



Consultation Paper

Breckland Local Plan Full Update:

Alternative Development Strategy Options

Date: December 2023



Breckland can provide material in alternative formats, including translations

For further information contact communications@brecklandgov.uk

Contents

1	Introduction.....	2
2	Viability and Developer Contributions	3
3	Responses to the Issues and Options Consultation (March – May 2023)	5
4	Housing Requirement.....	11
5	Previously Developed Land	14
6	Land north of Station Road and East of Fakenham Road, Billingford.....	14
7	The Swanton Morley Barracks (Swanton Morley)	16
8	The Abbey Estate (Thetford)	16
9	The Brecks Special Protection Area	17
10	Local Service Centres	18
11	Weeting	19
12	Call for Sites	20
13	Alternative Development Options.....	20
	ALTERNATIVE SCENARIO A	24
	ALTERNATIVE SCENARIO B	26
	ALTERNATIVE SCENARIO C	29
	ALTERNATIVE SCENARIO D	31
	ALTERNATIVE SCENARIO E	33
	ALTERNATIVE SCENARIO F	36
	Are there any alternative scenarios or options?	39
	APPENDIX 1: METHODOLOGY	40
	APPENDIX 2: POSSIBLE ALTERNATIVE STRATEGY	41

Please note:

This consultation papers sets out a range of development scenarios to explore the different ways growth may be distributed to Breckland's towns and villages in the new Local Plan.

The numbers set out for each Alternative Development Scenario are based on a range of delivery assumptions and are not the final proposed figures for growth in each settlement, that will be set out in further detail in future consultation stages on the Local Plan.

1 Introduction

- 1.1 Consultation on the Regulation 18 stage of the Local Plan: Full Update began in early 2023 with a formal issues and options consultation between March 10 and May 19 2023. The consultation attracted an excellent level of response and a summary of responses relevant to this consultation is included in the Report. The Council has adopted a new tool 'Commonplace' to help with community engagement and promotion of key issues relating to the Local Plan. This leading technology has been used successfully by a number of local authorities in their Local Plan processes, and the Council continues to use this platform as part of the emerging Local Plan.
- 1.2 During the formal Issues and Options consultation both the full document and a booklet setting out the main points were available across the District. The document set out issues and options for both the development and the protection of areas of the District, addressing issues such as housing, the economy, leisure, retail, the environment and infrastructure. In considering where development should and should not be located, three Development Strategy Options were set out. in terms of the potential distribution of development in the District over the plan period for consultees to consider and choose their preference.
 - Option 1: Do you think development should be concentrated within the market towns?

- Option 2: Do you think more housing should be dispersed within rural areas/villages?
- Option 3: Should there be a new settlement Garden Town/Village developed within Breckland and should the 15 minute neighbourhood concept be introduced?
- Option 4: Should development be concentrated on the main transport routes (A47, A11 or others)?

2 Viability and Developer Contributions

2.1 Paragraph 58 of the National Planning Policy Framework (NPPF) states:

‘Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable’.

2.2 It is therefore imperative that very careful consideration is given to this as part of any allocations that will be included in the Local Plan. This will involve close liaison with key infrastructure providers and this work will progress as development Options and possible allocations are identified. In considering infrastructure requirements the Council will need to ensure that requirements are appropriate and meet national planning policy. Planning obligations assist in mitigating the impact of unacceptable development to make it acceptable in planning terms. Planning obligations may only constitute a reason for granting planning permission if they meet the following tests. They must be:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

2.3 These tests are set out as statutory tests in the Community Infrastructure Levy Regulations 2010 (as amended by the 2011 and 2019 Regulations) and as policy tests in the National Planning Policy Framework. These tests apply whether or not there is a levy charging schedule for the area.

- 2.4 Developer contributions are based upon an established principle that developers should mitigate negative impacts created by the developments they bring forward, or where additional infrastructure is required to support this development. They are intended to make acceptable developments which would otherwise be unacceptable by offsetting the impact by making local improvements. This is usually achieved through planning conditions. However, if this is not possible, developers may be required to enter into legally binding agreements which can include financial compensatory measures to mitigate such impacts. Planning obligations may be undertaken unilaterally by the developer, or by agreements between the developer and the Local Planning Authority.
- 2.5 The following list is not exhaustive but may include:
- Highways and transportation
 - Flooding and drainage
 - Education and childcare
 - Health facilities
 - Emergency service facilities
 - Sporting and recreational facilities
 - Open spaces
 - Biodiversity
 - Green and blue infrastructure
 - Heritage
 - Affordable housing
- 2.6 These policy requirements should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the section 106. Policy requirements should be clear so that they can be accurately accounted for in the price paid for land.
- 2.7 The legal tests for planning obligations in section 106 agreements have been recently examined in two similar court cases. These concerned challenges by NHS Trusts to decisions of local authorities to grant planning permission without an NHS contribution. The lessons from these cases are important not only when

considering the reasonableness of any requested NHS contribution, but also all planning obligations that may be sought by local authorities, statutory consultees, and interested parties.

- 2.8 Both cases set out what funding is available to the National Health Service, confirming that funding is set out annually, and is based on the previous year's costs with an allowance for population growth. Unless a funding gap can be demonstrated, and linked to additional capacity a new development will generate, it will be difficult to justify a contribution. The recent Court of Appeal cases, and to a certain extent the guidance on education contributions, provide some comfort to developers when significant community contributions are requested for a development, as they set an important reminder that all planning obligations sought must meet the test set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010.

3 Responses to the Issues and Options Consultation (March – May 2023)

- 3.1 Option 1: 200 responses were received to Q11: Option 1: Do you think development should be concentrated within the market towns? 148 said 'yes' with 35 stating no and 17 were unsure.
- 3.2 In terms of the towns identified as suitable for development there was a fairly even split, with several respondents suggesting more than one town as suitable locations for development:
- Attleborough 20
 - Dereham 36
 - Swaffham 22
 - Thetford 28
 - Watton 24
- 3.3 A number of representations considered that the market towns have a better range

of services and employment as well as better transport links and should be the focus for further planned growth because of this. Key concerns regarding the availability of infrastructure (in particular health provision) and traffic congestion were also identified.

3.4 Some responses noted that as the current development strategy concentrates development in two large sustainable urban extensions at Attleborough and Thetford, this would result in a much lesser number of smaller allocations in the other towns and larger villages. These responses noted that development should be on appropriate sites throughout the settlement hierarchy so that the Local Service Centres and Villages with Boundaries benefit from coordinated development which brings with it affordable housing and S106 contributions which can help fund important services and facilities within the settlements, rather than being subject to small schemes, which fall under the thresholds and lead to an increase of the population but without the benefits of slightly larger schemes.

3.5 **Option 2: 214 responses were received to Q12: Do you think more housing should be dispersed within rural areas/villages? 68 said 'yes, 116 stated 'no' with 30 unsure.**

3.6 A number of different opinions were expressed during this phase of the consultation. These included:

- Everywhere should have their fair share of development but villages need to have a few houses only to protect the countryside, land, wildlife etc
- The potential of cities (Norwich) and market towns should be fully explored before any rural or new town developments are considered.
- Infill and small developments can be very beneficial to rural communities and they should be part of the policy.
- There should be a supply of housing that enables local people to stay local, if they wish and this should be from starter and social housing through to family homes and homes for the elderly.
- Villages don't have work opportunities or services so it will increase traffic on the roads. The roads are also of poor quality and not maintained so this would make a bad situation worse.

- Housing should be on brownfield sites.
- Smaller developments of maximum of 10/20 houses suit villages better.
- Dispersal of some (non-strategic) growth is important to support rural communities and smaller settlements.
- The smaller towns and villages do not have the sustainable transport links of the larger towns, so this Option is likely to increase car-borne commuting.
- Any growth strategy that directs the development to a large number of smaller sites, which would not contribute to any major infrastructure improvements and are likely to be limited by their impact on the character of smaller settlements, should not be supported.
- Should allow for the minor growth of every rural parish via windfall development during the proposed plan period up to a 5 dwelling limit (Refer to Greater Norwich Local Plan)

3.7 **Option 3: 2,261 responses were received to Q13: Should there be a new settlement Garden Town/Village developed within Breckland and should the 15 minute neighbourhood concept be introduced? 44 said 'yes, 2,199 stated 'no' with 18 unsure.**

3.8 The main principle underpinning 15-minute neighbourhoods is ensuring residents in built-up areas can live near public places they visit regularly. That means families should be able to walk their children to school, do their shopping, visit their GP, and visit restaurants and leisure facilities without having to travel long distances. In many ways, 15-minute neighbourhoods hark back to older methods of planning how cities and towns were designed. Advantages include health benefits since residents are encouraged to walk and cycle as well as supporting local economies since families are able to shop without travelling long distances.

3.9 The COVID-19 outbreak immediately caused the closure of schools and offices, emptied out public transport and in some cases, restricted residents to a tight perimeter around their homes. These restrictions have resurrected discussions around 15-minute neighbourhoods that involve a menu of policy actions that provide residents access to most, if not all, of their needs within a short walk or bike ride from their home. 15-minute policies transform urban spaces into

connected and self-sufficient (or 'complete') neighbourhoods. Reducing car use and encouraging active travel are central to delivering the 15-minute vision. The 15-minute neighbourhood serves as an organising principle for urban development and urban life that makes life more liveable for residents, by improving air quality and making neighbourhoods safer, quieter, more diverse, inclusive and economically vibrant. In the UK, there are relatively few examples of planning policies and interventions that nurture 15-minute neighbourhoods, but the low traffic neighbourhoods being pioneered in Waltham Forest and Sheffield – and those planned for Bristol, Bath, Manchester and other cities – are tentative first steps. The Plan could consider applying this approach if larger strategic developments are to be developed. The NPPF states that larger scale developments such as new settlements or significant extensions to existing villages and towns can be considered and if these are to form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

- 3.10 The 15 minute neighbourhood model aims to encourage and support communities to access their daily goods and services locally, by sustainable means. The concept was developed as a model for cities, including those identified above and is better applied to existing larger urban areas. The concept becomes more complex to apply in a rural context. In rural areas the implementation of 15-minute neighbourhoods, or complete, compact and connected communities poses a different set of challenges from those typical in urban areas. Rural communities can suffer from poorer digital connectivity, inferior public transport provision and road, cycling and walking infrastructure, and limited access to a variety of employment opportunities. Housing quality and affordability, and isolation from and access to various services can also be issues which impact on rural communities' health and wellbeing.
- 3.11 Planning policy in Breckland has been established with the idea of a settlement hierarchy, particularly with regards to retail, leisure and other town centre functions. This is considered to be the most appropriate development strategy for the future planning of the District, with discussions focussing on how the required development should be distributed within this overall concept and whether there is a role for freestanding developments that can be demonstrated as being of an

appropriate scale to meet identified needs as well as suitable and deliverable in planning terms, including for example, in terms of being well located to transport networks, local employment opportunities and/or for example make the best use of previously developed land.

- 3.12 It will also be important for the Plan to include enabling policies to allow for housing to meet identified local needs as well as for local community hubs and local employment opportunities that could increase local sustainability similar to the larger scale 15 minute neighbourhoods.
- 3.13 2,261 responses were made to Q13 and Q13A. These include significant opposition including 1,670 individual objections from two campaigns, including one from 35 town and parish councils. There was very significant opposition to Option 3 and in particular the promotion of land near North Elmham for major development received under the Call for sites. This generated some 2,000 objections including one from a collective of 35 town and parish councils.
- 3.14 Key issues raised by those in favour were that a 15 minute neighbourhood is compact and connected, and one where the everyday needs of residents can be met within a short walk or cycle. Such a proposal would be consistent with sustainable transport policies, and in particular in promoting the use of walking, cycling and public transport, limiting the need to travel, supporting an appropriate mix of uses in areas, and minimising journeys for most activities.
- 3.15 The most common themes from those opposed to the proposed development in North Elmham include:
- Destruction of unique ecosystems and much needed farmland (food production) to produce a commuter ghetto that does nothing to support the rural young nor support rural industry.
 - Lack of infrastructure.
 - Impacts on biodiversity.
 - Increased traffic and pollution.
 - Impact on existing water supply and sewage treatment; loss of tranquillity

and dark skies.

- Impact on existing community identity.
- Better located in existing area of development where people have access to transport, jobs and infrastructure.
- Provision of affordable homes to meet local needs best provided in modest numbers spread over an area close to where people have their work and to enhance trade for existing small local businesses.
- irreparable damage to the countryside and fragile landscape.

3.16 **Option 4: 198 responses were received to Q14: Should development be concentrated on the main transport routes (A47, A11 or others)? 138 said 'yes, 31 stated 'no' with 29 unsure.**

3.17 Those supporting this Option noted that:

- New development should be close to well-developed transport routes. People need to get to places where they work.
- Massive investment has been made on these main routes and this should be capitalised on to make Norwich accessible to people for work.
- Amenities and infrastructure already exist, transport routes more acceptable to volumes of traffic. Closer to jobs/bus links/retail/rail links, more suitable for construction traffic.
- The district is well-served by the A11 and A47 trunk roads. It is entirely sensible for the Council to capitalise on the links that these roads provide, particularly given the infrastructure improvements planned for the road network. If the Council wants to capitalise on these links, it should not solely direct all growth to the market towns that have access to these transport corridors. It will be necessary to consider how growth in the rural settlements in close proximity to these roads can also play a role in capitalising on these links.
- A key consideration when identifying locations for development should be the opportunity existing / proposed transport infrastructure plays in relation to the scale and density of development that can be accommodated. On this basis, key infrastructure routes in the District, such as the A47, A11, and existing

infrastructure, will be key considerations in locations for growth.

3.18 However, other comments included:

- The A47 is already extremely over used at present and the roads feeding onto it are very busy at peak times.
- This would only create two densely packed corridors.
- The A11 is adequate and suitable for development as it has good access via A14 to the whole of the country but the A47 is more congested and dangerous and does not have additional rail access and suffers from North South traffic congestion (Dereham and Swaffham).
- Development should also be close to mainline train stations.
- The identification of development around main transport routes is logical, but growth needs to be dispersed across the District to sustain local communities.

4 Housing Requirement

4.1 Another issue that emerged as part of the consultation was the overall scale of development required for housing. At the time of the consultation, the overall scale of development required within Breckland was based on the Standard Method figure of 661 dwellings per annum. This figure is currently being assessed by independent consultants but initial evidence does not point to exceptional circumstances to move away from this standard method starting point. This would mean a total housing requirement over the plan period of **16,525 dwellings** (661 homes per year during the 25-year period of the Local Plan).

4.2 Paragraph 75 of the NPPF states that *strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should monitor their deliverable land supply against their housing requirement, as set out in adopted strategic policies. The Council considers that it would be prudent to include a buffer of 10% to ensure choice and competition in the market for land. This would result in an overall housing requirement of **18,177 dwellings over the plan period.***

- 4.3 In addition it is likely that not all sites currently with permission will be implemented. Therefore, it is appropriate to include a lapse rate of 10% on sites with permission that are yet to commence (excluding the Attleborough SUE). This is 308 dwellings

Towns	Completions	Commitments	Remaining Allocations	Totals	2021 - 2046
Attleborough	253	579	0	832	832
Attleborough SUE	0	4000	0	4000	2200 ¹
Dereham	168	356	190	714	714
Swaffham	269	257	126	652	652
Thetford	28	73	0	101	101
Thetford SUE	332	4,774	0	5,000	3,904 ²
Watton	162	266	160	588	588
Totals	1,212	10,305	476	11,887	8,991
Local Service Centres	360	1127	343	1,830	1,830
Villages with boundaries	174	368	66	608	608
Other parishes	118	177	0	289	289
Totals					11,718

(3,086*10%). This gives a total requirement of **18,485 dwellings for the plan period.**

Housing Supply

- 4.4 It is important to note that the Plan period is 2021 – 2046. Dwellings completed or with permission will be taken into account as part of the overall housing need as will sites allocated in the current Breckland Local Plan without permission where delivery can be confirmed.
- 4.5 At March 2023 these were as follows:
- 4.6 Deducting these completions and commitments means that the new Plan will need to find sites for **6,767 dwellings** (18,485-11,718).
- 4.7 The NPPF also allows the Plan to include an allowance for windfall sites as part of anticipated supply, where there is compelling evidence that they will provide a reliable source of supply. The 5 year Housing Land Supply Report shows that Breckland has a strong track record of windfall delivery. Over the last 12 years,

¹ Based on an estimate of an average of 100 dwellings per year from 2024/25 to 2046

² Based on Developer provided Trajectory

the average annual windfall development on minor sites is 193 units. New allocations set out in the Plan may reduce the number of windfalls but they will remain a significant source of supply in the large predominantly rural District. Therefore, the Council is adopting a precautionary approach to expected delivery from windfall sites of 100 units per year. This is 2,300 dwellings from 2024 (100*23).

4.8 Including the windfall allowance, there will be a need to allocate new sites for housing for a total of **4,467 dwellings** (6,767 – 2,300).

4.9 The NPPF requires the Plan to identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved. For Breckland this means that allocations for a total of 446 dwellings should be on small sites.

Summary of Housing Requirement and Need

Demand

Base Requirement	16,525
10% flexibility rate	1,652
10% Lapse Rate	308
Total Requirement	18,485

Supply

Total commitments	11,718
Windfall allowance	2,300
Total new allocations	4,467
Total new allocations on small sites	446

4.10 It is important to recognise that the standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on

demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the current figure of 661 dwellings per annum. Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of: growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth, strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; policy decisions of the Council who may wish to increase the delivery of affordable housing or increased economic development growth or an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground. For the purposes of this consultation the figure of 661 units per annum has been used. Additional information on the outcome of the consultants' work including a revision (if any) of the 661 figure will be considered at a later stage when the review is complete.

5 Previously Developed Land

- 5.1 Previously developed land: Land (also known as Brownfield land) is land which is or was occupied by a permanent structure, including the curtilage of the developed land. Paragraph 123 of the NPPF states:

'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.'

- 5.2 It is therefore important that, where available, deliverable and suitable sites have been identified these should be considered in the Plan especially where this would reduce the amount of greenfield, including farmland, that would need to be developed.

6 Land north of Station Road and East of Fakenham Road,

Billingford

6.1 This greenfield site proposed a mixed-use garden community, including a mix of uses and was submitted under the call for sites. The proposal resulted in over 2,000 objections, including from 35 town and parish councils, during the Issues and Options stage. Whilst this level of opposition is very significant it does not mean that the proposal should automatically be discounted, However, the Council considers that further consideration of this site would be inappropriate for the following reasons:

- The scale of development (5,000 dwellings) is not required to meet the identified housing need that the Plan needs to identify (4,021 dwellings on major sites based on the identified need of 661 dwellings per annum). The NPPF (paragraph 74) considers that

“the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way’.

- Unless the Council chose a higher overall housing requirement figure, the allocation of this site would effectively mean that the Plan would be over providing and that no other sites would need to be allocated across the whole District, in the Plan, including the rural areas. Concentrating development in a single location is not considered as an appropriate development strategy to meet the needs of the District as a whole.
- The NPPF sets out a presumption in favour of brownfield sites where possible (See Section 5 of this paper)
- There is a need for the Plan to demonstrate a robust supply of sites across the whole plan period and given the nature and location of this site and the need for significant infrastructure to be provided (as demonstrated by both the Thetford and Attleborough urban extensions) it is unlikely that the site would

deliver houses until the second part of the Plan period. This could result in a significant shortfall of overall delivery against requirement in the first half of the Plan Period.

- There is a requirement for the identification of smaller sites in the Plan and for the Council to demonstrate a robust supply of sites across the whole plan period. Subject to the conclusions from the HEDNA Report, the allocation of this site would therefore mean that the Council would need to allocate significantly more sites for housing than evidenced in the Housing and Economic Development Needs Assessment.

7 The Swanton Morley Barracks (Swanton Morley)

- 7.1 Swanton Morley Barracks is located on the parish boundary between Swanton Morley and Hoe. The Barracks has been identified as surplus to requirements and is expected to close in 2029. The previously developed site contains residential accommodation as well as commercial and recreation facilities. Although the Parish of Swanton Morley only includes a relatively small part of the whole Barracks site, it is referred to in the Swanton Morley Neighbourhood Plan (2022).³ This Plan recognizes that it would not be desirable for the site to be ‘mothballed’ for any length of time and that the Parish Council will be in proactive discussions with stakeholders regarding its disposal. The Plan considers that the site offers opportunity for a mix of housing and commercial uses. The site was promoted under the Call for Sites and could accommodate between 500 and 2000 dwellings. As a previously developed site with some existing infrastructure and uses the site is considered to be worthy of further consideration and as such is included in some of the Options for development set out in this Paper. If considered acceptable it would reduce the loss of greenfield land elsewhere. For the purposes of this Paper 2,000 dwellings are allocated for this site. If, following further work a lower capacity is preferred then this will require the redistribution of any shortfall within the Preferred development strategy.

8 The Abbey Estate (Thetford)

³ https://www.breckland.gov.uk/media/14281/Swanton-Morley-Neighbourhood-Plan-Final-version/pdf/SMNP_Referendum_versionf.pdf?m=637684174492300000

- 8.1 In the late 1960's the Abbey Estate was constructed comprising 1,100 houses, public open spaces and footpaths. The Estate was planned in line with Radburn layout principles – notably employing cul-de-sacs and typified by the fronts of homes facing one another, over common yards rather than the street. Radburn layouts have been criticised for resulting in an absence of properly overlooked streets and encouraging crime and anti-social behaviour. The urban principles of the Radburn System are accused of contributing to places that lack prosperity, pride, or opportunities for healthy and happy lifestyles. The current Radburn layout encourages private vehicle use for short journeys and 'hides' neighbourhood facilities and the retail and community centre of the estate. The Abbey Estate today ranks in the top 7% of most deprived areas in England and despite strong community cohesion, the community struggle with health and wellbeing issues together with challenges associated with fly tipping, anti-social behaviour and poor connections both across the estate and to local assets including the Little Ouse River, Thetford Forest and Thetford town centre.
- 8.2 Under the Call for Sites there is a proposal to regenerate the estate that includes the addition of new housing as well as varying degrees of re-development of the existing housing stock, environment and landscaping. This could result in an additional 460 new dwellings and as a previously developed site with identifiable social and other associated benefits is worthy of further consideration under the development Options and if considered acceptable would reduce the loss of greenfield land elsewhere.

9 The Brecks Special Protection Area

- 9.1 The Breckland Special Protection area covers over 39,434 ha of heathland, forest and arable farmland covering the districts of Breckland, West Suffolk and a small part of West Norfolk. The Brecks is of European value to birdlife and was designated in 2006 as a Special Protection Area (SPA) under the European Council's Directive on the Conservation of Wild Birds. The Brecks habitat is important for a range of ground – nesting birds including the Stone Curlew, Woodlark and Nightjar.
- 9.2 The National Planning Policy Framework gives further guidance. Paragraph 188

states that the “*presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site*”.

- 9.3 This is a key consideration in the determination of the Development Strategy and the Council will not allocate any sites within the Affected area unless the promoter of the site can demonstrate, in writing , that the proposed allocation will not have an adverse effect on the SPA’s integrity and that Natural England does not object to the allocation, The parishes where this may be an issue are set out below:

Parish ⁴	Whole or Part affected	Parish	Whole or Part affected
Brettenham	Part	North Pickenham	Part
Bridgham	Part	Oxborough	Part
Cockley Cley	Part	Roundham and Larling	Part
Croxton	Part	Saham Toney	Part
Didlington	Part	South Pickenham	Part
Foulden	Part	Standford	All
Gooderstone	All	Stow Bedon	Part
Gt Cressingham	Part	Sturston	All
Hilborough	All	Swaffham	Part
Hockham	Part	Thetford	Part
Ickburgh	All	Thompson	Part
Kilverstone	Part	Tottingham	All
Lt Cressingham	Part	Watton	Part
Lynford	Part	Weeting	All
Merton	Part	Wretham	Part
Mundford	Part		

10 Local Service Centres

- 10.1 In considering the development strategy for the Local Plan it is important to note

⁴ Parishes in **bold** are towns or local service centres where allocations may be appropriate

that the current Local Plan, including the development strategy, that was adopted in 2019 was found to be sound by an independent Inspector and remains up to date. Whilst the Council will consider representations that propose a new Strategy, it is considered appropriate, to apply the existing Strategy of concentrating new development in the market towns and larger more sustainable parishes as this is a demonstrably robust and up to date strategy. Consideration will also be given to whether other suitable sized previously developed strategic sites such as the Swanton Morley Barracks near Swanton Morley can contribute to meeting the overall development needs of the District.

- 10.2 To this end the Council has updated its information on the relative sustainability of the larger parishes within Breckland based on responses to a request for information to parishes in 2023 and other publicly available information. The outcome of this work is set out in the Local Service Centre Profile document accompanying this Paper and the villages identified as being most sustainable are used in the alternative development strategies. The 2019 Local Plan identified the following parishes as being the most sustainable:

Ashill, Banham, Bawdeswell, Garboldisham, Great Ellingham, Harling, Hockering, Kenninghall, Litcham, Mattishall, Narborough, Necton, North Elmham, Old Buckenham, Shipdham, Sporle, Swanton Morley, and Weeting

- 10.3 The 2023 update now includes the parishes of Beeston and Mundford as Local Service Centres with the remainder of the parishes remaining unchanged from the 2017 Report.

11 Weeting

- 11.1 The current Local Plan identifies Weeting as a Local Service Centre through the locational strategy, The Plan did not consider that it was appropriate for housing growth and instead it was identified solely for services protection and enhancement. The village is wholly located within the Brecks SPA (see paragraph 9.3) and is part of the area designated for the protection of the Stone Curlew which is the special interest feature of the SPA. As with the current Plan this Paper does not consider - due to the environmental constraints surrounding the village - that allocations for development are appropriate.

12 Call for Sites

- 12.1 The Council received some 500 sites identifying land for possible future development. An assessment of these sites has been undertaken that has identified a pool of sites which may be suitable, available and achievable for housing or economic development uses. The results of this assessment and methodology are published for comment alongside this Paper.
- 12.2 It is important to note that even if a site is suitable, achievable and available it does not follow automatically that it will be included in the Plan. Sites will need to deliver against the final preferred strategy for the Plan, that is part of this consultation. Inclusion of land in the assessment does not necessarily mean it will be allocated in the Local Plan, nor does it imply that planning permission would be granted if a planning application was submitted.
- 12.3 However, this approach does ensure that all land is assessed together to identify which sites are the most suitable and deliverable when considered against the aims of the Local Plan and identified future needs.
- 12.4 Once the Council agrees a preferred development Strategy, sites will be tested through further technical work to assess their sustainability, suitability and deliverability. This will include discussions with key stakeholders including the promoters of sites as well as Norfolk County Council, utility and key infrastructure providers.
- 12.5 The sites considered most appropriate will be published in the Draft Local Plan that will then be subject to further public consultation.
- 12.6 The initial assessment indicates that are sufficient sites available to meet each of the possible development Options.

13 Alternative Development Options

- 13.1 No clear preferred Option emerged from the consultation, but there was clear opposition to the creation of a 'garden village' at North Elmham. There was some consensus about concentrating development along the main transport corridors

(in particular the A11) and at the Market towns but also that there should be some development in the villages particularly aimed at meeting local needs and in particular affordable housing. If adopted, this approach tends to support a continuation of the existing development strategy as set out in the 2019 Local Plan but with greater emphasis on the use of brownfield land and a clearer policy basis to allow 'local housing for local needs in the villages'.

13.2 As a result, this Report sets out 6 main alternative options have been formulated, referred to as Options A – F. As part of the Sustainability Appraisal process, all of these will be tested. It is important to note that the preferred development strategy will depend on the availability of suitable deliverable sites. It may be that a hybrid of 2 or more alternatives could be the preferred outcome. For example, other % splits between the Market towns and local service centres may be a possibility or instead of using a % split, absolute figures could be applied to settlements, for example: Town X: 1,000 and Village Y: 100 dwellings.

- **Alternative Option A:** Concentrate development in the Market towns with 80% of housing need being allocated to the 5 Market Towns and 20% to the Local Service Centres
- **Alternative Option B:** Equal Distribution between Urban and Rural Areas with 50% of housing need being allocated to the 5 Market Towns and 50% in the Local Service Centres.
- **Alternative Option C:** Maximises the use of strategic sites on previously developed land by including both the Swanton Morley Barracks and the Abbey Estate in Thetford with the remainder of housing need being allocated to the 5 Market Towns (80%) and 20% to the Local Service Centres.
- **Alternative Option D:** Maximises the use of strategic sites on previously developed land by including both the Swanton Morley Barracks and the Abbey Estate in Thetford with the remainder of housing need being allocated to the 5 Market Towns (50%) and 50% to the Local Service Centres
- **Alternative Option E:** Equal Distribution between Urban and Rural Areas with 50% of housing need being allocated to the 5 Market Towns and 50% in the to the rural areas (with 70% of the rural requirement directed to Local Service Centres and 30% to those villages identified as Villages with Boundaries under Policy HOU 04 in the current Local Plan).

- **Alternative Option F:** Maximises the use of strategic sites on previously developed land by including both the Swanton Morley Barracks and the Abbey Estate in Thetford with the remainder of housing need being allocated to the 5 Market Towns (50%) and 50% to the rural areas (with 70% of the rural requirement directed to Local Service Centres and 30% to those villages identified as Villages with Boundaries under Policy HOU 04 in the current Local Plan.

13.3 The 6 scenarios are not exhaustive and there may be others that are preferred. The Paper also seeks views as to whether there any other possible development strategy options that the Council should consider that are not included. Examples of alternative strategies are also set out in this Paper as follows:

- An equal split of the full requirement across both the Market towns and Local Service Centres based on size of parish (population). This could also include strategic sites on previously developed land at both the Swanton Morley Barracks and the Abbey Estate in Thetford. This is set out in Appendix 2.

13.4 A further possible Strategy is one that considers the importance of a GP surgery in designating a Local Service Centre. Across rural Breckland, there are very few parishes within Breckland which have GP Surgeries due to population size and rural nature of the District. Surgeries outside the main market towns therefore provide a service for a wide rural catchment, and it was not considered in the 2017 Topic paper appropriate to identify local service centres through the existence of a GP surgery within a village. This is considered to remain valid. However, for the purposes of this Consultation Paper, an option is included that identifies those parishes where there is a GP surgery and where all of the criteria considered necessary to justify Local Service Centre status exist. These areas are designated as 'Enhanced Local Service Centres' and more development is directed to these than to the other Local Service Centres. This is set out in Appendix 2.

- Development in Market towns and across a higher level of 'Enhanced Local Service Centres' and local service centres. District wide housing needs would be proportionately distributed across the five Market towns, Enhanced Local Service Centres and Local Service Centres. This could also include an approach that includes the use of strategic sites on

previously developed land by including both the Swanton Morley Barracks and the Abbey Estate in Thetford.

13.5 It is also important to note that the Local Service Centres (LSC) set out in the Options below reflect those in the current Local Plan as updated to 2023. This list may change as evidence emerges on the relative sustainability of a particular village and as a result of this consultation. The Options set out the numbers required for each settlement required to meet the overall District need of 661 dwellings per year. This has been done by applying a proportionate factor of the relative size of a settlement that reflects the approach of the current Local Plan.

13.6 The Local Plan is required to make appropriate provision for the needs of gypsies, travellers and travelling showpeople. The Call for Sites did not result in any available sites being identified. The needs assessment for this group of people is still to be completed but at the moment it is highly likely that insufficient land has been identified to meet the identified need.

13.7 Planning Policy Guidance states⁵

“When preparing strategic policies, it may be concluded that insufficient sites / broad locations have been identified to meet objectively assessed needs, including the identified local housing need. In the first instance, strategic policy-making authorities will need to revisit their assessment, for example to carry out a further call for sites, or changing assumptions about the development potential of particular sites to ensure these make the most efficient use of land. This may include applying a range of densities that reflect the accessibility and potential of different areas, especially for sites in town and city centres, and other locations that are well served by public transport. If insufficient land remains, then it will be necessary to investigate how this shortfall can best be planned for. If there is clear evidence that strategic policies cannot meet the needs of the area, factoring in the constraints, it will be important to establish how needs might be met in adjoining areas through the process of preparing statements of common ground, and in accordance with the duty to cooperate. If following this, needs cannot be met then the plan-making authority will have to demonstrate the reasons why as part of the plan examination.”

⁵ Paragraph: 025 Reference ID: 3-025- 20190722

- 13.8 If insufficient sites cannot be identified the Council may have to carry out a further call for sites or, as part of the ongoing discussions with adjoining areas through the Duty to Co-operate, consider if and how needs can be met at a wider scale. Failure to plan appropriately could result in the Plan being found unsound at Examination.
- 13.9 Any allocations will need to be deliverable within the Plan period and include a trajectory to demonstrate this.
- 13.10 The alternative options set out below have not been tested for deliverability. If sites are not available, suitable or deliverable then this may need a different Option to be considered or a re-distribution of allocations to those areas where sites may be available. The Options have not, for example, assessed whether allocations required within the Brecks Special Area of Conservation would be acceptable and supported by Natural England. Once a preferred Option is chosen, this will trigger more detailed discussions on possible sites within the chosen areas on key issues of deliverability including appropriate discussions with key infrastructure providers including health, power and water.
- 13.11 Across the 5 market towns it is anticipated that 8,991 dwellings will be developed from sites either with current planning permission or from remaining allocations in the current Local Plan. This represents 55% of the total number of dwellings (16,185) requiring allocation in the Plan. Therefore, any development option that seeks to allocate less than 55% to the 5 towns will result in no new allocations being required for those parts of the District. This is explored further in Alternative B.

ALTERNATIVE SCENARIO A

Concentrate development in the Market Towns

- 13.12 District wide development needs would be proportionately distributed across the five Market towns and Local Service Centres with 80% of development in the five market towns and 20% in the Local Service Centres. The numbers take account of existing completions and commitments from 2021. This reflects the current

Local Plan where 78% of the total dwelling need were identified on sites in the 5 market towns.

- 13.13 This would allow for a strategic allocation of land in Dereham and some at Swaffham along the A47 corridor) as well as at Watton. The existing allocations at Attleborough and Thetford along the A11 would be sufficient to meet the needs of the towns for the new Plan Period.
- 13.14 There would not be a requirement to allocate either of the larger previously developed sites at the Abbey Estate in Thetford or the Barracks near Swanton Morley.
- 13.15 Economic Development allocations would be concentrated along the main trunk roads to link with the best transport infrastructure links available in the District (road and rail). New major allocations would be focused at Snetterton and at Dereham.
- 13.16 Sites to meet the identified needs of the traveller community could be a requirement of any larger allocations in the new Plan.
- 13.17 For the remainder of the District a suite of Development Management policies will allow for small-scale housing to meet locally identified needs (entry level, starter homes, custom and self build, housing for the elderly or veterans or those with long term disabilities or build to rent) and economic development within all the District's smaller settlements, creating opportunities for social and economic prosperity for future generations.

Alternative A: Summary of Housing Requirement and Need

Demand

A	Base Requirement	16,525
B	10% flexibility rate	1,652
C	10% Lapse Rate	308
D	Total Requirement	18,485 (16,525 + 1,652 + 308)
E	Windfalls	2,300
F	Dwellings requiring allocation	16,185 (18,485 – 2,300)

Supply

G	80% in Market Towns	12,948 (80% of F)
H	Commitments/ allocations	8,991
I	New allocations	3,957 (12,948 – 8,991)
J	20% in Local Service Centres	3,237 (20% of F)
K	Commitments/ allocations	2,727
L	New allocations	510 (3,237 – 2,727)
M	Total (H+I+K+L)	16,185

Alternative A

Towns	Net new Allocations
Attleborough	0
Dereham	2,308
Swaffham	573
Thetford	0
Watton	1,075
Totals	3,956

Alternative A

LSC	Net new Allocations	LSC	Net new Allocations
Ashill	0	Mattishall	64
Banham	0	Mundford	93
Bawdeswell	51	Narborough	28
Beeston	19	Necton	0
Garboldisham	15	North Elmham	53
Great Ellingham	0	Old Buckenham	60
Harling	47	Shipdham	0
Hockering	24	Sporle	0
Kenninghall	38	Swanton Morley	0
Litcham	20	Weeting	0
		Totals	511

ALTERNATIVE SCENARIO B

Equal Distribution between Urban and Rural Areas

- 13.18 Development would be proportionately distributed across the five Market towns and Local Service Centres with 50% of development in the five market towns and 50% in the Local Service Centres.
- 13.19 This means that the existing completions and commitments in all five towns would be sufficient to meet the needs of the towns for the new Plan Period. There would therefore be no need for new allocations in any of the five towns and any new development for housing would be through small scale windfall development.
- 13.20 There would not be a requirement to allocate either of the larger previously developed sites at the Abbey Estate in Thetford or the Barracks near Swanton Morley
- 13.21 This would mean that all the new housing allocations would be in the Local Service Centres, that would take an additional 4,466 new dwellings through allocations.
- 13.22 Economic Development allocations could be concentrated along the main trunk roads to link with the best transport infrastructure links available in the District (road and rail) and/or in the rural areas such as Shipdham Airfield. New major employment could be focused at Snetterton and at Dereham to help create new jobs for past and committed development in the towns.
- 13.23 Sites to meet the identified needs of the traveller community could be a requirement of any larger allocations in the new Plan.
- 13.24 For the remainder of the District a suite of Development Management policies will allow for small-scale housing to meet locally identified needs (entry level, starter homes, custom and self build, housing for the elderly or veterans or those with long term disabilities or build to rent) and economic development within all the District's smaller settlements, creating opportunities for social and economic prosperity for future generations.

Alternative B: Summary of Housing Requirement and Need

Demand

A	Base Requirement	16,525
B	10% flexibility rate	1,652
C	10% Lapse Rate	308
D	Total Requirement	18,485 (16,525 +1,652 +308)
E	Windfalls	2,300
F	Dwellings requiring allocation	16,185 (18,485 – 2,300)

Supply

G	50% in Market Towns	8,092 (50% of F)
H	Commitments/ allocations	8,991
I	New allocations	-899 (8,092 – 8,991)
J	50% in Local Service Centres	8,092 (50% of F)
K	Commitments/ allocations (Including surplus from I)	3,626
L	New allocations	4,466 (8,092 – 3,626)
M	Total (H+I+K+L)	16,184

Alternative B

Town	Net new Allocations
Attleborough	0
Dereham	0
Swaffham	0
Thetford	0
Watton	0
Totals	0

Alternative B

LSC	Net new Allocations	LSC	Net new Allocations
Ashill	217	Mattishall	499
Banham	223	Mundford	342
Bawdeswell	189	Narborough	244
Beeston	112	Necton	334
Garboldisham	173	North Elmham	285
Great Ellingham	0	Old Buckenham	267
Harling	442	Shipdham	307
Hockering	155	Sporle	150

Kenninghall	201	Swanton Morley	214
Litcham	114	Weeting	0
		Totals	4,467

ALTERNATIVE SCENARIO C

Scenario A and that maximises the use of previously developed land by including both the Swanton Morley Barracks and the Abbey Estate in Thetford.

- 13.25 Under this Option the previously developed site at Swanton Morley Barracks and the Abbey Estate in Thetford would be allocated for up to 2,000 and 460 dwellings respectively. The remainder of the dwellings would be allocated on an 80/20% split between the market towns and Local Service Centres.
- 13.26 Economic Development allocations could be concentrated along the main trunk roads to link with the best transport infrastructure links available in the District (road and rail). And or in the rural areas such as Shipdham Airfield. New major employment could be focused at Snetterton and at Dereham to help create new jobs for past and committed development in the towns.
- 13.27 Sites to meet the identified needs of the traveller community could be a requirement of any larger allocations in the new Plan.
- 13.28 For the remainder of the District a suite of Development Management policies will allow for small-scale housing to meet locally identified needs (entry level, starter homes, custom and self build, housing for the elderly or veterans or those with long term disabilities or build to rent) and economic development within all the District's smaller settlements, creating opportunities for social and economic prosperity for future generations.

Alternative C: Summary of Housing Requirement and Need

Demand

A	Base Requirement	16,525
B	10% flexibility rate	1,652

C	10% Lapse Rate	308
D	Total Requirement	18,485 (16,525 +1,652 +308)
E	Windfalls	2,300
F	Dwellings requiring allocation	16,185 (18,485 – 2,300)
Supply		
G	Swanton Morley Barracks	2,000
H	Abbey Estate Thetford	460
I	Dwellings requiring allocation	13,725 (16,185 - 2,460)
J	80% in Market Towns	10,980 (80% of I)
K	Commitments/ allocations	8,991
L	New allocations	1,989 (10,980 – 8,991)
M	20% in Local Service Centres	2,745 (20% of I)
N	Commitments/ allocations	2,727
O	New allocations	18 (2,745 – 2,727)
P	Total (G+H+K+L+N+O)	16,185

Alternative C

Swanton Morley Barracks	2,000
Abbey Estate (Thetford)	460
Town	Net new Allocations
Attleborough	0
Dereham	1,303
Swaffham	165
Thetford	0
Watton	520
Totals	1,988

Alternative C

LSC	Net new Allocations	LSC	Net new Allocations
Ashill	0	Mattishall	0
Banham	0	Mundford	12
Bawdeswell	6	Narborough	0
Beeston	0	Necton	0
Garboldisham	0	North Elmham	0

Great Ellingham	0	Old Buckenham	0
Harling	0	Shipdham	0
Hockering	0	Sporle	0
Kenninghall	0	Swanton Morley	0
Litcham	0	Weeting	0
Totals			18

ALTERNATIVE SCENARIO D

Scenario B plus the use of previously developed land by including both the Swanton Morley Barracks and the Abbey Estate in Thetford.

- 13.29 Under this Option the previously developed site at Swanton Morley Barracks and the Abbey Estate in Thetford would be allocated for up to 2,000 and 460 dwellings respectively. The remainder of the dwellings would be allocated on a 50/50% split between the market towns and Local Service Centres.
- 13.30 Economic Development allocations could be concentrated along the main trunk roads to link with the best transport infrastructure links available in the District (road and rail). New major employment could be focused at Snetterton and at Dereham to help create new jobs for past and committed development in the towns.
- 13.31 Sites to meet the identified needs of the traveller community could be a requirement of any larger allocations in the new Plan.
- 13.32 For the remainder of the District a suite of Development Management policies will allow for small-scale housing to meet locally identified needs (entry level, starter homes, custom and self build, housing for the elderly or veterans or those with long term disabilities or build to rent) and economic development within all the District's smaller settlements, creating opportunities for social and economic prosperity for future generations.

Alternative D: Summary of Housing Requirement and Need

Demand

A	Base Requirement	16,525
B	10% flexibility rate	1,652
C	10% Lapse Rate	308
D	Total Requirement	18,485 (16,525 +1,652 +308)
E	Windfalls	2,300
F	Dwellings requiring allocation	16,185 (18,485 – 2,300)

Supply

G	Swanton Morley Barracks	2,000
H	Abbey Estate Thetford	460
I	Dwellings requiring allocation	13,725 (16,185 - 2,460)
J	50% in Market Towns	6,863 (50% of I)
K	Commitments/ allocations	8,991
L	New allocations	-2,128 (6,863 – 8,991)
M	50% in Local Service Centres	6,862 (50% of I)
N	Commitments/ allocations (including surplus from L)	4,855
O	New allocations	2,007 (6,862 – 4,855)
P	Total (G+H+K+L+N+O)	16,185

Alternative D

Allocations

Swanton Morley Barracks	2,000
Abbey Estate (Thetford)	460

Town

	Net new allocations
Attleborough	0
Dereham	0
Swaffham	0
Thetford	0
Watton	0
Totals	2,460

Alternative D

LSC	Net new Allocations	LSC	Net new Allocations
Ashill	78	Mattishall	246
Banham	87	Mundford	197

Bawdeswell	108	Narborough	118
Beeston	58	Necton	135
Garboldisham	81	North Elmham	150
Great Ellingham	0	Old Buckenham	146
Harling	212	Shipdham	80
Hockering	79	Sporle	53
Kenninghall	106	Swanton Morley	14
Litcham	59	Weeting	0
Totals		2,008	

ALTERNATIVE SCENARIO E

Equal Distribution between Urban and Rural Areas (including Local Service Centres and Villages with boundaries⁶)

- 13.33 Development would be proportionately distributed across the five Market towns and Local Service Centres and villages with boundaries with 50% of development in the five market towns and 50% in the Rural Areas with 70% of this rural requirement in the Local Service Centres and 30% in the villages with boundaries.
- 13.34 This means that the existing completions and commitments in all five towns would be sufficient to meet the needs of the towns for the new Plan Period. There would therefore be no need for new allocations in any of the five towns and any new development for housing would be through small scale windfall development.
- 13.35 There would not be a requirement to allocate either of the larger previously developed sites at the Abbey Estate in Thetford or the Barracks near Swanton Morley
- 13.36 This would mean that all the new housing allocations would be in the Local Service Centres and Villages with boundaries, that would take an additional 4,469 new dwellings through allocations.
- 13.37 Economic Development allocations could be concentrated along the main trunk

⁶ The villages with boundaries are those identified in Policy HOU 04 of the current Local Plan)

roads to link with the best transport infrastructure links available in the District (road and rail) and/or in the rural areas such as Shipdham Airfield. New major employment could be focused at Snetterton and at Dereham to help create new jobs for past and committed development in the towns.

13.38 Sites to meet the identified needs of the traveller community could be a requirement of any larger allocations in the new Plan.

13.39 For the remainder of the District a suite of Development Management policies will allow for small-scale housing to meet locally identified needs (entry level, starter homes, custom and self build, housing for the elderly or veterans or those with long term disabilities or build to rent) and economic development within all the District's smaller settlements, creating opportunities for social and economic prosperity for future generations.

Alternative E: Summary of Housing Requirement and Need

Demand

A	Base Requirement	16,525
B	10% flexibility rate	1,652
C	10% Lapse Rate	308
D	Total Requirement	18,485 (16,525 +1,652 +308)
E	Windfalls	2,300
F	Dwellings requiring allocation	16,185 (18,485 – 2,300)

Supply

G	50% in Market Towns	8,093 (50% of F)
H	Commitments/ allocations	8,991
I	New allocations	- 898 (8,093-8991)
J	50% in Rural Areas	8,092 (50% of F)
K	Over provision in Urban areas	898
L	Commitments in rural areas (excluding LSC and villages with boundaries)	289
M	Rural Requirement	6,906 (8,093 -898 – 289)
N	70% of the rural requirement in Local Service Centres	4,834 (70% of M)
O	Commitments/ allocations in LSC	1,830

P	New allocations in LSC	3,004 (4,834 – 1,830)
Q	30% in villages with boundaries	2,072 (30% of M)
R	Commitments in villages with boundaries	607
S	New allocations in Villages with Boundaries	1,465 (2,072 – 607)
T	Total (H+I+O+P+R+S)	16,185

Alternative E

Town	Net new Allocations
Attleborough	0
Dereham	0
Swaffham	0
Thetford	0
Watton	0
Totals	0

Alternative E

LSC	Net new Allocations	LSC	Net new Allocations
Ashill	134	Mattishall	349
Banham	142	Mundford	256
Bawdeswell	141	Narborough	169
Beeston	80	Necton	216
Garboldisham	118	North Elmham	205
Great Ellingham	0	Old Buckenham	195
Harling	305	Shipdham	172
Hockering	110	Sporle	93
Kenninghall	144	Swanton Morley	95
Litcham	82	Weeting	0
Totals		3,004	

Alternative E

Villages with boundaries	Net new Allocations	Smaller Villages	Net new Allocations
Beetley	181	Quidenham	42

Carbrooke	352	Rocklands	88
Caston	54	Saham Toney	118
Gressenhall	135	Shropham	30
Griston	188	Thompson	40
Hockham	0	Weasenham	41
Lyng	111	Yaxham	24
North Lopham	59		
Totals		1,474	

ALTERNATIVE SCENARIO F

Scenario E plus the use of previously developed land by including both the Swanton Morley Barracks and the Abbey Estate in Thetford.

- 13.40 Under this Option the previously developed site at Swanton Morley Barracks and the Abbey Estate in Thetford would be allocated for up to 2,000 and 460 dwellings respectively. Development would be proportionately distributed across the five Market towns and 50% in the Rural Areas with 70% of this rural requirement in the Local Service Centres and 30% in the villages with boundaries.
- 13.41 This means that the existing completions and commitments in all five towns would be sufficient to meet the needs of the towns for the new Plan Period. There would therefore be no need for new allocations in any of the five towns and any new development for housing would be through small scale windfall development.
- 13.42 This would mean that all the new housing allocations would be in the Local Service Centres and Villages with boundaries, that would take an additional 4,469 new dwellings through allocations.
- 13.43 Economic Development allocations could be concentrated along the main trunk roads to link with the best transport infrastructure links available in the District (road and rail) and/or in the rural areas such as Shipdham Airfield. New major employment could be focused at Snetterton and at Dereham to help create new jobs for past and committed development in the towns.

- 13.44 Sites to meet the identified needs of the traveller community could be a requirement of any larger allocations in the new Plan.
- 13.45 For the remainder of the District a suite of Development Management policies will allow for small-scale housing to meet locally identified needs (entry level, starter homes, custom and self build, housing for the elderly or veterans or those with long term disabilities or build to rent) and economic development within all the District's smaller settlements, creating opportunities for social and economic prosperity for future generations.

Alternative F: Summary of Housing Requirement and Need

Demand

A	Base Requirement	16,525
B	10% flexibility rate	1,652
C	10% Lapse Rate	308
D	Total Requirement	18,485 (16,525 +1,652 +308)
E	Windfalls	2,300
F	Dwellings requiring allocation	16,185 (18,485 – 2,300)

Supply

G	Swanton Morley Barracks	2000
H	The Abbey Estate Thetford	460
I	Dwellings requiring allocation	13,725 (16,185 - 2,460)
j	50% in Market Towns	6,863 (50% of I)
J	Commitments/ allocations	8,991
K	New allocations	- 2.128 (6,863 – 8,991)
L	50% in Rural Areas	6,863 (50% of F)
M	Over provision in Urban areas	2,128
N	Commitments in rural areas (excluding LSC and villages with boundaries)	289
O	Rural Requirement	4,446 (6,863 -2,128 – 289)
P	70% in Local Service Centres	3,112 (70% of O)
Q	Commitments/ allocations in LSC	1,830
R	New allocations in LSC	1,282 (3,112 – 1,830)
S	30% in villages with boundaries	1,334 (30% of O)
T	Commitments in villages with boundaries	607

U	New allocations in Villages with Boundaries	727 (1,334 – 607)
V	Total (H+I+L+O+P+R+S)	16,186

Alternative F

Allocations

Swanton Morley Barracks	2,000
Abbey Estate (Thetford)	460

Town	Net new Allocations
Attleborough	0
Dereham	0
Swaffham	0
Thetford	0
Watton	0
Totals	0

Alternative F

LSC	Net new Allocations	LSC	Net new Allocations
Ashill	34	Mattishall	166
Banham	44	Mundford	152
Bawdeswell	83	Narborough	79
Beeston	41	Necton	73
Garboldisham	52	North Elmham	107
Great Ellingham	0	Old Buckenham	108
Harling	139	Shipdham	9
Hockering	54	Sporle	23
Kenninghall	76	Swanton Morley	0
Litcham	42	Weeting	0
Totals		1,282	

Alternative F

Villages with boundaries	Net new Allocations	Smaller Villages	Net new Allocations
Beetley	102	Quidenham	15
Carbrooke	205	Rocklands	45
Caston	28	Saham Toney	30

Gressenhall	79	Shropham	6
Griston	89	Thompson	20
Hockham	0	Weasenham	21
Lyng	65	Yaxham	0
North Lopham	23		
Totals			727

Are there any alternative scenarios or options?

13.46 Are there any other possible development strategy scenarios that the Council should consider that are not set out above? Any alternative Strategy will need to demonstrate compliance with national planning policy and in particular, that it is considered robust and sustainable.

For example:

- Do you have any comments on the Scenarios set out above?
- Are there any parishes included in the Scenarios above that should not have allocations for development?
- If so which parishes and why?
- Are there any other parishes (other than those included in the above Scenarios) where allocations for development should be considered?
- If so which parishes and why?
- Should the distribution of development between the towns and / or Local Service Centres be equally distributed irrespective of the size of a particular parish in terms of population?

Please provide details of any alternative Development Scenario or Option the Council should consider?

APPENDIX 1: METHODOLOGY

Total number of dwellings to be allocated = 12,948

Towns	Population	% of town's population	Total commitments	Allocations	Commitments - allocation
				12,948	
Attleborough	11,232	14.5	3,032	1,877	-1,155
Dereham	20,785	26.9	714	3,483	2,769
Swaffham	8,434	10.9	652	1,411	759
Thetford	25,492	32.9	4,005	4,260	255
Watton	11,453	14.8	588	1,916	1,328
Totals	77,396	100	8,991	12,948	3,957

Attleborough has 1,155 more commitments than required allocations.

Remove Attleborough from the calculation and redistribute the 1,155 across the remaining 4 towns based on % population. e.g. Dereham equates to 31.4% of the total population of the 4 remaining towns

$$31.4\% \text{ of } 1,155 = 363$$

$$\text{New Allocation for Dereham} = 2,406 \text{ (} 2,769 - 363 \text{)}$$

Towns	Population	% of town's population	Redistribute 1,155	New allocation
Attleborough	0.00	0.00	0.00	0.00
Dereham	20,785	31.41	363	2,406
Swaffham	8,434	12.75	147	612
Thetford	25,492	38.53	445	-190
Watton	11,453	17.31	200	1,128
Totals	66,164	100.00	1,155	3,957

Thetford has 190 more commitments than required allocations.

Remove Thetford from the calculation and redistribute the 190 across the remaining 3 towns based on % population. E.g. Dereham equates to 51.1% of the total population of the 3 remaining towns

$$51.1\% \text{ of } 190 = 98$$

$$\text{New Allocation for Dereham} = 2,308 (2,406 - 98)$$

Towns	Population	% of town's population	redistribute 190	new allocation
Attleborough	0.00	0.00	0.00	0.00
Dereham	20,785	51.1	98	2,308
Swaffham	8,434	20.7	39	573
Thetford	0.00	0.00	0.00	0.00
Watton	11,453	28.2	53	1,075
Totals	40,672	100.00	190	3,957

APPENDIX 2: POSSIBLE ALTERNATIVE STRATEGY

An equal split of the full requirement across both the Market towns and Local Service Centres based on size of parish (population) including or excluding strategic previously developed sites at Swanton Morley and Abbey Estate in Thetford.

Summary of Housing Requirement and Need

Demand

A	Base Requirement	16,525
B	10% flexibility rate	1,652
C	10% Lapse Rate	308
D	Total Requirement	18,485 (16,525 + 1,652 + 308)
E	Windfalls	2,300
F	Sites requiring allocation	16,185 (18,485 – 2,300)

Supply

G	100% in towns and LSCs	16,185
---	------------------------	--------

H	Commitments/ allocations	11,718
I	New allocations	4,467 (16,185 –11,718)
J	Total (H+I)	16,185

Summary of Housing Requirement and Need

Demand

A	Base Requirement	16,525
B	10% flexibility rate	1,652
C	10% Lapse Rate	308
D	Total Requirement	18,485 (16,525 +1,652 +308)
E	Windfalls	2,300

Supply

F	Allocation at Swanton Morley Barracks	2,000
G	Allocation at Abbey Estate (Thetford)	460
F	Dwellings requiring allocation in District	13,725 (16,185 – 2460)
G	100% in towns and LSCs	13,725
H	Commitments/ allocations	11,718
I	New allocations	2,007 (13,725 –11,718)
J	Total (F+G+H+I)	16,185

Allocations

Allocations	Excluding Swanton Morley Barracks and the Abbey Estate	Including Swanton Morley Barracks and the Abbey Estate
Swanton Morley Barracks	0	2,000
Abbey Estate (Thetford)	0	460
Attleborough	0	0
Dereham	1,692	894
Swaffham	324	0
Thetford	0	0
Watton	738	298
Ashill	61	3
Banham	70	13
Bawdeswell	98	65
Beeston	51	29

Garboldisham	70	32
Great Ellingham	0	0
Harling	183	88
Hockering	69	37
Kenninghall	94	55
Litcham	53	30
Mattishall	214	109
Mundford	179	119
Narborough	102	50
Necton	111	28
North Elmham	133	77
Old Buckenham	131	81
Shipdham	52	0
Sporle	41	1
Swanton Morley	0	0
Weeting	0	0
Totals	4,467	4,469

APPENDIX 2: POSSIBLE ALTERNATIVE STRATEGY

Development in Market towns and across a higher level of ‘super’ local service centres and local service centres (see para 13.4) including or excluding strategic previously developed sites at Swanton Morley and the Abbey Estate in Thetford.

Demand		
A	Base Requirement	16,525
B	10% flexibility rate	1,652
C	10% Lapse Rate	308
D	Total Requirement	18,485 (16,525 +1,652 +308)
E	Windfalls	2,300
F	Sites requiring allocation	16,185 (18,485 – 2,300)
Supply		

G	70% in Market Towns	11,330 (60% of F)
H	Commitments/ allocations	8,991
I	New allocations	2,339 (11,330 – 8,991)
J	20% in Enhanced Local Service Centres	3,237
K	Commitments/ allocations	1,596
L	New allocations	1,641 (3,237 – 1,596)
M	10% in Local Service Centres	1,618
N	Commitments/ allocations	1,131
O	New allocations	487 (1,618 – 1,131)
P	Total (H+I+K+L+N+O)	16,185

Demand		
A	Base Requirement	16,525
B	10% flexibility rate	1,652
C	10% Lapse Rate	308
D	Total Requirement	18,485 (16,525 +1,652 +308)
E	Windfalls	2,300
F	Sites requiring allocation	16,185 (18,485 – 2,300)
Supply		
G	Swanton Morley Barracks	2,000
H	Abbey Estate Thetford	460
I	Residual sites requiring allocation	13,725
J	70% in Market Towns	9,608 (70% of 13,725)
K	Commitments/ allocations	8,991
L	New allocations	617 (9,608 – 8,991)
M	20% in Enhanced Local Service Centres	2,745
N	Commitments/ allocations	1,596
O	New allocations	1,149 (2,745 – 1,596)
P	10% in Local Service Centres	1,373
Q	Commitments/ allocations	1,131
R	New allocations	242 (1,373 – 1,131)
S	Total (K+L+N+O+Q+R)	16,185

Allocations		
	New Allocations	New Allocations
Swanton Morley Barracks	0	2,000
Abbey Estate (Thetford)	0	460
Towns		
Attleborough	0	0
Dereham	1,482	524
Swaffham	237	0
Thetford	0	0
Watton	620	92
Totals	2,339	2,460 (617)

Allocations		
Enhanced LSC	Net new Allocations	Net new Allocations
Harling	257	187
Kenninghall	124	96
Litcham	70	54
Mattishall	295	219
Mundford	225	182
Narborough	143	105
Necton	174	114
North Elmham	176	136
Shipdham	124	56
Swanton Morley	53	0
Totals	1,641	1,148

Allocations		
LSC	Net new Allocations	Net new Allocations
Ashill	42	0
Banham	52	10
Bawdeswell	88	63
Beeston	44	27
Garboldisham	58	29
Great Ellingham	0	0
Hockering	59	35
Old Buckenham	115	77
Sporle	29	0
Totals	487	242