCA 84: Mid Norfolk [\[See reference 213\]](#)
- NCA 85: The Brecks [\[See reference 214\]](#)

7.10 Most land in Breckland falls within NCA 85: The Brecks. The area is characterised by underlying chalk geology which has produced a low, gently undulating plateau, largely covered with sandy soils of glacial origin. The Brecks lies between the more fertile, and more wooded, clayland plateau to the north, east and south, and the level drained peat and silt fens to the west, which the main rivers, the Little Ouse, Wissey and Lark, drain into [\[See reference 215\]](#).

Future baseline and likely evolution without the Local Plan

7.11 The District is predominantly rural in character. While there are no landscapes designated as having special importance in the national context, the Brecks landscape, is recognised to be a regionally significant green infrastructure asset. The existing rural landscapes of the District which provide setting for heritage assets and the District's settlements are likely to be impacted upon as development is provided over the plan period to meet identified needs.

Key sustainability issues and opportunities for the Local Plan to address them

- The District contains a number of nationally distinct landscape character areas that could be harmed by inappropriate development. Threats to these NCAs include:
 - Recreational pressure - Increased use of the forest and heathland areas for recreation.

- Pressure from development – including from new housing and infrastructure developments such as transport improvements.
- Negative impact of farming methods on farmland habitats.
- Harm to trees.
- Need for restoration and re-creation of heathland.

7.12 The Local Plan Review provides opportunities to ensure that the variation in landscape character is taken into account in the design and siting of development to support its long term protection and enhancement.

IA objectives

- Maintain, enhance and preserve the distinctiveness, diversity and quality of the landscape and townscape.
- Would the policy maintain and enhance the character and setting of settlements?
- Would the policy enhance the quality of public realm and open spaces?
- Would the policy encourage high quality design principles to respect local character?

Chapter 8

Historic environment

Policy context

8.1 The following section presents the most relevant documents identified in the policy review for the purposes of the new Local Plan. The key targets emerging from the review are summarised below.

Historic environment policy context

International

- Valletta Treaty [\[See reference 216\]](#), published by Council of Europe in 1992
- European Convention for the Protection of the Architectural Heritage of Europe [\[See reference 217\]](#), published by Council of Europe in 1985
- UNESCO World Heritage Convention [\[See reference 218\]](#), published by UNESCO in 1972

National

- National Planning Policy Framework [\[See reference 219\]](#), published by Department for Levelling Up, Housing and Communities (DLUHC) in 2023
- The Heritage Statement 2017 [\[See reference 220\]](#), published by HM Government in 2017

- Sustainability Appraisal and Strategic Environmental Assessment, Historic England Advice Note 8 [\[See reference 221\]](#), published by Historic England in 2016
- The Government's Statement on the Historic Environment for England 2010 [\[See reference 222\]](#), published by HM Government in 2010
- Planning (Listed Buildings and Conservation Areas) Act 1990 [\[See reference 223\]](#), published by HM Government in 1990
- Ancient Monuments and Archaeological Areas Act 1979 [\[See reference 224\]](#), published by HM Government in 1979
- Historic Buildings and Ancient Monuments Act 1953 [\[See reference 225\]](#), published by HM Government in 1953

8.2 At the international level, the new Local Plan should have regard to the Valletta Treaty which sets out that the conservation and enhancement of archaeological heritage is one of the goals of urban and regional planning policy. The European Convention for the Protection of the Architectural Heritage of Europe defines 'architectural heritage' and requires that the signatories maintain an inventory of it and take statutory measures to ensure its protection. Furthermore, conservation policies should be integrated into planning systems and other spheres of government influence. The UNESCO World Heritage Convention promotes co-operation among nations to protect heritage around the world that is of such outstanding universal value that its conservation is important for current and future generations.

8.3 The new Local Plan will need to have regard to the NPPF which sets out as part of its environmental objective the protection and enhancement of the built and historic environment. The framework also states that plans should include a positive strategy for "the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay and other threats." Such a strategy is required to take into consideration the desirability of sustaining and enhancing the significance of heritage assets and bringing them into viable use as well as the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring.

8.4 The Government's Heritage Statement describes out how it will support the heritage sector and help to protect and care for heritage and the historic environment. The document notes the potential to maximise the economic and social impact of heritage so that more people can enjoy and benefit from it.

8.5 Legislation for the grating for building works, most notably in relation to Listed Buildings and Conservation Areas is provided for in the Planning (Listed Buildings and Conservation Areas) Act 1990. The Act introduced special controls for the demolition, alteration or extension of buildings, objects or structures of particular architectural or historic interest, as well as Conservation Areas.

Baseline information

8.6 Breckland is fortunate to possess a rich and diverse architectural heritage, displaying the use of a wide range of materials, influenced greatly prior to industrialism by the geology and landscape of the District and its surroundings. The use of brick, flint, chalk, clay lump and timber framing for walling is common with thatch; clay tiles and, in later years following industrialism, slates for roofing **[See reference 226]**.

8.7 Breckland contains almost 1,600 Listed Buildings as well as 134 Scheduled Monuments and nine Registered Parks and Gardens **[See reference 227]**. **Figure 8.1** shows the heritage assets in Breckland.

8.8 Breckland has two Conservation Areas on the Heritage at Risk Register **[See reference 228]**; Dereham and Thetford. Both are in poor condition. Dereham is considered to have a deteriorating trend, while Thetford is deteriorating significantly.

8.9 Breckland has 11 building and structure entries, 13 place of worship entries and two archaeology entries on the Heritage at Risk Register. The following entries are recorded as being in 'very bad' condition **[See reference 229]**:

- Scheduled Monument, Ruins of St Andrew's Church, Roudham and Larling;
- Listed Building grade I, Church of All Saints, Stanford;
- Listed Place of Worship grade I, Church of St Mary, The Green, Beachamwell;
- Listed Place of Worship grade I, Church of St Nicholas, The Street, North Lopham; and
- Listed Place of Worship grade I, Church of St Mary, Mattishall Lane, North Tuddenham.

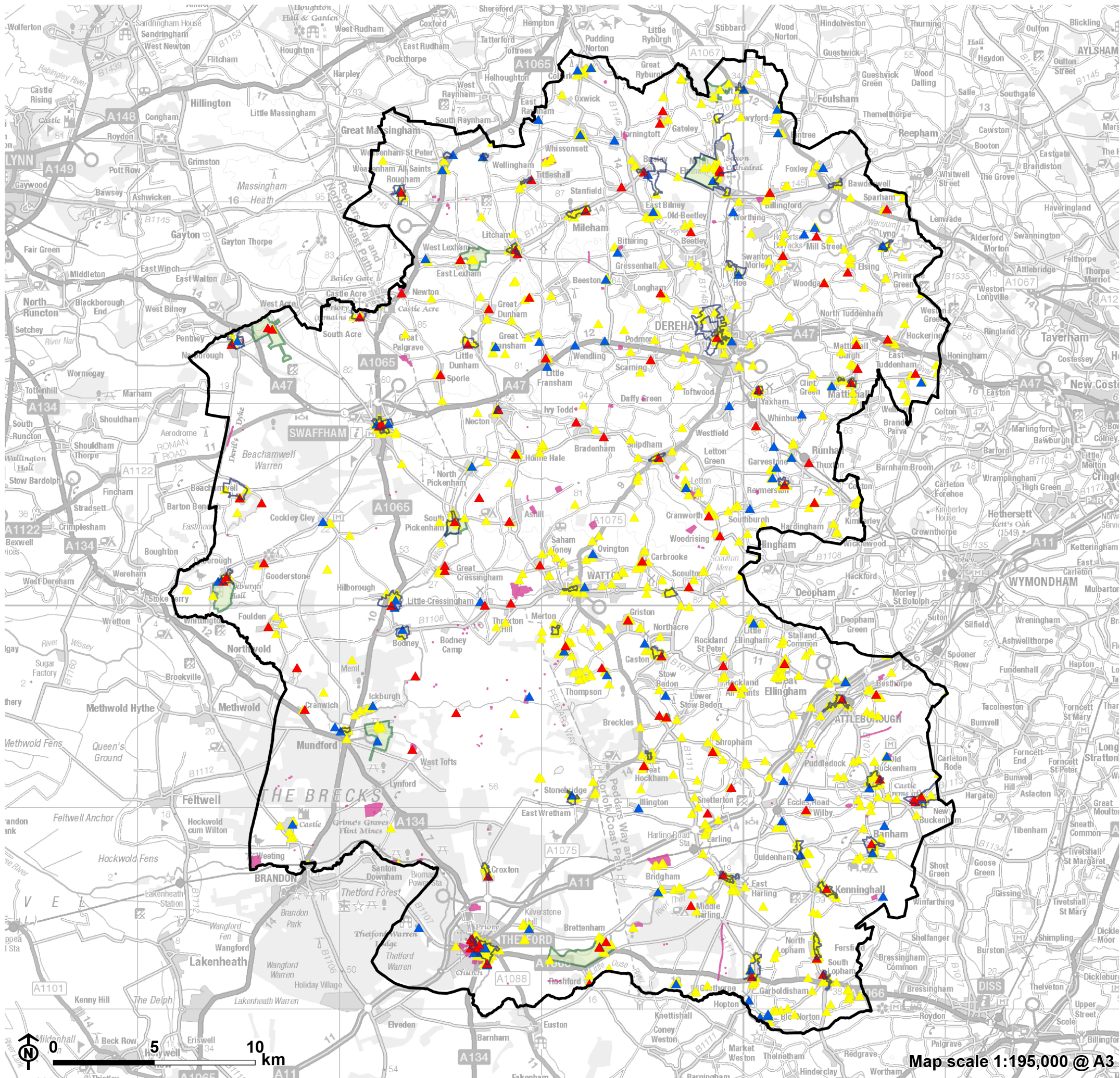


Figure 8.1: Historic environment in Breckland

- Breckland District
- Conservation Area
- Scheduled Monument
- Registered Park and Garden
- Listed building
 - Grade I
 - Grade II*
 - Grade II

Future baseline and likely evolution without the Local Plan

8.10 The historic environment is considered a finite resource. It cannot be replaced and is susceptible to decline over time as historic features experience degradation and decay. However, cultural heritage as a whole can evolve and change, and features which are not currently considered a valued part of the historic environment may become so in the future, either due to their uniqueness, past use, or historic or cultural significance.

8.11 New development and infrastructure and environmental pressures, such as extreme weather and flooding, present the greatest risk to cultural heritage assets in the District. The requirement for development and infrastructure and the likelihood for many environmental pressures are likely to continue regardless of whether or not the Local Plan Review progresses. The planning and listed buildings consent regime set out through national legislation will help to limit particularly adverse effects in relation to development that might otherwise affect heritage assets. However, without the new Local Plan development is more likely to come forward at locations of increased sensitivity for the historic environment.

8.12 Policies ENV 07 and 08 of the current Local Plan set out the approach for the conservation and enhancement of the significance of designated heritage assets (including their settings) and historic character, appearance and setting of non-designated historic assets.

Key sustainability issues and opportunities for the Local Plan to address them

8.13 Analysis of the baseline information has enabled a number of key sustainability issues facing Breckland to be identified. These are outlined below, in addition to the opportunities the Local Plan presents to address them.

- The District contains numerous heritage assets, some of which are identified as being in poor condition.
- Designated and undesignated heritage assets and areas of historical and cultural interest in Breckland could be adversely affected by poorly located and designed development and climate change.

8.14 The Local Plan Review provides an opportunity to update planning policy in the District to reflect changes in local circumstances and ensure the protection and enhancement of the District's historic assets (including their settings) from inappropriate development. New policy can also support improved accessibility to and interpretation of distinctive features of local heritage. There is potential for new policy to support vacant heritage assets being brought back into appropriate uses.

IA objectives

- Maintain, enhance and preserve the historic environment
 - Would the policy conserve and/or enhance the significance of heritage assets including any contribution made to their significance by setting?
 - Would the policy protect support the conservation, management and enhancement of the historic environment, particularly at-risk heritage assets?
 - Would the policy promote access to the local historic environment?

Chapter 9

Transport connections and travel habits

Policy context

9.1 The following section presents the most relevant documents identified in the policy review for the purposes of the new Local Plan. The key targets emerging from the review are summarised below.

Transport connections and travel habits policy context

International

- 2030 Agenda for Sustainable Development [\[See reference 230\]](#), published by United Nations Department of Economic and Social Affairs in 2015
- Johannesburg Declaration on Sustainable Development [\[See reference 231\]](#), published by United Nations in 2002

National

- National Planning Policy Framework [\[See reference 232\]](#), published by Department for Levelling Up, Housing and Communities (DLUHC) in 2023
- National Planning Practice Guidance (PPG) [\[See reference 233\]](#), published by Department for Communities and Local Government in 2023
- Future Of Transport: Supporting Rural Transport Innovation [\[See reference 234\]](#), published by Department for Transport in 2023

- Decarbonising Transport: Setting the Challenge [\[See reference 235\]](#), published by Department for Environment, Food and Rural Affairs in 2023
- The Cycling and Walking Investment Strategy Report to Parliament [\[See reference 236\]](#), published by Secretary for Transport in 2022
- Decarbonising Transport: A Better, Greener Britain [\[See reference 237\]](#), published by Department for Communities and Local Government in 2021
- The Environment Act 2021 [\[See reference 238\]](#), published by HM Government in 2021
- Transport Investment Strategy [\[See reference 239\]](#), published by Department for Transport in 2017
- Highways England Sustainable Development Strategy and Action Plan [\[See reference 240\]](#), published by Highways England in 2017
- The Road to Zero [\[See reference 241\]](#), published by Department For Transport in 2018

Sub-national

- Norfolk Climate Strategy 2023 [\[See reference 242\]](#), published by NCC in 2023
- Environmental Strategy and Delivery Plan 2023-2025 [\[See reference 243\]](#), published by South Norfolk and Broadland Council in 2023
- Norfolk Strategic Infrastructure Delivery Plan 2022 [\[See reference 244\]](#), published by NCC in 2022
- Net Zero 2030 Strategy and Climate Action Plan [\[See reference 245\]](#), published by North Norfolk District Council in 2021
- Norfolk Local Transport Plan 4 Strategy 2021-2036 [\[See reference 246\]](#), published by NCC in 2021

9.2 As described in relation to the policy context for the earlier topics in this Scoping Report, the UN's Declaration on Sustainable Development (the 'Johannesburg Declaration') is of relevance to the Local Plan's approach to

supporting sustainable development. As part of this approach the plan should support the delivery of required infrastructure including for transport and should help to reduce the need to travel by private vehicle.

9.3 The new Local Plan will need to have regard to the NPPF, which seeks to promote sustainable transport requiring that related issues should be considered from the earliest stages of plan-making. The framework requires that the planning system should “actively manage patterns of growth” in support of the objectives underpinning the promotion of sustainable transport and address the “potential impacts of development on transport networks”. The promotion of sustainable transport should seek to promote opportunities arising from existing or proposed transport infrastructure, along with changing transport technology. Furthermore, opportunities to promote walking, cycling and public transport use should be identified and pursued.

9.4 The framework states that planning policies should aspire to create "healthy, inclusive and safe places." This involves supporting a mix of uses across an area and focussing development at locations that can be made sustainable, to minimise the number and length of car journeys required.

9.5 Planning policies should also identify and protect sites and routes that could be critical for developing infrastructure to widen transport choices and facilitate large-scale development opportunities. Policies should also provide for well-designed walking and cycling networks, secure cycle parking, and large-scale transport facilities in the area.

9.6 The National Planning Practice Guidance offers guidance to local planning authorities on assessing and reflecting strategic transport needs in Local Plan making. It also provides advice on when Transport Assessments and Transport Statements will be required, outlining their essential contents.

Baseline information

9.7 Breckland is strategically positioned along two trunk road routes – the A47 and A11. The A47 connects Dereham and Swaffham (in Breckland) with Norwich in the east and King’s Lynn in the west, extending further to Peterborough and the A1(M). The A11 links Attleborough and Thetford (in Breckland) with Norwich and the Norwich Research Park to the northeast, and Newmarket, Cambridge, and the M11 in the south-west (**Figure 9.1**).

9.8 Thetford and Attleborough provide access to the national rail network with regular services to Norwich and Cambridge. These routes provide onward connections to London, the Midlands, and the north of England. Public transport services in the District primarily comprise buses, which allow for access between the market towns and shopping and employment destinations in Norwich, King’s Lynn, and Bury St. Edmunds. In rural areas, there are less frequent services linking villages with the nearest town. The connectivity varies from settlement to settlement, with more limited access in isolated areas [**See reference 247**].

 Breckland District

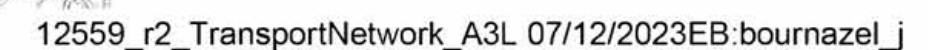
 Rail network

 National Cycle Network

Road

 A Road

 B Road



9.9 Given the rural nature and dispersed pattern of settlement, travel to work in the District is primarily by private car (**Figure 9.2**). No data is available about the breakdown of all journeys made in Breckland in terms of the modes used. However, the travel to work data available is considered to be representative of the situation for trips made in the District. The high rate of commuting to work by car, reflects the more rural nature of the District and the dependency of residents in more rural locations on higher order centres for access to jobs and services and facilities.

9.10 Travel to work data taken from Census 2021 (**Figure 9.2**) indicates that residents in Breckland walk for commuting purposes at a level that is comparable to the Norfolk level. 1.8% of residents in Breckland cycle for commuting purposes compared to 3.0% in Norfolk as a whole. The percentage of individuals who regularly work from home is 21.9% in Breckland, which is lower than the percentage for Norfolk (25.4%) and for England (31.5%). A relatively small proportion of residents (26.1%) in Breckland live within 10km of their place of work compared to 33% in Norfolk and 35.4% in England, which is reflective of the rural nature of the District (**Figure 9.3**).

Figure 9.2: Breckland and Norfolk method of travel to workplace [See reference 248], [See reference 249]

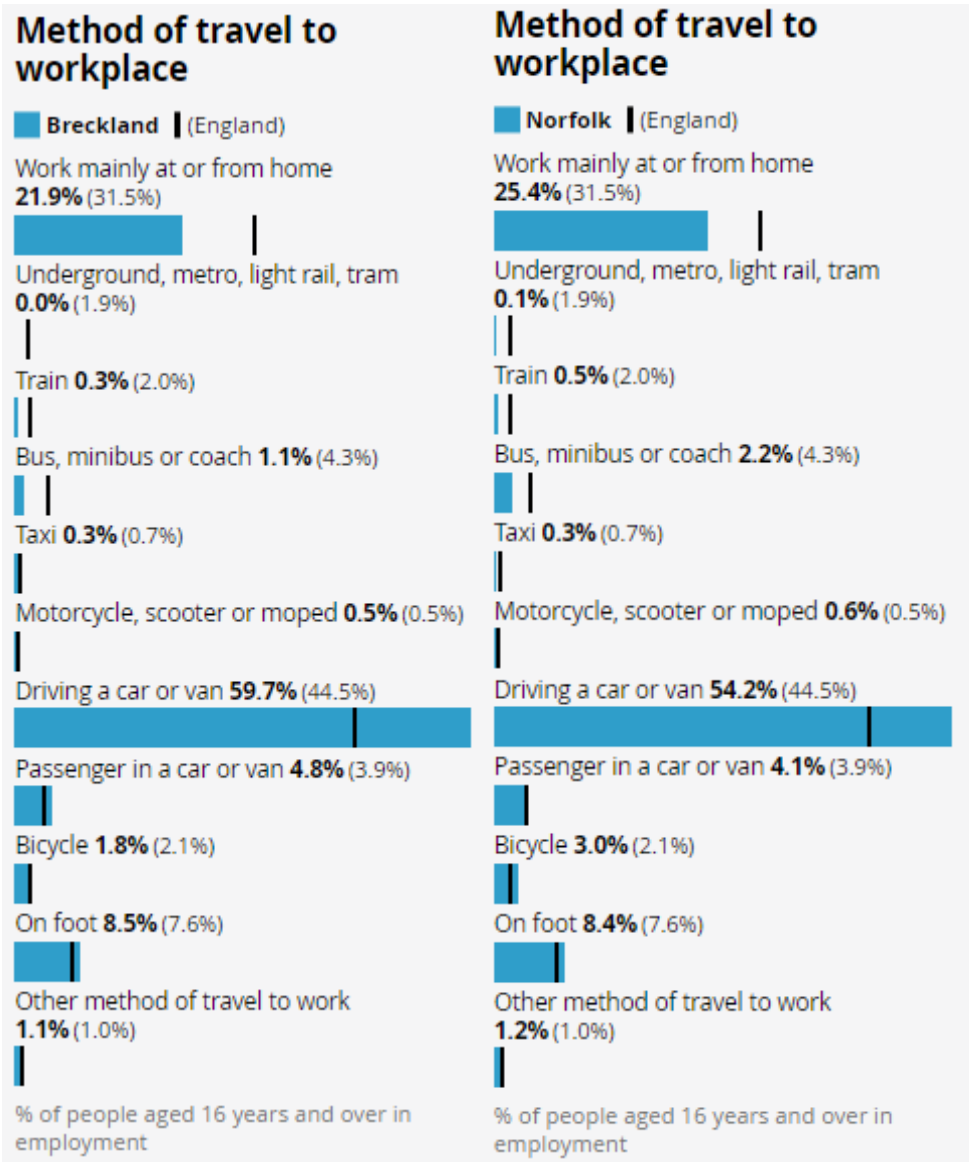
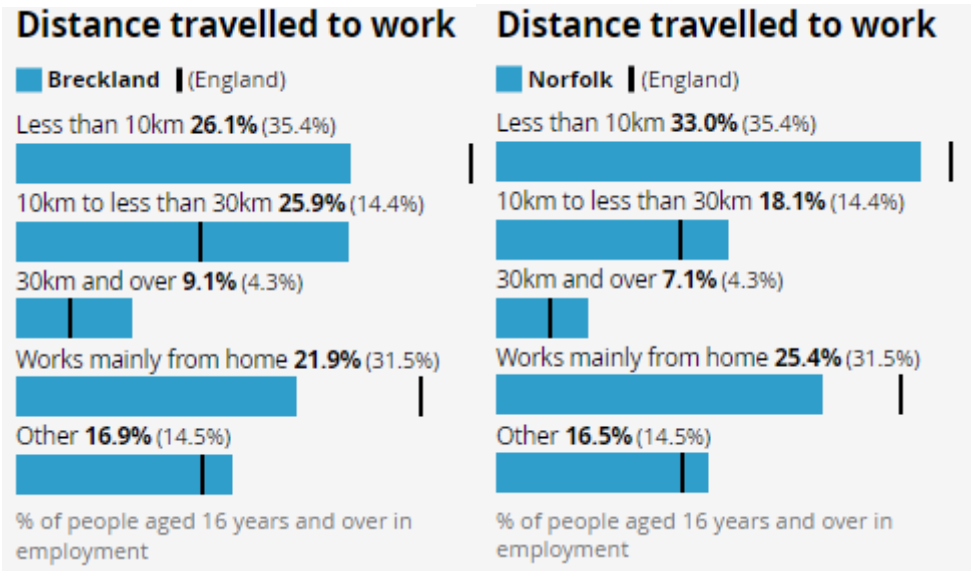


Figure 9.3: Breckland and Norfolk distance travelled to work
[See reference 250], [See reference 251]



Future baseline and likely evolution without the Local Plan

9.11 Without the Local Plan Review, car dependency will continue to be high and sites may be in inaccessible locations with no easy access to public transport. The rural nature of much of the District and dispersed nature of development means that more frequent sustainable transport provisions will be difficult to support. The longer journeys to services and facilities and employment sites will mean that it will be difficult to encourage residents to undertake journeys by alternative modes of transport. Without the new Local Plan development is more likely to come forward at less connected locations and locations where there is limited potential to support improvements for sustainable transport. This type of approach is likely to entrench the existing propensity towards using cars for journeys in the District.

Key sustainability issues and opportunities for the Local Plan to address them

9.12 Analysis of the baseline information has enabled a number of key sustainability issues facing Breckland to be identified. These are outlined below, in addition to the opportunities the Local Plan presents to address them.

- High levels of car use.
- Uptake of more sustainable travel options is limited.

9.13 The Local Plan Review provides an opportunity to promote sustainable and active transport through measures such as supporting infrastructure that will increase network connectivity and new technologies such as those related to electric vehicles. It can also help direct development to the most sustainable locations and promote mixes of use that will encourage travel by more active modes.

IA objectives

- To encourage travel by sustainable and active modes of transport and reduce the need to travel.
 - Promote the delivery of integrated, compact communities made-up of a complementary mix of land uses?
 - Support the maintenance and expansion of public transport networks including in areas with sufficient demand for the introduction of new public transport?
 - Enhance connectivity of the active transport network and provide new cycling and walking infrastructure to enable modal shift?

Chapter 10

IA framework

10.1 The SEA Regulations, Schedule 2(6) require the Environmental Report to consider:

“The likely significant effects on the environment, including short, medium and long term effects, permanent and temporary effects, positive and negative effects and secondary, cumulative and synergistic effects, on issues such as (a) biodiversity, (b) population, (c) human health, (d) fauna, (e) flora, (f) soil, (g) water, (h) air, (i) climatic factors, (j) material assets, (k) cultural heritage including architectural and archaeological heritage, (l) landscape and (m) the inter-relationship between the issues referred to in sub-paragraphs (a)–(l).”

10.2 The development of a set of IA objectives (known as the IA framework) is a recognised way in which the likely environmental and sustainability effects of a plan can be described, analysed and compared. The IA framework presented overleaf builds on the IA framework previously presented in Breckland’s June 2022 IA Scoping, having been reviewed and updated to reflect the latest policy context as well as the changes to baseline situation and key sustainability issues and opportunities identified in the District.

10.3 All of the topics specifically required by the SEA Regulations (set out in Schedule 2 of the SEA Regulations) are clearly addressed by the IA objectives, as listed below each objective. This text also indicates how the IA objectives also incorporate EIA and HIA.

IA framework for the Breckland Local Plan

1. Ensure all groups have access to affordable, decent and appropriate housing that meets their needs and reduces disparity

- Would the policy ensure an appropriate mix of types, tenures and sizes of properties in order to meet current and projected housing needs?
- Would the policy support a reduction in the number of unfit homes across the District?
- Would the policy ensure the number of houses meets demand for delivery of affordable housing needs?

Relevant SEA topics and coverage of Equalities Impact Assessment and Health Impact Assessment

- Population;
- Human health;
- Material assets;
- Equalities Impact Assessment; and
- Health Impact Assessment.

2. Promote equality of opportunity, improve health and wellbeing and reduce levels of deprivation and disparity

- Would the policy ensure equality of opportunity and equal access to services and facilities / infrastructure for all?
- Would the policy avoid differential negative impacts based on 'protected characteristics' as defined in the Equality Act 2010 and redress inequalities related to age, gender, disability, race, faith, location and income?
- Would the policy reduce the proportion of people living in deprivation?
- Would the policy foster good relations between different groups of people?
- Would the policy support healthier lifestyles and improvements in determinants of health?
- Would the policy reduce health inequalities?
- Would the policy promote healthy lifestyles by encouraging and facilitating walking and cycling?
- Would the policy promote health and wellbeing by maintaining, connecting and creating multifunctional open spaces, green infrastructure, and recreation and sports facilities?
- Would the policy protect health and wellbeing by preventing, avoiding and mitigating adverse health effects associated with air and noise pollution, vibration and odour?

Relevant SEA topics and coverage of Equalities Impact Assessment and Health Impact Assessment

- Population;
- Human health;
- Equalities Impact Assessment; and
- Health Impact Assessment.

3. Improve the quality, range and accessibility of essential services, facilities, green infrastructure and open space

- Would the policy improve accessibility to key local services and facilities, including health, education and leisure?
- Would the policy improve accessibility to shopping facilities?
- Would the policy support the delivery of new and improve access to green infrastructure and key open space such as play areas, parks and sports provision?

Relevant SEA topics and coverage of Equalities Impact Assessment and Health Impact Assessment

- Population;
- Human health;
- Equalities Impact Assessment; and

- Health Impact Assessment.

4. Improve the efficiency, competitiveness and adaptability of the local economy and help people gain access to satisfying work appropriate to their skills, potential and place of residence

- Would the policy support Breckland-based businesses in higher-wage sectors and enhance competitiveness?
- Would the policy provide an adequate supply of land and promote the delivery of essential infrastructure to help meet the District's forecast employment needs?
- Would the policy support diversification of employment sectors to facilitate areas of growth?
- Would the policy provide for new and improved education and training facilities leading to a work ready population of school and college leavers?
- Would the policy help to reduce levels of unemployment?
- Would the policy improve access to employment, including by means other than the private car?
- Would the policy increase the vitality and viability of town centres?
- Would the policy support and enable growth and investment in town centres?

Relevant SEA topics and coverage of Equalities Impact Assessment and Health Impact Assessment

- Population;
- Human health;
- Material assets;
- Equalities Impact Assessment; and
- Health Impact Assessment

5a. Reduce contributions to climate change and localised air pollution **[See reference 252]**

- Would the policy lead to an increased proportion of energy needs being met from renewable sources?
- Would the policy reduce the emissions of greenhouse gases?
- Would the policy help to avoid, minimise and mitigate the effects of poor air quality?
- Would the policy give consideration to the impact of development on AQMAs in Breckland and the surrounding area?
- Would the policy encourage traffic management measures that contribute to reduced congestion?
- Would the policy encourage more active and sustainable transport modes that are less polluting (including by low / zero emissions vehicles)?
- Would the policy reduce the emissions of greenhouse gases?
- Would the policy incorporate sustainable design and construction into development?

- Would the policy provide roadside green infrastructure, particularly trees, which could help absorb carbon dioxide?

Relevant SEA topics and coverage of Equalities Impact Assessment and Health Impact Assessment

- Air;
- Climatic factors;
- Population;
- Material assets;
- Human health;
- Biodiversity;
- Equalities Impact Assessment; and
- Health Impact Assessment.

5b. Adapt and respond to the implications of a changing climate

- Would the policy minimise inappropriate development in areas prone to flood risk and areas prone to increasing flood risk elsewhere, taking into account the impacts of climate change?
- Would the policy minimise flood risk by promoting the use of Sustainable Drainage Systems (SuDS) and flood resilient design?
- Would the policy reduce the risk of damage to people, property and infrastructure from extreme weather events?

- Would the policy ensure that buildings and public spaces are designed to respond to winter and summer temperatures, i.e. ventilation, shading and landscaping?

Relevant SEA topics and coverage of Equalities Impact Assessment and Health Impact Assessment

- Climatic factors;
- Air;
- Water;
- Soil;
- Population;
- Human health;
- Biodiversity;
- Equalities Impact Assessment; and
- Health Impact Assessment.

6. Protect, conserve, enhance and expand biodiversity and promote and conserve geodiversity

- Would the policy protect, maintain and enhance sites designated for their nature conservation interest?
- Would the policy conserve and enhance the quality, diversity and connectivity of species, habitats and green infrastructure and avoid harm to protected species?

- Would the policy support the achievement of biodiversity net gain?
- Would the policy protect and enhance geodiversity?

Relevant SEA topics and coverage of Equalities Impact Assessment and Health Impact Assessment

- Biodiversity;
- Climatic factors;
- Soil;
- Water; and
- Health Impact Assessment.

7. To conserve and protect land and soils, minimise the loss of agricultural land, whilst reducing land contamination

- Would the policy use land that has been previously developed?
- Would the policy use land efficiently?
- Would the policy protect and enhance the best and most versatile agricultural land?
- Would the policy bring contaminated land back into effective use?

Relevant SEA topics and coverage of Equalities Impact Assessment and Health Impact Assessment

- Material assets;
- Climatic factors;
- Soil;
- Water;
- Biodiversity;
- Landscape; and
- Health Impact Assessment.

8a. Maintain, enhance and preserve the distinctiveness, diversity and quality of the landscape and townscape

- Would the policy maintain and enhance the distinctiveness of landscape and townscape character?
- Would the policy maintain and enhance the character of settlements?
- Would the policy enhance the quality of public realm and open spaces?
- Would the policy encourage high quality design principles to respect local character?

Relevant SEA topics and coverage of Equalities Impact Assessment and Health Impact Assessment

- Historic environment;
- Landscape; and
- Health Impact Assessment.

8b. Maintain, enhance and preserve the historic environment

- Would the policy conserve and enhance the significance of heritage assets including any contribution made to their significance by setting?
- Would the policy protect support the conservation, management and enhancement of the historic environment, particularly at-risk heritage assets?
- Would the policy promote access to the local historic environment?

Relevant SEA topics and coverage of Equalities Impact Assessment and Health Impact Assessment

- Historic environment;
- Landscape; and
- Health Impact Assessment.

9. Minimise the production of waste and encourage the recycling/reuse of onsite resources

- Would the policy reduce the levels of waste going to landfill, including through increasing levels of waste being reused or going for composting and/or recycling?
- Would the policy promote the use of locally and sustainably sourced, and recycling of materials in construction and renovation?

Relevant SEA topics and coverage of Equalities Impact Assessment and Health Impact Assessment

- Material assets;
- Soil;
- Landscape; and
- Health Impact Assessment.

10. Limit water consumption to the capacity of natural processes and storage systems, ensure the sustainable reuse of water to accommodate growth and maintain and enhance water quality

- Would the policy help to reduce water consumption and promote more efficient use of water?

- Would the policy seek to avoid deterioration and where possible improve the water quality of the district's rivers and groundwater resources?
- Would the policy minimise inappropriate development in Source Protection Zones?
- Would the policy ensure there is sufficient wastewater treatment capacity to accommodate the new development?

Relevant SEA topics and coverage of Equalities Impact Assessment and Health Impact Assessment

- Water; and
- Health Impact Assessment.

11. Reduce the need to travel and encourage sustainable and active alternatives to motorised vehicles to reduce road traffic congestion

- Promote the delivery of integrated, compact communities made-up of a complementary mix of land uses?
- Support the maintenance and expansion of public transport networks including in areas with sufficient demand for the introduction of new public transport?
- Enhance connectivity of the active transport network and provide new cycling and walking infrastructure to enable modal shift?

Relevant SEA topics and coverage of Equalities Impact Assessment and Health Impact Assessment

- Air;
- Climatic factors;
- Population and human health;
- Equalities Impact Assessment; and
- Health Impact Assessment.

Predicting and evaluating effects

10.4 The prediction and evaluation of the effects of options in the Local Plan relies heavily on the IA framework – every policy and site option (and reasonable alternatives) will be appraised for their likely impacts in relation to achievement of the IA objectives. In line with the SEA Regulations, the following characteristics of effects will be predicted and evaluated:

- Probability;
- Duration, including short, medium and long-term impacts;
- Frequency;
- Reversibility;
- Cumulative and synergistic nature;
- Transboundary nature;
- Secondary nature;
- Permanent or temporary nature; and
- Positive or negative nature.

Probability

10.5 There is an inherent degree of uncertainty in carrying out an IA. Should it be adopted, the Local Plan would likely be in force for several years. Over this time, currently unforeseen changes are likely to occur. For example, any given community facility in Breckland District could potentially close or move within a period of months, and thus an assessment which considers that a Local Plan policy or site would provide new residents with good access to this facility pre-development, may not do so by the time construction begins. These circumstances are impossible to predict. The planning system is generally robust enough to deal with such changes by re-assessing the needs of sites and communities at the time applications are made. Uncertainties are dealt with in the IA by adopting a precautionary approach, wherein a reasonable worst-case scenario is assumed unless reliable evidence suggests otherwise. This is to ensure that any potentially significant negative effects are identified, and appropriate consideration is given to how the Local Plan could help to avoid or mitigate the worst effects if such scenarios were to arise. However, it is accepted that the likelihood of many such worst-case scenarios occurring is low, particularly as the comprehensive array of policies proposed in the Local Plan would help to avoid or mitigate negative impacts.

10.6 The assessment of Local Plan options will indicate where uncertainties exist in relation to the effects identified.

Duration, including short, medium and long-term impacts

10.7 The temporal scope of the IA covers the Local Plan period. For the purposes of the IA:

- Short term covers the period for 0-5 years, or during construction (inclusive of temporary impacts);

- Medium term covers the period for 5-20 years; and
- Long term covers the period over 20 years, beyond the Local Plan period.

10.8 Effects can occur over multiple terms, such as arising in the short-term and residing in the long-term.

Frequency

10.9 All effects of the Local Plan are considered to occur once, unless indicated otherwise.

Reversibility

10.10 The assessment will consider whether effects are reversible or irreversible. Reversible effects may be identified where a former mineral site is proposed for restoration to open space; irreversible effects may be identified where development is proposed on greenfield land thereby resulting in the loss of best and most versatile agricultural land.

Cumulative and synergistic effects

10.11 The IA will provide an appraisal of all reasonable options considered for inclusion in the Local Plan. The vision, strategic objectives, policies and site allocations of the Local Plan will not be adopted in isolation and therefore an evaluation of the cumulative and synergistic effects will be undertaken.

Cumulative and synergistic effects are defined below.

- Cumulative effects arise, for instance, where several developments each have insignificant effects but together have a significant effect, or where several individual effects have a combined effect.

- Synergistic effects interact to produce a total effect greater than the sum of the individual effects, so that the nature of the final impact is different to the nature of the individual impacts.

Transboundary effects

10.12 The geographical extent of effects will be experienced predominantly in Breckland District. However, where effects would be likely to be discernible in neighbouring authorities or at a scale greater than Breckland District, this will be specified. For example, transboundary effects may be experienced as housing provision and education can all result in flows of people across local authority boundaries. Furthermore, the high number of Breckland District residents commuting to other local authority areas for work, mainly by private car, is contributing to traffic congestion and poor air quality in the region.

Secondary effects

10.13 The assessment process inherently includes a consideration of secondary effects. Secondary effects are defined as “effects that are not a direct result but occur away from the original effect or as a result of a complex pathway”.

Permanent or temporary

10.14 The assessment will indicate whether effects are temporary or permanent in nature. Should the Local Plan be adopted, it would only be in place for the Plan period and would subsequently be replaced by a new Local Plan. Many of the effects of policies in the Local Plan are therefore typically temporary effects. Nevertheless, several the effects of new development on a greenfield site would be likely to be permanent.

Positive and negative effects and significance

10.15 The IA will evaluate whether the nature of effects is likely to be positive, negative, neutral or mixed. The magnitude of effects in relation to each IA objective will be defined as significant or minor. For example, a significant positive effect would be identified where an option is likely to significantly contribute to the achievement of an IA objective, whereas an adverse effect (either significant or minor negative) would be identified where the option conflicts with the IA objective. Options which are unlikely to significantly influence whether an objective will be achieved will receive a negligible rating. Mixed effects may be identified where an option is expected to have both a positive and negative effect on the IA objective.

10.16 The IA assessments will be carried out at a high level and so the dividing line between sustainability effects is often quite small. The effect of an option on an IA objective will be significant where it is of such magnitude that it will have a noticeable and measurable effect compared with other factors that may influence the achievement of that IA objective.

10.17 Minor effects will still be identified as these assist with the identification of cumulative and synergistic effects (e.g., several minor effects can combine to become a significant effect), can help to identify opportunities for enhancements (e.g., enhancing a minor positive effect to make it significant) and better enable the Council to make a more informed decision over the sustainability performance of options.

10.18 In determining the significance of the effects of the options for potential inclusion in the Local Plan, the IA will consider the Plan's relationship with the other documents in the planning system such as the NPPF and other national policy approaches, and regulatory requirements, as these may provide additional safeguards or mitigation of potentially significant adverse effects.

10.19 The findings of the IA will be presented as a colour coded symbol showing a score for each option (including reasonable alternatives) against each of the IA objectives along with a concise justification for the score given, where appropriate. The use of colour coding in the matrices will allow for the magnitude of effects (both positive and negative) to be easily identified. **Table 10.1** presents the colour coded symbols and definitions that will be used to report the significance of effects of the Local Plan policies and sites and their reasonable alternatives.

Table 10.1: Effect symbols and colours used in IA

IA Effect	Description of Effect
++	Significant positive effect likely
++/-	Mixed significant positive and minor negative effects likely
+	Minor positive effect likely
+/-	Mixed minor effects likely
++/--	Mixed significant effects likely
-	Minor negative effect likely
--/+	Mixed significant negative and minor positive effects likely
--	Significant negative effect likely
0	No or negligible effect likely
?	Likely effect uncertain
N/A	Assessment criterion not applicable

Reasonable alternatives

10.20 The IA must appraise not only the preferred options for inclusion in the Local Plan but also ‘reasonable alternatives’ to these options. This implies that alternatives that are not reasonable do not need to be subject to appraisal. Part (b) of Regulation 12(2) notes that reasonable alternatives will consider the objectives of the plan, as well as its geographical scope. Therefore, alternatives that do not meet the objectives of national policy or are outside the Plan area are unlikely to be reasonable.

10.21 The objectives, policies and site allocations to be considered for inclusion within the Local Plan are in the process of being identified and reviewed. The Council’s reasons for selecting the alternatives to be included in the Local Plan will be reported at a later stage in the IA process.

Health Impact Assessment

10.22 The background and overall approach to Health Impact Assessment is set out in **Chapter 1**. The IA framework above identifies the IA objectives that have potential to impact the health and wellbeing of the population.

Equality Impact Assessment

10.23 There are three main duties set out in the Equality Act 2010, which public authorities including Breckland Council must meet in exercising their functions:

- To eliminate discrimination, harassment, victimisation and other conduct that is prohibited under the Act;
- To advance equality of opportunity between persons who share relevant protected characteristics and persons who do not share it; and

- To foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

10.24 The Equality Act 2010 identifies nine ‘protected characteristics’ and seeks to protect people from discrimination based on these characteristics:

- Protected characteristics identified in the Equality Act 2010:
 - Age: Children (0-4), Younger people (aged 18-24), older people (aged 60 and over);
 - Disability: Disabled people, people with physical and mental impairment;
 - Gender reassignment;
 - Marriage and civil partnership;
 - Pregnancy and maternity;
 - Race;
 - Religion or belief;
 - Sex; and
 - Sexual orientation.

10.25 The Local Plan will therefore be assessed to consider the likely impacts of policy and site options on each of the nine protected characteristics from the Equality Act.

Chapter 11

Initial Integrated Assessment findings

11.1 Breckland Council is consulting on the below two documents, which contain options that may form part of the new Local Plan and so should be subject to IA.

- Alternative Development Strategy Scenarios; and
- Approaches to defining settlements and protecting the countryside from inappropriate development.

Alternative Development Scenarios

11.2 This section sets out the findings of the IA of the six Alternative Development Scenarios that have been identified for the Breckland Local Plan, alongside four other Scenarios also considered. The options have been devised by the Breckland Council officers preparing the Local Plan. Further details about the Scenarios are provided in the Alternative Development Strategy Scenarios Paper (November 2023), information from which has been used to inform this appraisal.

11.3 Where the scenarios refer to Urban Areas, this is taken to mean the five Market Towns within the District: Attleborough, Dereham, Swaffham, Thetford and Watton. Where reference is made to Rural Areas, this is anywhere but the Market Towns and includes the Local Service Centres, Enhanced Local Service Centres and Villages with Boundaries.

11.4 The Alternative Development Scenarios are:

- **Alternative Scenario A:** Concentrate development in the Market Towns with 80% of housing need being allocated to the five Market Towns and 20% to the Local Service Centres.
- **Alternative Scenario B:** Equal distribution between Urban and Rural Areas with 50% of housing need being allocated to the five Market Towns and 50% to the Local Service Centres.
- **Alternative Scenario C:** Maximises the uses of strategic sites on previously developed land by including both the Swanton Morley Barracks and Abbey Farm sites in Thetford with the remainder of housing need being allocated to the five Market Towns (80%) and 20% to the Local Service Centres.
- **Alternative Scenario D:** Maximises the use of strategic sites on previously developed land by including both the Swanton Morley Barracks and Abbey Farm sites in Thetford with the remainder of housing need being allocated to the five Market Towns (50%) and 50% to the Local Service Centres.
- **Alternative Scenario E:** Equal distribution between Urban and Rural Areas with 50% housing need being allocated to the five Market Towns and 50% to the Rural Areas, specifically 70% to the Local Service Centres and 30% to the Villages with Boundaries.
- **Alternative Scenario F:** Maximises the use of strategic sites on previously developed land by including both the Swanton Morley Barracks and Abbey Farm sites in Thetford with the remainder of housing need being allocated to the five Market Towns (50%) and 50% to the Rural Areas, specifically 70% to the Local Service Centres and 30% to the Villages with Boundaries.

Appendix 2 Alternatives

- **Alternative Scenario 1:** An equal split of the full requirement across both the Market Towns and Local Service Centres based on size of parish

(population), excluding strategic previously developed sites at Swanton Morley and Abbey Fields in Thetford.

- **Alternative Scenario 2:** An equal split of the full requirement across both the Market Towns and Local Service Centres based on size of parish (population), including strategic previously developed sites at Swanton Morley and Abbey Fields in Thetford.
- **Alternative Scenario 3:** Development in Market Towns and across a higher level of 'Enhanced Local Service Centres' [\[See reference 253\]](#) and Local Service Centres, excluding strategic previously developed sites at Swanton Morley and Abbey Fields in Thetford.
- **Alternative Scenario 4:** Development in Market Towns and across a higher level of 'Enhanced Local Service Centres' and Local Service Centres, including strategic previously developed sites at Swanton Morley and Abbey Fields in Thetford.

11.5 The IA of the ten Alternative Development Scenarios is presented by IA objective below.

Table 11.1: Summary of IA effects for the Alternative Development Scenarios

IA objective	Alternative Scenario A: Market Towns followed by Local Service Centres	Alternative Scenario B: Equal distribution between Market Towns and Local Service Centres	Alternative Scenario C: Previously developed land together with Scenario A	Alternative Scenario D: Previously developed land together with Scenario B	Alternative Scenario E: Scenario B with 70% of the rural requirement to Local Service Centres and 30% to Villages with Boundaries	Alternative Scenario F: Scenario D with 70% of the rural requirement to Local Service Centres and 30% to Villages with Boundaries	App. 2 Alternative Scenario 1: Equal distribution between Market Towns and Local Service Centres based on parish population	App. 2 Alternative Scenario 2: Previously developed land together with Scenario 1	App. 2 Alternative Scenario 3: Market Towns followed by Enhanced Local Service Centres and Local Service Centres	App 2 Alternative Scenario 4: Previously developed land together with Scenario 3
IA1: Housing	++	++	++	++	++	++	++	++	++	++
IA2: Equality, health and wellbeing	++	+	++	++	+	++	+	++	++	++
IA3: Services, facilities, open space	++	+	+	0	+	0	+	0	++	+
IA4: Economy and education	++	+	++	+	+	+	+	+	++	+
IA5a: Climate change mitigation	++/-	-	+	-	-	-	-	-	++/-	++/-
IA5b: Climate change adaptation			-	-		-		-		-
IA6: Biodiversity and geodiversity		-			-					
IA7: Land and soil	+	-	++	++	-	++	-	++	+	++
IA8a: Landscape and townscape	+	-	+	-	-	-	-	+	+	+
IA8b: Historic environment										

IA objective	Alternative Scenario A: Market Towns followed by Local Service Centres	Alternative Scenario B: Equal distribution between Market Towns and Local Service Centres	Alternative Scenario C: Previously developed land together with Scenario A	Alternative Scenario D: Previously developed land together with Scenario B	Alternative Scenario E: Scenario B with 70% of the rural requirement to Local Service Centres and 30% to Villages with Boundaries	Alternative Scenario F: Scenario D with 70% of the rural requirement to Local Service Centres and 30% to Villages with Boundaries	App. 2 Alternative Scenario 1: Equal distribution between Market Towns and Local Service Centres based on parish population	App. 2 Alternative Scenario 2: Previously developed land together with Scenario 1	App. 2 Alternative Scenario 3: Market Towns followed by Enhanced Local Service Centres and Local Service Centres	App 2 Alternative Scenario 4: Previously developed land together with Scenario 3
IA9: Waste	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IA10: Water resources	-	-	-	-	-	-	-	-	-	-
IA11: Sustainable transport	++	-	+	-	-	-	-	-	++	++

IA objective 1: Ensure all groups have access to affordable, decent and appropriate housing that meets their needs and reduce disparity

11.6 Breckland Council has an identified need of 16,185 new dwellings over the Plan period 2021-2046. As each of the scenarios will deliver enough housing to meet this identified need for the District, each is expected to have a significant positive effect in relation to IA objective 1.

IA objective 2: Promote equality of opportunity, improve health and wellbeing and reduce levels of deprivation and disparity and IA objective 3: Improve the quality, range and accessibility of essential services, facilities, green infrastructure and open space

11.7 The likely effects of the Alternative Development Scenarios on IA objectives 2 and 3 are presented together, due to the close linkages between equality, health and wellbeing and access to services, facilities and open space.

11.8 'Access to services' is the subdomain Breckland scores worst against in the Health Index, followed by 'Access to green space'. This reflects metrics such as the minimum distance to travel to key services (GPs, pharmacies and sports or leisure facilities), which are considerably higher than the regional and national averages. Due to continued pressure from many infrastructure providers to centralise services and facilities into fewer larger hubs, access to community facilities, services and healthcare is more viable in urban areas. As

such, focusing most new development (around 80% and 70%, respectively) in the Market Towns under Scenarios A and App. 2 Scenario 3 would likely achieve good levels of access for new residents to existing services and facilities, including public open space. Any improvements delivered as part of new development or as a result of an increase in the local population would also increase accessibility. Therefore, Scenarios A and App. 2 Scenario 3 are expected to have significant positive effects in relation to both these objectives.

11.9 Scenarios B and App. 2 Scenario 1 also support development in the Market Towns (around 50%) together with Local Service Centres (also around 50%), although App. 2 Scenario 1 is based on parish population. These two scenarios therefore contribute a lesser extent to the achievement of IA objectives 2 and 3 than Scenarios A and App. 2 Scenario 3 as their primary focus is not the Market Towns. However, roughly distributing development equally between the Market Towns (i.e. Urban Areas) and Local Service Centres (i.e. Rural Areas) would result in a more dispersed pattern of development and so may mean that existing services and facilities, including healthcare facilities, are less likely to become overloaded with less pressure on public open space. More dispersed development under these scenarios would also mean that existing facilities in smaller and rural areas continue to be supported and remain viable, often where access to community services, including healthcare, is needed the most. Therefore, these scenarios could help ensure more equal access to facilities and infrastructure for all. This is particularly the case for App. 2 Scenario 2 which is the same as App. 2 Scenario 1 but includes the redevelopment of Abbey Farm Estate, which currently falls within the top 7% most deprived areas in England. Overall, therefore, Scenarios B and App. 2 Scenario 1 are expected to have minor positive effects in relation to these two objectives. App. 2 Scenario 2 is expected to have a significant positive effect in relation to IA objective 2 because the objective seeks to promote equality of opportunity and reduce levels of deprivation and disparity. A potential minor positive effect was identified for App. 2 Scenario 2 in relation to IA objective 3 but this was downgraded to a negligible effect due to the service provision issues at the Swanton Morley Barracks and Abbey Farm Estate sites described in the following paragraph.

11.10 Scenario E is similar to Scenario B, except that the 50% of development distributed to the Rural Areas has a 70% / 30% split between the Local Service Centres and Villages with Boundaries, rather than it all going to the Local Service Centres. As such, Scenario E will result in a greater dispersal of development than the other options, which as mentioned above may mean that services and facilities are less likely to become overloaded and also increase the viability of existing rural facilities. It may also help reduce inequalities in the more deprived rural areas of the District. However, it is less likely that people will be within easy walking distance of a wide range of services and facilities than if they were based in the Urban Areas. Like Scenario B, this scenario is also expected to have minor positive effects in relation to IA objectives 2 and 3.

11.11 Scenarios C and D prioritise the redevelopment of the Swanton Morley Barracks and Abbey Farm Estate sites. Although Swanton Morley Barracks and Abbey Farm Estate contain some existing open spaces and neighbourhood facilities, it is likely that much of this would need to be renewed, enhanced and made more accessible as part of the redevelopment of these sites. For example, Abbey Farm Estate contains a number of public open spaces and neighbourhood facilities including the Estate's retail and community centre, but they are hidden by the design and layout of the Estate. The current layout of the Estate also encourages private vehicle use for short journeys as it lacks opportunities for walking and cycling, which encourage healthier lifestyles. Since both scenarios would encourage the regeneration of Abbey Farm, which currently falls within the top 7% most deprived areas in England, both are expected to have significant positive effects in relation to IA objective 2: Equality, health and wellbeing. While redevelopment of these two sites could support improved social infrastructure, the scale of development envisaged for either site would be unlikely to support higher order services of the type available in the Market Towns and the Abbey Farm Estate would be unlikely to support Local Service Centre levels of service provision. Provision of new or improved services also carries the risk that these may not be available until later stages of development, with adverse effects in the short-term. Scenario C directs most of the remaining development to the Market Towns (80%) where most services and facilities (including open space and healthcare) are available while Scenario D directs 50% of the remaining development to Market Towns; the residual is directed to Local Service Centres under both scenarios. Taking

all of the above into account, Scenario C is expected to have a minor positive effect in relation to IA objective 3, while Scenario D is expected to have a negligible effect.

11.12 Scenario F is similar to Scenario D, except that the amount of development distributed to the Rural Areas has a 70% / 30% split between the Local Service Centres and Villages with Boundaries, rather than it all going to the Local Service Centres. As Scenario F would prioritise the redevelopment of Swanton Morley Barracks and Abbey Farm Estate and distribute the remaining development equally between the Urban and Rural Areas, it is also expected to have a significant positive effect in relation to IA objective 2, and a negligible effect in relation to IA objective 3, like Scenario D. It is noted that this scenario may have beneficial effects in reducing inequalities in the more deprived rural areas of the District.

11.13 App. 2 Scenario 4 also prioritises the redevelopment of Swanton Morley Barracks and Abbey Farm Estate, proportionately distributing remaining development across the Market Towns (70%), Enhanced Local Service Centres (20%) and Local Service Centres (10%). As the Enhanced Local Service Centres contain GP surgeries, new residents would be likely to have easy access to primary healthcare. Other amenities such as green infrastructure and open space are also present in these parts of the District and so in addition to healthcare, people would likely have easy access to recreational opportunities. Therefore, Scenario F(ii) is expected to have significant positive effects in relation to IA objectives 2 and 3. The effect for IA objective 3 under App. 2 Scenario 4 is, however, downgraded to a minor positive effect, as the redevelopment of Swanton Morley Barracks and Abbey Farm would be unlikely to support higher level service provision and could result in delays to the delivery of supporting infrastructure in the short-term. It is also acknowledged that focusing more development in areas where GP surgeries are available may place increased pressure on their capacity.

IA objective 4: Improve the efficiency, competitiveness and adaptability of the local economy and help people gain access to satisfying work appropriate to their skills, potential and place of residence

11.14 All ten scenarios support major employment development at Snetterton and Dereham and are therefore all expected to have positive effects in relation to this objective. The scenarios are also likely to promote employment opportunities for new residents in the Market Towns, as they all support development in the Market Towns – particularly Scenarios A and App. 2 Scenario 3 which distribute 80% and 70% of development to the Market Towns, respectively. Similarly, but following the redevelopment of Swanton Morley Barracks and Abbey Farm Estate, Scenario C distributes 80% of remaining development to the Market Towns (just under 11,000 dwellings). As there are likely to be more employment areas in addition to schools and further and higher education facilities in the Market Towns, Scenarios A, C and App. 2 Scenario 3 are expected to have significant positive effects in relation to this objective.

11.15 The remaining scenarios are expected to have minor positive effects in relation to this objective as while they do support development in the Market Towns, they also distribute development more widely across the District. Therefore, residents in these areas may not necessarily be within close proximity of employment areas or able to easily access employment opportunities.

IA objective 5a: Reduce contributions to climate change and localised air pollution and IA objective 11: Encourage modal shift through the promotion of active and sustainable transport modes

11.16 The likely effects of the Alternative Development Scenarios on IA objectives 5a and 11 are presented together, due to the close linkages between vehicle use and associated CO₂ emissions, which contribute towards climate change, in addition to poor air quality.

11.17 All ten scenarios distribute at least some growth to the Market Towns. One of the Market Towns, Swaffham, contains an Air Quality Management Area (AQMA) in its town centre. Therefore, all ten scenarios could exacerbate existing air quality issues in Swaffham. As Scenarios A and App. 2 Scenario 3 distribute more development than the other scenarios to Swaffham, they are more likely to have adverse effects on air pollution and so have potential minor negative effects in relation IA objective 5a. Conversely, the Market Towns are located towards the top of Breckland's Settlement Hierarchy, as they contain numerous services and facilities. They have good access to public transport and as various services and facilities are within close proximity of one another, can be easily accessed via walking and cycling. The range of services and facilities also helps minimise reliance on the private car to travel elsewhere to reach certain amenities. As such, the potential minor negative effects are mixed with significant positive effects. Scenarios A and App. 2 Scenario 3 are also expected to have significant positive effects in relation to IA objective 11 for the reasons outlined above. As App. 2 Scenario 4 is a repeat of App. 2 Scenario 3 but includes the redevelopment of Swanton Morley Barracks and Abbey Farm Estate, it is also expected to have a mixed significant positive and minor negative effect in relation to IA objective 5a, and a significant positive effect in relation to IA objective 11.

11.18 Scenarios C, D and F primarily focus development at Swanton Morley Barracks and Abbey Farm Estate. Swanton Morley Barracks is located in Swanton Morley Parish, which is a Local Service Centre / Rural Area. Although there are some services and facilities located in Swanton Morley, there is only one bus service and so an increased reliance on the private car. Abbey Farm Estate, on the other hand, is located in the Market Town of Thetford and so in addition to providing its own neighbourhood facilities (although these may be re-provided as part of its redevelopment), is close to a wider range of other services and facilities, albeit that connections to Thetford Town Centre are currently poor. In addition to these two strategic sites, Scenarios C, D and F distribute all remaining development to the Market Towns and Local Service Centres, with Scenario F also distributing development to the Villages with Boundaries. . As Scenario C distributes more development to the Market Towns compared to Scenarios D and F, it is more likely to reduce reliance on the private car and associated CO₂ emissions, in addition to air pollution. Therefore, Scenario C is expected to have a minor positive effect in relation to IA objectives 5a and 11. Under Scenarios D and F, roughly distributing development equally between Urban and Rural Areas could result in a wider distribution of development and so result in the need for residents to travel longer distances and via the private vehicle. This is particularly so for Scenario F which distributes 70% of the rural requirement to the Local Service Centres and 30% to the Villages with Boundaries. While maximising development in Thetford may help to reduce this, allowing for a higher level of growth in smaller settlements is likely to result in a higher proportion of new residents relying on private vehicle use on a day-to-day basis. As such, Scenarios D and F are expected to have minor negative effects in relation to IA objectives 5a and 11. App. 2 Scenario 1 also prioritises the redevelopment of Swanton Morley Barracks and Abbey Farm and distributes any remaining development equally between the Market Towns and Local Service Centres but based on parish population. Therefore, like Scenarios D and F, is also expected to have minor negative effects in relation to these IA objectives.

11.19 Scenarios B, E and App. 2 Scenario 1 are also expected to have minor negative effects in relation to these two objectives, as they support the equal distribution of development between Urban and Rural Areas, although App. 2 Scenario 1 is based on parish population.

IA objective 5b: Adapt and respond to the implications of a changing climate

11.20 Scenario A directs most development to the Market Towns, two of which contain a relatively large amount of land within Flood Zones 2 and 3 (Dereham and Thetford), meaning they are at high risk of fluvial flooding from the nearby rivers. Further to this, urbanisation has reduced the ability of land to absorb water and so the risk of flooding may increase in more urban areas.

Development under Scenario A could therefore result in an increased flood risk – particularly if development placed pressure on existing areas of green space that could otherwise help absorb flood water. Therefore, Scenario A is expected to have a significant negative effect in relation to this objective.

11.21 Scenario B distributes development equally between the Market Towns and Local Service Centres. As there are a number of Local Service Centres, development is likely to be more widely distributed across the District. As such, there is likely to be a wider range of sites to choose from, which may help avoid development in areas at increased risk of flooding. However, due to the District's many waterbodies and rivers, this Scenario may still direct development to areas at high risk of flooding, such as Mundford which contains land within Flood Zone 3. Therefore, Scenario B is also expected to have a significant negative effect in relation to this objective. App. 2 Scenario 1 repeats Scenario B but is based on parish population. Most development under this Scenario would therefore take place in Dereham, followed by Watton. As IA is undertaken on a precautionary basis and Dereham has been identified as at risk of fluvial flooding, App. 2 Scenario 1 is expected to have a significant negative effect in relation to this objective. Scenario E, like Scenario B, distributes development equally between Urban and Rural Areas, but specifically allocates 70% of development in the Rural Areas to Local Service Centres and 30% to Villages with Boundaries. There are fifteen Villages with Boundaries and they are fairly evenly spread across the District. Some of them fall within areas at risk of fluvial flooding (e.g. Caston and Lyng) whereas others do not (e.g. Beetley, Gressenhall and Shropham), and most of them are at risk of surface water flooding. Again, because IA takes a precautionary approach,

Scenario E is also expected to have a significant negative effect in relation to IA objective 5b.

11.22 Alternative Development Scenarios C, D, App. 2 Scenario 2 and App. 2 Scenario 4 prioritise the redevelopment of Swanton Morley Barracks and Abbey Farm – neither of which is at risk of fluvial flooding. These two strategic sites may, however, be vulnerable to surface water flooding due to the fact they comprise previously developed land and associated impermeable surfaces. Following development of Swanton Morley Barracks and Abbey Farm, these four scenarios would distribute any remaining development across the Market Towns and Local Service Centres, in addition to the Enhanced Local Service Centres for App. 2 Scenario 4. Overall, therefore, these scenarios are expected to have minor negative effects in relation to this objective. Scenario F is also expected to have a minor negative effect in relation to IA objective 5b because it also prioritises the redevelopment of the two strategic sites, followed by distributing any remaining development between Urban and Rural Areas, specifically Local Service Centres and Villages with Boundaries. Some of these settlements are located within areas at risk of flooding whereas others are not, although most of the Villages with Boundaries do not fall within an area at risk of fluvial flooding.

11.23 App. 2 Scenario 3 is similar to Scenario A in that it distributes development to the Market Towns and Local Service Centres, but also includes Enhanced Local Service Centres. The option supports a high number of new allocations at the Market Town of Dereham, which is at risk of flooding. There are ten Enhanced Local Services Centres – Harling, Kenninghall, Litcham, Mattishall, Mundford, Narborough, Necton, North Elmham, Shipdham, and Swanton Morley – some of which are at risk of flooding. Therefore, overall, App. 2 Scenario 3 is expected to have a significant negative effect in relation to this objective.

11.24 IA objective 5b also considers whether buildings and public spaces will respond to the effects of a changing climate (i.e. ventilation, shading and landscaping). Such design considerations are beyond the scope of the Alternative Development Scenarios and will be considered by the IA later in the plan-making process.

IA objective 6: Protect, conserve, enhance and expand biodiversity and promote and conserve geodiversity

11.25 There are four Special Areas of Conservation (SAC) and one Special Protection Area (SPA) within Breckland District, in addition to 52 Sites of Special Scientific Interest (SSSI). The District also contains four National Nature Reserves (NNS), three Local Nature Reserves (LNR) and 80 areas of Ancient Woodland. Most of these biodiversity and geodiversity assets are located in the south-west of the District, whilst the areas of Ancient Woodland are located to the north of the District through its centre. While the five Market Towns are spread fairly evenly across the District, one of them is located in the south-west (Thetford) of the District while another two are not in the south-west but within close proximity of the aforementioned SACs, SPA and SSSIs (Swaffham and Watton).

11.26 As all ten Alternative Development Scenarios distribute development to the Market Towns, they could all have adverse effects in relation to biodiversity and geodiversity. This is particularly the case for Scenarios A and App. 2 Scenario 3, which allocate the most development of all ten options to the Market Towns (roughly 80% and 70%, respectively). However, numerous Local Service Centres are also located close to biodiversity and geodiversity assets, namely Garboldisham, Harling, Mundford and Weeting. The Local Service Centres of Bawdeswell, North Elmham and Swanton Morley are not located in the west of the District and are instead in the north-east, although they are close to the River Wensum SAC and SSSI. As the Alternative Development Scenarios also distribute development to the Local Service Centres, particularly Scenarios B and App. 2 Scenario 1, they could also have adverse effects on IA objective 6. Only a relatively small amount of development may be proposed at each Local Service Centre compared to the Market Towns though, and so the effects may not be as severe. It is important to note, however, that App. 2 Scenario 1 would see most development in the Market Town of Derehem, which is within close proximity of the Valley Fens SAC. Therefore, Scenarios A, App. 2 Scenario 3 and App. 2 Scenario 1 are expected to have significant negative effects in

relation to this objective, while Scenario B is expected to have a minor negative effect. Scenario E is almost identical to Scenario B but distributes 70% of the rural requirement to the Local Service Centres, instead of 100%. The remaining 30% is distributed to the Villages with Boundaries. Scenario E is therefore also expected to have a minor negative effect in relation to IA objective 6 for the reasons outlined above.

11.27 Scenarios C and D prioritise the redevelopment of Swanton Morley Barracks and Abbey Farm, followed by the Market Towns and Local Service Centres. Swanton Morley Barracks is located within close proximity of the River Wensum SAC and SSSI. Such large-scale development could have considerably adverse effects on water quality and biodiversity that are reliant on it, particularly in the short-term during construction. Abbey Farm Estate is located in Thetford, one of the Market Towns, which is in the south-west of the District within close proximity of numerous SACs and SSSIs, in addition to a SPA. However, due to the fact it is a brownfield site and embedded within the urban area of Thetford, is expected to have limited effects on biodiversity and geodiversity. Overall, Scenarios C and D are both expected to have significant negative effects in relation to IA objective 6. Scenario F, App. 2 Scenario 3 and App. 2 Scenario 4 also prioritise the redevelopment of Swanton Morley Barracks and Abbey Farm. For the reasons outlined above, these scenarios are also expected to have significant negative effects in relation to this objective.

IA objective 7: To conserve and protect land and soils, minimise the loss of agricultural land, whilst reducing land contamination

11.28 Focussing development predominantly in the Market Towns under Scenarios A and App. 2 Scenario 3 may offer more opportunities to make use of brownfield land. However, the Market Towns of Swaffham and Dereham contain some of the best and most versatile agricultural land (Grade 2) in the District, which would most likely be lost to development pressures. Therefore, overall,

Scenarios A and App. 2 Scenario 3 are expected to have minor positive effects in relation to this objective.

11.29 Development would be equally distributed between the Market Towns and Rural Areas under Scenarios B and E. Scenario B would distribute all development in the Rural Areas to the Local Service Centres whereas Scenario E would distribute 70% of development in the Rural Areas to the Local Service Centres and 30% to the Villages with Boundaries. Therefore, it is likely that development would take place on greenfield land. Further to this, some of the District's Local Service Centres and Villages with Boundaries contain Grade 2 agricultural land. Overall, therefore, Scenarios B and E are expected to have minor negative effects in relation to this objective. App. 2 Scenario 1 is a repeat of Scenario B but based on parish population numbers. Although the numbers differ slightly in terms of how much housing would go where, they are still fairly similar and therefore App. 2 Scenario 1 is also expected to have a minor negative effect in relation to IA objective 7.

11.30 Scenarios C, D, F, App. 2 Scenario 2 and App. 2 Scenario 4 will offer the greatest opportunities for brownfield redevelopment by maximising the use of strategic sites on previously developed land, namely Swanton Morley Barracks and Abbey Farm Estate. Any remaining development under these scenarios would be spread between the Market Towns and Local Service Centres, in addition to Enhanced Local Service Centres for App. 2 Scenario 2 and Villages with Boundaries for Scenario F, with Market Towns in particular offering increased opportunities to utilise brownfield land. This would be more likely under Scenarios C and App. 2 Scenario 4 rather than D, F and App. 2 Scenario 2, as Scenarios C and F focus more development in the Market Towns than the Local Service Centres. Overall, Scenarios C, D, F, App. 2 Scenario 2 and App. 2 Scenario 4 are expected to have significant positive effects in relation to IA objective 7.

IA objective 8a: Maintain, enhance and preserve the distinctiveness, diversity and quality of the landscape and townscape.

11.31 The District, which falls within three National Character Areas, contains a number of nationally distinct landscape character areas that could be harmed by inappropriate development. The Market Towns have retained much of their medieval character but potential effects on the historic environment are separately addressed under IA objective 8b.

11.32 The scenarios that distribute development to the Rural Areas (includes Local Service Centres, Enhanced Local Service Centres and Villages with Boundaries) could have a greater effect on the landscape than those that direct development to the Market Towns. This is because the towns are already largely built-up and so development is unlikely to have an effect on the landscape unless it is on the edge of the towns. Development within towns is likely to enhance the townscape, particularly on disused brownfield site. Therefore, Scenario A is expected to have a minor positive effect in relation to this objective, whilst Scenarios B, E and App. 2 Scenario 1 are expected to have minor negative effects.

11.33 Scenarios C, D, F, App. 2 Scenario 2 and App. 2 Scenario 4 prioritise the redevelopment of two strategic sites, Swanton Morley Barracks and Abbey Farm Estate. Although Swanton Morley Barracks comprises previously developed land, it is a relatively open and exposed site. Therefore, its redevelopment could have an adverse effect on the landscape. Abbey Farm Estate, on the other hand, is located within an urban area and its regeneration could improve the townscape. Overall, therefore, all five scenarios could have both positive and negative effects on the landscape and townscape. As Scenarios C and App. 2 Scenario 4 distribute most of the remaining development to the Market Towns, they are expected to have minor positive effects in relation to this objective. As Scenarios D, F and App. 2 Scenario 2 distribute half of the remaining development to the Rural Areas, they are expected to have minor negative effects.

IA objective 8b: Maintain, enhance and preserve the historic environment

11.34 All new development has the potential to have an impact on the historic environment, both directly and indirectly. Specific effects, including the extent to which new development may enhance the historic environment, will be dependent on the design and layout of specific proposals.

11.35 There are numerous heritage assets within the District and they are spread fairly evenly across it. There are concentrations of heritage assets located in the settlements, particularly the five Market Towns of Swaffham, Watton, Thetford, Dereham and Attleborough. As such, distributing more development to these towns has the potential to significantly adversely affect the historic environment. Scenarios A and App. 2 Scenario 3 are therefore expected to have significant negative effects in relation to this objective.

11.36 Distributing development more evenly between urban and rural areas, as is the case under Scenarios B, E and App. 2 Scenario 1, may reduce the potential for effects on the built historic environment. However, the District's rural areas also contain historic assets, with the potential to be affected by development. For example, there is a Registered Park and Garden (Oxburgh Hall) just outside of Watton, a Scheduled Monument (Roman Settlement at Woodcock Hall) at Little Cressingham, some Listed Buildings near Brettenham and some of the Villages with Boundaries (Scenario E) comprise conservation areas. Scenarios B, E and App. 2 Scenario 1 are therefore also expected to have significant negative effects in relation to this objective.

11.37 Scenarios C, D, F, App. 2 Scenario 2 and App. 2 Scenario 4 prioritise the redevelopment of Swanton Morley Barracks and Abbey Farm. Swanton Morley Barracks is located within close proximity of a scheduled monument (Three Pickett-Hamilton Forts at Swanton Morley Airfield) and a grade II listed building (Control Tower). Its redevelopment could have adverse or positive effects on these historic assets. Similarly, Abbey Farm Estate is also located within close proximity of Thetford Conservation Area, which contains numerous grade I and

II listed buildings, in addition to some scheduled monuments and redevelopment of the estate could enhance or harm the settings of these. The five scenarios distribute all remaining development to the Urban and Rural Areas. Overall, therefore, Scenarios C, D, F, App. 2 Scenario 2 and App. 2 Scenario 4 are expected to have significant negative effects in relation to this objective.

IA objective 9: Minimise the production of waste and encourage the recycling/reuse of onsite resources

11.38 New development as part of all scenarios considered will result in the use of raw materials and the generation of waste, both in construction and operation; however, this will not be influenced by the broad spatial distribution of development. Waste management practices are largely dependent on peoples' behaviour and the design of development. This objective is therefore not applicable to the Alternative Development Scenarios.

IA objective 10: Limit water consumption to the capacity of natural processes and storage systems, ensure the sustainable reuse of water to accommodate growth and maintain and enhance water quality

11.39 The scale of development that would come forward under any of the ten scenarios would result in an increased demand for water consumption; however it is possible that new development would be designed and built to high standards of efficiency. The spatial distribution of development will not have significant impacts on water availability, although some locations will have

greater potential to harm water quality than others. For example, Source Protection Zones cover most of the District and all five Market Towns fall within Source Protection Zone 3 and all scenarios distribute development to the Market Towns. Overall, a minor negative effect is identified for all scenarios in relation to this objective.

Approaches to defining settlements and protecting the countryside from inappropriate development

11.40 This section sets out the findings of the IA of the Council's 'Approaches to defining settlements and protecting the countryside from development' Paper (November 2023).

11.41 The settlement boundary options that have been subject to IA are:

- **Option A:** Continue to define settlement boundaries using the currently adopted approach, i.e. direct appropriate new development to sustainable locations within clearly defined settlement boundaries and generally restrict development beyond the boundary. This approach limits the windfall sites that come forward to only within the settlement boundaries. Certain types of development may be permitted beyond settlement boundaries, such as affordable housing, renewable energy, expansion of employment sites, accommodation for rural workers and the conversion of buildings to alternative uses.
- **Option B:** Instead distinguish between settlements and the countryside using a criteria-based approach. The criteria have not been determined but could include meeting potential unmet housing needs and local affordable housing needs close to but not necessarily within larger and smaller settlements, respectively. This approach has the potential to address specific, clearly defined and evidenced needs, such as elderly or special needs accommodation that may not otherwise be delivered, in addition to self and custom build homes in areas where there is a

demonstrable need. This option would also provide a more positive approach to supporting windfall development in rural areas of the District. There is slightly more freedom in this approach in terms development type and its location, although dependent on the agreed criteria.

11.42 The current approach (Option A) supports development within settlement boundaries based on where they fall in the Settlement Hierarchy and via Policies GEN 05 and HOU 04, amongst others. However, settlement boundaries can make housing less affordable if land values within settlements are artificially increased due to the ability to achieve planning permission in those areas. There may also be increases in land value for areas that sit alongside settlement boundaries in the hope that this land will be included within the boundary in the future. Option A limits windfall sites to within settlement boundaries. Option B could provide a more positive approach to supporting windfall in the rural areas of the District. Therefore, it has the potential to deliver a greater amount of development than Option A. It could, however, prevent development within smaller, rural settlements that are not located towards the top of the settlement hierarchy, which could reduce development within some rural areas and impact on the affordability and availability of housing in those areas. Therefore, overall, both options are expected to have mixed minor positive and minor negative effects in relation to **IA objective 1: Housing**.

11.43 The currently adopted approach (Option A) will ensure development is directed to more sustainable locations where there is better access to services, including open space and healthcare. To avoid increased pressure to develop open spaces within settlements, it designates areas of open space and allotments within settlement boundaries, protecting these areas from development. As such, Option A is expected to have minor positive effects in relation to **IA objectives 2: Equality, health and wellbeing** and **3: Services, facilities and open space**. Option B provides less certainty about where development will be located but may be easier to apply for small rural communities with a relatively dispersed development pattern and is therefore expected to have mixed minor positive and minor negative effects in relation to **IA objectives 2 and 3**.

11.44 If settlement hierarchies are applied to employment development as well as to residential development (Option A), this will ensure employment and development is clearly directed to existing settlements where there is more likely to be a ready supply of local labour and more sustainable commuting options for workers travelling from further afield. However, a criteria-based approach (Option B) could give more consideration to the settlement hierarchy and could result in development focused at settlements higher up in the hierarchy that could be more sustainable. Option B may also offer greater flexibility to locate employment development to well located sites outside of existing settlements. Such sites may also have lower land values and be more viable for employment use. Effects of the options in relation to education mainly relate to how accessible existing education facilities are likely to be to residential development and are likely to be similar to those described for accessibility of services and facilities more generally, as described under IA objective 4 above. Overall, both options are expected to have minor positive effects in relation to **IA objective 4: Economy and education**.

11.45 Option A will ensure development is directed to more sustainable locations where there is better access to sustainable transport links, including active travel networks. This could support a modal shift away from private vehicles reducing emissions associated with transport, which can contribute towards poor air quality. The criteria-based approach (Option B) is likely to be more flexible but less certain in this regard. It can also take into consideration the settlement hierarchy and result in development focused at settlements higher up in the hierarchy that could be more sustainable. Overall, both options are expected to have minor positive effects in relation to **IA objectives 5b: Climate change adaptation and 11: Sustainable transport**.

11.46 By directing development within clearly defined settlement boundaries, Option A avoids the potential for development on most valued wildlife sites and habitats as these are generally in rural areas. This will reduce the potential for negative impacts on local biodiversity and wildlife habitats. Although settlement boundaries could increase pressure to develop any valued habitats and sites within the settlement boundary, these are designated for protection under the current policy approach to settlement boundaries. Overall, Option A is expected to have a negligible effect in relation to this objective. A criteria-based approach

(Option B) would partially rely on the settlement hierarchy to define where development should be located, together with things like the spatial strategy for the area and where available sites are located. Therefore, there is greater potential for wildlife habitats and designated and non-designated sites, including on the edges of the built form of a settlement identified in the settlement hierarchy, to be negatively impacted by development. This could result in the loss of wildlife habitats and impact local biodiversity. Therefore, Option B is expected to have a minor negative effect in relation to **IA objective 6: Biodiversity and geodiversity**.

11.47 Through the currently adopted approach (Option A), development may be more likely to take place on brownfield land, as the settlement boundaries include brownfield land within or adjacent to the built area of the settlement. However, development within settlement boundaries could also result in the take-up of greenfield land, potentially resulting in the loss of high quality agricultural land. Therefore, Option A is expected to have a mixed minor positive and minor negative effect in relation to **IA objective 7: Land and soil**. Under Option B, development close to but not necessarily within settlements could result in greater take-up of greenfield land and potentially the loss of high quality agricultural land. Overall, Option B is expected to have a minor negative effect in relation to **IA objective 7**.

11.48 Settlement boundaries can help to direct appropriate new development to locations within the boundary and restrict development outside of the boundaries unless they are a certain type of development that is permitted. It can be difficult to draw settlement boundaries around dispersed rural communities. The use of settlement boundaries will help to protect the countryside by reducing the potential for inappropriate development within the countryside. Settlement boundaries can also help protect rural settlements and reduce coalescence and urban sprawl. This will help protect the character of these settlements. However, the use of settlement boundaries can create pressure for development within the settlement boundaries which could negatively impact the character of settlements. In addition, settlement boundaries could lead to denser developments which could also impact on the character of the settlement. The currently adopted approach could therefore create pressure for development within the settlement boundaries of rural

settlements, which could negatively impact the character and setting of these settlements. Overall, Option A is expected to have a mixed minor positive and minor negative effect in relation to **IA objective 8a: Landscape and townscape**. As most heritage assets are located within settlement boundaries, this option could have a minor negative effect in relation to **IA objective 8b: Historic environment**. Conversely, Option B does not restrict development to settlement boundaries. There is, however, still potential for this option to adversely affect the landscape and historic environment. Therefore, Option B is expected to have a minor negative effect in relation to **IA objective 8a** and a mixed minor positive and minor negative effect in relation to **IA objective 8b**.

11.49 The currently adopted policy approach safeguards waste processing facilities within settlement boundaries, reducing the potential for loss of these facilities. As such, Option A is expected to have a minor positive effect in relation to **IA objective 9: Waste**. The criteria-based approach is expected to have a negligible effect.

11.50 Negligible effects are expected for both approaches in relation to **IA objectives 5b: Climate change mitigation and 10: Water resources**.

Chapter 12

Consultation and next steps

12.1 In order to meet the requirements of the SEA Regulations, the views of the three statutory environmental bodies (Natural England, Historic England and the Environment Agency) are being sought in relation to the scope and level of detail to be included in the IA. The Scoping Report also contains an appraisal of some initial options (**Chapter 10**) that the Council is consulting on, which arose from the consultation responses received in 2023. The two documents which contain the options that have been subject to IA are:

- Alternative Development Strategy Scenarios (November 2023); and
- Approaches to defining settlements and protecting the countryside from inappropriate development (November 2023).

12.2 The IA Scoping Report will be published on the Council's website for consultation with the three statutory bodies, including members of the public between January and February 2024.

1) Scoping Report

12.3 In particular, the consultees are requested to consider:

- Whether the scope of the IA generally is appropriate as set out.
- Whether there are any additional plans, policies or programmes that are relevant to the IA and should be included in relation to the relevant topic areas addressed by the Scoping Report.
- Whether the information included in relation to each topic area is robust and comprehensive and provides a suitable baseline for the IA of the Local Plan Full Update.
- Whether there are any additional key sustainability issues that should be included.

- Whether the IA framework (included in **Chapter 10**) is appropriate and includes a suitable range of objectives.

2) Initial IA findings

12.4 In particular, the consultees are requested to consider:

- Whether the appraisal findings are clear and justified.
- Whether there are any further issues relating to the options appraised that should be reported on in the IA.

12.5 As the new Local Plan is drafted, it will be subject to the later stages of the IA using the IA framework. A full IA Report (incorporating the later stages of the IA process) will then be produced and made available to other stakeholders and the general public for wider consultation alongside the emerging Local Plan Full Update.

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January 2024

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objective due to the close linkages between vehicle use and associated CO₂ emissions, which contribute towards climate change, in addition to poor air quality.

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