

Breckland Council Regulation 18 (2025)

Consultee comments

The Consultees are in the following order:

- Anglian Water
- Environment Agency
- Forestry Commission
- Homes England
- Norfolk & Waveney Integrated Care Board
- National Farmers Union
- National Grid
- National Highways
- Natural England
- Rail Future East Anglia
- Water Management alliance
- Ministry of defence
- National Gas
- Norfolk County Council
- Norfolk County Council – Education comments
- Local Highway Authority
- Historic England

Anglian Water Consultation Response

Breckland Draft Local Plan (Reg 18) Consultation

1. Anglian Water

- 1.1. Anglian Water is the water and water recycling provider for over 6 million customers in the east of England. Our operational area spans between the Humber and Thames estuaries and includes around a fifth of the English coastline. The region is the driest in the UK and the lowest lying, with a quarter of our area below sea level. This makes it particularly vulnerable to the impacts of climate change including heightened risks of both drought and flooding, including inundation by the sea.
- 1.2. Anglian Water has amended its Articles of Association to legally enshrine public interest within the constitutional make up of our business – this is our pledge to deliver wider benefits to society, above and beyond the provision of clean, fresh drinking water and effective treatment of used water. Our Purpose is to bring environmental and social prosperity to the region we serve through our commitment to Love Every Drop.

2. Anglian Water and Local Plans

- 2.1. Anglian Water is the statutory water and sewerage undertaker for Breckland District Council and a statutory consultee under The Town and Country Planning (Local Planning) (England) Regulations 2012. Anglian Water wants to proactively engage with the local plan process to ensure the plan delivers benefits for residents and visitors to the area, and in doing so protect the environment and water resources. As a purpose-led company, we are committed to seeking positive environmental and social outcomes for our region.
- 2.2. Anglian Water has positively engaged in the consultations for the emerging Local Plan and has provided information to support the evidence base.

3. Commentary on the Draft Breckland Local Plan

- 3.1. Anglian Water has the following comments in relation to the Draft Breckland Local Plan:

Design and Sustainable Development

GEN 01: Design and Sustainable Development

Anglian Water notes that the scope of the policy has changed since the previous iteration of the Local Plan in 2024, and no longer references that development should contribute to mitigation of climate change and appropriate adaptations to the risk of climate change, including taking full account of flood risk and minimising impact on water resources. It is considered that the current policy misses the opportunity to highlight the importance of addressing these matters as a general principle of design and sustainable development, whilst recognising that subsequent policies in the plan will address these specific matters in further detail.

The reference to ensuring development will minimise all forms of pollution including avoiding unacceptable impacts on surface and groundwater quality is supported. Anglian Water abstracts water from surface waters and groundwater across Norfolk and is dependent on measures that seek to protect water quality, particularly within source protection zones around our abstraction points (see our comments in relation to Section 11 Resilient and Adaptable Infrastructure).

GEN 02: Parish Hierarchy and Spatial Development Strategy

Anglian Water notes that development is principally focussed on three Strategic Development Areas for up to 3,000 dwellings each, over the longer term (beyond the local plan period), five market towns which include sustainable urban extensions, and the most sustainable villages. It is considered that this strategy provides scope for development to come forward in a range of locations. However, we would reiterate our previous responses to the Local Plan preparation, which supports a quantitative approach to assessing growth options i.e. utilising available capacity at our Water Recycling Centres to accommodate future growth at locations informed by a Water Cycle Study/Integrated Water Management Study. This approach applies the sustainability hierarchy and utilises existing infrastructure to reduce emissions from building new infrastructure to support growth. Where there is insufficient infrastructure capacity to support the quantum of growth identified for the Local Plan review, we would recommend that a quantum of growth that supports 5,000 population equivalent (i.e. above 2,000 dwellings) such as sustainable urban extensions to higher order settlements or new settlements - this would ensure that investment in new infrastructure provides the greatest carbon efficiency in relation to embodied/capital carbon in infrastructure. Such an approach would identify where phasing of growth would be required to enable future infrastructure capacity to be planned for and delivered, and locations where growth is less constrained and able to come forward to meet housing delivery requirements and five year housing land supply targets (see commentary on policies HOU1 and HOU2 below).

The Strategic Development Areas (SDAs) are shown to meet a set of criteria (para 4.24), which emphasises that these are new settlements outside existing urban areas, which will need to incorporate necessary infrastructure to support the proposed quantum of growth, including utilities infrastructure. For new settlements in rural areas where there is no existing infrastructure, Anglian Water recommends that wastewater infrastructure including new water recycling centres are delivered by the developer as part of the wider package of infrastructure measures required to support the settlement. The new WRCs should be built to adoptable standards so that they may be adopted and operated by a water company.

In contrast the three proposed Sustainable Urban Extensions (SUEs) for Swaffham, Watton and Thetford, represent extensions to market towns which have existing water supply and wastewater infrastructure networks and facilities. The quantum of growth proposed for the SUEs means that carbon efficiencies can be achieved through the provision of water/wastewater infrastructure needed to support growth, but further investment may be required to support the level of growth proposed.

Fewer and smaller allocations are identified in lower order parishes/settlements, however, the quantum of growth allocated in these tiers is not consistent with their role and function, or necessarily the infrastructure capacity available. See our comments under HOU1 and HOU2.

Policy RB 1: Robertson Barracks

As indicated in our response to the previous Local Plan consultation in July 2024, Anglian Water acknowledges that this is a significant brownfield site, where sustainable growth could maximise the carbon efficiencies through opportunities to reuse existing infrastructure, buildings and housing on the site. Swanton Morley WRC has dry weather flow (DWF) headroom to accommodate relatively substantial growth; however, the WRC also accepts flows from developments on the east of Dereham. Further consideration of the capacity to accommodate flows from strategic development on this site and from the eastern edge of Dereham would need to be assessed.

Both Dereham and Swanton Morley WRCs will have measures to reduce nutrients to technically achievable limits (TAL) in AMP8: for phosphorus (0.25mg/l) and nitrogen (10mg/l) at Dereham, and at Swanton Morley WRC for phosphorus by 2030. This will present future challenges for additional growth that would require a change to the discharge permits for increased dry weather flow (DWF) which is likely to lead to tighter parameters for other sanitary measures such as Phosphorus and Nitrogen.

The capacity for future growth at Swanton Morley WRC, will be dependent on the location of the allocations, and the quantum of growth at Dereham and whether flows are directed to Dereham WRC or Swanton Morley WRC. We suggest that further evidence will be required (i.e. a Water Cycle Study) to determine the balance of allocations and the treatment of wastewater flows at Dereham and Robertsons Barracks.

Anglian Water welcomes the intention for the Council to work with the site promoters and key statutory undertakers to determine future opportunities and uses for the site, including having regard for any constraints. It is recommended that Policy RB1 includes:

- in criterion d) reference is made to wastewater treatment when considering wider infrastructure capacity for the site,
- reference to water efficiency in addition to energy efficiency in criterion h), and
- flood resilient design should have its own criterion.

5. Housing

Attleborough SUE

5.14 - The paragraph states that outline permission was granted in 2020 for "4,000 homes, a link road and other infrastructure such as a wastewater treatment works..."

This is an error - the permission does not provide for a wastewater treatment works (i.e. a water recycling centre) - it includes a pumping station and rising main to pump and convey wastewater flows from the SUE to the Attleborough Water Recycling Centre (WRC). It is anticipated that due to current capacity limitations for dry weather flow at Attleborough WRC, growth investment will be

required from AMP9 to accommodate flows from the SUE and other allocations/windfall within the catchment. The next iteration of the Drainage and Wastewater Management Plan for 2030-2055 is currently in preparation, for publication in 2028, the findings of which will be used to inform the PR29 Business Plan for investments in AMP9.

HOU1: Breckland's Housing Requirement

HOU2: Distribution of Housing Development

Anglian Water notes the significant uplift to the local housing requirement following the revision to the National Planning Policy Framework and Planning Practice Guidance in December 2024, which has necessitated a further iteration of the Preferred Options consultation, to address the shortfall in housing allocations. The 920 dwellings per annum average is significantly greater than previous delivery rates in the district which will require a diversity of sites and development opportunities to meet the new target. The challenge will be to address any infrastructure shortfalls that may prevent sites coming forward in the short term.

To date, the Council has not prepared a Stage 2 Water Cycle Study (WCS) as part of the evidence base to inform the Integrated Assessment Report and selection of preferred site options for growth. The Stage 1 WCS provides a useful baseline for considering future growth in the district; however, we would advise the Council to undertake a Stage 2 WCS to provide evidence to demonstrate whether suitable infrastructure capacity is available and where mitigation may be required i.e. through phasing the delivery of sites to allow future investment to come forward, or alternative options taken forward. Similarly, the Infrastructure Delivery Plan does not take account of water supply or wastewater infrastructure that might be required to support growth in the district. Anglian Water requests a separate policy on Water Quality to address the management of wastewater under Section 11 Resilient and Adaptable Infrastructure.

The existing commitments that have the benefit of planning consent, will have a right to connect to our networks for water supply and wastewater treatment under the Water Industry Act, whether sufficient capacity exists or not. Anglian Water will therefore have to manage the growth coming forward regardless of any capacity constraints. As a statutory consultee, Anglian Water is reliant on the planning system, to ensure new development coming forward is managed effectively, protects the environment and any risks associated with our assets are mitigated. The Stage 2 WCS and IDP should appropriately identify any constraints for new proposed sites in the draft Local Plan and recommend suitable policy measures to address these, to avoid harm to the environment and our customers.

There is some concern that significant uplifts in both property and population in the short term, will be constrained by water recycling capacity, as our current Drainage and Wastewater Management Plan (DWMP 2025-2050) will not have planned for this national policy change, which will be factored into the preparation of our next DWMP due to be published in 2028. We are seeking to fully understand potential additional housebuilding programmes in the near and longer term for inclusion in this plan. The required level of housing may be delayed in some locations due to infrastructure constraints and the time it takes to fund and deliver capital investment often required for large scale growth. It is important that such constraints are factored into the Local Plan with phased delivery



where necessary to allow for infrastructure investment to take place to facilitate sustainable growth and this is appropriately reflected in housing delivery trajectories.

Whilst it is acknowledged that a range of settlements and strategic development areas have been identified for growth across the district, the Plan states that modest amounts of growth is needed in smaller settlements to help deliver the significant uplift to housing supply. The water supply and wastewater infrastructure to support this growth in the range of settlements is varied depending on the networks and facilities in place and the operational capacity. Smaller settlements may be part of a larger wastewater network for a neighbouring town; be part of a network serving a number of villages; or may only be partially served by a very small water recycling centre historically built for a specific development. This undoubtedly means that the infrastructure capacity to accommodate growth is similarly variable.

WRCs within Breckland identified in the Stage 1 Water Cycle Study (WCS) as having capacity constraints for future growth, do not have named growth schemes identified in the Business Plan for this AMP period (AMP8 2025-2030); therefore, funding for these would need to be included in the next Price Review process (PR29) covering the period 2030-2035.

Anglian Water is committed to enabling sustainable growth and is collaborating with external stakeholders to find solutions to capacity challenges. We are working to secure policy and regulatory change that allows water companies to better support growth, for example by allowing us to invest strategically to create new capacity ahead of growth materialising, and by changing charging rules to allow for developer contributions to new infrastructure.

Similarly, resolving the impact of environmental pressures, including sites that will need to meet technically achievable limits (TAL) for phosphorus and nitrogen, and the approach required to enable future sustainable growth is a matter Anglian Water will continue to discuss with the Environment Agency and key stakeholders to assess future options for growth. Anglian Water is working with the Environment Agency on alternative options to accommodate additional growth at WRCs that are already required to meet technically achievable limits (TAL) for phosphorus but will also need to accommodate additional growth through increasing dry weather flow capacity. Potential solutions being explored include catchment approaches and investments in removing phosphorus from wastewater discharges at upstream WRCs. These solutions will need to be identified through the next DWMP and PR29 Business Plan to seek investment for what is needed to support growth without deterioration to water quality.

HOU 17: Water efficiency

Anglian Water strongly supports the introduction of tighter water efficiency standards in new development that can help make development across the district more water efficient and allow sustainable growth, whilst longer term water supply solutions are being developed/implemented.

As well as managing risks to the environment, tighter water efficiency measures may also reduce the need for water companies to restrict supply for non-domestic growth, alongside other initiatives. We are pleased to note that reference is also made to the implementation of tighter water efficiency standards help to reduce the operational and capital carbon required to heat water in the home, deliver infrastructure, and pump and treat wastewater flows from new development.

It would be helpful to reference the [Shared Standards for Water Efficiency in Local Plans](#) (published in June 2025) within the supporting text. These Shared Standards set out a collaborative and collective approach by Anglian Water, Cambridge Water, Essex & Suffolk Water, Affinity Water, the Environment Agency and Natural England, with the full endorsement of Water Resources East (WRE) as part of strengthening the Regional Water Resources Plan for Eastern England. It recommends that Local Planning Authorities (LPAs) include tighter water efficiency standards in Local Plan policies to support a clean and sustainable supply of water - essential for growth and nature recovery. Anglian Water has noted that several emerging local plans are proposing tighter water efficiency standards and have signposted the Shared Standards as part of the evidence base.

The Shared Standards recommend that LPAs include Local Plan Policies that:

- Require new homes to be built to more stringent standards for water efficiency than the optional Building Regulations (part G) standard of 110 litres per person per day (l/p/d). Evidence indicates that a design standard of up to 85 litres/person/day (l/p/d) for residential developments is feasible (a range between 85-95 l/p/d should be considered subject to viability).
- Require new, extended or redeveloped non-domestic¹ development to aim to achieve full credits in the BREEAM water calculator.
- Require new major non-domestic developments to include water saving measures and water reuse in their design.

These standards provide guidance and local evidence to help LPAs make a case that more stringent water efficiency policies are justified, feasible and viable as part of Water Cycle Studies and Integrated Water Management Plans that effectively manage a range of challenges across the water environment and aid nature recovery. Local Plans have a significant role in helping to deliver the sustainable use of water resources and address shorter-term water scarcity issues. LPAs can help ensure the risk of harm to habitats and deterioration to water bodies due to water scarcity is minimised by setting more ambitious, tighter water efficiency standards for new residential and non-domestic developments in local planning policy.

Tighter water efficiency standards that can be justified by evidence set out in the annexes supporting Shared Standards. The evidence is extensive and demonstrates, inter alia, that:

- The Water Resource Management Plans (WRMPs), prepared by water companies, in the Shared Standards area demonstrate that there are significant challenges in meeting predicted domestic and non-domestic growth in water demand whilst also meeting statutory environmental obligations (i.e. there are non-domestic water restrictions Anglian Water's area).
- Water efficiency is needed for protected sites and wider nature recovery. Of the 239 SSSIs in the Shared Standards area, 96 at time of writing, have water abstraction identified as an active pressure. Many have measures in place to address these pressures linked in many cases to the plan-led approach. The Shared Standards complement or support the delivery of those measures.

- At present it is feasible to achieve a total consumption of 85 l/p/d by taking a fittings-based approach using product types outlined in the Shared Standards Annex C - Section C2, which can be achieved at relatively low cost. In addition, water companies offer incentives to developers to build water efficient homes. These are tied into water company Business Plans that are published every five years, with the latest being published in 2025 alongside WRMPs.

Currently, we are in the position where we need to decline requests for [non-domestic water](#) that exceed 20m³ per day, in order to protect existing supplies and the environment until strategic supply options come online. A water resources assessment is now only required for Nationally Strategic Infrastructure Projects or Special Development Orders. Therefore, we recommend that policy criterion g) should be amended to state:

g) demonstrate that any non-domestic water use proposed by the development can be supplied.**

The non-domestic water requirements for a proposed development may be supplied from other sources (e.g. Rainwater harvesting and reuse) and may not require a potable supply - this should be demonstrated in the Water Efficient Design Statement. In addition, the supporting text could state that water companies provide environmental incentive schemes to fund water efficiency measures in new developments and should be explored.

HOU 22: Provision for Travellers and Travelling Showpeople

Whilst not all sites may be within a reasonable distance to our water supply and wastewater networks to connect and private supplies/wastewater treatment may be required; the policy should include "utilities" in the list set out in policy criterion f).

EMP 01: Economic Growth Strategy

Anglian Water has highlighted the current position in terms of non-domestic water requests in respect of the water efficiency policy HOU17. However, we believe that for consistency this policy should be at least referenced in the supporting text (if not in the policy itself) and the link to our [Non-Domestic Water Requests](#) Policy as it will be particularly relevant for certain types of employment growth in manufacturing/industrial sectors including agri food and agri tech.

6. Employment and Economic Development

EMP 03: Snetterton General Employment Area

Anglian Water has existing water supply assets within the designated General Employment Area. Our existing infrastructure is protected by easements and should not be built over or located where access for maintenance and repair could be restricted. The existing pipes should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required. It is important to ensure that any Anglian Water assets that may be affected by development proposals are reflected in any site allocation policy, and we request that the following wording is added to the policy:

- **the safeguarding of suitable access for the maintenance of existing water supply infrastructure.**

There is no wastewater or surface water sewer network in this area, and therefore wastewater treatment on site must be operated by the site owners with the relevant discharge permits agreed with the Environment Agency.

EMP 04: Reserve Employment Allocation

Anglian Water have no existing assets within the reserve employment allocation at Shipdham Airfield. There is no wastewater or surface water sewer network in this area, and therefore wastewater treatment on the existing Shipdham Airfield Industrial site must be operated by the site owners with the relevant discharge permits agreed with the Environment Agency. Similar arrangements would apply to future employment growth at this reserve allocation, or developers would need to fund conveyance to the closest WRC with capacity to accommodate flows generated by the development.

EMP 07: Employment Development Outside Existing and Allocated Employment Sites - Sustaining a Prosperous Rural Economy

Paragraph 6.56:

Anglian Water welcome the reference to the need for local water cycle studies to be used to identify constraints and strategic solutions to inform spatial options for new employment - this could helpfully cross reference to policy HOU17 Water Efficiency and refer to our Non-Domestic Water Requests Policy if included under policy EMP 01: Economic Growth Strategy.

Given the statement in paragraph 6.56, we recommend that this is specifically included in the policy to ensure suitable water resources are available to support new development and water efficient designs are incorporated, consistent with HOU17, where appropriate.

8. The Environment

8.14 Anglian Water welcome the reference to addressing water resource issues and measures to resolve these including major infrastructure projects. As part of the supply side options identified in our Water Resources Management Plan 2025-2050 (WRMP24) being delivered in AMP8, we are extending our strategic water grid for the East of England, which started in AMP7, to include strategic interconnectors in Norfolk - these are planned to cross Breckland District Council area. This includes the following water resource zone potable water transfers:

- Fenland to Norfolk Bradenham
- Norfolk Bradenham to Norwich and The Broads
- Suffolk Thetford to Norfolk East Harling
- Norfolk Harleston to Norfolk East Harling

The pipelines in our strategic water grid will allow water to be moved from 'wetter' to 'drier' areas of the region, helping to combat the risk of shortages, boosting resilience and securing water



supplies. They will also reduce the number of homes and businesses that rely on a single water source.

We support the need to protect ground water source zones to safeguard drinking water quality but consider that additional policy measures are required through a separate policy on water quality – see our response under Section 11 Resilient and Adaptable Infrastructure.

Water Industry National Environment Programme (WINEP) and Advanced WINEP (A-WINEP)

The Government has challenged water companies to increase their investment and to improve environmental outcomes by 2030, Anglian Water will be investing in river restoration projects between 2025 to 2030 to enhance and protect our rivers, nurture wildlife and restore important habitats for future generations to enjoy and explore. River restoration is just one small part of a wider program to improve the environment which is part of our Water Industry National Environment Program (WINEP) for AMP8 - which includes measures to reduce nutrients from the discharges at some of our Water Recycling Centres (WRCs).

These ambitious measures have been set by the Environment Agency. Anglian Water are looking to work with landowners to help deliver river restoration on 16 rivers across the region, these have been identified by the Environment Agency as our region's most important rivers and streams. Our WINEP programme will help achieve wider nature recovery ambitions identified in LNRs across our region.

In addition, our Advanced WINEP investment aims to demonstrate an approach to maximise value by going even further for the environment through partnership working (including co-development and co-funding), focus on the use of nature-based solutions, implementing solutions to water management challenges at scale, and improved multi-stakeholder governance. The A-WINEP has clear potential to contribute to some of the biodiversity priorities and strategic opportunities which relate to rural regeneration (nature-based solutions and land management) within the district.

The A-WINEP region of interest extends to 11 river catchments that include the whole of Norfolk. A-WINEP will build upon existing strategic relationships that have been developed as part of Water Resources East and the Norfolk Water Hub Strategy, extending to other geographies and environmental delivery programmes e.g. funded through our Get River Positive programme.

Catchment Plans will be created for the initial 11 catchments within the A-WINEP rural regeneration programme, which will be developed over the full duration of the A-WINEP and will provide a holistic approach to catchment regeneration. Projects that seek A-WINEP match funding must address two primary outcomes: the reduction of nutrient pollution into rivers and mitigating the impact of low flow. It is considered that our A-WINEP rural regeneration programme will help deliver the strategic aims identified in the Norfolk Local Nature Recovery Strategy – particularly around climate change, internationally important chalk streams, and water quality and resources.

ENV 01: Climate Responsive Design

Anglian Water is supportive of the policy requirements particularly those that seek to address flood risk, surface water drainage, and the use of water efficient fixtures and fittings. The PDF version of the plan does not separate out clauses d and e. It is assumed that the requirement for "Existing buildings should be retained...etc" is a separate paragraph in the policy.

We recommend that the policy also requires the submission of a foul drainage strategy/assessment as a separate clause f) to demonstrate that there is capacity available in the sewerage network and at the receiving water recycling centre to accommodate wastewater flows from the site. Anglian Water further suggests a separate policy to address wastewater management (see Section 11 Resilient and Adaptable Infrastructure).

f) foul drainage strategy to demonstrate that there is capacity available in the sewerage network and at the receiving water recycling centre to accommodate wastewater flows from the site.

ENV 02: Green and blue infrastructure

Anglian Water supports the policy requirement to consider GBI at the earliest stages of the design process, as part of on-site provision, particularly where this includes natural SuDS features as part of the multi-functional benefits that can be achieved. We welcome the reference to blue corridors and opportunities for natural flood management and water quality improvements - this aligns with our A-WINEP rural regeneration programme and the Norfolk LNRS habitat (freshwater and urban) opportunities.

ENV 03: Improving Biodiversity

Anglian Water welcomes the policy requirement that all qualifying development must achieve BNG to at least the minimum statutory requirement. Whilst we note that developments that provide more than the statutory requirement will be favourably considered with a minimum of 20% being actively encouraged, we would support that statutory BNG requirement for projects delivering essential infrastructure. This is because BNG requirements cannot be met onsite for projects where Anglian Water is not the landowner as 30-year habitat management cannot be guaranteed. For example, linear pipeline schemes (such as those previously referenced) frequently cross multiple landownerships. These projects often have minimal impact on biodiversity, but when the full length of a scheme is considered, BNG requirements are already significant. In cases where Anglian Water is the landowner, scope for achieving BNG onsite is limited by the needs of site operations and the need to consider future infrastructure upgrades. Consequently, whilst other development types where onsite BNG is feasible and viable for going beyond the statutory BNG requirements (such as new housing allocations), it does not reflect the realities of delivering water infrastructure projects.

Our proposed infrastructure upgrades and WINEP schemes in AMP8 are already delivering significant biodiversity and nature recovery benefits, which will help to deliver sustainable growth and improve the ecological quality of catchments and aligns with the Government's 25 Year Environment Plan ambitions and wider agenda.

We note the policy references the Norfolk LNRS as "currently being prepared" and therefore consider that the policy will be updated to address the published LNRS.

Nutrient Neutrality

As referenced in our response to policies HOU1 and HOU2, resolving the impact of environmental pressures, including those WRCs within Breckland that will need to meet technically achievable limits (TAL) for phosphorus and nitrogen, and the approach required to enable future sustainable growth, is a matter Anglian Water will continue to discuss with the Environment Agency and key stakeholders to assess future options for growth. Anglian Water is working with the Environment Agency on alternative options to accommodate additional growth at WRCs that are already required to meet technically achievable limits (TAL) for phosphorus but will also need to accommodate additional growth through increasing dry weather flow capacity. Potential solutions being explored include catchment approaches and investments in removing phosphorus from wastewater discharges at upstream WRCs. These solutions will need to be identified through the next DWMP and PR29 Business Plan to seek investment for what is needed to support growth without deterioration to water quality.

8.71 the LURA makes the requirement for upgrades to wastewater treatment works or nutrient significant plants by 1 April 2030 - these are WRCs within the nutrient sensitive catchments that serve a population equivalent (PE) of 2,000 or more.

ENV 11: Agricultural Intensification

Anglian Water supports the need for water management plan to support development proposals for agricultural intensification. We agree that the efficient use of water and opportunities for water reuse should be the priority for such schemes. As explained in our response to Policy HOU17 Water Efficiency, Anglian Water's Non-Domestic Water Requests Policy means we are currently in a position where we need to decline requests for non-domestic water where the volume exceeds 20m³/day, until strategic supply side options can be delivered.

ENV 13: Local Green Space

Anglian Water may have assets within proposed Local Green Spaces, and we will raise matters of concern when these proposed designations in Local Plans and Neighbourhood Plans could impact on the operation and maintenance of our assets. Whilst the NPPF position regarding the Green Belt protections will enable us to undertake any operational works to our underground assets that intersect with these spaces, we would request that **our assets such as pumping stations (see below regarding MATTISHALL-HOWES LANE TPS) are omitted from the local green space designation, as the policy requirements could impinge on any future upgrades that may be required to support the effective operation of our critical infrastructure.**

023: Land to north of Lolly Moor, Westfield, Dereham - Anglian Water water main

015: Gressenhall Playing Field, Gressenhall - Anglian Water sewer

068: Dereham Road/Old Hall Road, Mattishall - Anglian Water water main



032: North of Dereham Road, west of Back Lane, Mattishall - **Anglian Water Mattishall Howes Lane terminal pumping station (TPS)**, gravity sewers and rising mains (pressurised sewers) - **land in Anglian Water ownership to be removed from the proposed LGR designation**

005: Land to rear Wayland Road, Rockland All Saints - Anglian Water sewer and land in Anglian Water ownership pertaining to the former ROCKLANDS WAYLAND ROAD WRC which has been decommissioned. We have no objection to the local green space designation.

012: Open space at Swans Nest, Otter Road (site including Play Area adjacent Clover Road), Swaffham - Anglian Water surface water sewer

ENV 15: Agritech Development and Community Growing Spaces

The range of different scales and types of food growing spaces addressed by this policy, means that water resources should be a consideration, as outlined under policy ENV11 Agricultural Intensification. Water efficient measures and water reuse should be prioritised for these types of developments.

9. Design Quality and Principles

Anglian Water is supportive of the six design priorities and consider those that ensure integration with nature and climate responsive design are important for ensuring the creation of sustainable and resilient developments that incorporate the wise use of water resources, mitigation of flood risk, and enhancing water quality, in ways protect and enhance the environment.

COM 01: Healthy Lifestyles

In seeking to ensure that new development contributes to the protection and improvement of the physical, social and mental health and wellbeing of Breckland's residents, Anglian Water suggests that policy criterion d) is amended to include "Energy **and water** efficient homes" to be adaptable to climate change. This would be consistent with other policies in the plan and help to reduce whole lifetime costs including operational and capital carbon, as outlined in the supporting text for Policy HOU17.

11. Resilient and adaptable infrastructure

Flood Risk and Surface Water Drainage

In terms of flood risk, whilst Anglian Water should also be consulted, as we are responsible for surface water drainage in the public sewer system. Our sewer networks can become overwhelmed when flooding occurs, and we agree that its new development is located to minimise flood risk and mitigates surface water flood risk appropriately. Our [Flooding Incident Reduction Plan](#) is available on our website and sets out how we aim to mitigation flooding risks across our region. It is essential for the effective management of our operational risk that we ensure the risk posed from [surface water drainage](#) is clearly understood and taken into account by developers. Anglian Water has published

[Surface Water Risk Management Guidance](#) that provides a comprehensive approach to how we will assess different types of site in terms of surface water connections.

For new surface water connections to an existing surface water sewer Anglian Water will need to ensure the surface water hierarchy has been followed and require developers to liaise with the Lead Local Flood Authority (LLFA) - this is an essential pre-requisite to Anglian Water accepting a surface water drainage strategy. If LLFA are satisfied that, based upon evidence, no other option is feasible then a connection point may be made to the surface water sewer at a rate agreed with LLFA, subject to there being existing capacity or the provision of network reinforcement to accommodate the flow.

The developer is responsible for providing the appropriate surface water disposal infrastructure. As such, all the work to determine the feasibility of a connection to the existing surface water sewer complete with all upgrades to the consented outfall is to be carried out by the developer at their cost. Anglian Water will request a planning condition to ensure no additional flow will be connected until, any identified upgrades have been delivered and sufficient capacity in the network has been demonstrated.

Should network reinforcement be required as a consequence of additional surface water flow to an existing public surface water sewer, Anglian Water will request a planning condition to ensure no additional flow will be connected until sufficient capacity in the network has been demonstrated. Reinforcement of the existing network, when required because of a new surface water connection, is not included within the Infrastructure Charge. These works may be requisitioned under Section 98 of the Water Industry Act 1991 or implemented by a self-lay provider under Section 151 of the Water Industry Act 1991, with the capital cost fully chargeable to the applicant. A cost and time-scale estimate can be provided for requisitioned network reinforcement.

11.17 and 11.18 Anglian Water supports the statements in these paragraphs in respect of surface water drainage issues to be addressed in planning applications - this should also take account of any groundwater flooding issues which can similarly cause hydraulic overloading of our sewer network. We agree that the Water Cycle Study (WCS), SFRA and any subsequent Surface Water Management Plan must inform the level of detail required to accompany planning applications identified in any designated groundwater protection zones and/or critical drainage catchments. Anglian Water requests that the statement referring to the use of Grampian conditions to ensure appropriate upgrades to the sewer network are completed in advance of new development taking place should be suitably referenced in the policy. We also recommend a similar approach is used in terms of wastewater network and treatment capacity, to protect the environment and existing communities from the risks of spills and pollutions.

INF 03: Flood Risk & Surface Water Drainage

Anglian Water is generally supportive of the principles of this policy to minimise the risk of flooding from all new development and mitigating any such risk through design and implementation of SuDS. However, we would recommend the following changes:

- Under no circumstances will surface water be permitted to discharge into a separate foul sewer or to a combined sewerage system via a new connection. All surface and foul water flows should be separated. Surface water run-off must follow the drainage hierarchy and where it cannot be discharged into the ground, or to a surface water body then discharge must be to a surface water sewer or local highway drain subject to consultation with the Lead Local Flood Authority and Anglian Water.
- Existing connections to a combined sewer through redevelopment of a brownfield site, should provide betterment in terms of reduced flows to the sewer network.
- Proposals should demonstrate that appropriate measures have been undertaken to reduce the pressure on the sewerage network, reduce the use of storm overflows and reduce the risk of flooding from surface water and other sources.

Protecting and Enhancing Water Quality

Managing Wastewater

Anglian Water recommends that the Local Plan should have a separate policy on Water Quality to include relevant policies on the protection of groundwater source zones and managing wastewater. This should be informed by the WCS and SFRA as appropriate. We would seek a robust policy in the Local Plan to ensure that developers must demonstrate that there is capacity available in the sewerage network and at the receiving water recycling centre to accommodate wastewater flows from the site.

Developers should engage with Anglian Water at the earliest opportunity to assess infrastructure capacity, and any specific requirements that may be needed to deliver the proposed development, which may include sustainable points of connection to the water supply and wastewater networks to minimise impacts on existing communities and the environment. The submission, approval and implementation of a Foul Drainage Strategy should be required; providing details of any enhancements and demonstrating that there is capacity available in the sewerage network and at the receiving water recycling centre (WRC) to accommodate wastewater flows from the site prior to occupation of any dwellings. This should include the identification of a sustainable point of connection into the wastewater network, which is agreed with Anglian Water. We use a complexity matrix to identify a sustainable point of connection into our network, which presents a number of factors for assessment including pollution risks and CSO spills, surcharges of our network, existing flood potential and excess surface water flooding. If a site triggers a number of these risks, then our engineers will require a sustainable point of connection - these will be reflected in our planning responses and should be specified in a recommended planning condition. We would encourage this policy to state that where permanent measures are not possible, proposals will not be supported.

Source Protection Zones (SPZs)

Similarly, for the protection of groundwater, we suggest a policy that addresses the following measures:

A proposal within a Source Protection Zone (SPZ) 1 or within 50m of a private potable groundwater source that includes any of the following development types, or activities, will only be supported where adequate assessment has been completed and appropriate safeguards against possible contamination can be agreed, implemented and maintained:

- septic tanks/cess tanks and associated foul water treatment systems, sustainable drainage systems with ground infiltration;
- oil pipelines;
- storm water overflows and below ground attenuation tanks;
- activities that involve the disposal of liquid waste to land;
- above and below ground storage of hazardous chemicals (e.g. fuels);
- cemeteries and graveyards; or
- other types of development identified in the Environment Agency's Groundwater Protection guides, or successor documents.

Such development types/activities within an SPZ 1 which have the potential to contaminate groundwater will require a hydrogeological risk assessment (HRA) to ascertain risks to controlled waters (groundwater) and any further mitigation measures which would be required. An assessment must also be made of the development site(s) former uses to determine any likelihood of prior contamination which is likely to inform the design and viability of future development – e.g. infiltration SuDS.

A proposal within a SPZ 2 or 3 or on a principal or secondary aquifer will be considered on a risk based approach with the exception of development involving sewerage, trade and storm effluent to ground or deep soakaways, which will only be supported where it can be demonstrated that these are necessary, are the only option available and adequate safeguards against possible contamination of groundwater can be agreed, implemented and maintained.

A proposal in any SPZ will be expected to provide full details of the proposed construction of new buildings and construction techniques, including foundation design. If piling works (or other penetrative methods) are proposed, additional supporting documentation may be required to ensure that piling/foundations works do not harm groundwater resources, in line with Paragraph 187 of the National Planning Policy Framework (NPPF).

A stand-off area of at least 50 metres must be maintained around any Anglian Water groundwater assets – i.e. boreholes, adits, shafts – to minimise the risk of disturbance of these assets during and after construction, and to allow ongoing access for maintenance and operation.



This approach is based on the groundwater protection policy in the draft Huntingdonshire Local Plan¹, which we consider to be an example of best practice when considering development proposals within SPZs. We have inserted additional aspects, considering that there are SPZs within Breckland that will be impacted by proposed allocations.

Implementation Strategy

As previously raised, the IDP does not include reference to water supply or sewerage infrastructure. Anglian Water is undertaking significant investment in AMP8 to support our region in order to prepare it against the unprecedented pressures of climate change and population growth. This sustained investment would help us prepare for these challenges; by delivering essential investment in water and sewerage infrastructure and protecting and enhancing the environment.

We agree that a combination of funding mechanisms will need to be used to deliver new and improved infrastructure in the district, and that for major development, some sites will need to be phased to ensure essential infrastructure can be delivered. We consider that the IDP should be informed by the WCS to identify future investment requirements, and our Business Plan investments planned for this AMP, which include strategic pipelines to help deliver future resilience in local Water Resource Zones.

Anglian Water suggests that **the Infrastructure Implementation Strategy should form the basis for a strategic policy setting out how infrastructure will be provided in Breckland. We would welcome a positive policy framework which underpins the delivery of essential infrastructure to support growth in the district including water supply and wastewater infrastructure.**

12. Site Specific Policies – Housing

To avoid repetition throughout, we suggest that site allocation policies should specifically reference “surface water drainage” and the provision of SuDS when requiring proposals to include a drainage strategy.

Where development is “subject to compliance with other policies in this Local Plan”, Anglian Water can only support this, if our policy recommendation for water quality (wastewater management and protection of groundwater source zones) is incorporated into the Local Plan.

Strategic Development Areas (SDA)

SDA 1: Frans Green, East Tuddenham

As indicated under our response to Policy GEN1 the Strategic Development Areas (SDAs) are new settlements outside existing urban areas, which will need to incorporate necessary infrastructure to support the proposed quantum of growth, including utilities infrastructure. For new settlements in rural areas where there is no existing infrastructure, Anglian Water recommends that wastewater infrastructure including new water recycling centres are delivered by the developer as part of the

¹ <https://www.huntingdonshire.gov.uk/planning/local-plan-update/preferred-options/>

wider package of infrastructure measures required to support the settlement. The new WRCs should be built to adoptable standards so that they may be adopted and operated by a water company. The supporting text should reference that early engagement with Anglian Water is essential.

We support the policy measures to ensure that water supply and sewerage capacity will be made available in time to serve the site. However, we consider a foul drainage strategy would be more suitable in this instance to demonstrate the wastewater network and treatment solutions are clearly addressed.

SDA 2: Barkers Farm, Larling

As indicated previously, the Strategic Development Areas (SDAs) are new settlements outside existing urban areas, which will need to incorporate necessary infrastructure to support the proposed quantum of growth, including utilities infrastructure. For new settlements in rural areas where there is no existing infrastructure, Anglian Water recommends that wastewater infrastructure including new water recycling centres are delivered by the developer as part of the wider package of infrastructure measures required to support the settlement. The new WRCs should be built to adoptable standards so that they may be adopted and operated by a water company. The supporting text should reference that early engagement with Anglian Water is essential.

We support the policy measures to ensure that water supply and sewerage capacity will be made available in time to serve the site. However, we consider a foul drainage strategy would be more suitable in this instance to demonstrate the wastewater network and treatment solutions are clearly addressed. More particularly given the proximity to SDA 3, where it would be preferable to bring forward a solution that would serve both sites.

SDA 3: Roudham & Larling

As indicated previously, the Strategic Development Areas (SDAs) are new settlements outside existing urban areas, which will need to incorporate necessary infrastructure to support the proposed quantum of growth, including utilities infrastructure. For new settlements in rural areas where there is no existing infrastructure, Anglian Water recommends that wastewater infrastructure including new water recycling centres are delivered by the developer as part of the wider package of infrastructure measures required to support the settlement. The new WRCs should be built to adoptable standards so that they may be adopted and operated by a water company. The supporting text should reference that early engagement with Anglian Water is essential.

We support the policy measures to ensure that water supply and sewerage capacity will be made available in time to serve the site. However, we consider a foul drainage strategy would be more suitable in this instance to demonstrate the wastewater network and treatment solutions are clearly addressed. More particularly given the proximity to SDA 2, where it would be preferable to bring forward a solution that would serve both sites. There is only a small descriptive works (Roudham

WRC) serving Roudham Park Industrial Estate, which is unsuitable to serve the quantum of growth identified².

Market Towns

Attleborough

PROPOSAL ATT 1 (110): Land West of Hargham Road

The Stage 1 WCS identifies that Attleborough WRC will require further investment to increase dry weather flow (DWF) capacity to treat wastewater flows from future growth. This will need to be identified through the next DWMP and PR29 Business Plan to seek investment for what is needed to support growth without deterioration to water quality. The Stage 2 WCS should provide further recommendations following assessment of the sites being proposed as part of the preferred options.

As highlighted previously, Anglian Water suggests the incorporation of a new policy in the Local Plan to address water quality and wastewater management. We suggest that allocation policies will have regard to this policy when the plan is read as a whole or specific measures to address wastewater network and treatment capacity are incorporated into each policy. Wastewater treatment and network capacity is dynamic and influenced by a wide range of factors, which is why we encourage developers to undertake early engagement with us to develop a feasible solution wherever possible.

Dereham

Dereham PROPOSAL DER 1 (079): Land Behind Dereham Hospital

There is a surface water sewer within the site boundary. Therefore, the layout should be designed to take this into account as our existing infrastructure is protected by easements and should not be built over or located where access for maintenance and repair could be restricted. The existing sewer should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required. It is important to ensure that any Anglian Water assets that may be affected by development proposals are reflected in any site allocation policy, and we request that the following wording is added to the policy:

- **the safeguarding of suitable access for the maintenance of existing sewerage infrastructure.**

Part of the site is within SPZ2 – Anglian Water has made a recommendation for the inclusion of a water quality policy to include policy measures to protect groundwater source zones, and this should be referenced in the supporting text.

PROPOSAL DER 2 (344): Southeast of Swanton Road

There is a rising main (pressurised sewer) along the eastern site boundary. Therefore, the layout should be designed to take this into account as our existing infrastructure is protected by easements

² See our Position Statement for Descriptive Works
<https://www.anglianwater.co.uk/siteassets/developers/new-content/p--c/descriptive-works-position-statement-march-2025.pdf>

and should not be built over or located where access for maintenance and repair could be restricted. The existing sewer should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required. It is important to ensure that any Anglian Water assets that may be affected by development proposals are reflected in any site allocation policy, and we request that the following wording is added to the policy:

- **the safeguarding of suitable access for the maintenance of existing sewerage infrastructure.**

PROPOSAL DER 3 (032): The Maltings, Norwich Road

There are sewers and water mains to the west and north site boundaries. Therefore, the layout should be designed to take this into account as our existing infrastructure is protected by easements and should not be built over or located where access for maintenance and repair could be restricted. The existing sewer should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required. It is important to ensure that any Anglian Water assets that may be affected by development proposals are reflected in any site allocation policy, and we request that the following wording is added to the policy:

- **the safeguarding of suitable access for the maintenance of existing water supply and sewerage infrastructure.**

PROPOSAL DER 4 (144): Dumpling Green

There are sewers and water mains to the northern site boundary along Dumpling Green. Therefore, the layout should be designed to take this into account as our existing infrastructure is protected by easements and should not be built over or located where access for maintenance and repair could be restricted. The existing sewer should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required. It is important to ensure that any Anglian Water assets that may be affected by development proposals are reflected in any site allocation policy, and we request that the following wording is added to the policy:

- **the safeguarding of suitable access for the maintenance of existing water supply and sewerage infrastructure.**

PROPOSAL DER 5 (164): North of Dereham Road

There is a foul sewer running through the site and water mains some boundaries. Therefore, the layout should be designed to take this into account as our existing infrastructure is protected by easements and should not be built over or located where access for maintenance and repair could be restricted. The existing sewer should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required. It is important to ensure that any Anglian Water assets that may be affected by development proposals are reflected in any site allocation policy, and we request that the following wording is added to the policy:

- **the safeguarding of suitable access for the maintenance of existing water supply and sewerage infrastructure.**

The Stage 1 WCS identifies that Dereham WRC will require further investment to increase dry weather flow (DWF) capacity to treat wastewater flows from existing commitments and future growth. However, the WCS does not appear to be based on the latest spatial distribution of growth as described in this iteration of the Local Plan. The Stage 2 WCS should provide further recommendations following assessment of the sites being proposed as part of the preferred options.

Future growth at Dereham will need to be identified through the next DWMP and PR29 Business Plan to seek investment for what is needed to support growth without deterioration to water quality as the site will be treating wastewater to technically achievable limits (TAL) for Phosphorus and Nitrogen by 2030.

Our comments under policies HOU 1 and HOU 2 explain that Anglian Water will continue to discuss with the Environment Agency and key stakeholders the approach required to enable future sustainable growth in terms of assessing future options for growth. Anglian Water is working with the Environment Agency on alternative options to accommodate additional growth at WRCs that are already required to meet technically achievable limits (TAL) for phosphorus but will also need to accommodate additional growth through increasing dry weather flow capacity.

Swaffham

PROPOSAL Swaffham SUE (072): North of Norwich Road (West)

PROPOSAL Swaffham SUE (073): North of Norwich Road (East)

PROPOSAL Swaffham SUE (074): South of Norwich Road (West)

We support the policy measures in these policies to ensure that water supply and sewerage capacity will be made available in time to serve the site. However, we consider a foul drainage strategy would be more suitable in this instance to demonstrate the wastewater network and treatment solutions are clearly addressed. Furthermore, we question why these sites are separate allocation policies and not considered together as one SUE policy to ensure that the infrastructure needs of the SUE are considered as a whole, as per the requirement of the masterplan.

There are limited Anglian Water assets within this SUE on the edge of Swaffham. There is a water main along the Norwich Road, which would need to be considered when constructing accesses to the SUE.

PROPOSAL SWA 2 (195): South of Sporle Road, Swaffham

PROPOSAL SWA 3 (179): East of Sporle Road, Swaffham

PROPOSAL SWA 4 (077): Stoneycroft House, Sporle Road

We support the policy measures in these policies to ensure that water supply and sewerage capacity will be made available in time to serve the site. However, we consider a foul drainage strategy would be more suitable in this instance to demonstrate the wastewater network and treatment solutions are clearly addressed – including for Proposal SWA 4. Furthermore, we question why these sites are separate allocation policies and not considered together as one strategic allocation policy to ensure that the infrastructure needs of the area are considered and masterplanned together.

There are no Anglian Water assets within these sites on the edge of Swaffham.

PROPOSAL SWA 5 (070): South of North Pickenham Road

There are sewers and water mains within the site. Therefore, the layout should be designed to take this into account as our existing infrastructure is protected by easements and should not be built over or located where access for maintenance and repair could be restricted. The existing sewer should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required. It is important to ensure that any Anglian Water assets that may be affected by development proposals are reflected in any site allocation policy, and we request that the following wording is added to the policy:

- **the safeguarding of suitable access for the maintenance of existing water supply and sewerage infrastructure.**

A utilities statement including a foul drainage strategy should be a requirement within this policy.

PROPOSAL SWA 6 (069): South of Norwich Road

There is a foul sewer within the site. Therefore, the layout should be designed to take this into account as our existing infrastructure is protected by easements and should not be built over or located where access for maintenance and repair could be restricted. The existing sewer should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required. It is important to ensure that any Anglian Water assets that may be affected by development proposals are reflected in any site allocation policy, and we request that the following wording is added to the policy:

- **the safeguarding of suitable access for the maintenance of existing sewerage infrastructure.**

A utilities statement including a foul drainage strategy should be a requirement within this policy.

There is sufficient DWF headroom available at Swaffham WRC to accommodate growth in the short to medium term, but further investment will be required in subsequent AMPs to accommodate the full quantum of growth proposed in the Local Plan. Further assessment should be undertaken through the Stage 2 WCS. Developers should also engage with Anglian Water at an early stage to assess whether a sustainable point of connection to the wastewater network is available.

Thetford

PROPOSAL Kingsfleet Grove SUE (079)

Anglian Water is supportive of the requirement for a masterplan for this SUE to ensure that infrastructure can be provided in a comprehensive way. Anglian Water has no existing infrastructure within the proposed SUE. We support the policy measures to ensure that water supply and sewerage capacity will be made available in time to serve the site. However, we consider a foul drainage strategy would be more suitable in this instance to demonstrate the wastewater network and treatment solutions are clearly addressed.

The site is within SPZ 2 – Anglian Water has made a recommendation for the inclusion of a water quality policy to include policy measures to protect groundwater source zones, and this should be referenced in the supporting text.

There is existing DWF headroom available to accommodate planned growth at Thetford WRC. Developers should also engage with Anglian Water at an early stage to assess whether a sustainable point of connection to the wastewater network is available.

Watton

PROPOSAL Watton SUE (225): North and East of Shrublands (within SPZ 1 & 2)

PROPOSAL Watton SUE (223): East of Summer Lane (wholly within SPZ1)

PROPOSAL Watton SUE (086): Rear of Shrublands (West) (within SPZ 1 & 2)

PROPOSAL Watton SUE (339): Shrublands Site 1 (Centre) (within SPZ 1 & 2)

PROPOSAL Watton SUE (340): Shrublands Site 2 (East) (within SPZ 1 & 2)

Anglian Water is supportive of the requirement for a masterplan for this SUE to ensure that infrastructure can be provided in a comprehensive way. Anglian Water has no existing infrastructure within the proposed SUE. We support the policy measures to ensure that water supply and sewerage capacity will be made available in time to serve the site. However, we consider a foul drainage strategy would be more suitable in this instance to demonstrate the wastewater network and treatment solutions are clearly addressed. Furthermore, we question why these sites are separate allocation policies and not considered together as one strategic allocation policy to ensure that the infrastructure needs of the SUE as a whole, are considered and masterplanned together.

As indicated in our previous consultation on the Local Plan, these sites are within SPZs 1 and 2 and close to our abstraction points. Anglian Water has made a recommendation for the inclusion of a water quality policy to include policy measures to protect groundwater source zones, and this must be referenced in the policies and supporting text to highlight the need for specific measures to be undertaken to protect the quality of water for abstraction.

PROPOSAL WAT 2 (085): Former RAF Base, Shackleton Road

There are foul sewers within the site. Therefore, the layout should be designed to take this into account as our existing infrastructure is protected by easements and should not be built over

or located where access for maintenance and repair could be restricted. The existing sewer should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required. It is important to ensure that any Anglian Water assets that may be affected by development proposals are reflected in any site allocation policy, and we request that the following wording is added to the policy:

- **the safeguarding of suitable access for the maintenance of existing sewerage infrastructure.**

The site is predominantly within SPZ 1 and close to our abstraction points. Anglian Water has made a recommendation for the inclusion of a water quality policy to include policy measures to protect groundwater source zones, and this must be referenced in the policies and supporting text to highlight the need for specific measures to be undertaken to protect the quality of water for abstraction.

A utilities statement including a foul drainage strategy should be a requirement within this policy.

PROPOSAL WAT 3 (088): North of Thetford Road

There is a foul sewer and water main within the site and surface water sewers and rising main at the boundaries. Therefore, the layout should be designed to take this into account as our existing infrastructure is protected by easements and should not be built over or located where access for maintenance and repair could be restricted. The existing sewer should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required. It is important to ensure that any Anglian Water assets that may be affected by development proposals are reflected in any site allocation policy, and we request that the following wording is added to the policy:

- **the safeguarding of suitable access for the maintenance of existing water supply and sewerage infrastructure.**

A utilities statement including a foul drainage strategy should be a requirement within this policy. The site is partly within SPZ 2 – Anglian Water has made a recommendation for the inclusion of a water quality policy to include policy measures to protect groundwater source zones, and this should be referenced in the supporting text.

PROPOSAL WAT 4 (289): West of Thetford Road

There is a foul sewer and water main at the north/northeast site boundaries. Therefore, the layout should be designed to take this into account as our existing infrastructure is protected by easements and should not be built over or located where access for maintenance and repair could be restricted. The existing sewer should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required. It is important to ensure that any Anglian Water assets that may be affected by development proposals are reflected in any site allocation policy, and we request that the following wording is added to the policy:

- **the safeguarding of suitable access for the maintenance of existing water supply and sewerage infrastructure.**

A utilities statement including a foul drainage strategy should be a requirement within this policy.

Since the Stage 1 WCS, the permit for Watton WRC has been updated to account for additional DWF headroom. This should be considered in the Stage 2 WCS in the context of proposed growth and existing commitments – including the extension to HMP Wayland. Developers should also engage with Anglian Water at an early stage to assess whether a sustainable point of connection to the wastewater network is available.

Key Service Parishes

East Harling

PROPOSAL HAR 1 (212): Lopham Road

PROPOSAL HAR 2 (133): Garboldisham Road

PROPOSAL HAR 3 (398): North of Kenninghall Road

Anglian Water supports the policy requirement to ensure development will be compliant with other policies in the plan. Anglian Water has recommended a policy to address water quality and wastewater management. However, we consider a foul drainage strategy should be a requirement within this policy.

Sites HAR 1 and HAR 2 are within SPZ 2 – Anglian Water has made a recommendation for the inclusion of a water quality policy to include policy measures to protect groundwater source zones, and this should be referenced in the supporting text.

There is existing DWF headroom available to accommodate planned residential growth at East Harling WRC. However, this should be assessed in the Stage 2 WCS together with any employment growth. Developers should also engage with Anglian Water at an early stage to assess whether a sustainable point of connection to the wastewater network is available.

Mattishall

PROPOSAL MAT 1 (307): Thynnes Lane

There is a water main to the southern site boundary. Therefore, the layout should be designed to take this into account as our existing infrastructure is protected by easements and should not be built over or located where access for maintenance and repair could be restricted. The existing water main should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required. It is important to ensure that any Anglian Water assets that may be affected by development proposals are reflected in any site allocation policy, and we request that the following wording is added to the policy:

- **the safeguarding of suitable access for the maintenance of existing water supply infrastructure.**

A utilities statement including a foul drainage strategy should be a requirement within this policy.

PROPOSAL MAT 2 (357): North of Dereham Road

There are no existing Anglian Water assets within the site. A utilities statement including a foul drainage strategy should be a requirement within this policy. The site is opposite a terminal pumping station east of Howes Lane. There should be a sufficient encroachment buffer to this pumping station to ensure it does not impact on the amenity of future residents on the site due to odour. Currently there is a small area of woodland within the site which appears to provide a natural buffer to this asset, if retained as part of the site's biodiversity assets.

There is existing DWF headroom available to accommodate planned residential growth at Mattishall WRC. However, this should be assessed in the Stage 2 WCS together with any employment growth. Developers should also engage with Anglian Water at an early stage to assess whether a sustainable point of connection to the wastewater network is available.

Necton

PROPOSAL NEC 1 (005): Brackenwoods

PROPOSAL NEC 2 (302): North Pickenham Road (Phase 3)

There are no existing Anglian Water assets within these sites. A utilities statement including a foul drainage strategy should be a requirement within these policies.

There is existing DWF headroom available to accommodate planned residential growth at Necton WRC. However, this should be assessed in the Stage 2 WCS together with any employment growth. Developers should also engage with Anglian Water at an early stage to assess whether a sustainable point of connection to the wastewater network is available.

Primary Parishes

Banham

PROPOSAL BAN 1 (013): West of Mill Road

There are no existing Anglian Water assets within this site. A utilities statement including a foul drainage strategy should be a requirement within the policy.

There is existing DWF headroom available to accommodate planned residential growth at Old Buckenham WRC. However, this should be assessed in the Stage 2 WCS together with any employment growth. Developers should also engage with Anglian Water at an early stage to assess whether a sustainable point of connection to the wastewater network is available.

Bawdeswell

PROPOSAL BAWD 1 (161): North of Foxley Road

There are no existing Anglian Water assets within this site. A utilities statement including a foul drainage strategy should be a requirement within the policy.

There is existing DWF headroom available to accommodate planned residential growth at Bylaugh-near-Church WRC. However, this should be assessed in the Stage 2 WCS together with any employment growth. Developers should also engage with Anglian Water at an early stage to assess whether a sustainable point of connection to the wastewater network is available.

Kenninghall

PROPOSAL KEN 1 (167): Powell Close

There are two rising mains running through the site. The developer is encouraged to engage with Anglian Water to discuss how these assets might be incorporated³. Therefore, the layout should be designed to take this into account as our existing infrastructure is protected by easements and should not be built over or located where access for maintenance and repair could be restricted. The existing rising mains should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required. It is important to ensure that any Anglian Water assets that may be affected by development proposals are reflected in any site allocation policy, and we request that the following wording is added to the policy:

- **the safeguarding of suitable access for the maintenance of existing sewerage infrastructure.**

A utilities statement including a foul drainage strategy should be a requirement within this policy.

The northernmost corner of the site is adjacent to a terminal pumping station (KENNINGHALL POWELL CLOSE TPS). There should be a sufficient encroachment buffer to this pumping station to ensure it does not impact on the amenity of future residents on the site due to odour. Anglian Water normally advise a buffer of at least 15m from the boundary of the pumping station to the boundary of any residential property⁴

PROPOSAL KEN 2 (031): Kings Oak

There is a rising main running through the site and a water main to the eastern boundary. Therefore, the layout should be designed to take this into account as our existing infrastructure is protected by easements and should not be built over or located where access for maintenance and repair could be restricted. The existing assets should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required. It is important to ensure that any Anglian Water assets that may be affected by development proposals are reflected in any site allocation policy, and we request that the following wording is added to the policy:

- **the safeguarding of suitable access for the maintenance of existing water supply and sewerage infrastructure.**

A utilities statement including a foul drainage strategy should be a requirement within this policy.

³ <https://www.anglianwater.co.uk/developing/drainage-services/diverting-a-public-sewer>

⁴ <https://www.anglianwater.co.uk/developing/planning--capacity/asset-encroachment>

Both sites are within SPZ2 – Anglian Water has made a recommendation for the inclusion of a water quality policy to include policy measures to protect groundwater source zones, and this should be referenced in the supporting text.

There is existing DWF headroom available to accommodate planned residential growth at East Harling WRC. However, this should be assessed in the Stage 2 WCS together with any employment growth. Developers should also engage with Anglian Water at an early stage to assess whether a sustainable point of connection to the wastewater network is available.

Litcham

PROPOSAL LIT 1 (257): Lexham Road

There is a water main and foul sewer to the boundary with Pound Lane. Therefore, the layout should be designed to take this into account as our existing infrastructure is protected by easements and should not be built over or located where access for maintenance and repair could be restricted. The existing assets should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water’s existing assets may be required. It is important to ensure that any Anglian Water assets that may be affected by development proposals are reflected in any site allocation policy, and we request that the following wording is added to the policy:

- **the safeguarding of suitable access for the maintenance of existing water supply and sewerage infrastructure.**

Anglian Water supports the policy criteria g) and h) so that development proposals must demonstrate that there is adequate capacity at the sewage treatment works and the foul sewerage network. We would seek consistency across site allocation policies and our policy recommendation in relation to water quality and wastewater management.

It is considered that there is existing DWF headroom available to accommodate planned residential growth at Litcham WRC; however, a growth scheme is likely to be required in subsequent AMPs when accounting for windfall developments that may also come forward within the catchment. This should be assessed in the Stage 2 WCS together with any employment growth. Developers should also engage with Anglian Water at an early stage to assess whether a sustainable point of connection to the wastewater network is available.

Mundford

PROPOSAL MUN 1 (361): West Hall Drive

There is a water main and surface water sewer to the eastern boundary. Therefore, the layout should be designed to take this into account as our existing infrastructure is protected by easements and should not be built over or located where access for maintenance and repair could be restricted. The existing assets should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water’s existing assets may be required. It is important to ensure that any Anglian Water assets that may be affected by development proposals are reflected in any site allocation policy, and we request that the following wording is added to the policy:

- **the safeguarding of suitable access for the maintenance of existing water supply and sewerage infrastructure.**

PROPOSAL MUN 2 (360): Bracken Rise

There are no Anglian Water assets within the site.

For both sites, a utilities statement including a foul drainage strategy should be a requirement within this policy. There is currently no capacity at Mundford WRC to accommodate further growth, and no growth scheme has been identified for delivery in AMP8 (2025-2030). Any upgrades will need to be identified through the next DWMP and PR29 Business Plan to seek investment for what is needed to support growth from AMP9 without deterioration to water quality, and development phased appropriately to align with delivery. This should be assessed in the Stage 2 WCS together with any employment growth.

Narborough

PROPOSAL NAR 1 (105): East of Chalk Lane

PROPOSAL NAR 2 (103): West of Chalk Lane

There are no Anglian Water assets within the sites. For both sites, a utilities statement including a foul drainage strategy should be a requirement within this policy.

The sites are within SPZ 1 – Anglian Water has made a recommendation for the inclusion of a water quality policy to include policy measures to protect groundwater source zones, and this should be referenced in the policy and supporting text.

It is considered that there is existing DWF headroom available to accommodate a proportion of the residential growth at Narborough WRC; however, a growth scheme is likely to be required in subsequent AMPs when accounting for windfall developments that may also come forward within the catchment. This should be assessed in the Stage 2 WCS together with any employment growth. Developers should also engage with Anglian Water at an early stage to assess whether a sustainable point of connection to the wastewater network is available.

North Elmham

PROPOSAL NEL 1 (205): South of Eastgate Street

There are no Anglian Water assets within the site. It is noted that this policy includes reference to demonstrating sufficient utility provision, but this does not include wastewater treatment. This is not consistent with other site allocation policies. A utilities statement including a foul drainage strategy should be a requirement within this policy.

PROPOSAL NEL 2 (330): Back Lane

There are no Anglian Water assets within the site. It is noted that this policy does not include reference to demonstrating sufficient utility provision or wastewater treatment. A utilities statement including a foul drainage strategy should be a requirement within this policy.

It is considered that there is existing DWF headroom available to accommodate a proportion of the residential growth at North Elmham WRC; however, a growth scheme is likely to be required in subsequent AMPs when accounting for windfall developments that may also come forward within the catchment. This should be assessed in the Stage 2 WCS together with any employment growth. Developers should also engage with Anglian Water at an early stage to assess whether a sustainable point of connection to the wastewater network is available.

Old Buckenham

PROPOSAL OLD 1 (111): Hargham Road

There are no Anglian Water assets within the site. There is existing DWF headroom available to accommodate planned residential growth at Old Buckenham WRC. However, this should be assessed in the Stage 2 WCS together with any employment growth. Developers should also engage with Anglian Water at an early stage to assess whether a sustainable point of connection to the wastewater network is available.

Secondary Parishes

<p>Ashill PROPOSAL ASH 1 (320): The Willows PROPOSAL ASH 2 (319): Greenacre Close</p>	<p>There are no Anglian Water assets within the sites. A utilities statement including a foul drainage strategy should be a requirement within these policies.</p> <p>Since the Stage 1 WCS, the permit for Watton WRC has been updated to account for additional DWF headroom. This should be considered in the Stage 2 WCS in the context of proposed growth and existing commitments – including the extension to HMP Wayland. Developers should also engage with Anglian Water at an early stage to assess whether a sustainable point of connection to the wastewater network is available.</p>
<p>Beetley PROPOSAL BEET 1 (134): Fakenham Road</p>	<p>There are no Anglian Water assets within the site.</p> <p>Beetley is within Dereham WRC catchment (see comments relating to the Dereham sites). Anglian Water supports policy criterion h) regarding the need to demonstrate that there is adequate capacity at the sewerage treatment works and the foul sewerage network. We consider this should be replicated in other site allocation policies to ensure consistency.</p>
<p>Caston PROPOSAL CAS 1 (024): Home Farm, North Acre</p>	<p>There are no Anglian Water assets within the site. Developers should also engage with Anglian Water at an early stage to assess whether a sustainable point of connection to the wastewater network is available.</p> <p>Caston is within the Watton WRC catchment. See previous comments relating to Watton WRC.</p>
<p>Fransham</p>	<p>There is a rising main and surface water sewer within the site. The Policy should include the following requirement to be consistent</p>

<p>PROPOSAL FRAN 1 (001): West of Station Road</p>	<p>with other site recommendations where Anglian Water have assets within the boundary:</p> <ul style="list-style-type: none"> • <u>the safeguarding of suitable access for the maintenance of existing sewerage infrastructure.</u> <p>The site is adjacent to the catchment for Little Fransham-Glebe House WRC which is a small descriptive works unlikely to be suitable to accommodate future growth. Our position statement on descriptive works should be considered in the context of this site⁵, when demonstrating that there is adequate capacity in the sewage treatment works and the foul sewerage network (h).</p>
<p>Garboldisham PROPOSAL GARB 1 (057): Smallworth Lane</p>	<p>Some areas within this development site GARB 1 will be exposed to odour emissions and noise emanating from Garboldisham the Common WRC operation. It is not practicable to mitigate these emissions at source. As the anticipated level of exposure would restrict the full amenity of this development it may not be compatible with the essential operation of the WRC. A detailed odour assessment is recommended, to establish the extent to which this exposure may be mitigated by the layout and design of the development.</p> <p>There is a rising main and surface water sewer within the site. The Policy should include the following requirement to be consistent with other site recommendations where Anglian Water have assets within the boundary:</p> <ul style="list-style-type: none"> • <u>the safeguarding of suitable access for the maintenance of existing sewerage infrastructure.</u> <p>The site is adjacent Garoldisham The Common WRC which is a small descriptive works unlikely to be suitable to accommodate future growth. Our position statement on descriptive works should be considered in the context of this site, when demonstrating that there is adequate capacity in the sewage treatment works and the foul sewerage network.</p>
<p>Griston PROPOSAL: GRIS 1 (347): Caston Road</p>	<p>There are no Anglian Water assets within the site. Developers should also engage with Anglian Water at an early stage to assess whether a sustainable point of connection to the wastewater network is available.</p>

⁵ <https://www.anglianwater.co.uk/siteassets/developers/new-content/p--c/descriptive-works-position-statement-march-2025.pdf>

	<p>Griston is within the Watton WRC catchment. See previous comments relating to Watton WRC. Anglian water supports the policy requirement to demonstrate that there is adequate capacity in the sewage treatment works and the foul sewerage network.</p>
<p>Hockering PROPOSAL HOC 1 (400): The Street</p>	<p>There is a rising main the runs along part of the southern boundary of the site. The Policy should include the following requirement to be consistent with other site recommendations where Anglian Water have assets within the boundary:</p> <ul style="list-style-type: none"> • <u>the safeguarding of suitable access for the maintenance of existing sewerage infrastructure.</u> <p>Hockering WRC has capacity to accommodate proposed growth in the Local Plan. This should be assessed in the Stage 2 WCS together with any employment growth. Developers should also engage with Anglian Water at an early stage to assess whether a sustainable point of connection to the wastewater network is available. We support policy criterion f) to demonstrate that there is adequate capacity in the sewage treatment works and the foul sewerage network.</p>
<p>Hockham PROPOSAL GHOC 1 (109): West of Watton Road</p>	<p>There are no Anglian Water assets within the site. There is insufficient capacity to accommodate this quantum of growth at the Great Hockham Lt Hockham Rd WRC, and no growth scheme is planned for delivery in AMP8. Any upgrades will need to be identified through the next DWMP and PR29 Business Plan to seek investment for what is needed to support growth from AMP9 without deterioration to water quality, and development phased appropriately to align with delivery. This should be assessed in the Stage 2 WCS together with any employment growth.</p> <p>Anglian Water supports policy criterion h) to demonstrate that there is adequate capacity in the sewage treatment works and the foul sewerage network.</p>
<p>Lyng PROPOSAL LYNG 1 (091): North of Heath Road</p>	<p>There is a water main and foul sewer to the northern boundary of the site. The Policy should include the following requirement to be consistent with other site recommendations where Anglian Water have assets within the boundary:</p> <ul style="list-style-type: none"> • <u>the safeguarding of suitable access for the maintenance of existing water supply and sewerage infrastructure.</u> <p>Lyng is within the Bylaugh-near-Church WRC catchment. See previous comments relating to this WRC. Developers should also engage with Anglian Water at an early stage to assess whether a sustainable point of connection to the wastewater network is available. We would support a policy criterion similar to those included in other Secondary Village site allocations to</p>

	demonstrate that there is adequate capacity in the sewage treatment works and the foul sewerage network.
North Lopham PROPOSAL N-LOP 1 (054): Rear of Bell Farm, South of Primrose Lane	<p>There are no Anglian Water assets within the site. However, there is a sewer pumping station to the northwest of the site boundary. There should be a sufficient encroachment buffer to this pumping station to ensure it does not impact on the amenity of future residents on the site due to odour. Anglian Water normally advise a buffer of at least 15m from the boundary of the pumping station to the boundary of any residential property⁶.</p> <p>North Lopham is within East Harling WRC catchment – see previous comments relating to East Harling WRC. Developers should also engage with Anglian Water at an early stage to assess whether a sustainable point of connection to the wastewater network is available. We would support a policy criterion similar to those included in other Secondary Village site allocations to demonstrate that there is adequate capacity in the sewage treatment works and the foul sewerage network.</p>
Rocklands PROPOSAL ROC 1 (065): North of The Street PROPOSAL ROC 2 (064): South of Bell Road	<p>There are water mains within the sites. The Policies should include the following requirement to be consistent with other site recommendations where Anglian Water have assets within the boundary:</p> <ul style="list-style-type: none"> • <u>the safeguarding of suitable access for the maintenance of existing water supply infrastructure.</u> <p>Rockland All Saints is within Attleborough WRC catchment, which currently does not have capacity to accommodate growth from proposed future growth – see previous comments on Attleborough WRC. We would support a policy criterion similar to those included in other Secondary Village site allocations to demonstrate that there is adequate capacity in the sewage treatment works and the foul sewerage network.</p>
Saham Toney PROPOSAL SAHAM 1 (072): West of Hills Road	<p>There is water main and foul sewer within the site. The Policy should include the following requirement to be consistent with other site recommendations where Anglian Water have assets within the boundary:</p> <ul style="list-style-type: none"> • <u>the safeguarding of suitable access for the maintenance of existing water supply and sewerage infrastructure.</u> <p>Since the Stage 1 WCS, the permit for Watton WRC has been updated to account for additional DWF headroom. This should be considered in the Stage 2 WCS in the context of proposed growth and existing commitments – including the extension to HMP</p>

⁶ <https://www.anglianwater.co.uk/developing/planning--capacity/asset-encroachment>

	Wayland. Developers should also engage with Anglian Water at an early stage to assess whether a sustainable point of connection to the wastewater network is available.
Sporle PROPOSAL SPL 1 (370): Bunkers Hill (Left)	<p>There are no Anglian Water assets within the site.</p> <p>Sporle is within Necton WRC catchment and previous comments for Necton WRC will apply. We would support a policy criterion similar to those included in other Secondary Village site allocations to demonstrate that there is adequate capacity in the sewage treatment works and the foul sewerage network.</p>
PROPOSAL SPL 2 (146): West of The Street	<p>There are sewers and a water main within the site. The Policy should include the following requirement to be consistent with other site recommendations where Anglian Water have assets within the boundary:</p> <ul style="list-style-type: none"> • <u>the safeguarding of suitable access for the maintenance of existing water supply and sewerage infrastructure.</u> <p>It appears from the mapping that the site boundary may interface with land in Anglian Water ownership where a terminal pumping station is located. Anglian Water recommends the site boundary is reviewed to ensure that land owned by Anglian Water is omitted, and a suitable policy requirement is included to ensure a sufficient encroachment buffer to this pumping station to ensure it does not impact on the amenity of future residents on the site due to odour. Anglian Water normally advise a buffer of at least 15m from the boundary of the pumping station to the boundary of any residential property.</p> <p>Sporle is within Necton WRC catchment and previous comments for Necton WRC will apply. We would support a policy criterion similar to those included in other Secondary Village site allocations to demonstrate that there is adequate capacity in the sewage treatment works and the foul sewerage network.</p>
Yaxham PROPOSAL YAX 1 (094): North of Norwich Road	<p>There is a rising main running through the site. The Policy should include the following requirement to be consistent with other site recommendations where Anglian Water have assets within the boundary:</p> <ul style="list-style-type: none"> • <u>the safeguarding of suitable access for the maintenance of existing sewerage infrastructure.</u> <p>Yaxham is within Mattishall WRC catchment – previous comments relating to Mattishall WRC will apply. We would support a policy criterion similar to those included in other Secondary Village site allocations to demonstrate that there is adequate capacity in the sewage treatment works and the foul sewerage network.</p>

Tertiary Parishes

<p>Beeston with Bittering PROPOSAL BEES 1 (028): Back Lane (West) PROPOSAL BEES 2 (203): Back Lane (East) PROPOSAL BEES 3 (058): Playing Field & Dereham Road PROPOSAL BEES 4 (204): School Farm Paddock PROPOSAL BEES 4 (204): School Farm Paddock</p>	<p>The five small site allocations within Beeston are a cause for concern. The settlement is served by a small descriptive works Beeston-Bitt-Dykewood Farm WRC, which is unlikely to be suitable to accommodate future growth. Our position statement on descriptive works should be considered in the context of these sites, when demonstrating if there is adequate capacity in the sewage treatment works and the foul sewerage network.</p>
<p>Brisley PROPOSAL BRIS 1 (006): North of Gateley Road</p>	<p>Part of the settlement is served by a very small descriptive works Brisley WRC, which is extremely unlikely to be suitable to accommodate future growth. Our position statement on descriptive works should be considered in the context of these sites, when demonstrating if there is adequate capacity in the sewage treatment works and the foul sewerage network, unless alternative wastewater treatment can be provided on site (subject to the appropriate discharge permit from the Environment Agency).</p>
<p>Colkirk PROPOSAL COL 1 (155): East of Hall Lane</p>	<p>There is a foul sewer to the eastern site boundary. The Policy should include the following requirement to be consistent with other site recommendations where Anglian Water have assets within the boundary:</p> <ul style="list-style-type: none"> • <u>the safeguarding of suitable access for the maintenance of existing sewerage infrastructure.</u> <p>Colkirk is within Fakenham WRC catchment and should be considered by the Stage 2 WCS in the context of growth being delivered in the North Norfolk Local Plan. We would support a policy criterion similar to those included in Secondary Village site allocations to demonstrate that there is adequate capacity in the sewage treatment works and the foul sewerage network.</p>
<p>Garvestone Reymerston and Thuxton PROPOSAL GARV 1 (088): Site A – North of Dereham Road PROPOSAL GARV 2 (087): Site B – North of Dereham Road</p>	<p>There are no Anglian Water assets within these sites.</p> <p>The sites are opposite Garvestone-Dereham Rd WRC which is a very small descriptive works extremely unlikely to be suitable to accommodate future growth. Our position statement on descriptive works should be considered in the context of these sites, when demonstrating if there is adequate capacity in the sewage treatment works and the foul sewerage network, unless alternative wastewater treatment can be provided on site (subject to the appropriate discharge permit from the Environment Agency). The majority of the settlement is reliant on private wastewater treatment.</p>

<p>Great Dunham PROPOSAL GDUN 1 (256): East of Litcham Road</p>	<p>There is a water main within the site boundary. The Policy should include the following requirement to be consistent with other site recommendations where Anglian Water have assets within the boundary:</p> <ul style="list-style-type: none"> • <u>the safeguarding of suitable access for the maintenance of existing water supply infrastructure.</u> <p>Anglian Water has a small sewage discharge at Great Dunham South Street, which either discharges no more than 5m³ /day of effluent to watercourse (roughly equivalent to the daily flow from 8 houses), or 2m³ /day if they discharge to a soakaway. Anglian Water would therefore object to the site where a connection is proposed to this facility, and alternative wastewater treatment facilities would need to be considered.</p>
<p>Shropham PROPOSAL SHROP 1 (142): East of Rocklands Road</p>	<p>There are no Anglian Water assets within the site. Shropham WRC, is a small descriptive works, which is very unlikely to be suitable to accommodate future growth of this scale. Our position statement on descriptive works should be considered in the context of this site, when demonstrating if there is adequate capacity in the sewage treatment works and the foul sewerage network, unless alternative on-site wastewater treatment can be delivered, subject to the appropriate discharge consent from the Environment Agency. We support policy criterion f) to demonstrate that there is adequate capacity in the sewage treatment works and the foul sewerage network but would suggest that “unless alternative wastewater treatment can be provided on site” is included.</p>
<p>South Lopham PROPOSAL S-LOP 1 (276): West of Church Road</p>	<p>It appears that part of this site has already been developed. Most of South Lopham is not connected to the public sewer network. Only a small descriptive works serves a few dwellings in the settlement at South Lopham-Church Road WRC, which is very unlikely to be suitable to accommodate future growth of this scale. Our position statement on descriptive works should be considered in the context of this site, when demonstrating if there is adequate capacity in the sewage treatment works and the foul sewerage network, unless alternative on-site wastewater treatment can be delivered, subject to the appropriate discharge consent from the Environment Agency.</p>
<p>Thompson PROPOSAL THOM 1 (170): Tottington Road</p>	<p>There are no Anglian Water assets within the site. Most of Thompson is not connected to the public sewer network. Only a small descriptive works serves a few dwellings in the settlement at Thompson WRC, which is very unlikely to be suitable to accommodate future growth. Our position statement on descriptive works should be considered in the context of this site, when demonstrating if there is adequate capacity in the sewage treatment works and the foul sewerage</p>

	network, unless alternative on-site wastewater treatment can be delivered, subject to the appropriate discharge consent from the Environment Agency.
PROPOSAL THOM 2 (108): East of Watton Road	As above. The scale of growth in this site and distance from the small descriptive works would suggest alternative on-site wastewater treatment should be delivered, subject to the appropriate discharge consent from the Environment Agency.
Weasenham St Peter PROPOSAL WEAS 1 (227): School Road	<p>There is a water main and sewer within the site boundary. The Policy should include the following requirement to be consistent with other site recommendations where Anglian Water have assets within the boundary:</p> <ul style="list-style-type: none"> • <u>the safeguarding of suitable access for the maintenance of existing water supply and sewerage infrastructure.</u> <p>The site is adjacent to a small descriptive works Weasenham St Peters WRC, which is unlikely to be suitable to accommodate future growth. Our position statement on descriptive works should be considered in the context of this site, when demonstrating if there is adequate capacity in the sewage treatment works and the foul sewerage network, unless alternative on-site wastewater treatment can be delivered, subject to the appropriate discharge consent from the Environment Agency.</p>

4. Conclusion

4.1. Anglian Water welcomes the opportunity to comment on the Local Plan and our suggestions are helpful in informing the next iteration of the Local Plan. We would seek to engage with the Council and their consultants on the Stage 2 WCS which will be a key component of the evidence base and ensure that appropriate policy safeguards are in place, particularly in relation to wastewater treatment and source protection zones.

Breckland District Council
Elizabeth House Walpole Loke
Dereham
Norfolk
NR19 1EE

Our ref: AE/2025/130987/01-L01
Your ref: Reg 18

Date: 15 December 2025

Dear Sir/Madam

BRECKLAND LOCAL PLAN

BRECKLAND

Thank you for consulting us on the Breckland Local Plan – Regulation 18. We have reviewed this report and considered the local environment in Breckland and wish to provide the comments below which align with the various constraints within our remit. We appreciate the opportunity to engage with you on the Local Plan review and look forward to ongoing engagement as the review progresses.

Flood Risk

The draft Local Plan has not addressed issues raised at the Issues and Options stage and there are still areas of the Local Plan that are not in line with National Planning Policy, therefore at this stage we consider the Local Plan to be unsound.

Notably, the section on Flood Risk & Surface Water Drainage (p.283- 287) has not been updated to reflect the findings of the Level 1 SFRA published in 2024, or to take into consideration the comments we raised at the Issues and Options stage.

The Sequential Test and requirement for Level 2 SFRA

No evidence has been provided to demonstrate that the flood risk Sequential Test has been applied to the preferred site allocations. It is noted that the majority of the sites are located within Flood Zone 1, however there are some sites that contain areas of Flood Zones 2 and 3 and there are sites that contain areas of high surface water flood risk. Updates to the National Planning Policy Framework and Planning Practice Guidance in December 2024 and September 2025 have made it clear that all sources of flood risk, including the risk of flooding from surface water, must be considered alongside river and coastal flooding when applying the Sequential Test.

The Local Plan must provide clear evidence that the Sequential Test has been undertaken utilising the findings of the Level 1 SFRA. A Level 2 SFRA may be required if development cannot be located outside areas of flood risk.

Unless this evidence is provided, we would recommend the Planning Inspector consider the Plan unsound.

Safeguarding Land

The Local Plan should safeguard any land that is likely to be required to deliver current and future flood risk management infrastructure, in accordance with paragraph 172 of the NPPF. The PPG paragraph 011 explains how land for future flood risk management infrastructure should be safeguarded. The SFRA and Infrastructure Delivery Plan should provide the evidence base for identifying any land that needs to be safeguarded.

Changes of Use

The PPG recommends that Local Plans include a policy on what changes of use will be acceptable in flood risk areas. The reason for this is that conversions of buildings to residential use do not require the application of the Sequential Test but may result in inappropriate development in high flood risk areas. It is often difficult to make existing buildings resistant to flooding and these may be in isolated locations that are difficult for the emergency services to reach in the event of flooding.

Comments on the draft local plan

Sustainable Development Principles - Flood Risk (section 4.16)

The requirements for a flood risk assessment (FRA) set out in the Local Plan are not in line with footnote 63 of the NPPF. As such, we consider that the Local Plan is currently unsound.

The first sentence of paragraph 4.18 states that the NPPF requires an FRA for sites of 1 hectare or more. The NPPF also requires an FRA for any development in Flood Zones 2 and 3, as well as for land identified in an SFRA as being at increased flood risk in the future or land subject to other sources of flooding, where its development would introduce a more vulnerable use (see footnote 63 of the NPPF). An FRA will also be required for some changes of use, as detailed in paragraph 176 of the NPPF. The first sentence should therefore be expanded to reflect these requirements.

Policy ENV 02: Retaining and Enhancing Green and Blue Infrastructure (p.204)

We support this policy and are pleased to see reference to 'blue corridors' and natural SUDS as potential green infrastructure to be provided as part of all major development of 50 homes or more located on greenfield sites.

Developer Contributions (p.296)

Paragraph 11.42 states that the Infrastructure Delivery Plan (IDP) will be revised and updated as the detailed strategy and allocations for development to 2042 are established. The IDP should identify potential flood interventions and set out any improvements needed to existing flood risk management infrastructure to deliver

planned growth. Please note that flood risk management measures are not limited to flood defences and can include river maintenance, retrofitting SuDS in areas of combined sewers and providing telemetry for flood warnings.

Policy INF 06: Developer Contributions (p. 298)

We support the inclusion of point g. in this policy – i.e. the delivery of environmental infrastructure, such as flood defences and SUDS.

Policy ENV 11: Agricultural Intensification (p.241)

We consider that the Flood Risk and Surface Water Run Off section of this policy is quite poorly worded and some changes need to be made to ensure it is in line with the NPPF. The Environment Agency should be consulted on planning applications for major agricultural development if these are within Flood Zone 3 and the LLFA will need to be consulted on any major agricultural developments; the first sentence of this section needs to be changed to reflect this. In addition, the next sentence should refer to paragraph 173 of the NPPF instead of paragraph 103.

Point I. of the flood risk section should be reworded – we would suggest the following wording: *‘Explaining what attenuation measures are in place, designed to the 1% annual probability standard, including an appropriate allowance for climate change, to prevent any increase in flood risk.’*

Flood Risk & Surface Water Drainage (p.283- 287)

We recommend that this section and policy INF 03 is moved to a separate part of the Local Plan as flood risk and surface water drainage does not only relate to ‘Resilient and Adaptable Infrastructure’.

Paragraph 11.14 - Although reference to the flood risk sequential approach is a positive inclusion, we consider that the reference to ‘Flood Zone 1’ should be removed as this relates to fluvial flood risk only. It needs to be clarified that all sources of flood risk and the impacts of climate change need to be considered when steering new development towards areas of low flood risk, in accordance with national policy. The PPG (paragraph 024) states: *‘The Sequential Test ensures that a sequential, risk-based approach is followed to steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account.’*

We recommend that the second sentence is re-worded as follows: *‘The policy approach is to steer development towards areas of low flood risk, considering all sources of flood risk and the impacts of climate change.’*

Paragraph 11.15 – We note that the latest Level 1 Strategic Flood Risk Assessment was published in 2024. It will need to be ensured that policy INF 03 and any other relevant policies are in line with the recommendations of the updated SFRA.

Policy INF 03: Flood Risk & Surface Water Drainage

This policy is primarily focused on surface water flood risk. We acknowledge that surface water is the major source of flood risk in Breckland and support the specific policy requirements relating to surface water drainage that aim to ensure appropriate mitigation measures and a reduction in flood risk where possible.

However, we consider that more reference should be made to fluvial flood risk associated with watercourses in the area. We recommend adding a bullet point to make it clear that developers will be required to show that the proposed development would *'not result in any loss of floodplain storage and, wherever practicable, provide a net gain in floodplain storage.'*

Point a. states that all new development will be *'located to minimise the risk of flooding'* – it needs to be made clear that a sequential approach should be taken, with all new development located in areas at lowest risk of flooding, considering all sources of flood risk and climate change. Given that fluvial flood risk is limited to watercourse corridors, which should be protected and enhanced, development should only be permitted in areas at risk of flooding in exceptional circumstances.

Point b. states that new development *'should not materially increase the flood risk to other areas.'* – the wording of this needs to be changed to make it clear that mitigation measures must ensure there is no increase in flood risk in other areas, in line with National planning policy. We recommend rewording the first sentence as follows: *'incorporate appropriate surface water drainage mitigation measures to minimise its own risk of flooding and to ensure there is no increase in flood risk to other areas.'*

Point e. We support the inclusion of this point but recommend re-wording this to make it clear what is meant by a 'positive impact'. We suggest re-wording this as follows: *'wherever practicable, reduce the risk of surface water flooding in the surrounding area adjacent to the development.'*

Third paragraph - We consider that this paragraph is poorly worded and not in line with the NPPF. We recommend making the following changes:

'Proposals for development in medium (flood zone 2) and high flood risk areas (flood zones 3a and 3b) must be accompanied by a site-specific flood risk assessment, clearly demonstrating the development will be safe for its lifetime, taking account of the vulnerability of its users, and there will be no increase in flood risk elsewhere. Where the Exception Test needs to be applied, it should be demonstrated that any opportunities to reduce flood risk overall have been fully investigated and incorporated into the development where practicable.'

Please note that table 2 of the PPG makes it clear that only water compatible development and essential infrastructure should be permitted in flood zone 3b (the functional floodplain); we recommend that the flood risk policy also makes this clear. The 'functional floodplain' should be clearly defined in the policy – i.e. with reference to the SFRA and Table 1 of the PPG on flood risk and coastal change. We support the last sentence relating to seeking opportunities to reinstate areas of functional floodplain.

Fourth paragraph - We are pleased to see the inclusion of the following sentence: *‘Consideration should be given to assessing opportunities to undertake river restoration and enhancement as part of a development to make space for water.’* However, please note that the Environment Agency should be consulted on any proposals for enhancement and restoration of the river corridor, as well as Norfolk County Council. There are a couple of minor errors in the second sentence: *‘(e.g. de-culverting...raising bridge soffits...)’*. We recommend clarifying that if river restoration and enhancement works are proposed as part of a development, a site-specific FRA will need to fully assess the flood risk implications of such works and demonstrate that there will be no increase in flood risk elsewhere.

The policy does not make any reference to residual risk or provide any clarification of the preferred mitigation strategy for ensuring any new development in flood risk areas will be safe for its lifetime, as set out in paragraph 042 of the PPG: *“Where necessary, local planning authorities should use information on identified residual risk to state in strategic policies their preferred mitigation strategy for ensuring development will be safe throughout its lifetime...”* The preferred mitigation strategy should be based on the recommendations of the Level 1 SFRA.

We recommend that the policy states that where detailed hydraulic modelling of a watercourse is not available, modelling should be undertaken as part of a site-specific FRA.

Water Resources

Overall position

We welcome the strong emphasis on water efficiency and integrated water management in the draft Plan. In particular we support:

- Recognition that Breckland sits within a seriously water-stressed region, with existing pressures on rivers and groundwater and the need to reduce abstraction to protect designated sites and the wider water environment.
- Inclusion of a dedicated section on the Management of Water Resources, which acknowledges climate change impacts, licence revocations and the role of regional water resources planning.
- A robust water efficiency policy (HOU 17) which adopts an 85 litres per person per day (l/p/d) design standard for new housing and BREEAM-based requirements for non-residential development, closely aligned to the Shared Standards.

However, at this stage the Local Plan is not yet supported by a complete water resources evidence base. The Plan relies on a future Water Cycle Study (WCS) / Integrated Water Management Strategy to test the deliverability and environmental acceptability of growth. Until that work is complete, we cannot be confident that the spatial strategy, site allocations and timing of development are fully compatible with:

- the most recent Water Resources Management Plans (WRMPs),
- the WRE Regional Plan,

- existing and future abstraction licence reductions, and
- the need to avoid further deterioration in water body status and to support environmental destination objectives.

Our overarching recommendation is therefore:

A comprehensive, up-to-date Water Cycle Study / Integrated Water Management Strategy should be completed before Regulation 19 and its findings used to refine the spatial strategy, site allocations, phasing and policy wording. The Plan's water-related policies should explicitly draw on this evidence, the Shared Standards and the latest WRMPs and WRE Regional Plan to demonstrate that growth will be both sustainable and deliverable from a water resources perspective.

Evidence base and Water Cycle Study requirements

The draft Plan refers to preparing a Water Cycle Study and Water Integrated Management Plan, and to using this alongside the SFRA and any Surface Water Management Plan to inform water protection zones and evidence requirements in sensitive areas.

We strongly support this approach, but consider that the role, scope and timing of the WCS need to be made explicit to ensure the Plan is justified and effective

Timing and status

The Plan should clearly state that a WCS/IWMS will be completed to align with the Regulation 19 stage, and that it will form a core part of the Plan's evidence base
The WCS should be used to:

- test whether the chosen growth strategy and site allocations are compatible with sustainable water availability and environmental objectives;
- identify any necessary phasing or infrastructure dependencies; and
- refine and, where necessary, strengthen the wording of HOU 17 and the water-related infrastructure and environment policies.

Scope and methodology

In line with the Water Resources Toolkit and WCS advice, we recommend that the WCS

i) Works at Water Resource Zone (WRZ) scale

- Assess water resources at the level of the WRZs that supply Breckland, rather than only within the administrative boundary.
- Explicitly consider growth and abstraction in neighbouring authorities that draw on the same WRZs, to capture cumulative pressures.

ii) Uses the latest WRMPs and WRE Regional Plan

- Draw on the most recent draft and final WRMPs for all relevant water companies.

- Compare the Plan's housing and employment growth assumptions with those in the relevant WRMP demand forecasts, identifying where local plan growth is higher or lower than assumed.
- Take account of the WRE Regional Plan, including the forecast regional deficit, the timing and capacity of strategic options (such as new reservoirs, transfers and strategic pipelines), and the assumed levels of demand reduction.

iii) Captures licence reductions and deferrals

- Explicitly assess the implications of existing and proposed abstraction licence revocations and sustainability reductions (e.g. in relation to the Broads SAC, River Wensum SAC and other sensitive catchments).
- Identify any deferrals of licence changes in the WRMPs and consider how these interact with the timing of growth and environmental objectives.

iv) Assesses reliance on demand management

- Quantify the extent to which the WRMPs' supply–demand balance depends on achieving ambitious demand management measures (e.g. metering, leakage reduction, behaviour change).
- Translate this into a required level of local plan policy ambition on water efficiency, so that HOU 17 and related policies can be clearly justified.

v) Separates construction and operational water use

- Distinguish between construction-phase water requirements and operational demand once development is occupied, and consider how planning policies and conditions can influence both

vi) Considers non-domestic supply restrictions

- Reflect water companies' policies on non-domestic supply restrictions and how future drought management or constrained supplies may affect employment, industrial and agricultural growth unless new development is highly water efficient.

vii) Explores water neutrality/offsetting where appropriate

- In catchments and WRZs where pressures are particularly acute, explore the potential role of water neutrality/offsetting.
- If taken forward, the WCS should consider how water neutrality baselines, metrics, verification and governance would operate, ideally at WRZ scale.

Soundness

To be found justified and effective, the Plan will need to demonstrate that:

- spatial choices and site allocations have been tested against a robust, up-to-date WCS;
- the Plan is compatible with the latest WRMPs and WRE Regional Plan; and

- the water efficiency and infrastructure policies are sufficiently ambitious, specific and enforceable to manage water risk over the whole plan period.

We recommend stating this clearly in the supporting text and cross-referencing the WCS as a key piece of evidence.

Policy HOU 17 – Water Efficiency

We strongly support the intent and structure of Policy HOU 17. It is closely aligned with the Shared Standards and is an example of good practice for water-stressed areas.

Positive elements to retain

We support:

- The adoption of an 85 l/p/d design standard for new homes, which:
 - goes beyond the 110 l/p/d Building Regulations optional standard;
 - is consistent with the Shared Standards and national water efficiency roadmap;and
 - is necessary to help deliver regional supply–demand balance given the forecast deficit.
- The requirement that new non-residential development achieves full relevant BREEAM water credits (WAT01-04) and at least three credits in WAT01, aligning with Shared Standards recommendations.
- The requirement for a Water Efficient Design Statement, including:
 - baseline water use information;
 - full calculations demonstrating compliance with the design standard/BREEAM requirements; and
 - a completion certificate confirming as-built performance.

We consider that these elements are justified in the context of serious water stress and should be retained or strengthened at Regulation 19.

Strengthening link to Shared Standards and WCS

We recommend that:

- The supporting text explicitly references the Shared Standards in Water Efficiency for Local Plans as the evidence base for:
 - the selection of the 85 l/p/d threshold,
 - the BREEAM water requirements for non-household development, and
 - the conclusions on technical feasibility and financial viability.
- The Plan confirms that the WCS will draw on the Shared Standards annexes (environmental pressure, WRMP/WRE context, viability and monitoring) to demonstrate the justification for HOU 17 and identify whether there are locations

where further measures may be required.

“Aspirational” wording

The current supporting text suggests that development is “expected to aspire beyond these standards, where possible to do so.”

This “where possible” phrasing introduces avoidable uncertainty and could undermine the policy’s effectiveness. We recommend either:

- removing the “where possible” caveat so that the expectation is clear; or
- specifying in what circumstances and by what means developments should go beyond 85 l/p/d (for example, higher performance targets on strategic sites, or a defined proportion of dwellings per site designed to a more stringent standard), informed by the WCS and Shared Standards.

Coverage of non-residential development

To avoid ambiguity, we recommend clarifying that HOU 17’s non-residential requirements apply to all relevant employment, retail and community uses, other than those explicitly excluded under the Shared Standards definition of non-domestic users.

We also suggest cross-referencing HOU 17 from the employment, town centre and mixed-use allocation policies, so water efficiency is clearly treated as a cross-cutting requirement rather than a housing-only matter.

Monitoring and enforcement

We welcome the requirement for a completion certificate and recommend that the monitoring framework:

- reports annually on:
 - the number of permissions granted with HOU 17 conditions;
 - the number of completions where a valid Water Efficient Design Statement and completion certificate have been submitted;
 - any recorded variances against policy and reasons; and
- where possible, explores the use of anonymised smart-meter data (from representative large schemes) to check whether design standards are reflected in actual consumption.

This will help the Council, water companies and the Environment Agency to understand the real-world performance of the policy and to trigger a review or further guidance where needed.

Management of Water Resources – policy direction

We welcome the dedicated discussion on water resources management and its links to growth, climate change and environmental objectives. The Plan correctly identifies:

- the region's serious water stress;
- the poor ecological status of many watercourses;
- licence revocations and sustainability reductions (including those driven by protected European sites);
- the role of the WRE Regional Plan and strategic supply schemes; and
- the need for water protection zones and improved water management in all new development.

However, we are concerned by the statement that “water supply is not a strategic constraint to development”, based on the conclusion that the relevant WRMP shows sufficient water for future growth.

We recommend re-framing this to make clear that:

- Any apparent WRMP “surplus” is conditional on delivering both:
 - ambitious demand reductions (including achieving lower PCC levels across existing and new properties), and
 - a suite of new supply options, many of which have long lead times and are still in development.
- Water availability remains an important environmental and strategic constraint which must be actively managed through:
 - strong local plan policies (e.g. HOU 17, SuDS and green infrastructure policies),
 - careful phasing of growth relative to infrastructure and licence changes, and
 - ongoing monitoring.

We also support the proposed water protection zones and recommend:

- clearly identifying which Source Protection Zones (SPZs), safeguard zones and sensitive groundwater bodies will be subject to enhanced protection;
- ensuring that the detailed criteria are informed by the WCS and aligned with:
 - WFD/RBMP obligations,
 - abstraction licence reduction programmes, and
 - the need to protect groundwater-dependent ecosystems.

In addition, we encourage stronger cross-reference between water resource policy, climate change, design and green infrastructure policies, including the promotion of measures that:

- reduce demand (e.g. shading and cooling that also enables water reuse); and
- support resilience to both drought and flood risk.

Agriculture, private water supplies and other sectors

We welcome recognition that:

- agriculture is highly exposed to water scarcity and past licence revocations;
- existing on-farm storage capacity is limited and may become increasingly important as the climate changes;
- new agricultural development should consider water harvesting, storage and efficient irrigation technologies; and
- private water supplies can impact neighbouring users and the environment, requiring careful assessment.

We recommend that:

i) The WCS explicitly assesses agricultural abstractions and on-farm storage in the relevant WRZs, including:

- cumulative impacts alongside public water supply and industrial uses; and
- opportunities for multi-sector storage solutions (e.g. shared or multi-benefit reservoirs) aligned with WRE's regional work.

ii) Policy clarifies that proposals for private water supplies must:

- be supported by proportionate hydrogeological assessment;
- demonstrate no unacceptable impact on:
 - existing licensed and lawful unlicensed users,
 - SPZs and safeguard zones, and
 - groundwater-dependent ecosystems; and
- be assessed against the wider WRZ-scale sustainability context, not just localised effects.

iii) The Plan acknowledges that non-domestic supply restrictions are a likely part of future drought and water management for business and agricultural users, and that:

- employment and industrial growth will be more resilient where developments embrace high water efficiency, water reuse (rainwater and greywater) and good operational management.
- large employment or mixed-use proposals should be encouraged to engage early with water companies to explore water resource assessments and any available incentive schemes.

Flood risk, SuDS and integrated water management

We support the Plan's intention, through INF 03 and related text, to:

- promote SuDS, on-site rainwater storage, permeable surfacing and soft landscaping; and
- use the WCS, SFRA and any Surface Water Management Plan to determine evidence requirements in critical drainage and groundwater protection areas.

From a water resources perspective, we recommend that:

- The WCS and SWMP jointly explore SuDS options that can also contribute to water efficiency, such as systems that both attenuate runoff and supply non-potable water for irrigation or toilet flushing where technically and economically feasible.
- Policy and guidance encourage developers, especially on larger or strategic sites, to assess the viability of:
 - rainwater harvesting; and
 - greywater reuse,

in line with the cautious but supportive position set out in the Shared Standards (i.e. not as a blanket requirement, but as a site-specific opportunity where benefits are clear and maintainable).

This will help deliver multi-benefit solutions that address flood risk, water quality, biodiversity and water resource pressures together.

Implementation, phasing and monitoring

To ensure the Plan is deliverable and adaptable in the face of increasing water stress, we recommend strengthening implementation, phasing and monitoring in the following ways

Phasing of growth with water infrastructure

- Use the WCS to identify capacity-constrained WRZs and catchments where growth is particularly sensitive to water availability and environmental limits.
- In those areas, align the phasing of major allocations with:
 - the timing of licence reductions and any compensating supply schemes;
 - the delivery of new strategic infrastructure (e.g. regional transfers or reservoirs);and
 - the roll-out of demand management programmes (e.g. smart metering, leakage work).

Where necessary, phasing or triggers should be built into site-specific policies or infrastructure requirements.

Roles and responsibilities

The plan must clarify:

- who is responsible for enforcing HOU 17 and related conditions at application and completion stages;
- how automated meter reading findings on water efficiency will be reviewed and acted upon; and

- under what circumstances a partial review of the Plan or supplementary planning guidance would be triggered if monitoring shows that demand is exceeding sustainable levels or if key WRMP/WRE assumptions change.

Monitoring indicators

We recommend that the monitoring framework includes specific indicators related to water resources, for example:

- number and proportion of new dwellings built to at least 85 l/p/d by design;
- number and proportion of non-residential developments achieving the required BREEAM water credits;
- per-capita consumption (PCC) trends for the district, using water company data where available;
- number of major developments with a submitted and approved Water Efficient Design Statement and completion certificate; and
- qualitative reporting on SuDS and water reuse features secured through major developments.

These indicators will help demonstrate that the Plan is actively contributing to regional water resource and environmental objectives and will support adaptive management over time.

Conclusion

In summary:

- We support the strong direction of travel in the draft Breckland Local Plan on water efficiency and integrated water management, particularly Policy HOU 17 and the recognition of regional water stress.
- However, to be sound, the Plan will need to be underpinned by a comprehensive Water Cycle Study/Integrated Water Management Strategy and to make clearer how growth will be phased and managed in line with WRMPs, the WRE Regional Plan and environmental obligations.
- We have suggested specific amendments and clarifications to:
 - strengthen HOU 17;
 - refine the messaging in the water resources chapter;
 - better address agricultural and private water supplies;
 - embed integrated SuDS and water reuse; and
 - improve implementation, phasing and monitoring.

We would welcome ongoing engagement with the Council as the WCS is commissioned and as the Plan is refined for Regulation 19, to ensure that water

resources are managed in a way that supports both development and the environment over the long term.

Water Quality

We have reviewed:

- Draft Local Plan: Full Update, Preferred Options (Regulation 18), October 2025
- Infrastructure Delivery Plan (no date)
- Integrated Assessment of the Breckland Draft Local Plan Preferred Options (Regulation 18): October 2025
- Stage One Water Cycle Study, July 2025.

At present, the evidence base is not sufficiently complete to fully inform policy around management of wastewater and thus prevent deterioration in water quality.

We are pleased to see that a Stage One (Scoping) Water Cycle Study (WCS) has been undertaken. Given the growth projections for Breckland and the initial conclusions of the Stage One WCS, we strongly recommend Stage Two is progressed to support effective policy decisions that will protect the water environment.

Ensuring there is sufficient wastewater treatment capacity is crucial to securing the Strategic Objective of 'Creating a Rich Environment' as set out in LP paragraph 3.10., as well as ensuring that environmental legislation is met.

A high-quality water environment supports wildlife but also provides quality of life benefits and can support local economies including boosting land and property values, agriculture, tourism and recreation. Where it is not properly planned for, new development can increase pressure on the water environment. Where development is properly planned it can provide opportunities to protect and enhance the water quality, amenity and biodiversity within a catchment.

We note that LP ENV10 policy covers nutrient impacts from wastewater discharges in the context of Nutrient Neutrality, however this is not the same as the capacity of a wastewater treatment works to accommodate additional flows from growth in the catchment.

Some of the Site-Specific Policies within Section 12 do contain references to the need for development proposals to demonstrate that sufficient sewerage capacity will be made available in time to serve the development, which we support. However, this requirement should be within all of the Site Specific Policies given some of the site proposals would be served by very small wastewater treatment works (such as Kenninghall) that may not be able to be upgraded to support an increase in that location.

If the wording within Section 12 is generally intended to be kept, then it should also be tightened to show how development proposals might demonstrate that there is adequate capacity in sewage treatment works and the foul sewage network and that the proposals have regard to water quality standards. Will the LPA require evidence

such as discussions with Anglian Water and agreed proposals to upgrade, where necessary, infrastructure, including delivery timescales, etc? Will mitigation measures also be required to be demonstrated where increase in flows to a STW might result in WQ deterioration as identified in the Stage One WCS?

There also does not appear to be any specific policy around managing development where there is currently limited or no access to mains drainage. We would expect to see this considered to prevent unnecessary proliferation of septic tank discharges to ground, or an increase in private package treatment plants that discharge either to ground or surface waters.

We understand from para 11.49 that the Infrastructure Delivery Plan is being revised and updated. We expect to see reference to wastewater infrastructure, including capacity and ability of that infrastructure to be updated to accommodate growth within the Plan period as required. The IDP will also need to consider how Water Company Business Plans are currently developed, and funding for growth secured (five-year cycle). The LPA is advised to contact the Water Company to ensure they understand the current process, as well as what developers can and cannot contribute to, where infrastructure upgrades are needed to accommodate development.

The water company Business Planning round covering 2025 to 2030 has now been determined by Ofwat (PR24/AMP8). Any investment required at WRCs to accommodate growth between 2025 and 2030 may not have been allocated, meaning some developments may have to be phased into the next business planning round (PR29/AMP9). Improvement and upgrades at WRCs are not always straightforward and may not be completed until nearer the end of a Business Plan period. Anglian Water will be able to provide information as required.

Pollution

Pollution from existing permitted activities, for example noise, odour, emissions to air and discharges to water, are material planning considerations for planning applications for new developments nearby such as housing.

Intensive agricultural developments have the potential to cause significant amenity issues e.g Noise and odour. Intensive agricultural developments should aim to minimise the impact on the environment and neighbouring properties.

Farms that exceed the following capacity thresholds will require an environmental permit from the Environment Agency to operate:

- 750 sows
- 2,000 production pigs over 30kg
- 40,000 poultry (chickens, layers, pullets, turkeys, ducks and guinea fowl)

It is advised that applicants involving intensive agricultural developments have early discussions with the Environment Agency, particularly if located within groundwater source protection zone 1 or 2 or within 400m of an existing or potential future receptor sensitive to odour, noise, flies or dust. We will need to consider in more detail if a proposed intensive pig or poultry farm is located within 10km of a Special

Area of Conservation, Special Protection Area or a Ramsar site, within 5km of a Site of Special Scientific Interest or within 2km of a local nature conservation site. Pre-application discussions for the permit will help us to make an initial assessment of the level of impact against the conservation site designation.

We recommend that developers consider parallel tracking planning and permit applications as this can help identify and resolve any issues at the earliest opportunity.

Agricultural buildings, slurry storage and silage storage

Developments will need to comply with [Storing silage, slurry and agricultural fuel oil - GOV.UK \(www.gov.uk\)](http://www.gov.uk). Any increase in the numbers of livestock may require construction or expansion of slurry and silage storage facilities.

Anaerobic digestion plants.

It is also advised that applicants have early discussions with the Environment Agency for planning applications involving AD particularly where the feedstock for the plant involves waste which will require a permit or an exemption from the Environment Agency to operate and/or the AD plant (regardless of feedstock type) is located within a groundwater source protection zone 1 or 2.

New development within 250m of an anaerobic digestion activity could result in the community at the proposed development being exposed to odour emissions. The severity of these impacts will depend on the size of the facility, the way it is operated and managed, the nature of the waste it takes and the prevailing weather conditions

Applicants should demonstrate contingency for storing any digestate produced when the land bank is unavailable for spreading. Applicants should demonstrate they can comply with relevant environmental legislation for storing and spreading digestate to protect the environment.

Sewage treatment

Applicants must demonstrate that there is adequate capacity in the existing sewage treatment works and the foul sewerage network. Private sewage treatment facilities should only be used where it is not reasonable for a development to be connected to a public sewer, because of the greater risk of failures leading to pollution of the water environment posed by private sewerage systems compared to public sewerage systems.

Comments on the plan

8.99 Potential adverse impacts on air quality from ammonia will also arise from any new or expanded lagoon/tank for storing digestate on farms (with or without associated AD plants).

8.109 Storing and spreading of digestate arising from anaerobic digestion should

also be referred here and nitrogen/nitrates should also be included as a key pollutant to water quality.

8.110 Also, relevant to this section is The Water Resources (Control of Pollution) (Silage, Slurry and Agricultural Fuel Oil) (England) Regulations 2010 and The Nitrate Pollution Prevention Regulations 2015.

11:31. AD proposals- The LA is advised to refer to the potential impact to the local environment from spreading digestate from the AD process on surrounding farmland. The spreading will need to comply with The Reduction and Prevention of Agricultural Diffuse Pollution (England) Regulations 2018, The Nitrate Pollution Prevention Regulations 2015 and Code of Good Agricultural Practice when spreading digestate.

Contaminated Land

We encourage the re-development of land affected by contamination and we are pleased to acknowledge where sites have been identified for redevelopment opportunities. This is a sustainable approach which provides an opportunity for environmental improvement via remediation. The Local Authority is responsible for identifying and inspecting potential contaminated land sites in their area and we are therefore pleased to note that Section 4.13 highlights that the Local Council maintains a brownfield register of sites and has attempted to include these as potential redevelopment sites within the Plan.

The Plan includes details of the intended development of several sites which have the potential to be contaminated, including one site of a former landfill. We are pleased to see these included and that Plan highlights the necessity for soil and groundwater investigations and mitigation of any contamination prior to development. Any development proposed on brownfield sites, historic landfill sites, or sites suspected to have been affected by contamination, should follow the requirements of our [Land Contamination Risk Management \(LCRM\) guidance](#). This would initially require a Preliminary Risk Assessment, which would likely be followed by intrusive site investigation, and potentially detailed quantitative risk assessment to assess whether remediation can be undertaken to ensure the protection of the surface water and groundwater environments.

Though we note that contaminated land and brownfield sites are mentioned in several places throughout the Plan, we would recommend including an overall policy to highlight the opportunity to remediate legacy industrial contamination by actively supporting brownfield development.

We recommend that the following guidance be referenced: Paragraphs 123, 146, 180, 189 and 190 within the [National Planning Policy Framework \(NPPF\)](#); Part IIA of the [Environmental Protection Act 1990](#); The [Land Contamination Technical Guidance](#) on gov.uk including the [Land Contamination Risk Management \(LCRM\) guidance](#). Our guidance is regularly revised, and therefore, throughout the plan's duration, the most recent version or replacement guidance for superseded versions should be consulted.

Groundwater

Whilst key environmental issues have been raised, and protecting groundwater as a vulnerable resource is mentioned, we would recommend revisions to reflect the following comments in relation to aquifers and source protection in order to make the importance of groundwater clear:

Bedrock geology consists of Chalk across the entire district. There is local variation with the following chalk formations present in different areas: Lewes Nodular Chalk Formation Seaford Chalk Formation, Newhaven Chalk Formation, Culver Chalk Formation and Portsdown Chalk Formation. These areas are designated as Principal aquifers. Principal aquifers support water supply and sustain base flow to rivers on a strategic scale.

The Principal Chalk aquifer supports many groundwater abstractions for public water supply. Source Protection Zones (SPZs) surround these abstractions and extend across the majority of Breckland. The SPZs show the level of risk to the protected source from contamination and contaminative activities and are used to guide decisions about the acceptability of potentially polluting development scenarios.

Superficial deposits of Lowestoft Formation are most prevalent across Breckland, other prominent deposits include Alluvium, River Terrace, Head, Glaciofluvial, Peat, Sheringham Cliffs Formation, Briton's Lane Sand and Gravel Member and Croxton Sand and Gravel Member. These are classified as Secondary aquifers. Secondary aquifers can support local water supply and may also provide an important source of base flow to rivers.

The aquifers that underly the area support abstractions for public water supply, agricultural, industrial, commercial, public services and private/domestic water supply. The groundwater resource is therefore of high value.

We recommend that the following guidance be referenced: The [Groundwater Protection](#) guidance on gov.uk which includes the [Protect Groundwater and Prevent Groundwater Pollution](#) guidance and [The Environment Agency's Approach to Groundwater Protection](#). Our guidance is regularly revised, and therefore, throughout the plan's duration, the most recent version or replacement guidance for superseded versions should be consulted.

Sustainable Drainage Systems (SuDS)

The Plan highlights the importance of utilizing Sustainable Drainage Systems (SuDS) schemes where appropriate. We are in support of this, Drainage schemes should follow the requirements set out in Section G of the EA's Approach to Groundwater Protection. Soakaways and other infiltration SuDS must comply with statements G1 and G9 to G13 of our [Groundwater Protection Position Statements](#). They should be constructed in line with good practice and guidance documents, we are appreciative of the inclusion of the [CIRIA C753](#) SuDS Manual under ENV 11: Agricultural Intensification.

Infiltration SuDS must not be constructed in contaminated ground where infiltration could re-mobilise contaminants to pollute groundwater. All infiltration SuDS should

be designed to maintain a minimum 1.2m clearance above peak seasonal groundwater levels. We do not consider deep infiltration systems (>2.0m below ground level) to be routinely acceptable.

It should be noted that whilst we support infiltration to support aquifer recharge and reduce flooding, as highlighted in INF 03: Flood Risk & Surface Water Drainage, SuDS should use appropriate pollution treatment measures. Only clean roof water can be directly discharged to infiltration SuDS or watercourses; systems for the discharge of surface water from hard-standing, roads and impermeable vehicle parking areas must incorporate appropriate pollution prevention measures and a suitable number of SuDS treatment components in line with the environmental sensitivity of the receiving waters. An oil separator/interceptor (or equivalent device) may be required to remove oil from water draining off hard surfaces with a risk of oil contamination.

As the plan highlights expansion and population growth in the area, there should be due consideration of the impacts on water resource availability, as well as provision of cemetery space, considering our Guidance for Cemeteries and burials.

We recommend that the following guidance be referenced: [The Environment Agency's Approach to Groundwater Protection](#), particularly statements G1 and G9 to G13; The [CIRIA C753 SUDS Manual](#); The [Susdrain website](#); The [Sustainable Drainage Systems: Non-Statutory Technical Standards](#) guidance on gov.uk and the [Recommendations To Update](#) these.

Waste Management

We note the inclusion, under ENV 01: Climate Responsive Design, for developers to consider waste management in any design and access statement. We would recommend revision to reflect the following comments for waste management in the context of land contamination/remediation: Excavated materials recovered on a development site via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste Development Industry Code of Practice (DoWCoP) subject to certain conditions being met. This is sustainable approach. However, contaminated materials that are or must be disposed of are waste and must be managed in accordance with the relevant legislation.

We recommend that the following guidance be referenced: The [Definition of Waste: Development Industry Code of Practice](#); and The [Waste Management](#) page on gov.uk.

Biodiversity

Page 205. ENV2 Green and blue infrastructure

The current policy states that development that results in the loss, fragmentation or deterioration of the GBI network will only be supported where the public benefits clearly outweigh the harm and where like-for-like or better provision is secured that aligns with the strategic needs of the wider network, as identified in the Breckland GI study.

We suggest you remove 'like for like' and have a more ambitious 'better provision' only for cases where there will be loss, fragmentation or deterioration of the GBI network. *i.e.* Development that results in the loss, fragmentation or deterioration of the GBI network will only be supported where the public benefits clearly outweigh the harm and where better provision is secured that aligns with the strategic needs of the wider network, as identified in the Breckland GI study.

The current policy also states development which harms irreplaceable habitats (e.g. ancient woodland, chalk streams) will not be permitted unless clear mitigation and compensation measures are provided in line with the Norfolk LNRS. There should be a presumption against development which harms irreplaceable habitats.

The current policy ENV2 is not in line with the National Planning Policy Framework 193 (c) which states: development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.

Instead we suggest the wording, there is a presumption against development which harms irreplaceable habitats (e.g. ancient woodland, chalk streams); in exceptional circumstances, such development may be permitted with bespoke mitigation and compensation measures provided in line with the Norfolk LNRS, and in accordance with BNG requirements.

The local plan should include a policy that insists that a riparian corridor is always retained, and that no significant development (e.g. a housing estate) is undertaken within 8m of a main river.

Page 208 ENV 03 Improving Biodiversity

The Current Policy states that all qualifying development proposals must achieve biodiversity net gain within their schemes to at least the minimum statutory requirement as set out in Schedule 7A of the Town and Country Planning Act 1990 (or any subsequent legislation that amends this schedule)

The source legislation is the Environment Act 2021 (Schedule 14 which inserted Schedule 7A into the T&CP Act) and the subsequent Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024.

Page 209 ENV 03 Improving Biodiversity

The current policy states: An ecological assessment will be required for all major applications and any proposals that fall within ecologically sensitive areas, e.g. SSSIs, SPAs, SACs and areas impacted by these.

A development which may not be considered 'major' may also require an ecological assessment, for example if protected or priority species or habitats are present. We suggest the policy wording is amended to remove the word 'major' and to add

that an ecological assessment will be required for any sites which may support protected or priority species or habitats.

Ecological assessments are required in order for the LPA to comply with NPPF **193**. (a) “if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;”

We also suggest adding County Wildlife Site (CWS) to the list of examples given here. CWS have not been mentioned in the explanatory wording or in the policy.

There should be a presumption against development within ecologically sensitive areas, e.g. CWS, SSSIs, SPAs, SACs and areas impacted by these, unless there is a reason of overriding public interest and the mitigation hierarchy has been followed.

Page 223. ENV 09: The Brecks Protected Habitats and Species

Stone curlew

There should be a presumption against any development within the Breckland SPA or the 1500m buffer zone (as per policies map). If such development is proposed, for example for reasons of public interest, then the policies regarding Habitats Regulation Assessment should apply.

Woodlark/nightjar

There should be a presumption against any development within the Breckland SPA or the 400m buffer zone (as per policies map). If such development is proposed, for example for reasons of public interest, then the policies regarding Habitats Regulation Assessment should apply.

ENV011 Agricultural Intensification

Water Quality – should include the requirement for a buffer strip adjacent to every watercourse within or adjacent to an area of agricultural intensification. For example a minimum 10m.

Page 261 DES 02: Integrating Development With Nature

The current policy states that the removal of hedgerows and trees should be clearly and robustly justified in any planning application.

We recommend that “and appropriate compensatory planting of native species should be incorporated into the scheme” should be added to this.

We recommended additional policy statements: include the requirement for a buffer strip adjacent to every watercourse within or adjacent to an area being developed, eg 10m. Buffer strips should not form part of private gardens. This would have benefits for biodiversity, water quality and flood risk.

Protect and enhance the aquatic environment within or adjoining the site, including water quality and habitat. For development adjacent to watercourses this includes the need to consider options for contributing to WFD objectives, including for example riverbank naturalisation, removal of in-channel structures, de-culverting of piped watercourses, and riparian zone enhancements.

Developments should seek to include wildlife friendly features within new buildings, eg integrated bird and bat boxes.

SUDs design should incorporate as many wildlife enhancements as possible, for example, varied contours and depths of ponds and drains; appropriate native planting, and maximising habitat connectivity.

Maintenance of SUDs should be designed to support biodiversity, eg. allowing pollinators to bloom before cutting.

Creation of any new habitats should aim to maximise multiple benefits, for example SUDs, natural flood management, green infrastructure, etc.

Page 286 INF 03: Flood Risk & Surface Water Drainage

The current policy states that enhancement opportunities for renewing assets will be encouraged, where viable (e.g. de converting, the use of bio engineered river walls, raising bridge so fits to take into account climate change).

This paragraph has typos which obscure the meaning of the policy: de converting should read “decuverting” ie opening up culverted sections of watercourse; Bridge so fits should read “bridge soffits”.

We recommend that you add that buffer zones of 10m should be incorporated where development is within a riparian zone of a watercourse. This would have benefits for biodiversity, water quality and flood risk.

Yours faithfully,



**Miss Neve Cooper
Planning Officer**

Team e-mail: 

Team number: 

From: [Squire, Sandra](#)
To: [Local Plan](#)
Subject: Breckland Local Plan Regulation 18 Consultation
Sent: 11/12/2025 17:33:13

Thank you for consulting the Forestry Commission on your new local plan.

Site Allocations:

We note that SDA1 – Frans Green, East Tuddenham and WAT3 (088) are both adjacent to Ancient Woodland.

Ancient Woodland:

Ancient woodlands are an irreplaceable habitat. They have great value because they have a long history of woodland cover, being continuously wooded since at least 1600AD with many features remaining undisturbed. This applies equally to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS). Paragraph 193 (c) of the National Planning Policy Framework (Dec 2024), states:

"Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists"

It goes on to include what could be considered as "wholly exceptional reasons" and states:

"For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat."

As Ancient woodland, ancient trees and veteran trees are irreplaceable, proposed compensation measures should not be considered as part of your assessment of the merits of a development site proposal.

We also particularly refer you to further technical information set out in Natural England and Forestry Commission's [Standing Advice on Ancient Woodland](#) – plus supporting [Assessment Guide](#) and ["Keepers of Time" – Ancient and Native Woodland and Trees Policy in England](#).

The Standing Advice states that proposals should have a buffer zone of **at least** 15m from the boundary of ancient woodlands to avoid root damage which can result in loss or deterioration of the woodland. Where assessment shows impacts are likely to extend beyond this distance, you're likely to need a larger buffer zone.

For example, the effect of air pollution from development that can result from a significant increase in traffic or dust from construction.

The Standing Advice and the recommended buffer zones are currently under review and are likely to be updated recommending that the minimum buffer requirement will be increased.

The Joint NE/FC Standing Advice states that both the direct and indirect effects of development should be considered for both the construction and operational phases of any proposed development.

Not just including the potential for actual construction to impact on soils, trees and tree roots. But also the potential for effects when residential developments are in use and result in a likely increase in visitor numbers and recreational pressure.

Other impacts to the ancient woodland, for example reducing the resilience of the woodland and making it more vulnerable to change. Increasing the amount of dust, light, air and soil pollution and increasing disturbance to wildlife, also trampling of plants, erosion of soil and noise from additional people, traffic and domestic pets.

The Frans Green site appears to have a large buffer and the documents state there is a minimum 15m buffer which should be extended to 30-50m where there is a risk of pollution, recreational impact etc. A 15m buffer would be considered as suitable for one dwelling, the size of an ancient woodland buffer should also be consistent with the size and scale of the development.

Site WAT3 (088) is directly adjacent to Wayland Wood Ancient Semi Natural Woodland so would likely cause loss or deterioration to the woodland. We would expect to see a detailed assessment of any impacts to the ancient woodland, including details of measures to be taken to reduce and mitigate any effect.

Site WAT4 (289) also has the potential to affect Wayland Wood due to the additional visitor pressure.

Due to the irreplaceable nature of ancient woodland, most temporary effects will result in irreplaceable damage.

It is also worth noting that the Town and Country Planning (Consultation) (England) Direction 2024 mandates that Local Planning Authorities notify the Secretary of State if they are minded to approve any planning applications that could lead to the loss or deterioration of ancient woodland.

Priority Habitat – Mixed Deciduous Woodland

We note that several of the proposed allocated sites are either directly adjacent to or have mixed deciduous woodland on site.

In particular: WAT3 (088) – Watton, SDA2 – Barkers Farm, SUE 079 Kingsfleet Grove, SUE 076 Swaffham and Robertson Barracks SDA

These mixed Deciduous woodlands are on the National Forest Inventory and the Priority Habitat Inventory (England).

They were recognized under the UK Biodiversity Action Plan as being the most threatened, requiring conservation action. The UK Biodiversity Action Plan has now been superseded but this priority status remains under the Natural Environment &

Rural Communities Act 2006. (NERC) Sect 40 "Duty to conserve and enhance biodiversity" and Sect 41 – "List of habitats and species of principle importance in England".

Fragmentation is one of the greatest threats to mixed deciduous woodland. Woodlands can suffer loss or deterioration from nearby development through damage to soils, roots and vegetation and changes to drainage and air pollution from an increase in traffic and dust, particularly during the construction phase of a development.

We would expect to see careful consideration of these woodlands, including how they can be protected and enhanced, with improvements to habitat connectivity, also to assess any net loss of trees and the development of mitigation measures to minimise any risk of net deforestation because of the scheme

The UK Forestry Standard (UKFS) sets out the UK government's approach to sustainable forestry and woodland management, including standards and requirements as a basis for regulation, monitoring and reporting requirements. The UKFS and the Forestry Act (1967) have a general presumption against deforestation.

Where woodland loss is unavoidable, we would expect to see significant compensation and the use of buffer zones to enhance the resilience of neighbouring woodlands. These zones should include further tree planting or a mosaic of semi-natural habitats.

Paragraph 187b of the NPPF (December 2024) states:

"Planning policies and decisions should contribute to and enhance the natural environment recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland."

Policies:

ENV02 – Green & Blue Infrastructure

We note policy wording around Ancient Woodlands and development that harms ancient woodland not being permitted unless there is clear mitigation in line with the LNRS. Although this does not mention the exceptional reasons test as mentioned in the NPPF. (Previously mentioned above)

Whilst any application should be considered on its merits, in the case of irreplaceable habitats, the integrity of the woodland should take priority except when the exceptional reasons test applies.

Our concern is that by not mentioning the exceptional reasons test, the implication is that mitigation is enough to secure permission.

You may also wish to consider specifying the protection of priority habitats such as mixed deciduous woodland.

The Forestry Commission also encourages local authorities to consider the role of trees in delivering planning objectives as part of a wider integrated landscape approach. For instance through:

- The inclusion of green infrastructure (including trees and woodland) as a requirement in and around new development. As stated in the Environmental Improvement Plan 2023 it is a strategic government objective to increase the net area of tree canopy and woodland cover to 16.5% of total land area in England by 2050. Therefore, the Forestry Commission is seeking to ensure that tree planting is a consideration in every development not just as compensation for loss.
- Promoting the use of home grown timber used in construction as a sustainable building material, therefore reducing the embodied carbon emissions of new builds. In line with the Government's [25 Environment Plan](#) (Page 47), the "[Timber in construction](#)" roadmap and the [Net Zero Strategy](#).

If you require any further information, please do not hesitate to contact me.

Best wishes

Sandra

Sandra Squire

**Local Partnership Advisor
East & East Midlands**



Subscribe to our newsletter to be the first to hear about the latest information, advice, and news from the Forestry Commission

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorised to receive it. If you are not the recipient, you are hereby notified that any disclosure copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware.

15 December 2025

Planning Policy
Breckland District Council
Elizabeth House,
Walpole Loke,
Dereham,
Norfolk, NR19 1EE

Sent via email: localplan@breckland.gov.uk

Dear Planning Policy

**Regulation 18 Local Plan Consultation: Draft Local Plan – Full Update Preferred Options
Representations on behalf of Homes England**

Avison Young is instructed by Homes England to make representations to Breckland District Council in respect of the Draft Local Plan Full Update Preferred Options Consultation (Regulation 18 consultation).

Homes England owns land within the Attleborough Sustainable Urban Extension (SUE), which is identified in both the adopted and emerging Breckland Local Plans. The site is currently allocated under policy GEN-04 of the Breckland Local Plan (adopted 2023) and it was granted outline planning permission in March 2020 for 4,000 homes, a link road and other infrastructure (ref: 3PL/2017/0996/O). A S73 application has subsequently been approved (ref: 3PL/2021/1668/VAR) on 11 January 2023 and a number of planning conditions attached to the varied outline planning permission have been discharged. These include the approval of a structuring plan and a design code.

The draft Local Plan proposes to carry forward the allocation and draft policy HOU 02 (Distribution of Housing Development) and table 5.2 of the draft plan confirms that the SUE provides 4,000 housing commitments and that it expects 975 of these will be delivered within the emerging Local Plan period (i.e. by 2042).

This representation is written in support of the draft Local Plan, in so far as it relates to the Council's intention to carry forward the Attleborough SUE allocation. It is also submitted to confirm Homes England's ambition to delivering homes on the site and within the trajectory that is anticipated by the Council.

Attleborough SUE

The draft Local Plan proposes to carry forward the existing Attleborough SUE allocation. It does not include any new policies that seek to control its future development. Homes England supports this approach on the basis that outline planning permission has been granted for all of the land that is covered by the allocation and on the basis that the conditions attached to that planning permission will appropriately govern how reserved matters applications should come forward. It is therefore not necessary for any new site-specific policies to be prepared.

Homes England agrees that it is appropriate to rely on the Attleborough SUE to deliver a proportion of its local housing need for the emerging plan period and beyond. Appendix 2 of the draft Local Plan sets out the proposed housing trajectory and for Attleborough SUE, it anticipates delivery as follows:

Proposed Housing Trajectory. Source: Appendix 2 of Draft Local Plan Consultation Document

24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36
0	0	0	0	25	50	75	75	75	75	75	75
36/37	37/38	38/39	39/40	40/41	41/42						
75	75	75	75	75	75						

Homes England supports the trajectory and considers it to represent a reliable and accurate reflection of when homes are likely to be delivered. Homes England is committed to delivering housing and supporting infrastructure on the site and is actively taking steps to unlock delivery. To this end, Homes England has appointed a multi-disciplinary technical team who have supported with the discharge of a large number of planning conditions attached to the outline permission and the submission of the first reserved matters application for Phase 1A, which relates to the Northern Roundabout (ref: 3PL/2023/0278/D) and which is required to support the delivery of homes. In addition, planning permission has been granted to widen Buckenham Road to facilitate temporary construction access to the site (ref: 3PL/2024/0285/F) and for the construction of a Terminal (foul water) Pumping Station (ref: 3PL/2024/0286/F). The team is also actively working on proposals to assist with the preparation and submission of future detailed planning proposals. With this in mind, Homes England is of the view that the proposed trajectory should be treated as a ‘minimum’ figure which could be exceeded.

Homes England consider that housing delivery will likely commence from c.2028/29 of the initial 5 year period of the draft Local Plan, following installation of critical infrastructure including a foul water pumping station/foul sewer and main access junction(s) at Buckenham Road. This timeframe also supports the typical timelines expected for the release of development parcels to developers, preparation and determination of reserved matters applications for homes and other associated infrastructure and the discharge of relevant conditions.

The Council’s latest Local Development Scheme (dated March 2025) anticipates that the emerging Local Plan will be adopted in 2027. Assuming the Local Plan progresses as anticipated and it is adopted in either year 26/27 or 27/28, the Council would be relying on Attleborough delivering at least 150 or 225 homes to demonstrate a 5 year supply of deliverable housing sites. Homes England is comfortable that these assumed housing numbers can be relied upon and that the delivery rates over the plan period are achievable as a minimum anticipated housing trajectory.

Summary

This letter has set out Homes England's representation to the Regulation 18 consultation on the Draft Local Plan Full Update Preferred Options. We trust that it will be taken into consideration by Breckland District Council as it prepares the Regulation 19 version of the draft Local Plan Full Update. Should Officers have any queries about this letter, please do not hesitate to contact Tim Collard of Avison Young on 07768 124 845, or via email tim.collard@avisonyoung.com.

Yours faithfully



Avison Young (UK) Limited

Our Ref: Breckland Draft Local Plan Reg 18

Norfolk and Waveney Integrated Care
System
ICS Estates Department

Email: [REDACTED]

15th December 2025

By email: planning@breckland.gov.uk

Dear Sir / Madam

**Draft Local Plan - Full Update,
Preferred Options (Regulation 18): 2024 - 2042**

31st October 2025 – 15th December 2025

Thank you for engaging with the NHS Norfolk and Waveney Integrated Care Board's (ICB) Strategic Estates function regarding the emerging Local Development Plan (LDP).

The ICB welcomes the opportunity to respond to the Breckland Local Plan Draft for the period 2024 to 2042 and acknowledges the comprehensive approach taken in the plan to address the healthcare needs of the growing and ageing population in Breckland.

The ICB has reviewed the context, content, and recommendations set out in the LDP document at its current stage, and is sharing the following points, observations, and recommendations on behalf of the ICB, Norfolk Community Health and Care (NCHC), Norfolk & Norwich University Hospital NHS Foundation Trust, Queen Elizabeth Hospital NHS Foundation Trust, Norfolk and Suffolk NHS Foundation Trust, Primary Care Services, and the East of England Ambulance Service NHS Trust (EEAST).

Background Information

The population of Breckland is projected to increase by 23,700 people over the plan period, with 65% of this growth in age groups 65 and over. This demographic shift raises significant issues for healthcare infrastructure and will place substantial demand on services. It is crucial that the plan includes specific provisions for expanding healthcare facilities to meet this demand, including the level and distribution of appropriate service provision. The plan emphasises the need for new and improved healthcare facilities to support the growing and aging population. This includes the provision of primary healthcare services, such as GP surgeries, and the integration of healthcare facilities within new housing developments.

The strategic objective is noted and plans to improve the health and well-being of Breckland's residents by reducing health inequalities, promoting healthy living, and supporting locally accessible, high-quality healthcare. There are policies (HOU 04, HOU 10 & HOU 17 within the plan which identify the need for housing developments to be well-related to existing healthcare facilities

or to include provisions for new healthcare infrastructure, this is to ensure that the increased demand for healthcare services due to housing growth is adequately met. These policies ensure that housing developments are strategically placed to support the health and well-being of the community by being close to existing healthcare facilities or by including provisions for new healthcare infrastructure. This is acknowledged and welcomed by the ICB.

Health Impact Assessments

The local plan stipulates that Health Impact Assessments (HIAs) are required for major developments to identify and address potential health impacts. This approach ensures the integration of health considerations within the planning process and aims to support developments that contribute positively to community health outcomes. The ICB endorses the requirement for HIAs on major projects and recommends that these assessments be mandated for all developments comprising 250 dwellings or more. HIAs should be thorough, encompassing detailed strategies to mitigate any identified adverse health impacts on both physical estate infrastructure and residents' wellbeing. In accordance with Section 10.11 of the draft local plan, the ICB expresses its willingness to collaborate with developers and the local planning authority to facilitate effective implementation of HIAs. It is further recommended that the HUDU Rapid Health Impact Assessment Tool be utilised, as it draws upon a robust body of existing evidence to efficiently evaluate development impacts.

Healthcare Infrastructure and Housing Allocations

Healthcare Infrastructure refers to the physical estate capacity and its ability to provide sustainable and effective services, as well as its capacity to handle the additional demands from population growth due to new housing developments. Estates Infrastructure Strategies, demand and capacity modelling, master planning and local plan housing allocations help identify where increased estate capacity is needed to support the growing population. To ensure accessible and sustainable services for the growing population, investment in healthcare infrastructure will be essential. Developer contributions via Section 106 agreements and/or the Community Infrastructure Levy are key to helping mitigate the impacts of ongoing developments and the resulting population growth, enabling the expansion of healthcare infrastructure.

NHS Norfolk and Waveney Integrated Care Board (ICB) assesses healthcare needs as part of the Regulation 18 consultation on the draft local plan, and in accordance with the Norfolk Planning in Health Protocol 2024, the ICB will assess and highlight the impact of each development in the Local Plan and identify constrained areas and the healthcare infrastructure development requirements. When specific sites are designated for allocation and consulted on, the ICB will model and assess the specific housing numbers, population growth, the potential impact on current healthcare services, the required expansion and investment in estate infrastructure, and any requested developer contributions towards this required expansion.

Responding to Breckland consultations is led by the ICB on behalf of the following health partners.

- NHS Norfolk & Waveney Integrated Care Board (ICB)
- The Norfolk and Norwich University Hospital NHS Foundation Trust
- The Queen Elizabeth Hospital, King's Lynn NHS Foundation Trust
- Norfolk and Suffolk NHS Foundation Trust
- Norfolk Community Health & Care NHS Trust
- Primary Care (covering GP practices, dental practices, pharmacies, and opticians)
- East of England Ambulance Service Trust

The NHS welcomes the opportunity to engage with the planning authority about the Breckland Local Plan. The overall impact, if the Plan were to be fully realised, would require significant investment in, and development of, the health infrastructure in the area to ensure access to services for the growing population.

Using the housing allocation information included in section 5 and policy HOU 02, the ICB have modelled the impact of all housing assuming that during the plan period all the housing proposed is realised. Modelling demand and capacity and assessing current and future floorspace requirements has been undertaken for GP primary GMS services and this is illustrated in the below tables.

At this stage modelling is only estimated due to unknown dwelling sizes and tenure splits. As and when planning applications are submitted to the local planning authority and these applications consulted on, the ICB will be able to model the proposals in more detail and provide more accurate information related to net gain in population, floorspace requirements and any required developer contributions to help mitigate the impact of housing developments on local healthcare services.

Table 1: Current and future floorspace capacity status for GP practices, General Medical Services

Area	Current Floorspace capacity status (sqm)	Future Floorspace capacity status (sqm)	Difference Pre and Post (sqm)
Breckland District Council Area	-692.5	-2344.9	-1652.4

The table below identifies the locations within Breckland where, should all housing proposed in the local plan proceed, a substantial expansion of estates infrastructure capacity will be necessary to accommodate the resulting increase in population and demand. Planned projects encompass a combination of new facilities, replacements, extensions, and reconfigurations. Key areas of focus include the three SDAs, Attleborough, Dereham, Shipdham, Swaffham, Thetford, and Watton but are not limited to these areas.

Planning policies site allocations should require that NHS healthcare infrastructure is incorporated into the planning permission process, ensuring that developer contributions are allocated to support and enhance healthcare services.

Table 2: Future floorspace capacity status for GP practices, General Medical Services, by development area, estate infrastructure project proposal and status

Area	Future Deficit (Sqm)	Infrastructure Requirement	Status
Attleborough	-211.4	New build health care facility	Proposal
Dereham	-203.9	New build health care facility	Proposal
Dereham		New build outpatient facility at Dereham Hospital	Proposal
East Tuddenham	-141.9	New build health care facility	Proposal
Larling	-439.3	New build health care facility	Proposal
Mundford	-116.5	<i>Future project to be scoped</i>	
Shipdham	-212.3	<i>Future project to be scoped</i>	
Swaffham	-308.8	Reconfiguration at health care facility	Proposal
		<i>Future project to be scoped</i>	
Thetford	-354.1	New build health care facility	Proposal
Watton	-187.4	<i>Future project to be scoped</i>	

The ICB acknowledges that, although the Swanton Morley Barracks site is a criteria-based allocation and does not contribute to overall housing numbers in the plan, it will nonetheless require an appropriate planning permission policy. This policy should again specify that developer

contributions and/or land provision for healthcare services are necessary, given the limited capacity of the local healthcare estate, which would be insufficient to support a significant increase in dwellings within the area.

Housing for the Elderly and Care Facilities

The proposed plan suggests a growing need for housing tailored to elderly individuals and those requiring specialist care. It sets out policies designed to facilitate the development of care homes and specialist housing.

Policy RB 1 designates the Robertson Barracks site as a potential location for a care or nursing facility, as part of a broader long-term strategy for the site. The policy highlights the importance of preparing a comprehensive masterplan, which would address the provision of essential infrastructure and services, including primary healthcare. The ICB would like to request involvement in any early discussions related to this site as a whole.

Policy HOU 04 requires that any development plan exceeding 500 dwellings must incorporate provisions for a care or nursing facility. The Local Plan identifies several designated sites for such facilities, primarily situated within major Strategic Development Areas, sustainable urban extensions, and the proposed Robertson Barracks site. This approach aligns with the ICB's request for additional developer contributions for these specific locations, reflecting the distinctive requirements associated with this type of development.

From a healthcare perspective, residents of Housing for the Elderly and Specialist Care often present with complex, chronic, and multiple health conditions. This cohort typically requires more frequent and intensive GP intervention than the wider population, which in turn increases demand on local primary care services. An influx of residents into such developments may place additional pressure on already strained GP, community, and nursing services. Insufficient community capacity could further increase GP workloads and contribute to higher rates of Accident and Emergency department visits and ambulance conveyances. It is essential to consult with the ICB at the earliest possible opportunity.

Several factors must be carefully evaluated before determining the location of prospective care facilities, and these considerations should be incorporated into the local planning process and policies:

- Alignment with healthcare service capacity within the designated catchment area. This can be informed by engagement with NHS Norfolk & Waveney ICB as per planning consultations.
- Confirm alignment with the infrastructure development strategies outlined by the ICB.
- Initiate early discussions with the ICB when planning a care facility to provide all stakeholders the opportunity to express any concerns and facilitate timely engagement among all involved parties.

Health Inequalities

The document highlights that Breckland has pockets of health deprivation and that the average age of Breckland residents is increasing, which raises issues for health service provision, the economy, and the housing market. A strategic objective of the draft plan is to improve the health and well-being of communities by reducing health inequalities, promoting healthy living, and support locally accessible health care.

Key considerations for helping to reduce health inequalities should include:

- Proximity and accessibility to healthcare services as a core design principle, especially for ageing populations and those with mobility challenges, but also accessibility in terms of

healthcare estates floorspace capacity.

- Ensure developments address health inequalities by designing for accessibility, safety, and inclusion.
- A mix of affordable housing and market housing to help reduce inequalities by promoting Social Integration.
- Design accessible and adaptable homes to meet the latest Building Regulation codes.

These considerations should be included in a planning document or design code that developers must follow to meet required metrics when designing and delivering homes.

Embedding Health Impact Assessments within planning policies will help to identify potential health risks and opportunities early and provide the ICB and other statutory consultees such as public health with the opportunity to feedback any concerns and work with the local planning authority and developers on mitigation strategies.

Policies within the plan (COM 01 & COM 02) promote healthy lifestyles and aim to ensure that new developments contribute to the health and wellbeing of residents. Policies HOU 09, HOU 10 & HOU 16 place emphasis on housing that meets the needs of all local residents such as adaptable and accessible homes.

Green spaces, recreational facilities, active travel and sustainable transport all encourage physical activity and mental well-being helping to reduce long-term health conditions. It is recognised that the draft plan does emphasise the importance of green and blue infrastructure to promote health and reduce health inequalities.

By supporting healthcare infrastructure and where necessary its expansion, this will contribute to a number of benefits:

- **Improved Access to Services:**
Expanding primary care and community facilities in underserved areas ensures timely access to care, preventing conditions from worsening.
- **Capacity to Meet Demand:**
Infrastructure planning considers demographic changes and future demand. The ICB's latest Infrastructure Strategies identify where estate capacity must grow in response to proposed housing allocation sites and numbers.
- **Integration of Services:**
New Neighbourhood planning looks at how health infrastructure supports integrated care - bringing together physical health, mental health, and social care. This approach will help to tackle health inequalities.
- **Prevention:**
Well-designed facilities enable preventive services (screening, health education) and community engagement.

In general, the plan should promote early collaboration with NHS Norfolk and Waveney Integrated Care Board (ICBs) and its local health partners. This approach aims to reduce health inequalities, especially when development is considered in deprived areas.

Neighbourhood Health

Neighbourhood health promotes a collaborative approach for the NHS, local authorities, social care, and their partners, making integrated working standard practice. It covers a wide range of concepts, policies, and strategies for providing health and social care.

Healthcare estate infrastructure will play a pivotal role in the delivery of neighbourhood health plans. With government plans to establish Neighbourhood Health Centres, by transforming NHS estate for a more community-based care model. Integrating GPs, diagnostics, mental health, physiotherapy, pharmacy, and social care services, all located close to residents. These are not necessarily new build facilities, with the idea that some NHS estate could be optimised through refurbishment and extensions to create a neighbourhood health centre.

Healthcare estate infrastructure supports neighbourhood health plans by:

- Shifting care into communities
- Optimising the existing NHS estate
- Embedding population health into long-term planning.
- Enhancing service accessibility

The Local plan can help to influence health by shaping environments and mandating health considerations in development. Good health infrastructure ensures equitable access, supports integrated care, and supports prevention strategies.

Section 106 developer contributions

We recommend that funding mechanisms, such as Section 106 agreements or Community Infrastructure Levy (CIL), be made available and utilised to secure contributions towards healthcare infrastructure. Policies COM 02 and INF 06 highlight the use of S106 agreements to secure contributions for various infrastructure needs, including healthcare. The ICB welcomes the inclusion of this within the draft plan.

Section 106 agreements will be key, alongside other funding streams, in delivering required NHS estate to provide increased capacity and as such accessible and sustainable healthcare services.

The ICB would like the local planning authority to consider adjusting the timing of secured S106 contributions. Extending the period during which the ICB can retain secured funding beyond the standard five years would be advantageous, as it would facilitate pooling funds from the same locality for use on a single project. For instance, if developer contributions are obtained from four separate sites within the same town but construction occurs at varying times, the ability to hold each portion of funding for a longer duration would allow all contributions to be allocated collectively for one premises project.

Conclusion

The NHS Norfolk and Waveney ICB welcome the comprehensive approach of the Breckland Draft Local Plan (2024–2042) but emphasises that the scale and demographic nature of projected growth, especially the significant increase in residents aged 65 and over, will place substantial new demands on local healthcare infrastructure. To ensure the health and wellbeing of Breckland's growing and aging population, the ICB makes the following key requests and highlights critical needs:

Healthcare Infrastructure Expansion:

- There is a significant need for new and expanded healthcare facilities, including GP surgeries and integrated health centres, to keep pace with population growth and changing demographics.
- Investment in both new builds and the extension of existing premises is essential, with decisions guided by location, scale, and catchment area needs.

Developer Contributions and Funding Mechanisms:

- The ICB requests that Section 106 agreements be used to secure developer contributions to aid expansion of healthcare infrastructure.
- The ICB also requests extending the period for retaining S106 funds beyond the standard five years, allowing pooled contributions from multiple developments to be used more effectively for larger projects.

Health Impact Assessments (HIAs):

- The ICB endorses mandatory HIAs for all major developments, ensuring health considerations are integrated into planning and that adverse impacts are identified and mitigated early.
- The HUDU Rapid Health Impact Assessment is recommended as the tool of choice.
- The ICB also offers to collaborate with developers and the planning authority on HIA implementation.

Strategic Collaboration:

- The ICB is committed to ongoing collaboration with Breckland District Council and developers, to ensure healthcare needs are fully considered and funded throughout the planning process.

Planning Consultation Modelling:

- The ICB will continue to model the impact of housing allocations as more detailed planning applications come forward, refining estimates for population growth, required floorspace, and developer contributions.
- Early engagement with the ICB is requested for all major site allocation proposals, in line with the Planning in Health Protocol.

Addressing Health Inequalities:

- The ICB urges that proximity and accessibility to healthcare services be core design principles, especially for elderly and vulnerable populations.
- Planning policies should promote healthy lifestyles, accessible homes, and green infrastructure to reduce health inequalities.

Without significant, timely investment in healthcare infrastructure, supported by effective planning policies, developer contributions, and ongoing collaboration, the health and wellbeing of Breckland's residents could be compromised by the scale of planned growth. The ICB welcomes the opportunity to work with partners to ensure that healthcare provision is not only protected but enhanced and sustainable in response to the planned housing growth identified through the local plan.

Yours faithfully

NHS Norfolk & Waveney - Strategic Estates

From: [Manthorpe, Gemma](#)
To: [Suggitt, Sarah](#)
Cc: [Faulkner, James](#)
Subject: RE: Feedback on Breckland Local Plan
Sent: 05/01/2026 13:28:01

Good afternoon,

Thank you for sending through I have copied in James so that this can be filed.

James could you also reach out and ask if they would like to sign up to our mailing list please?

Kind regards,

Gemma

Gemma Manthorpe

Planning Policy Manager
Breckland Council

T: [01362 656337](tel:01362656337)
M: [07901 868594](tel:07901868594)

Elizabeth House, Walpole Loke, Dereham, Norfolk, NR19 1EE



From: Suggitt, Sarah <Sarah.Suggitt@breckland.gov.uk>
Sent: 05 January 2026 13:20
To: Manthorpe, Gemma <Gemma.Manthorpe@breckland.gov.uk>
Subject: FW: Feedback on Breckland Local Plan

Hi Gemma,

Please see below response from NFU regarding local plan. We agreed when Sam and I saw them just before Christmas that we would like their feedback and this is the first opportunity they have had to respond. Hope that's ok. Please see Flora's details below if you would like to reach out.

Thank you

Kind regards,
Sarah Suggitt
District Councillor
All Saints & Wayland Ward
Deputy Leader & Executive Member for Planning & Housing
[REDACTED]

From: Flora Archer [REDACTED]
Sent: 05 January 2026 10:37
To: Suggitt, Sarah <Sarah.Suggitt@breckland.gov.uk>; Garnham, Phil <Phil.Garnham@breckland.gov.uk>
Subject: Feedback on Breckland Local Plan

Dear Phil and Sarah,

Further to our conversation at Graham's prior to Christmas, we have now reviewed the Breckland Local Plan and would like to provide the following comments for your consideration.

Policy EC05 – H

The extent of hardstanding should be clearly reflected in relation to the site size. Consideration should be given to the adequacy of parking and hardstanding policies, ensuring that business scale and car parking requirements are proportionate and appropriate.

In addition, we strongly recommend that all reasonable efforts are made to improve mobile network coverage across the area. Poor connectivity continues to have a significant impact on farms, particularly those operating in remote locations. This affects lone working practices and the overall efficiency and safety of day-to-day operations.

Overall, we felt that the plan was sensible, practical, and well-suited to a rural area, particularly when compared with other local plans.

Please do not hesitate to contact us if you would like to discuss any of the above in more detail.

Kind regards,

Flora Archer
County Adviser, Norfolk

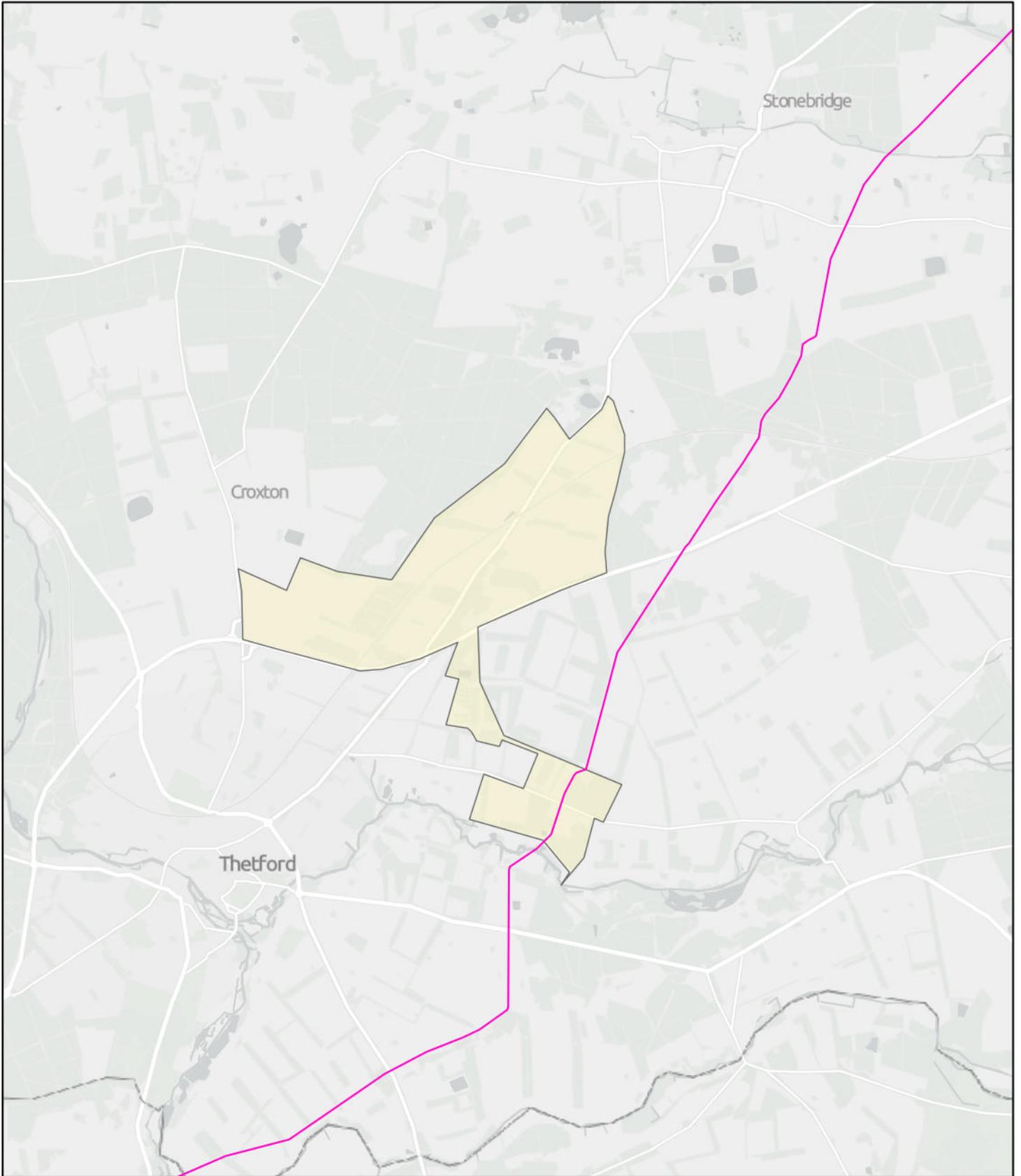
NFU – East



This e-mail is from the National Farmers' Union ("the NFU") or one of the organisations ("the Organisations") permitted by the NFU to use the NFU network. The information contained in this e-mail and in any attachments is intended for the named recipient and may be privileged or confidential. If you receive this e-mail in error please notify the NFU immediately on 024 7685 8500. Do not copy it, distribute it or take any action based on the information contained in it. Delete it immediately from your computer. Neither the NFU nor the sender accepts any liability for any direct, indirect or consequential loss arising from any action taken in reliance on the information contained in this e-mail and gives no warranty or representation as to its accuracy or reliability. Nor does the NFU accept any liability for viruses which may be transmitted by it. It is your responsibility to scan the e-mail and its attachments (if any) for viruses. The NFU may monitor and read both incoming and outgoing e-mail communications to protect its legitimate interests.

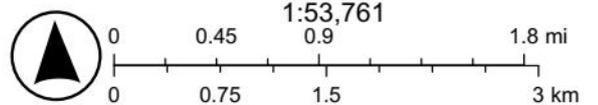
NFU, Registered in England No. 245E

Kingsfleet Grove SUE (079)



08/12/2025, 09:51:05

-  Gas Pipe
-  Development Sites



Our Ref: 105181-024

05 December 2025

Breckland Council
localplan@breckland.gov.uk
 via email only



Dear Sir /Madam,

**Breckland Regulation 18 Local Plan Consultation October – December 2025
 Representations on behalf of National Grid Electricity Transmission (NGET)**

National Grid Electricity Transmission has appointed Fisher German LLP to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. NGET manage not only today’s highly complex network but also to enable the electricity system of tomorrow. Their work involves building and maintaining the electricity transmission network – safely, reliably and efficiently. NGET connect sources of electricity generation to the network and transport it onwards to the distribution system so it can reach homes and businesses.

National Grid Electricity Distribution (NGED) are the electricity distribution division of National Grid and are separate from National Grid Electricity Transmission’s core regulated businesses. Please also consult with NGED separately from NGET.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid’s core regulated businesses. Please also consult with NGV separately from NGET.

National Energy System Operator (NESO) has taken over the electricity and gas network planning responsibility from National Grid Electricity System Operator Limited (NGESO) as of 1st October 2024. Early engagement with NESO is recommended in order to establish available supply capacity to any potential development sites and what, if any, reinforcement is required to ensure adequate continued supply. Please consult with NESO separately from NGET.

NGET assets within the Plan area

Following a review of the above Development Plan Document, we have identified one or more NGET assets within the Plan area. Details of NGET assets are provided below.

Asset Description

4VV ROUTE TWR (001 - 223): 400kV Overhead Transmission Line route: NORWICH MAIN - WALPOLE 1 - NORWICH MAIN - WALPOLE 2.
 Electrical Substation: NECTON 400KV S/S

A plan showing details of NGET assets is attached to this letter. Please note that this plan is illustrative only. NGET also provides information in relation to its assets at the website below.

<https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps>

New Infrastructure

Demand for electricity is expected to rise as the way NGET power our homes, businesses and transport changes. As the nation moves towards net zero, the fossil fuels that once powered the economy will be replaced with sources of low-carbon electricity, such as offshore wind farms.

The UK Government has committed to reach net zero emissions by 2050. This means achieving a balance between the greenhouse gases put into the atmosphere and those taken out. Decarbonising the energy system is vital to this aim.

NGET's infrastructure projects in England and Wales will support the country's energy transition and make sure the grid is ready to connect to more and more sources of low carbon electricity generated in Britain.

The way NGET generate electricity in the UK is changing rapidly, and NGET are transitioning to cheaper, cleaner and more secure forms of renewable energy such as new offshore windfarms. NGET need to make changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country, so that everyone has access to clean electricity from these new renewable sources. These changes include a need to increase the capability of the electricity transmission system between the North and the Midlands, and between the Midlands and the South. It is also needed to facilitate the connection of proposed new offshore wind, and subsea connections between England and Scotland, and between the UK and other countries across the North Sea.

Accordingly, we request that the Council is cognisant of the above.

Further Advice

NGET is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets.

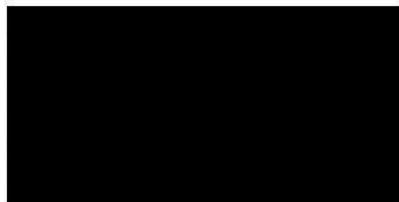
If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect our assets.

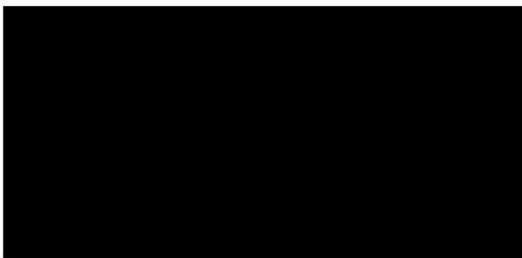


We would be grateful if you could add our details shown below to your consultation database, if not already included:

Angela Brooks MRTPI, Partner



Tiffany Bates, Development Liaison Officer



If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



**Angela Brooks MRTPI
Partner**

For and on behalf of Fisher German LLP



Further Guidance

NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

NGET's Design guidelines for development near pylons

and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgrid.com/document/345326/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

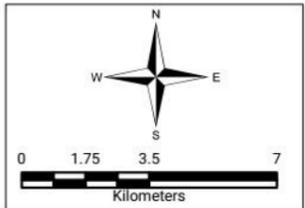
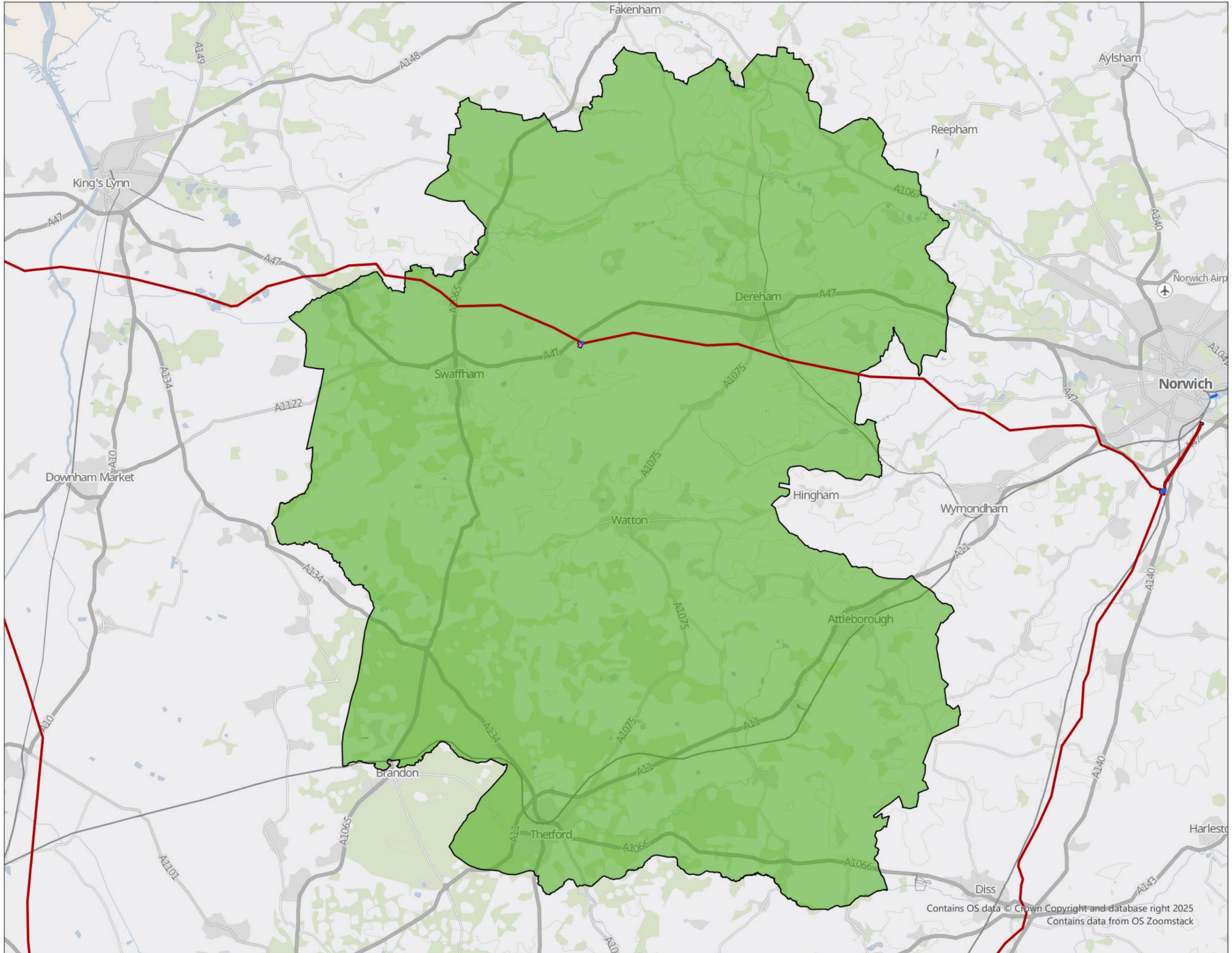
NGET's statutory safety clearances are detailed in their Technical Guidance Note 'Third-party guidance for working near National Grid Electricity Transmission equipment', which can be downloaded here: <https://www.nationalgrid.com/document/349291/download>

How to contact NGET

If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: ngplanning@fishergerman.co.uk





- LEGEND:**
- Cable
 - OHL
 - Substation
 - LPA Area

REVISION: A
 CLIENT: **nationalgrid**
 SCHEME:
 PLANNING INTERACTION
 TITLE:
 LPA ASSET INTERACTION
 FP: 105181-024
 SCALE: 1:194,000 @ A3
 DATE: 20/05/2025

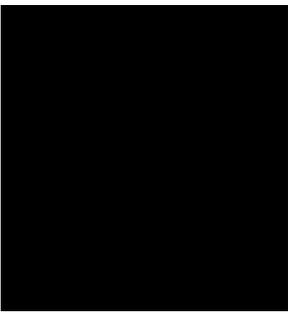
© Crown copyright and database rights 2025
 Ordnance Survey License Number AC000849937.



fisher german
 The Estates Office, Norman Court
 Ashby de la Zouch,
 Leicestershire, LE65 2UZ
 01530 412821
 fisherman.co.uk

DRAWING REF:
 NG-2025-03-MT-OP-LPA- Breckland

Contains OS data © Crown Copyright and database right 2025
 Contains data from OS Zoomstack



15th December 2025

Dear Sir/Madam

Regulation 18 Consultation (Preferred Options) – Breckland District Local Plan to 2042

National Highways welcomes the opportunity to comment on the Breckland District Draft Local Plan Regulation 18 Preferred Options consultation. The emerging Local Plan aims to set out the required growth and development for the period of 2024 to 2042.

National Highways is responsible for the operation, maintenance, and improvement of the Strategic Road Network (SRN) in England on behalf of the Secretary of the State. In the area within and surrounding Breckland District we have responsibility for the A47 and A11.

National Highways is a key delivery partner for sustainable development promoted through the plan-led system, and as a statutory consultee we have a duty to cooperate with local authorities to support the preparation and implementation of development plan documents. National Highways is aware of the relationship between development planning and the transport network, and we are mindful of the effects that planning decisions may have on the operation of the SRN and associated junctions. We cannot be expected to cater for unconstrained traffic growth generated by new developments, and we therefore encourage policies and proposals which incorporate measures to reduce traffic generation at source and encourage more sustainable travel behaviour.

National Highways recognise Breckland's Strategic Vision to place new developments in locations that are co-ordinated with transport provision, have good access to support existing services, community facilities and open space. It is noted that policy GEN02: Settlement hierarchy and Spatial Development Strategy states that approximately 75% of new housing development is directed to three Strategic Development Areas (SDAs), three Sustainable Urban Extensions (SUE) and extensions to the Market Towns of Attleborough, Dereham, Swaffham, Thetford and Watton. A further 13% (approximate) within Key Service Parishes and Primary Parishes and approximately 5% within Secondary Parishes.

In principle, National Highways supports the cascaded approach to allocate greater volumes of housing to towns with greater services and transport provision and connectivity. It is noted that the policy identifies the following strategic development site opportunities:

- Strategic Development Areas
 - o East Tuddenham SDA
 - o Barkers Farm SDA
 - o Roundham & Larling SDA

- Sustainable Urban Extension (SUE)
 - o Swaffham SUE
 - o Watton SUE
 - o Thetford SUE

Policy EMP01: Economic growth strategy, outlines the districts proposals for economic growth and development to meet the employment needs to the residents. The policy includes recognition to the A11 and A47 corridors. In principle, National Highways support this policy but encourages promoters of allocated sites within these corridors to engage prior to submission of any application to discuss potential impact of the SRN. It is noted that policy EMP02: Employment Land Provision identifies the requirement for approximately 148 hectares of strategic employment land to be allocated to provide a choice of employment sites to meet economic need and demand. The policy lists the following strategic employment and commercial development site opportunities:

- o Various parcels of land at Snetterton
- o Land to the north of the A47, Swaffham
- o Moorfields, Dereham

In addition to the above sites, a minimum of 5 hectares of employment land on each of the three SDAs. Each employment site needs to assess their impact on the SRN including cumulative impact and highway safety and be required to appropriately mitigate their impact where necessary as part of the local planning process.

National Highways are currently working with the Council with regards to assessing the traffic and transport implications of all the proposed Strategic Sites impacting the SRN. This collaborative approach is to ensure appropriate evidence is provided in support of an allocation within the Regulation 19 pre-submission draft. National Highways are currently concerned with the level of growth and cumulative impact on the A11 around Thetford with additional growth in the area, namely the approximately 2000 dwellings at Thetford and 6000 dwellings at Larling (Roundham and Larling SDA and Barkers Farm SDA). National Highways recommend early assessment of cumulative impacts so that proportionate contributions to mitigation can be planned and secured, supporting delivery of the Local Plan sites.

Whilst these discussions continue, National Highways offer no further comment on the overall acceptability of the individual sites, however, some early observations have been identified below to assist with the plan making process. In addition, it should be noted that each site will

be required to provide supporting evidence their developments can be accommodated safely and without resulting in a severe impact or delay on the SRN.

With reference to the Site-Specific policies for housing sites, National Highways have the following comments at this stage.

- East Tuddenham – the masterplan of the site has not been discussed, but it is understood that access would be taken from the existing A47. As part of the A47 duelling scheme, which is currently under construction, the existing A47 is due to be de-trunked and will become part of the Local Highway Network, managed by Norfolk County Council. Any application forthcoming prior to the A47 being detrunked would be subject to the Circular 01/2022 for new accesses and connections to the SRN. National Highways recommends consultation with both NH and NCC to ensure a suitable access is achievable for the scale of development proposed.
- Barkers Farm / Roundham and Larling – both sites due to their proximity to each other are considered to be brought forward jointly. From a National Highways perspective, this means that the impact of the whole scheme can be considered together and ensure the appropriate level of mitigation is considered. National Highways acknowledge the positive engagement is currently taking place with the promoters of this site, however, fundamental aspects of the development and the scope of the assessment required have not yet been agreed therefore an assessment of the impact on the A11 has not yet been completed.
- Swaffham SUE – No traffic modelling has been completed to assess the impact on the A47, in particular the A47/Norwich Road junction, therefore the impact on the SRN is not yet understood.
- Kingsfleet Grove SUE – National Highways have not been made aware of any traffic modelling for the extension to the existing Thetford SUE. The impact on the A11 from the additional development is not yet understood and level of mitigation required has not been agreed. There are already significant challenges in identifying a suitable solution for the current Thetford SUE, which is being discussed with the developer. Any additional sites would further compound issues around the roundabouts and mainline near Thetford. There is currently no National Highways scheme in place, so the developer would be expected to provide a solution.
- Hockering – Similar to the site at East Tuddenham, the access to the site is assumed to be taken from the current A47. Any application forthcoming prior to the A47 being detrunked would be subject to the Circular 01/2022 for new accesses and connections to the SRN. Any agreement to a new access off of the A47 would also need to be in consultation with Norfolk County Council.

With reference to the Site-Specific policies for employment sites, National Highways have the following comments at this stage.

- Snetterton – further discussions are required regarding a new access off the A11, however, the presumption should be that no new access will be permitted without a departure from policy and agreement from the Department for Transport. The A11 in this location is considered a high-speed traffic route whereby no new connections are not usually permitted other than under special circumstances such as for the provision of signed roadside facilities and emergency vehicle access.
- Swaffham - National Highways do not understand how Swaffham site 076 to the north of the A47 will be accessed. Access from Procession Lane will require significant

improvements to be suitable for development of this scale, and due to the proximity to the roundabout, would lead to additional safety concerns. Access from the roundabout would need to be considered in parallel to the development to the south of the A47 to ensure the roundabout can operate within capacity and safely, and any improvements should be identified during the local plan process

Further to the key points raised above, at present based upon our review National Highways cannot establish whether the level of growth proposed can be accommodated on the SRN as the transport evidence base or the strategic transport assessment which support the plan are not provided. It however should be recognised that National Highways are currently working with the Council and promoters of strategic development sites to ensure appropriate evidence is provided in support of future allocations.

National Highways have reviewed the Infrastructure Delivery Plan (IDP), which forms part of the Evidence Base for the Draft Plan. The IDP identifies infrastructure to support new development to deliver sustainable communities, particularly the infrastructure required for the plan period up to 2042. Infrastructure includes roads and other transport facilities, as well schools, medical facilities, open spaces and flood defences. National Highways agree with the position that transport studies are required for the strategic sites and urban extensions before agreeing to the extent of the highways work required for each location. The local plan should provide appropriate evidence base needs to *'provide a robust assessment of any positive and negative impacts on the SRN and inform a transport strategy and the Strategic Environmental Assessment (SEA) for the study area that aligns with the safe operation and long-term integrity of the SRN'* (paragraph 26 of Circular 01/2022. Further to this, in accordance with paragraph 33, robust evidence is required including demand forecasting modelling of the future development. The models will inform the analysis of alternative solutions by accounting for the effects of possible mitigation scenarios and mode share shift. It should be noted that Paragraph 29 outlines, where new connections and capacity enhancements to the SRN are considered necessary, these should be identified during the plan-making process and should identify appropriate mechanism for the delivery of strategic highway infrastructure. It should be noted that there cannot be any presumption that the infrastructure will be funded through a future Road Investment Strategy (RIS). At this stage, National Highways are unable to commit funding and that no such studies are currently in the National Highway pipeline for future projects.

In addition to this, due to the proximity of allocations around the SRN, some locations may result in potential severance issues. Consequently, provision needs to be accounted for infrastructure, such as overbridges, to minimise severance across settlements and new developments.

Aside from traffic generation from development sites, when land is allocated within proximity to the SRN, the increased number of residents can give rise to other issues. It is likely that these locations will be impacted by noise pollution from the SRN National Highways will not allow noise barriers, and other structures on its land. In addition, National Highways will not accept third party connections to its drainage systems as highlighted within paragraph 59 of the Circular 01/2022. Paragraph 59 also states that developments must not add extra run off to existing systems where existing informal or formal connections exist.

We trust the feedback above is useful in the progression of your proposals and welcome continued discussions with the council to this end. If you have any questions, please do not hesitate to contact me directly.

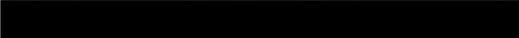
Yours Sincerely



Alice Lawman

Spatial Planner

National Highways Spatial Planning (East)

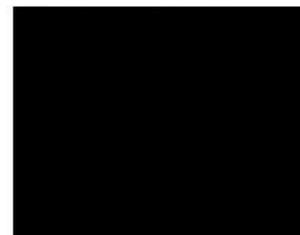
Email: 

Date: 09 December 2025
Our ref: 533006



LocalPlan@breckland.gov.uk
Breckland Council

BY EMAIL ONLY



T 0300 060 3900

Dear Sir / Madam

Draft Breckland Local Plan: Regulation 18 Consultation (Preferred Options) – October 2025

Thank you for your consultation on the above dated 11 November 2025 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

In responding to your consultation, we have reviewed the policies that we consider to be most relevant to our statutory purpose. The table in section one of this letter provides a summary of Natural England's advice, with our detailed advice provided in [Annex 1](#).

Further comment on housing allocations has been provided in [Annex 2](#) and employment allocations in [Annex 3](#). Natural England's *Standard Advice for Air Quality Impacts for Local Plans* is provided in [Annex 4](#).

Our comments on the Habitats Regulations Assessment (HRA) Screening Report (Place Services, October 2025) are provided in section two of this letter.

1. Policy Summary Table

Policy Name	Section in Annex 1	Summary of Natural England's advice
Breckland's strategic vision	1.	Appropriate and aligned with the three pillars of sustainable development.
GEN 01: General Development Principles	2.1.	Natural England broadly welcomes the general development principles proposed in this policy. The policy wording could be strengthened in respect of light pollution and air quality impacts.
GEN 02: Parish Hierarchy and Spatial Development Strategy	2.2.	In principle, Natural England supports the policy's approach to new development as it has the potential to protect more rural areas from development that may impact wildlife and landscape quality. However, some of the proposed Strategic Development Areas (SDAs) and Strategic Urban Extensions (SUEs) are in close proximity of protected sites. Potential impacts to these sites will need to be assessed.

Policy Name	Section in Annex 1	Summary of Natural England's advice
RB 1: Robertson Barracks	2.3.	Natural England advises that Annex 2 to this letter should be used as a key reference for the project-level HRA for this allocation. We advise that the policy references policies ENV 03, ENV 04, ENV 09, and the suggested additional policy "ENV X – Protected Sites and Species".
GEN 03: Built Form	2.4.	Natural England supports the policy in protecting settlements, undeveloped land and high-grade agricultural land.
HOU 02: Distribution of Housing Development	3.1.	<p>Please refer to Annex 2, which details key impact pathways and strategic solutions to consider for project-level HRAs for allocations under this policy. We have provided comment specifically on potential impacts from the Kingsfleet Grove SUE and Roudham & Larling SDA.</p> <p>Please amend the wording 'Brecks Special Protection Area' to <u>Breckland</u> Special Protection Area (SPA).</p> <p>For clarity, we advise reference to the 1500m area around Breckland SPA, where likely significant effects could occur.</p> <p>Further comment has been provided on how the wording of the policy can be strengthened in reference to Nutrient Neutrality, Norfolk Green Infrastructure and Recreational Avoidance and Mitigation Strategy (GIRAMS) and Natural England's Impact Risk Zones (IRZs).</p>
HOU 17: Water efficiency	3.2.	<p>Natural England welcomes the inclusion of this policy and commends the requirement that all new residential development is designed to utilise no more than 85 litres per person per day. We advise further evidence should be provided in line with Shared Standards in Water Efficiency for Local Plans (SS) for demonstrating that a more stringent water efficiency policy, is justified, feasible, and viable.</p> <p>We advise that the policy's reference to the SS could be strengthened and advise that a Water Cycle Study is undertaken to inform the Local Plan.</p> <p>Please amend BREAAM to BREEAM in reference to the Building Research Establishment Environmental Assessment Method.</p>
EMP 02: Employment Land Provision, EMP 03: Snetterton General Employment Area and EMP 04: Reserve Employment Allocation	4.1.	Natural England advises that Annex 3 to this letter should be used as a key reference for all project-level HRAs for employment allocations identified in these policies. We advise that the policies reference policies ENV 03, ENV 04, ENV 09, and the suggested additional policy "ENV X – Protected Sites and Species".
EC 06: Tourism Related Facilities and Attractions	5.1.	Natural England welcomes the inclusion of this policy. We recommend revising the wording of Criterion (i) to, " <u><i>Avoids detrimental impacts to the natural environment and helps to protect or enhance its special qualities.</i></u> "

Policy Name	Section in Annex 1	Summary of Natural England's advice
Policies supporting specific development types	6.	<p>We advise an additional criterion should be included in these policies stating that the proposal will need to align with policies ENV 03, ENV 04 and ENV 09 the suggested additional policy "ENV X – Protected Sites and Species". For the specific policies refer to the main advice.</p> <p>We advise these policies (and also the wider General Development Principles policy) include a criterion ensuring sewage capacity.</p>
ENV 01: Climate Responsive Design	7.1.	<p>Natural England supports the inclusion of this policy. In addition to the criteria listed in the policy, we recommend that the Sustainability Statements clearly address the following principles</p> <ul style="list-style-type: none"> • Integration of nature-based solutions for flood risk management • Biodiversity enhancement with Norfolk Local Natural Recovery Strategy (LNRS) priorities to deliver ecological connectivity • Adoption of energy and water efficiency measures • Green and blue Infrastructure (GBI) provision, in line with ENV 02
ENV 02: Green and Blue Infrastructure	7.2.	<p>Natural England welcomes the inclusion of a policy covering GBI. We strongly advise your authority to refer to the specific guidance for plan-makers provided in Natural England's Guide for developing Green Infrastructure (GI) Strategies and Policies to further develop this policy.</p> <p>We have provided advice on where the policy can be strengthened in relation to:</p> <ul style="list-style-type: none"> • GI standards • Use of GI mapping tools • Mitigation of recreational disturbance • Linkage to LNRS • Role of SuDS • Tree planting
ENV 03: Improving Biodiversity	7.3.	<p>We welcome the inclusion of a minimum of 20% BNG being actively encourage and the policy's approach to on-site net gain and reference to the Norfolk LNRS.</p> <p>We have provided advice on where the policy can be strengthened in relation to the mitigation hierarchy, European sites and irreplaceable habitats, LNRS alignment and long term management.</p> <p>Reference to the Norfolk LNRS should be updated to reflect that it has now been published.</p>
ENV 04: Protection and Enhancement of the Landscape	7.4.	<p>We welcome the inclusion of this policy and its reference to landscape character and emphasis on maintaining the intrinsic beauty of the countryside.</p>

Policy Name	Section in Annex 1	Summary of Natural England's advice
		<p>We have provided advice on where the policy could be strengthened to ensure it delivers robust protection and enhancement of Breckland's valued landscapes. Our comments relate to:</p> <ul style="list-style-type: none"> • Reference and application of East of England Landscape Typology and Natural England's National Character Area (NCA) profiles. • Use of Local Landscape Character Assessments • Landscape and Visual Impact Assessments • Integration of other policies • Regenerative tourism
ENV 05: Trees, Hedgerows and Development	7.5.	<p>We welcome the inclusion of this policy. This policy's approach aligns with national objectives for biodiversity enhancement and sustainable development.</p> <p>The policy could be strengthened to provide greater clarity and effectiveness. We advise that the policy clearly defines the criteria for what constitutes "<i>clear and overriding reasons</i>" for the removal of hedgerow and trees.</p>
ENV 09: The Brecks Protected Habitats and Species	7.6.	<p>Natural England welcomes Policy ENV 09, which addresses potential impacts of development on the qualifying features of Breckland SPA and SAC. To strengthen the policy, we recommend changing the name of the policy from "<i>ENV 09: The Brecks Protected Habitats and Species</i>" to reflect its focus on Breckland SPA/SAC.</p>
ENV X – Protected Sites and Species	7.7.	<p>We strongly advise including a policy covering all protected sites and species. We advise that the policy includes reference to the following:</p> <ul style="list-style-type: none"> • IRZs • Norfolk GIRAMS for recreational impacts. • Air quality • Protected species
ENV 10: Development in Nutrient Sensitive Areas	7.8.	<p>Natural England welcomes the inclusion of this policy. We advise referring to the Nutrient Neutrality Principles (TIN186) and the Nutrient Neutrality Generic Methodology (NECR459) in the policy wording.</p> <p>The following should be amended:</p> <ul style="list-style-type: none"> • Remove all reference to the 'River Yare SAC' as this is not a recognised European Site • Include reference to Broadland Ramsar • Amend paragraph 8.68 to, "<i>under the Conservation of Habitats and Species Regulations 201741.</i>"
ENV 11: Agricultural Intensification	7.9.	<p>We welcome the inclusion of this policy. However, we provide the following comments to strengthen it:</p> <ul style="list-style-type: none"> • We would advise that reference to policies ENV 09 and the proposed "ENV X – Protected Sites and Species" to ensure that a HRA/site of special scientific interest (SSSI) impact assessment is undertaken for developments that trigger an IRZ of a European sites/SSSIs. • Advice on air quality

Policy Name	Section in Annex 1	Summary of Natural England's advice
		<ul style="list-style-type: none"> • Advice on water quality <p>We also advise that the policy wording is amended to include reference to Broadland Ramsar.</p>
ENV 12: Open Space, Sport & Recreation	7.10.	Natural England welcomes this policy, which includes provision for allotment plots, along with the prior agreement for ongoing management. However, we do request further clarity to determine if the policy relates exclusively to 'formal' recreational land such as sports pitches, equipped playgrounds and formal parks or also includes natural or semi-natural green space or other 'green infrastructure'.
ENV 14: Regenerative Farming	7.11.	Natural England welcomes the policy's aims to prevent the irreversible loss of high-quality agricultural land. However, we advise revising the policy name to something that more accurately reflects this, such as "ENV 14: Protection of Best and Most Versatile Agricultural Land" or "ENV 14: Safeguarding Agricultural Soils."
ENV 15: Agritech Development and Community Growing Spaces	7.12.	Natural England welcomes ENV 15 and the protection of existing community food growing spaces and support for new community growing spaces near housing estates.
Integration of the Environmental Policies (ENV...) with Other Policies	7.13.	We advise that many of the ENV policies which aim to protect and enhance the environment are also mutually supportive of other policies and aims within the Local Plan. Stronger cross-referencing between these policies would help highlight the multifunctional benefits of a healthy natural environment for people and nature.
DES 02: Integrating development with nature	8.1	Natural England is supportive of this policy's aim to retain existing mature landscape features including existing gaps to maintain local character. We welcome the requirement for landscape strategies to be considered early in the design stage.
COM 01: Healthy Lifestyles	9.1	Natural England welcomes the holistic approach of this policy and the recognition of the importance of facilitating active travel and providing green infrastructure to create healthy places to live. We provide advice on the tools available that could support the policy in aligning priorities for both health and the natural environment to maximize outcomes.
INF 01: Sustainable Transport	10.1	Natural England welcomes this policy in the plan. We commend the prioritisation of active travel for the many benefits it provides for people and nature. This includes improvement to health and wellbeing, air quality and noise pollution.
INF 03: Flood Risk & Surface Water Drainage	10.2	<p>Natural England welcomes the inclusion of this policy and supports the use of SuDS to manage surface water disposal.</p> <p>We provide advice on guidance available to support SuDS design for nature.</p> <p>We highlight the need for SuDS to complement rather than substitute other GI elements.</p>

Policy Name	Section in Annex 1	Summary of Natural England's advice
		We advise policy wording is amended to include reference to... <i>"having a positive impact on aquifer recharge."</i>
INF 04: Renewable Energy Development	10.3	Natural England welcomes this policy. We commend its aim to support renewable and low carbon energy in a sustainable manner which avoids adverse impacts on the natural environment.

2. Comments on the HRA Screening Report

Natural England notes that your Authority has undertaken a Habitats Regulations Assessment (HRA) Screening of the Local Plan Full Preferred Options Draft report, namely, "*Breckland District Council Local Plan Full Update Preferred Options (Reg 18) Habitats Regulations Assessment Screening Report*" (Place Services, dated October 2025), hereby referred to as the HRA screening.

Your assessment concludes that your authority cannot rule out the likelihood of significant effects arising from the plan. On the basis of the information provided, Natural England concurs with this view.

In accordance with Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended), and as set out in paragraph 3.5.2 of the HRA screening, we advise that an Appropriate Assessment should now be undertaken to assess the implications of the plan for the European sites in view of their conservation objectives. Natural England is a statutory consultee at the Appropriate Assessment stage of the HRA process.

While we agree that an Appropriate Assessment will be required, we recommend that the following additional considerations are addressed within the HRA screening and carried forward into the Appropriate Assessment:

i) Impact Risk Zones

When assessing a proposed allocation (residential, or employment), we strongly advise using Natural England's [Impact Risk Zones](#)¹ (IRZs) to determine potential impact pathways. We would therefore recommend revising the assessment within Table 8 to reflect this.

ii) Combined Effects

Table 7 in section 3 of the HRA screening (Screening of Likely Significant Effects) lists the European Sites within scope of the Local Plan. It is noted in paragraph 3.5.4 of the HRA screening that cumulative effects have not been considered. We highlight the guidance [Habitats regulations assessments: protecting a European site - GOV.UK](#)² which states for step "1. Screening" of the HRA process, –

"Check for combined effects

Your proposal alone may have an effect on a European site that's not significant. You must check if this effect could combine with any other proposal planned or underway and affects the same site, that on its own also does not have a significant effect. If, in combination, your proposal could have a significant effect on the European site, you will need to do an appropriate assessment."

We advise that table 7 is revised to include the screening of combined effects.

¹ Natural England's Impact Risk Zones for Sites of Special Scientific Interest. Available at: https://magic.defra.gov.uk/metadata_for_magic/sssi_irz_user_guidance_magic.pdf

² Habitats regulations assessments: protecting a European site - GOV.UK. Available at: <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site#screening>

iii) Norfolk Green Infrastructure and Recreational Avoidance Mitigation Scheme (GIRAMS)

The Norfolk GIRAMS ensures that the cumulative impacts of additional visitors, arising from new developments of housing and tourism to European sites, will not result in any likely significant effects which cannot be mitigated.

We refer you to Table 5 of the [Norfolk GIRAMS report](#)³, which identifies the European sites which are deemed to have a likely significant effect by the combined effect of certain development types within Breckland's administrative boundary due to increased recreational pressure.

Based on information provided in the Norfolk GIRAMS report, we advise including the following additional sites within the screening assessment:

- Broadland Special Protection Area
- North Norfolk Coast Ramsar
- North Norfolk Coast Special Protection Area
- The Wash & North Norfolk Coast Special Area of Conservation
- The Wash Ramsar site
- The Wash Special Protection Area

Table 8 identifies the policies and allocations that may cause a likely significant effect. We advise that Table 8 is revised to reflect the advice we have provided on the in combination effects of recreational disturbance and the Norfolk GIRAMS. Please refer to [Annex 2](#) where we have outlined key impact pathways and strategic solutions that should be considered in a project level HRA for allocated sites. Please note that this is not an exhaustive list and only indicative at this stage.

As specified in our detailed advice in [Annex 1](#), we also highlight that for some larger residential development, a financial contribution to GIRAMS alone may not be sufficient to mitigate for the recreational disturbance impacts from the proposal *alone*. In these instances additional well-designed green infrastructure/open space of sufficient quantity and quality may also be required. We highlight in [Annex 2](#) for the specific allocations where we advise that the green infrastructure provision should be assessed within a project level HRA due to the number of dwellings proposed.

iv) Air pollution

As detailed in Table 8 of the HRA screening, the following allocations have been screened in for Appropriate Assessment, with regard to potential air quality impacts:

- LPRC4SDEV361 West Hall Drive
- LPRC4SDEV361 Bracken Rise
- LPRC4S25DEV079 (Part N A11 47ha)
- LPRC4S25DEV079 (Part Kilverstone Road 89ha)

As outlined in paragraph 3.4.19 of the HRA screening this is based on the proposal being within 200m of a European site. Further consideration should be given to allocations where traffic generated from the development will use new or existing road infrastructure within 200m of a designated site in line with [Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations \(NEA001\)](#)⁴.

The HRA screening does not appear to consider air pollution impacts from the combined growth of the Local Plan strategically at plan level. We therefore advise this assessment is undertaken. For further guidance, please refer to our advice in [Annex 4](#) - *Natural England's Standard Advice for Air Quality Impacts for Local Plans*.

v) Water Quantity

³ Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan. Available at: <https://www.breckland.gov.uk/article/21525/Norfolk-Recreational-Impact-Avoidance-and-Mitigation-Strategy-Action-Plan>

⁴ Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations - NEA001. Available at: <https://publications.naturalengland.org.uk/publication/4720542048845824>

Paragraph 3.4.15 of the HRA screening states that,

“There are no policies and allocation sites which have the potential to result in adverse water quantity. This is because no impact pathways were identified, as allocation sites are not located areas which could result in impacts upon either the Norfolk Valley Fens SAC parcels, the Breckland SAC, Waveney and Little Ouse Valley Fens SAC or Redgrave and Lopham Fen Ramsar site.”

However, we advise that we do not concur with this statement, and advise that the employment land allocations, including building classes, Class B2 (General Industrial Use) and Class B8 (Storage and Distribution, including warehouses), that do have the potential to cause a likely significant effect to designated sites from water quantity impacts based on Natural England’s IRZs. We refer you to [Annex 3](#) of our response for advice on these specific allocations.

vi) Impacts on protected species outside the designated site

We note that the section *“Impacts on protected species outside the designated site”* (paragraphs 2.4.12 to 2.4.18) in the HRA screening only refers to the 1500m area around Breckland SPA with regard to Stone Curlew. However, we highlight that this section should also include the 400m area for Woodlark and Nightjar around Breckland Forrest SSSI (a component part of Breckland SPA). We refer you to [Annex 2](#) for the additional allocations that should be considered with regard to the 400m constraint zone/buffer, and advise the HRA screening should be updated to reflect this.

For further advice on Breckland SPA and stone curlew, please refer to our comments provided in Annex 1, section 7.6 of this letter.

3) Further advice

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

For any questions in relation to this letter please contact using the details below.

Natural England would be happy to provide additional advice through our Discretionary Advice Service.

Yours sincerely

Joe Thompsett
Sustainable Development – Norfolk and Suffolk



Annex 1 - Natural England's Detailed Advice

1. Breckland's Spatial Vision and Objectives

1.1. Breckland's Strategic Vision

1.1.1. The Councils' vision seems appropriate and aligned with the [three pillars of sustainable development](#)⁵ (Economic, social and environmental). We believe that there should be a strategic approach to the protection and enhancement of the natural environment, including providing biodiversity net gain (BNG) and enhancing and improving connectivity of green infrastructure (GI).

2. Design and Sustainable Development

2.1. GEN 01: General Development Principles

2.1.1. Natural England broadly welcomes the general development principles proposed in policy GEN 01. We welcome the requirement for planning applications to demonstrate they will not result in the loss of open spaces. It is well evidenced that open space contributes greatly to people's physical and mental health and well-being. Natural England also supports the principle that, "Proposals will be refused where, individually, or cumulatively, there are unacceptable impacts arising from the development on:

e) The natural environment, general amenity, and the tranquillity of the wider rural area, including noise and light pollution."

This is in line with paragraph 187(a) of the [National Planning Policy Framework \(NPPF\)](#)⁶.

2.1.2. Light Pollution

To strengthen the policy, we recommend adding a requirement for lighting schemes that help conserve dark skies. This would reduce visual disturbance for nocturnal wildlife and maintain rural character. We refer you to the [Institute of Lighting Professionals Guidance Note for the Reduction of Obtrusive Light](#),⁷ which provides detailed advice for policy formation and for applicants preparing planning proposals.

2.1.3. Air Quality

Natural England welcomes the inclusion of air quality considerations within the policy. However, we note that the potential for air pollution impacts on designated sites has not yet been assessed at a strategic plan level.

We therefore advise that, in line with our comments the HRA screening in [Section 2](#) of the letter above, the Appropriate Assessment should include an evaluation of potential air quality impacts arising from the Local Plan on European sites, in view of their conservation objectives.

2.2. GEN 02: Parish Hierarchy and Spatial Development Strategy

2.2.1. In principle, Natural England supports the targeted 'parish hierarchy' approach to new development. Focusing on Strategic Development Areas (SDAs) and Sustainable Urban Extensions (SUEs) has the potential to protect more rural areas from development that may impact wildlife and landscape quality. However, some of the proposed SDAs and SUEs are within close proximity of protected sites. Potential impacts to these sites will need to be assessed within the Plan level Habitats Regulations Assessment (HRA) as well as any project level HRA. Further comment on allocations can be found in section 3 of Annex 1, and

⁵ Guiding_principles_for_SD.pdf. Available at: https://assets.publishing.service.gov.uk/media/5a7dcc1640f0b65d8863478d/Guiding_principles_for_SD.pdf

⁶ National Planning Policy Framework. December 2024. Available at: https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf

⁷ GN01 For the reduction of obtrusive light 2021. Available at: <https://theilp.org.uk/resource/gn01-ilp-guidance-note-1-the-reduction-of-obtrusive-light-2021.html>

[Annex 2](#).

2.3. RB 1: Roberston Barracks

- 2.3.1. Natural England advises using [Annex 2](#) of this letter as a key reference for the project-level HRA for the Roberston Barracks allocation. We advise that the Robertson Barracks allocation should be in line with ENV 03, ENV 04, ENV 09, and the suggested additional policy - [Additional Policy: "ENV X – Protected Sites and Species"](#).

2.4. GEN 03: Built Form

- 2.4.1. Natural England supports the policy in protecting settlements, undeveloped land and high-grade agricultural land. This policy approach also protects the wider countryside and landscape by protecting gaps between settlements.

3. Housing

3.1. HOU 02: Distribution of Housing Development

- 3.1.1. Natural England welcomes the inclusion of the measures, within Policy HOU 02 that seek to avoid unacceptable impacts on designated sites, including making reference to the Breckland Special Area of Conservation Constraint Zone/buffer and Nutrient Neutrality. It is important to ensure compliance with the Conservation of Habitats & Species Regulations 2017 (as amended) (further referred to as the habitats regulations) and the Wildlife and Countryside Act 1981 (as amended).
- 3.1.2. Natural England advises using [Annex 2](#) of this letter as a key reference for all project-level HRAs, for allocations identified in Policy HOU 02. Whilst not an exhaustive list, Annex 2 sets out key impact pathways and strategic solutions that we advise will need consideration in project-level HRAs. It also highlights potential measures identified in the Norfolk Local Nature Recovery Strategy (LNRS) for the major allocated sites.
- 3.1.3. We wish to highlight concerns for the following allocations:
- **Kingsfleet Grove Strategic Urban Extension (SUE)** for 2,000 dwellings falls within both the Breckland SPA 1500m constraint zone/buffer for Stone Curlew and the 400m buffer zone for Woodlark and Nightjar. These zones represent high sensitivity areas for qualifying species. We strongly advise early engagement with Natural England on this allocation.
 - **Roudham & Larling Strategic Development Area (SDA)** for 3,000 dwellings, we advise that no built development occurs within 400m of Breckland Forest SSSI to rule out adverse effects on Breckland SPA. While outside Breckland SPA and the 1500m constraint zone/buffer, Stone Curlew surveys should also be undertaken for this allocation. Please refer to our comments on policy ENV 09 for further detail.
- 3.1.4. Additionally, in the *Site Specific Policies – Housing* section, we welcome the addition that some of specific allocations must –
- “Demonstrate, through the ecological and arboricultural assessments, how the site layout will maintain and enhance ecological connectivity and green infrastructure in line with the Norfolk Local Nature Recovery Strategy”*
- However, in line with Policy ENV 03, we advise that this should be reflected for every allocated site, in order to maximise the potential integration of built development and nature recovery throughout the Plan area.
- 3.1.5. For those allocations where you currently have a policy requirement to demonstrate how the site layout will align with the Norfolk Local Nature Recovery Strategy (LNRS) (i.e. [SDA 1](#), [SDA 2](#), [SDA 3](#), [SUE 72-76](#), [SUE 79](#), [SUE 223](#) and [SUE 225](#)), we have also highlighted in [Annex 2](#) the potential measures identified in the LNRS which those allocated sites could help deliver through onsite habitat creation and/or restoration.

We also note for the Roudham & Larling (SDA 3) allocation in the “Site Specific Policies – Housing” section, that –

“The Masterplan must demonstrate how hedgerow loss has been minimised. These are an important asset that will need to be retained as far as possible to align with BNG and to enhance ecological connectivity and green infrastructure in line with the Norfolk Local Nature Recovery Strategy and the priorities of the Norfolk & Suffolk Nature Recovery Partnership.”

We welcome this, however, we advise that this criteria of protecting existing hedgerows and trees, should be reflected in all of the allocations in the *Site Specific Policies*, not just the Roudham & Larling allocation. We also recommend that the reference to “*the priorities of the Norfolk & Suffolk Nature Recovery Partnership*” is removed here (and elsewhere), as the LNRS is the way in which the priorities of the Norfolk and Suffolk Nature Recovery Partnership are expressed, recorded and disseminated.

3.1.6. We provide the following advice to strengthen policy HOU 02:

3.1.7. *Breckland Special Protection Area (SPA)*

For clarity, we advise updating references from “the Brecks Special Protection Area” to the formal name: [Breckland Special Protection Area](#)⁸.

Whilst the policy references parishes that are affected by the Breckland SPA, we would also advise inclusion of reference to the 1500m area around Breckland SPA that could result in a likely significant effect on stone curlew, a qualifying feature of the site. We note that there are inconsistencies on how the Local Plan refers to this area – constraint zone or buffer. For consistency we advise the use of one term throughout the Plan.

In light of this advice, we advise amending the policy wording as follows:

~~*“The following parishes are either wholly or partially affected by the Brecks Special Protection Area where housing development would not be acceptable.”*~~

“The following parishes are within, or partly within, the Breckland SPA and the 1500m [constraint zone/buffer].”

The policy wording should provide clarity on when a HRA would be expected. We advise amending the policy wording as follows:

“Any potential impact on the SPA must be carefully considered within a project-level Habitats Regulations Assessment in line with Policy ENV 09.”

3.1.8. *Nutrient Neutrality*

We welcome inclusion of parishes subject to the Nutrient Neutrality Methodology. For clarity, we advise revising the wording to:

“Whilst this does not preclude development, to ensure no further reduction in water quality to the River Wensum SAC and/or The Broads SAC and Broadland Ramsar, applicants should demonstrate, through robust scientific evidence, that their development proposals are nutrient neutral. This will need to be assessed within a project-level Habitats Regulations Assessment in line with ENV 10.”

This amendment will make clear which designated sites are affected, and that a Habitats Regulations Assessment will be required for these developments.

3.1.9. *Norfolk Green Infrastructure and Recreational Avoidance and Mitigation Strategy (GIRAMS)*

In addition to the above, as both Breckland SPA, and Nutrient Neutrality have been included with the Policy HOU 02 despite being also covered in separate policies (ENV 09 and ENV 10), we also recommend that the policy wording should refer to the Norfolk Green

⁸ Designated Sites View - Breckland SPA - UK9009201. Available at: <https://designatedsites.naturalengland.org.uk/SiteGeneralDetail.aspx?SiteCode=UK9009201&SiteName=Breckland%20SPA&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=>

Infrastructure and Recreational Avoidance and Mitigation Strategy (GIRAMS), and the suggested policy [“ENV X – Protected Sites and Species”](#). Details are provided in section 7.7 of this letter.

3.1.10. *Impact Risk Zones*

Notwithstanding the above advice we also advise that you should refer to Natural England's Impact Risk Zones (IRZs) to determine potential impacts of new development on designated sites.

3.2. **HOU 17: Water efficiency**

- 3.2.1. Natural England welcomes the inclusion of a policy covering the sustainable use of water resources and commends the requirement that all new residential development is designed to utilise no more than 85 litres per person per day of mains-supplied potable water. This aligns with the water efficiency objectives set out in [Anglian Water's 2024 Water Resources Management Plan](#)⁹ and the [Shared Standards in Water Efficiency for Local Plans](#)¹⁰ (further referred to as SS) guidance for demonstrating that a more stringent water efficiency policy, is justified, feasible, and viable.
- 3.2.2. Currently, while Policy HOU 17, makes reference to some of the recommended evidence outlined in the SS, we advise that this could be strengthened. As part of the SS, it is recommended that environmental evidence (highlighted in Annexes A and B of the SS) is brought together in a Water Cycle Study (WCS).
- 3.2.3. This WCS should demonstrate whether water supply has the potential to adversely affect the environment or prevent statutory objectives from being met, and whether greater water efficiency is necessary to support growth and meet environmental objectives. We also draw attention to Annex D of the SS, which sets out the policy and legislative framework, including nature recovery obligations, that underpin a more stringent water efficiency policy.
- 3.2.4. Paragraph 8.13 of the Local Plan states “*for Breckland's proposed growth, these will be informed by a Water Cycle Study.*” However, this implies that the WCS will be undertaken at a later stage. The SS require that a WCS should inform the Local Plan itself. Therefore, we advise that the WCS is completed prior to, or at least alongside, the preparation of the Local Plan to ensure that growth proposals are deliverable and sustainable in terms of water supply, wastewater treatment, and environmental protection.
- 3.2.5. The SS also recommend that non-domestic buildings should include water-saving measures and water reuse in their designs, and encourages that extended or redeveloped non-household buildings get full credits in the Building Research Establishment Environmental Assessment Method (BREEAM) water calculator. We therefore welcome that this has been referred to within policy HOU 17. However, we highlight that the BREEAM abbreviation referred to in section b) of HOU 17 is incorrect (referred to as BREAAAM), and therefore advise this is corrected.

4. Employment and Economic Development

4.1. EMP 02: Employment Land Provision, EMP 03: Snetterton General Employment Area and EMP 04: Reserve Employment Allocation

- 4.1.1. Natural England advises that [Annex 3](#) to this letter should be used as a key reference for all project-level Habitats Regulations Assessments (HRAs) for employment allocations identified in Policy EMP 02, EMP 03 and EMP 04
- 4.1.2. We advise that all employment and economic development should be in line with ENV 03,

⁹ Our Water Resources Management Plan 2024 – Anglian Water. Available at:

<https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp/reviced-draft-wrmp24-main-report-v2.pdf>

¹⁰ Shared Standards in Water Efficiency for Local Plans, June 2025, Anglian Water. Available at:

<https://www.anglianwater.co.uk/siteassets/developers/new-content/p--c/shared-standards-in-water-efficiency-for-local-plans.pdf>

ENV 04, ENV 09 , and the suggested additional policy below - [Additional Policy: “ENV X – Protected Sites and Species”](#).

5. Retail and Commercial Development

5.1. EC 06: Tourism Related Facilities and Attractions

5.1.1. Natural England welcomes the inclusion of criteria aimed at ensuring tourism development is well-designed, respects landscape character, and safeguards the historic and natural environment. We particularly support criterion (i), which seeks to protect the natural environment. However, we recommend the following enhancements:

5.1.2. *Revised Wording for Criterion (i)*

The current wording for Criterion (i) is,

“i) ~~The natural environment is preserved or enhanced by the development proposed.~~”

The term “preserve” implies a static approach to the natural environment, which is dynamic and constantly changing. We suggest replacing this with:

“j) Avoids detrimental impacts to the natural environment and helps to protect or enhance its special qualities.”

This wording better reflects the need for proactive enhancement and resilience. This approach ensures that tourism development contributes positively to the character and resilience of the natural environment, supporting both ecological integrity and visitor experience.

6. Policies supporting specific development types

6.1. Natural England advises for the following policies:

- HOU 07: Affordable Housing Exception Sites
- HOU 08: Community Led Development
- HOU 09: Housing for the Elderly and Specialist Care (Single Plot)
- HOU 10: Housing for the Elderly and Specialist Care (Two or more dwellings)
- HOU 11: Self and Custom Build Homes
- HOU 15: Rural Worker’s Dwellings
- HOU 19: Sub-Division and Multi-Occupation of Dwellings
- HOU 20: Residential Development on Backland and Garden Sites
- HOU 22: Provision for Travellers and Travelling Showpeople
- EMP 07: Employment Development Outside Existing and Allocated Employment Sites Sustaining a Prosperous Rural Economy
- EC 05: Farm Diversification
- EC 06: Tourism Related Facilities and Attractions
- EC 07: Tourist Accommodation, Camping, Caravanning and Holiday Lets

6.2. In addition to the criteria currently listed for where development will be supported/permitted by the Council, an additional criterion should be included stating that the proposal will need to align with policies *ENV 03*, *ENV 04*, *ENV 09* and the suggested additional policy [“ENV X – Protected Sites and Species”](#)

6.3. We also note that the above policies (and also in the broader GEN 01 policy) do not ensure sewage capacity as a criteria for permitting/supporting development. We therefore advise that this should be added as an additional criteria. This will encourage early engagement between your authority, the developer and Anglia Water for all developments (household and non-household), to ensure water supply and wastewater treatment capacity align, both spatially and temporally.

7. The Environment

7.1. ENV 01: Climate Responsive Design

- 7.1.1. Natural England supports the Council's recognition of the climate emergency and its commitment to achieving carbon net-zero by 2050. As the government's adviser on the natural environment, we consider climate change a profound threat to nature and people. The natural environment is already experiencing its impacts and must recover, adapt, and build resilience.
- 7.1.2. Sustainable development should contribute to net zero by supporting nature recovery and climate change mitigation and adaptation, helping both nature and people adapt through Nature-based Solutions.
- 7.1.3. We welcome the requirement that all major development proposals should prepare a Sustainability Statement as part of the Design and Access Statement. In addition to the criteria listed in the policy we also recommend that the Sustainability Statements clearly address the following principles, including:
- Integration of nature-based solutions for flood risk management, in line with INF 03. These could be aligned with those Norfolk LNRS priorities and measures which can help reduce flood risk (see the 'Nature Based Solutions (Water)' data layer under the 'Wider Environmental Benefits' data layer of the [Norfolk LNRS Local Habitat Map](#)¹¹)
 - Biodiversity enhancement aligned with Norfolk LNRS priorities and measures to deliver ecological connectivity, abundance, diversity and therefore increased ecological resilience in line with ENV 03.
 - Adoption of energy and water efficiency measures, in line with INF 04 and HOU 17.
 - GI provision, in line with ENV 02. As previously mentioned, GI makes places more resilient and adaptive to climate change and helps to meet zero carbon and air quality targets. GI itself should be designed to adapt to climate change to ensure long term resilience.
- 7.1.4. These measures will ensure that climate resilience and nature recovery are embedded in all development proposals, delivering benefits for both people and wildlife.

7.2. ENV 02: Green and Blue Infrastructure

- 7.2.1. Natural England welcomes the inclusion of a policy covering Green and Blue Infrastructure. Well-designed GI can deliver multiple functions, including supporting mental and physical health, encouraging active travel, cooling urban areas during heatwaves, attracting investment, reducing water run-off during flash flooding, storing carbon, providing sustainable drainage, and helping make places more resilient and adaptive to climate change, as well as helping to meet zero carbon and air quality targets.
- 7.2.2. We advise the use of [Natural England's Green Infrastructure Framework](#)¹² (GIF) to help prepare a GI evidence base that can support Local Plans policies, site allocations and local design codes. We strongly advise your authority refers to the specific guidance for plan-makers provided in [Natural England's Guide for developing Green Infrastructure Strategies and Policies](#)¹³ for developing policy ENV 02. This provides a step-by-step best practice process for developing a green infrastructure strategy and integrating green infrastructure policies into Local Plans.
- 7.2.3. We provide the following advice on how ENV 02 could be strengthened:

¹¹ Norfolk Local Nature Recovery Strategy – Local Habitat Map. Available at: <https://experience.arcgis.com/experience/3425559ce5b94929b6865d0ba7e34f50>

¹² Natural England's Green Infrastructure Framework. Available at: <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx>

¹³ Green Infrastructure Framework Process Guide for Local Planning Authorities. Available at: [https://designatedsites.naturalengland.org.uk/GreenInfrastructure/downloads/Green Infrastructure Framework Process Guide for Local Planning Authorities.pdf](https://designatedsites.naturalengland.org.uk/GreenInfrastructure/downloads/Green%20Infrastructure%20Framework%20Process%20Guide%20for%20Local%20Planning%20Authorities.pdf)

7.2.4. Reference to Green Infrastructure Standards

To align with best practice and neighbouring authorities, we advise that Natural England's GI Framework and the [Green Infrastructure Standards](#)¹⁴ should be explicitly referenced and applied within the policy wording. We suggest the following:

"New development should provide environmental net gains in terms of both green infrastructure and biodiversity. Proposals should demonstrate how the development would contribute towards new green infrastructure opportunities or enhance the existing green infrastructure network as part of the development. All proposals must be informed by the Breckland Design Guide, the GI Study, the guidance set out in Natural England's Green Infrastructure Framework and Standards, the Norfolk Local Nature Recovery Strategy (LNRS), relevant Neighbourhood Plans, and other adopted strategies, and any successor documents.

These standards define what good GI looks like and how to plan it strategically to deliver multiple benefits for people and nature in order to help achieve the [15 Green Infrastructure Principles](#)¹⁵. Embedding the GI Standards in the policy will ensure consistency with national best practice and help developers understand what constitutes high-quality GI provision. We also advise that ENV 02 should link with GI strategies of neighbouring authorities to ensure a joined-up approach.

7.2.5. Use of GI Mapping Tools

Natural England highlights the importance of using spatial evidence to guide GI planning. We recommend the use of [Natural England's Green Infrastructure Mapping Tool](#)¹⁶ during Local Plan preparation to:

- Identify areas of deprivation and poorer health outcomes,
- Highlight locations where GI provision would deliver the greatest benefits for communities and biodiversity,
- Support strategic planning for multifunctional GI networks.

This evidence base can then inform site allocations and policy implementation, ensuring developers understand priority areas for GI delivery and can maximise benefits for nature and people. We also recommend that the GI mapping tool should be referred to within the policy itself so that developers are aware of, and can use the tool themselves if they wish. Embedding this tool in policy will enable spatial prioritisation, ensuring GI delivery addresses health inequalities and biodiversity needs.

7.2.6. Mitigation for Recreational Pressure

Protected sites within Norfolk and Suffolk, including Breckland Special Area of Conservation, Breckland Special Protection Area, and underpinning SSSIs, are under high recreational pressure. Therefore more green spaces are needed to divert recreational activity away from these sensitive sites.

For larger residential developments, the policy should state that contributions to GIRAMS alone will not fully mitigate adverse impacts on European designated sites from recreational disturbance, and the provision of well-designed open space and GI will also be required in addition to GIRAMS contributions, and this provision should be assessed within a Habitats Regulations Assessment (HRA).

We advise that onsite GI should be designed to provide multifunctional, attractive spaces of

¹⁴ Green Infrastructure Standards. Available at: <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/GIStandards.aspx>

¹⁵ 15 Green Infrastructure Principles. Available at: <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/downloads/GreenInfrastructurePrinciples.pdf>

¹⁶ Natural England's Green Infrastructure Mapping Tool. Available at: <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/map.aspx>

sufficient size to reduce frequent visits to designated sites and nearby greenspaces that may be close to capacity. For larger developments, we recommend as a minimum, provisions should include the below, and advise including this in the policy:

- High-quality, informal, semi-natural areas
- Circular dog-walking routes within the site and/or links to surrounding public rights of way
- Dedicated 'dogs-off-lead' areas
- Signage and information leaflets to promote these areas for recreation
- Dog waste bins
- Long-term maintenance and management arrangements

7.2.7. *Linkage with Local Nature Recovery Strategy*

We note the policy wording:

“Development proposals must protect, enhance and expand the integrity, connectivity and multi-functionality of the District’s Green and Blue Infrastructure (GBI) network, as shown on the Policies Map and described in the Breckland Green Infrastructure Study.”

To strengthen this, we advise adding:

“This would also help to deliver the Norfolk Local Nature Recovery Strategy (LNRS).”

We also note the policy wording:

“Development that results in the loss, fragmentation or deterioration of the GBI network will only be supported where the public benefits clearly outweigh the harm and where like-for-like or better provision is secured that aligns with the strategic needs of the wider network, as identified in the Breckland GI study.”

To strengthen this, we advise adding:

“and is in line with the Norfolk Local Nature Recovery Strategy (LNRS).”

The LNRS is a statutory requirement under the Environment Act 2021; explicit reference will ensure policy compliance and strengthen nature recovery outcomes.

We advise that the sentence stating that *“Development which harms irreplaceable habitats (e.g. ancient woodland, chalk streams) will not be permitted unless clear mitigation and compensation measures are provided in line with the Norfolk LNRS”* should be amended. Paragraph 193 c of the NPPF states that *“development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists”*. Only where there are ‘wholly exceptional reasons’ (as set out under footnote 70 of the NPPF) and a compensation strategy is required should the Norfolk LNRS be used to guide that strategy.

We also note the section that states,

“All proposals must demonstrate how they respond to the site’s wider context, including:

- a) Strategic and local GI linkages and nature recovery networks”*

We advise that this is extended to read,

“Strategic and local GI linkages and nature recovery networks as shown in the Norfolk LNRS Local Habitat Map, ensuring proposals contribute to wider nature recovery and ecological connectivity.”

This ensures development proposals are aligned with LNRS priorities and measures and deliver benefits beyond site boundaries.

7.2.8. *Role of SuDS within GI*

While Natural England supports the inclusion of sustainable drainage systems (SuDS) within

development proposals, we have concerns about their classification as GI within the policy. While attenuation basins and similar SuDS features are valuable for flood risk reduction and biodiversity enhancement, they typically offer minimal recreational benefit.

Therefore, by referring to SuDS as part of the GI policy without qualification, developers may overly rely on these features to meet GI requirements, potentially reducing the delivery of multifunctional spaces that provide wider benefits for health, wellbeing, and active travel.

We therefore recommend clarifying within the policy that SuDS should complement rather than substitute other GI elements, and that proposals must demonstrate how GI provision delivers multiple functions, including recreation, connectivity, and nature recovery, in line with the Breckland GI Study and Natural England's Green Infrastructure Standards.

7.2.9. *Urban Tree Canopy Standards*

Natural England recommends that the policy references the [Urban Tree Canopy Standard](#)¹⁷ (part of Natural England's Green Infrastructure Framework). Paragraph 131 of the NPPF requires that new streets are tree-lined and encourages tree planting elsewhere in developments, alongside measures for long-term maintenance. Including this reference will help ensure that tree planting is integrated into development design to deliver benefits such as cooling, carbon storage, and improved health and wellbeing.

Given the existing extensive tree cover in the Brecks and the importance and vulnerability of the remaining open landscapes, we do not consider Breckland an appropriate target area for large-scale tree planting. Therefore, any tree planting in Breckland's urban areas should be assessed on a case-by-case basis to ensure there are no adverse impacts on the qualifying features of the Breckland SPA or the integrity of open landscapes.

Natural England's general advice on tree planting in the Brecks is that much of the special interest of the area relies on the openness of its habitats and landscape, along with characteristically impoverished soils. Increasing tree cover in these open landscapes can fragment habitats and create predator shadows, which negatively impact Stone Curlew (the qualifying features of the Breckland SPA).

7.3 ENV 03: Improving Biodiversity

7.3.1. Natural England welcomes:

- The inclusion of a minimum of 20% Biodiversity Net Gain (BNG) being actively encouraged, noting that the mandatory requirement set out in the Environment Act 2021 is a minimum of 10%.
- The policy's approach to prioritising on-site net gain provision before off-site delivery, in line with the Biodiversity Gain Hierarchy.
- The reference to the Norfolk LNRS in identifying priorities for habitat creation or enhancement, in line with paragraph 192 of the NPPF.

7.3.2. However, Natural England advise the following for strengthening the policy:

7.3.3. *Mitigation Hierarchy*

We advise that the policy wording should explicitly require compliance with the mitigation hierarchy, as outlined in paragraph 193 of the NPPF. While this is mentioned in the supporting text, it should also be stated within the policy itself.

7.3.4. *European Sites and Irreplaceable Habitats*

The policy should make clear that any mitigation and/or compensation requirements for European sites, other statutory designated sites, or irreplaceable habitats must be addressed separately from mandatory biodiversity net gain provision.

7.3.5. *LNRS Alignment and Off-site Provision*

¹⁷ Urban Tree Canopy Standard. Available at:

<https://designatedsites.naturalengland.org.uk/GreenInfrastructure/UrbanTreeCanopyStandard.aspx>

Paragraph 192(a) of the NPPF outlines that LPAs should ‘*identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks*’ in their development plan. Through the “Areas that Could Become of Importance to Biodiversity (ACB)” data layer within the [Local Habitat Map](#)¹⁸, the Norfolk LNRS has developed an ecological network built around the ‘[Lawton principles](#)’¹⁹ of more, bigger, better and more joined up habitats to provide a framework for nature recovery across Norfolk. This can therefore help your authority meet the NPPF requirement to **identify** and **map** such a network.

Further guidance on mapping ecological networks can be found in [Planning Practice Guidance for the natural environment](#)²⁰.

- 7.3.6. Furthermore, the [Natural environment PPG](#)²¹ (paragraph 046) states that, *‘Local planning authorities should be aware of those areas mapped and identified in the relevant Local Nature Recovery Strategy and the measures proposed in them and consider how these should be reflected in their local plan. In doing so, they should consider what safeguarding would be appropriate to enable the proposed actions to be delivered, noting the potential to target stronger safeguarding in areas the local planning authority considers to be of greater importance. This will enable local planning authorities to support the best opportunities to create or improve habitat to conserve and enhance biodiversity, including where this may enable development in other location’.*
- 7.3.7. You should therefore consider how best to safeguard this through your Local Plan to enable the proposed nature recovery network and measures in the LNRS to be delivered and not undermined. It should be noted that development sites proposed through Local Plans provide opportunities to help deliver the priorities identified in the LNRS. This could be done, for example, by creating and enhancing habitats in and around development sites in line with the LNRS measures and providing and/or maintaining connectivity through the sites into the wider nature recovery network.
- 7.3.8. We advise a clear requirement for alignment with LNRS priorities and measures for all biodiversity net gain plans. Identifying the Norfolk LNRS mapped potential measures on the Local Plan Policies Map will help demonstrate the relationship between development sites and opportunities for biodiversity net gain (See [Annex 2](#) where we have highlighted habitats that could be enhanced by allocations [SDA 1](#), [SDA 2](#), [SDA 3](#), [SUE 72-76](#), [SUE 79](#), [SUE 223](#) and [SUE 225](#)).
- 7.3.9. The wording of Policy ENV 03 (and the supporting text within Section 8.32) needs to be re-written to reflect the fact that, with the LNRS now published, the LNRS Local Habitat Map is the only way in which strategic significance can be determined when using the Biodiversity Metric to calculate the number of biodiversity units generated by a piece of land (see page 27 of [The Statutory Biodiversity Metric](#)²²). As per Table 8 of The Statutory Biodiversity Metric, this supersedes any interim arrangements put in place by your authority (e.g. in identifying River Wensum Catchment, Wendling Beck Nature Recovery Project as strategic sites). Policy ENV 03 currently states that further sites will be assigned strategic significance status ‘as the LNRS evolves’. This implies that sites other than those which have habitat measures mapped to them in the LNRS Local Habitat Map can have ‘strategic significance’ status if this is included in the Local Plan, which is not the case.

¹⁸ Local Habitat Map. Available at: <https://experience.arcgis.com/experience/3425559ce5b94929b6865d0ba7e34f50>

¹⁹ Making Space for Nature: A review of England’s Wildlife Sites and Ecological Network. Available at: <https://webarchive.nationalarchives.gov.uk/ukgwa/20130402151656/http://archive.defra.gov.uk/environment/biodiversity/documents/201009space-for-nature.pdf>

²⁰ Planning Practice Guidance for the natural environment. Available at: <https://www.gov.uk/guidance/natural-environment>

²¹ Natural environment PPG. Available at: <https://www.gov.uk/guidance/natural-environment>

²² The Statutory Biodiversity Metric. Available at: https://assets.publishing.service.gov.uk/media/689c5ee17b2e384441636196/The_Statutory_Biodiversity_Metric_-_User_Guide_-_July_2025.pdf

7.3.10. We also advise that paragraphs 8.31 and 8.32, as well as the wording of Policy ENV 03, are now out of date. They currently refer to the Norfolk LNRS as if it is still in development, for example:

- “*Breckland Council is working in collaboration with other Norfolk authorities in the preparation of the LNRS*” (para 8.31)
- “*Further sites will come forward as the LNRS develops*” (para 8.32)
- Within the policy: “*the Norfolk Local Nature Recovery Strategy (LNRS) which is currently being prepared by Norfolk County Council...*” and “*As the LNRS evolves, further sites will be assigned...*”

7.3.11. [The Norfolk LNRS](#)²³ has now been published, therefore these references should be updated to:

- Confirm that the LNRS is now adopted and operational.
- Remove language implying ongoing preparation or uncertainty.
- Ensure alignment with the published LNRS objectives and priorities.

7.3.12. We also highlight that the supporting text provides limited information on Breckland Council’s involvement and role in developing the Norfolk LNRS. We recommend that the supporting text for Policy ENV 03 should explain this clearly. Doing so will:

- Provide transparency on the council’s contribution to the LNRS development process, as a supporting authority.
- Clarify its ongoing responsibilities in delivering nature recovery objectives.
- Strengthen the link between the Local Plan and the LNRS.
- Demonstrate the council’s commitment to collaborative nature recovery.
- *Long-Term Management:*

7.3.13. *Long-Term Management*

We advise reference to the requirement that BNG measures will need to be secured for at least 30 years through legal agreements, as per the Environment Act 2021, and include monitoring and reporting obligations.

7.3.14. *Higher Ambition Beyond Statutory Minimum*

Consider moving from “actively encouraged” to a policy expectation for 20% BNG on major developments, with strong support for proposals exceeding this level.

7.3.15. *Climate Resilience and Nature-Based Solutions*

We advise linking biodiversity net gain delivery to policy ENV 01 for climate adaptation and mitigation objectives, prioritising habitats that deliver multiple benefits such as flood risk reduction, carbon sequestration, and improved water quality.

7.3.16. *Small-Scale Development*

For developments outside mandatory BNG, consider providing clear examples of proportionate biodiversity enhancements, such as native planting, hedgerow restoration, and provision of bird and bat boxes.

7.4. ENV 04: Protection and Enhancement of the Landscape

7.4.1. We welcome the reference to landscape character within ENV 04 and the emphasis on maintaining the intrinsic beauty of the countryside. However, there are several opportunities to strengthen this policy to ensure it delivers robust protection and enhancement of Breckland’s valued landscapes:

7.4.2. *Regional and National Alignment*

While the policy refers to local landscape character, we would advise reference and

²³ The Norfolk LNRS. Available at: <https://www.norfolk.gov.uk/article/73317/Norfolks-Local-Nature-Recovery-Strategy>

application of the [East of England Landscape Typology](#)²⁴ and [Natural England's National Character Area \(NCA\)](#)²⁵ profiles. This would provide stronger regional and national consistency and potentially better integration with other policies.

7.4.3. *Embedding Local Landscape Character Assessments*

The findings of the Local Landscape Character Assessments (LLCAs) should be embedded more directly and spatially within the policy. Ideally, this would include the use of landscape sensitivity and capacity mapping to guide development decisions. Explicitly mentioning characteristic features, such as pine lines and pingos would encourage developers to refer to local character assessments. We note that differences between available LLCAs may require interpretation, and this should be acknowledged in supporting guidance.

7.4.4. *Landscape and Visual Impact Assessments (LVIA)*

The policy should require LVIA for all major developments, and for smaller developments located in or near sensitive landscapes. These assessments should follow best practice guidance, specifically [Guidelines for Landscape and Visual Impact Assessment \(GLVIA3\)](#)²⁶ (Landscape Institute guidance), to ensure consistency and quality.

7.4.5. *Integration with Other Policies*

The policy should reinforce that GBI (ENV 02), Landscape (ENV 04), and Ecology (ENV 01, ENV 03 and ENV 09), policies are mutually supportive. Stronger cross-referencing between these policies would help deliver multifunctional benefits for biodiversity, climate resilience, and placemaking.

7.4.6. *Policy Wording Clarification*

The Policy wording currently states that *'Development proposals will be expected to contribute to and, where possible, enhance the local environment by recognising the intrinsic character and beauty of the countryside'*.

Natural England is unclear what is meant by the phrase *"contribute to the local environment."* If this is intended to mean improving the environment, we advise that this is already covered by the word *"enhance."* If it simply means *"be part of the local environment,"* rather than make the local environment better, we question whether this adds any meaningful requirement, and to avoid ambiguity, we would suggest simplifying the wording to:

"Development proposals will be expected to enhance the local environment by recognising the intrinsic character and beauty of the countryside."

7.4.7. In addition to the above, we also advise that the policy should consider referencing regenerative tourism, in line with the principles set out in the [Breckland Regenerative Tourism](#)²⁷ strategy by the Norfolk and Suffolk Local Visitor Economy Partnerships. Regenerative tourism goes beyond sustainability by actively restoring and enhancing landscapes, biodiversity, and cultural heritage while providing meaningful visitor experiences. Incorporating this principle would align economic development with environmental stewardship and community wellbeing, ensuring that tourism contributes positively to the landscape rather than placing additional pressures on it. We advise that this would also link to EC 06: Tourism Related Facilities and Attractions.

7.4.8. Paragraph 8.63 of the supporting text states that,

'Air pollution poses a threat to the Brecks which includes ~~feature~~ habitats and

²⁴ East of England Landscape Typology. Available at: <http://www.landscape-east.org.uk/>

²⁵ Natural England's National Character Area (NCA). Available at: <https://nationalcharacterareas.co.uk/>

²⁶ Guidelines for Landscape and Visual Impact Assessment (GLVIA3). Available at: <https://landscapeinstitute.org/policy-practice/technical/assessments-standards/glvia3-panel/>

²⁷ Breckland Regenerative Tourism. Available at: <https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.visiteastofengland.com%2Fwp-content%2Fuploads%2F2025%2F05%2FBreckland-Regenerative-Tourism.docx&wdOrigin=BROWSELINK>

species vulnerable to nitrate deposition....'

The phrase '*include feature habitats*' would seem to be a typing error. Instead this could either be '*which include habitats...*' or '*which feature habitats..*'

7.5. ENV 05: Trees, Hedgerows and Development

7.5.1. We welcome the inclusion of Policy ENV 05, which seeks to retain trees, hedgerows, and shrub masses as integral components of green infrastructure within the District. This approach aligns with national objectives for biodiversity enhancement and sustainable development. However, we advise that the policy could be strengthened to provide greater clarity and effectiveness in the following areas:

7.5.2. *Overriding Reasons for Loss*

The policy currently states that trees and hedgerows should only be removed where there are "clear and overriding reasons" for their loss. We advise that the policy should define what constitutes such reasons. Clear criteria will ensure consistent interpretation and decision-making.

7.5.3. *Root Protection and Development Distance*

Natural England welcomes the inclusion of a requirement for tree surveys in accordance with BS 5837:2012 for development within 15 metres of trees, hedges, or shrub masses. However, we recommend that the policy wording is clarified to ensure that BS 5837:2012 is applied not only to the survey requirement, but also to the actual protection of existing trees during construction. We advise the following wording -

"Any form of development within 15m of any tree/hedge/shrub mass, both on and off site, must be accompanied by a full tree survey compliant with BS 5837:2012, this survey will form an important part of the development process. In addition, all retained trees must also be protected during construction in accordance with BS 5837:2012."

7.6. ENV 09: The Brecks Protected Habitats and Species

7.6.1. Natural England welcomes Policy ENV 09, which addresses potential impacts of development on Breckland SPA and SAC. We support the continued inclusion of a 1500-metre constraint zone/buffer and recognition of qualifying species. To strengthen the policy, we recommend the following:

7.6.2. *Amend wording to use the correct name of the protected site*

It is noted in the supporting text (paragraph 8.64) of this policy that the words 'Brecks' and 'Breckland' have been used interchangeably in reference to Breckland SPA/SAC. We advise that this is amended to the correct names: Breckland SPA and Breckland SAC. This also requires amendment in other areas of the Local Plan (Supporting evidence reference in footnote 1, paragraphs 5.26, 5.41, 8.93, Policies HOU 02, ENV 11).

7.6.3. *Policy Name*

Consider changing the name of the policy from "*ENV 09: The Brecks Protected Habitats and Species*" to be more focused on Breckland SPA/SAC e.g. "*ENV 09: The Breckland Special Area of Conservation, and Special Protection Area*" as this is what the policy focuses on. Also noting our comments on an additional policy below which covers all other protected sites ensures that ENV 09 can just focus on Breckland SPA/SAC – see [Additional Policy: "*ENV X – Protected Sites and Species*"](#).

7.6.4. *Stone Curlew – Breckland SPA*

Natural England agrees with the continued inclusion of the 1500-metre constraint zone/buffer around components of the Breckland SPA which support or are capable of supporting nesting Stone Curlew. This zone was originally put in place to ensure that any impacts to Stone Curlew, a qualifying species of the SPA, are assessed. The conservation

objectives for the SPA found here - [European Site Conservation Objectives for Breckland SPA - UK9009201](#)²⁸. Breckland Farmland SSSI, one of the component SSSIs of Breckland SPA, is currently in unfavourable condition.

7.6.5. Stone curlew nest records

The project level HRA for developments within the SPA and 1500m constraint zone/buffer should be informed by up-to-date Stone Curlew nest records and/or surveys. As a minimum, we advise at least 3 years' worth of survey/record data of all potentially suitable areas of land within 1500m of the proposed development to inform the HRA. 3 years would account for arable rotations. Surveys are not required for areas unsuitable for Stone Curlew, such as built-up areas, wetlands or forestry. We advise you should make this clear in the policy wording.

7.6.6. Developments close to the SPA but outside of the 1500m constraint zone/buffer may also require stone curlew nest surveys/records. As detailed in the European Site Conservation Objectives for Breckland SPA, "*A significant proportion of the Stone Curlew population in Breckland are known to nest outside the SPA; this is primarily on arable land. Nesting birds outside of the SPA boundary may form part of the wider population but are protected separately by Schedule 1 of Wildlife & Countryside Act, 1981 as amended, and / or SSSI protection if nesting within a SSSI.*" For further guidance Natural England has produced [Protected species and development: advice for local planning authorities](#)²⁹ (standing advice) to help planning authorities understand the impact of particular developments on protected species.

7.6.7. We note that the current policy wording uses the example of securing alternative land outside the SPA as potential mitigation. The gov.uk guidance on [appropriate assessments](#)³⁰ states that mitigation measures are to "*remove or reduce potential adverse effects*". There is a risk that habitat creation intended to avoid an adverse effect on the integrity of a European site could be deemed compensation not mitigation. However, it is not Natural England's role to provide legal advice, and you may wish to consider seeking legal advice on legislative interpretations.

7.6.8. Natural England has previously provided guidance to Breckland Council with advice on the impact of certain types of developments on Stone Curlews within Breckland SPA. This is currently referred to explicitly in paragraphs 8.65, 8.66 and 8.67 of the draft Local Plan. Paragraph 8.61 also appears to refer to the same document therefore in our view the references to this in the draft Local Plan would be easier to interpret if these paragraphs were not split up within the document. We support your comment in paragraph 8.61 that "*the council will have regard to this guidance, or subsequent revisions*". On this basis, and noting correspondence which we sent to your authority on 5 December 2025, we advise that the details currently provided in paragraph 8.66 would be better summarised as:

"development outside of the 1500m constraint zone/buffer and certain development within the constraint zone/buffer within settlement boundaries".

We request that the details in paragraph 8.67 are not included.

7.6.9. Woodlark and Nightjar – Breckland SPA

We agree with the continuation of the 400m constraint zone/buffer around components of

²⁸ [European Site Conservation Objectives for Breckland SPA - UK9009201](#). Available at: <https://designatedsites.naturalengland.org.uk/ConservationAdvice.aspx?SiteCode=UK9009201&SiteName=Breckland&SiteNameDisplay=Breckland+SPA&SiteNameDisplay=Breckland+SPA&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=&HasCA=1&NumMarineSeasonality=3>

²⁹ Protected species and development: advice for local planning authorities, Natural England and Defra (April 2025). Available at: <https://www.gov.uk/guidance/protected-species-how-to-review-planning-applications>

³⁰ Gov.uk Guidance on Appropriate Assessments. Available at: <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site#appropriate-assessment>

Breckland SPA which support, or are capable of supporting, nesting Woodlark and/or Nightjar, the other qualifying features of the SPA.

7.6.10. Air Quality

We support the policy's requirement to consider air quality impacts. However, as the policy is focused on Breckland SPA/SAC, we advise reflecting this in the wording and suggest the following amendments:

“Road traffic emissions affecting air quality, new road infrastructure or road improvements within 200 metres of Breckland SPA/SAC have the potential to cause likely significant effects’ to qualifying features of the sites either directly or indirectly and, as such, will require project level habitats regulations assessment.”

Other SACs and protected sites are also at risk from air pollution. To account for this we advise that reference is made to air quality impacts in the proposed additional policy ENV X – Protected Sites and Species.

7.7. Additional Policy: “ENV X – Protected Sites and Species”

7.7.1. Natural England strongly advise that, alongside Policy ENV 09, the Local Plan includes a policy covering all protected sites that could be impacted by development within the Breckland administrative boundary. This would be in line with the approach in the adopted Local Plans of neighbouring authorities'. The policy should include European sites (SACs, SPAs, Ramsar) and Sites of Special Scientific Interest (SSSIs), in line with the Conservation of Habitats and Species Regulations 2017 (as amended) and NPPF paragraph 193.

7.7.2. We advise including the following wording in this policy,

“Where a development proposal falls within a Natural England Impact Risk Zone (IRZ) for a Site of Special Scientific Interest (SSSI), the proposal will only be supported where it can be demonstrated that it will not have an adverse effect on European sites and/or damage or destroy the interest feature of SSSIs, both alone and in combination with other plans and projects. This should be evidenced through a project-level Habitats Regulations Assessment and/or SSSI impact assessment”

7.7.3. Air Quality

For this policy with respect to air quality we advise the following wording,

“Developments which lead to an increase in air emissions—including major developments that result in significant increases in road traffic emissions, new road infrastructure or road improvements within 200 metres of protected sites (European Sites and SSSIs), and certain industrial or agricultural proposals—have the potential for likely significant effects on European Sites and/or negative impacts on SSSIs. Such proposals will require a project-level Habitats Regulations Assessment and/or SSSI impact assessment which are informed by an air quality assessment.”

7.7.5. We also strongly advise that the policy wording should state clearly that the HRA/SSSI impact assessment, and the air quality assessment should be assessed in line with [Air pollution and development: advice for local authorities - GOV.UK](#)³¹.

7.7.6. Norfolk Green Infrastructure and Recreational Avoidance and Mitigation Strategy (GIRAMS)

Natural England notes that the Local Plan does not currently include any policy requiring relevant development to contribute to the Norfolk GIRAMS to address recreational disturbance impacts on European sites. While GIRAMS is mentioned in the supporting text (paragraphs 8.22 and 8.64), it is not referenced in any policy.

7.7.7. We strongly advise that GIRAMS is included within a policy, similar to approaches taken by neighbouring authorities in their adopted Local Plans. This ensures clarity, enforceability,

³¹ Air pollution and development: advice for local authorities - GOV.UK. Available at: <https://www.gov.uk/guidance/air-pollution-and-development-advice-for-local-authorities>

and consistency across Norfolk.

7.7.8. We therefore suggest that GIRAMS is incorporated into the proposed additional policy (ENV X – Protected Sites and Species), with wording that makes clear that development proposals likely to increase recreational pressure on European sites must provide appropriate contributions in accordance with the Norfolk GIRAMS. We suggest the following wording,

“All new development within Breckland Council’s Administrative Boundary, falls within the Zone of Influence (Zoi) for multiple European designated sites identified in the Norfolk GIRAMS. It is anticipated that certain types of development are ‘likely to have a significant effect’ on the sensitive interest features of these European Sites due to increased recreational pressure. To mitigate this impact, a financial contribution to the Norfolk GIRAMS will be required for all qualifying development, and this must be assessed within a project-level Habitats Regulations Assessment.”

7.7.9. We also advise that the policy should specify that,

“For larger developments, or those close to designated sites, a financial contribution to GIRAMS alone may not be sufficient to mitigate for the recreational disturbance impacts from the proposal; in these instances additional well-designed green infrastructure/open space of sufficient quantity and quality may also be required”.

7.7.10. We also strongly advise setting out within the policy the types of qualifying development that will be in scope of GIRAMS, as per Section 3.4.1. of the GIRAMS report, and the specific European sites covered by Norfolk GIRAMS for Breckland Council’s administrative boundary, as per Table 5 of the GIRAMS report.

7.7.11. *Mitigation Hierarchy*

Natural England advises that the Local Plan should explicitly incorporate the **mitigation hierarchy** within policy wording, not just in supporting text. As stated in our comments on policy ENV 03, while section 8.29 references the hierarchy in relation to Biodiversity Net Gain (BNG), there is no clear guidance on how it should be applied in decision-making at the plan level with regard to impacts to designated sites.

We therefore recommend that Policy ENV X should:

- Explicitly state that all development proposals must follow the mitigation hierarchy (avoid, mitigate, compensate), noting that compensatory measures with regard to protected sites are only acceptable through [The Derogation Provisions under the Habitats Regulations](#)³²
- Identify the hierarchy of designated sites (e.g., SPA, SAC, SSSI, Local Wildlife Sites) and the level of protection afforded.
- Require robust evidence at plan and project level to demonstrate avoidance of harm before mitigation or compensation is considered.

This approach aligns with paragraphs 188, 192, and 193 of the NPPF, which require plans to:

- Give appropriate weight to the conservation of designated sites and habitats.
- Ensure that harm is avoided wherever possible before considering mitigation or compensation.

7.7.12. *Protected Species*

We also recommend that this policy addresses protected species, in line with NPPF paragraph 192(b), as the current Local Plan does not reference them. For advice, see [Protected species and development: advice for local planning authorities - GOV.UK](#)³³

³² The Derogation Provisions under the Habitats Regulations. Available at: <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site#derogation>

³³ Protected species and development: advice for local planning authorities - GOV.UK. Available at: <https://www.gov.uk/guidance/protected-species-how-to-review-planning-applications>

7.8. ENV 10: Development in Nutrient Sensitive Areas

7.8.1 Natural England welcomes the inclusion of this policy, which identifies the need for mitigation measures, to address the nutrient impacts from new development, within the catchments of the River Wensum SAC, and/or the Broads Special Area of Conservation (SAC) and Broadland Ramsar site. We advise that all developments within the scope of nutrient neutrality, including any proposed mitigation measures for these developments, should be in line with the [Nutrient Neutrality Principles \(TIN186\)](#)³⁴ and follow the [Nutrient Neutrality Generic Methodology \(NECR459\)](#)³⁵. We therefore advise that these documents should be referred to in the policy wording. Additionally, we advise the following revision to the policy wording to address inaccuracies:

7.8.2. We advise the policy wording is revised to reference the correct protected sites as follows,

“All residential developments within the nutrient sensitive catchments of the River Yare SAC, River Wensum SAC and/or The Broads SAC and Broadland Ramsar, which would lead to an increase in overnight accommodation...”,

The River Yare SAC is not a European site (but the River Yare Broads and Marshes is one of the SSSIs which legally underpin The Broads SAC), and while the Broadland Ramsar covers the same area as The Broads SAC, this Ramsar site is a separate designated site which is also subject to the nutrient neutrality methodology.

7.8.3. Additionally, we highlight that in paragraph 8.68 of the supporting text for policy ENV 10, there is a typing error and the wording should be amended as follows,

“Conservation of Habitats and Species Regulations 201744”

7.9. ENV 11: Agricultural Intensification

7.9.1. As per our previous advice dated 15 July 2024, Natural England welcomes the policy’s requirement for proposed agricultural development within the 1,500m area around Breckland SPA to undertake a HRA to assess the potential impacts to the site. However, we would still advise including additional wording referencing the need to align agricultural development with [“ENV 09: The Brecks Protected Habitats and Species”](#), and also the proposed [Additional Policy: “ENV X – Protected Sites and Species”](#). This will ensure a HRA/SSSI impact assessment is undertaken to assess the potential impacts from agricultural developments which trigger an IRZ of *any* European sites/SSSIs, rather than just Breckland SPA.

7.9.2. Air Quality

Natural England welcomes impact on air quality being included in this policy. Agricultural developments should demonstrate that they are fully compliant with relevant legislation and regulation, and assessment should take account of the cumulative impacts of air pollution sources in the area. With regards to assessing the impact of air pollution on protected sites, we refer you to Natural England’s Standing Advice on the impacts of air pollution on protected sites, included above in our advice for Additional Policy: *“ENV X – Protected Sites and Species”*.

7.9.3. Water Quality

As per Natural England’s previous advice (our ref 477856, dated 15 July 2024), with regard to water quality impacts, to support the Environment Act 2021 targets and Environment Improvement Plan, Natural England would advise that this policy should take account of all water courses, water bodies and water dependent habitats, and not just designated nutrient sensitive water dependent habitats.

³⁴ Nutrient Neutrality Principles (TIN186). Available at: <https://publications.naturalengland.org.uk/publication/5031421117988864>

³⁵ Nutrient Neutrality Generic Methodology (NECR459). Available at: <https://publications.naturalengland.org.uk/publication/5143927928913920>

7.9.4. We advise that the policy wording is amended to include reference to Broadland Ramsar. While the Broadland Ramsar covers the same area as The Broads SAC, it is a separate designation.

7.10 ENV 12: Open Space, Sport & Recreation

- 7.10.1. Natural England welcomes the policy ENV 12 and the provision for allotment plots, along with the prior agreement for ongoing management, for developments of over 100 dwellings.
- 7.10.2. As per Natural England's previous advice (our ref 477856, dated 15 July 2024), Natural England advise that this policy requires further clarity to determine if the policy relates to 'formal' recreational land such as sports pitches, equipped playgrounds and formal parks or also includes natural or semi-natural green space or other 'green infrastructure'.
- 7.10.3. Natural England welcome the plan's policies that support retaining and enhancing green infrastructure and open space, such as ENV 02. However, if natural/semi-natural green space is being included in this policy's definition of open space, it has potential conflicts with the requirements of these other policies. The reference to Accessible Natural Green Space Standard (ANGST) in the supporting text in paragraph 8.124 leads to this confusion.

7.11 ENV 14: Regenerative Farming

- 7.11.1. Natural England welcomes this policy as an important measure to prevent the irreversible loss of high-quality agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification). However, we advise that the current policy title, "Regenerative Farming," does not accurately reflect its purpose and could be confused with the agricultural approach focused on restoring soil health and biodiversity through farming practices ([Regenerative Farming](#)³⁶).
- 7.11.2. To avoid misinterpretation, we recommend revising the policy name to something more descriptive, such as "ENV 14: Protection of Best and Most Versatile Agricultural Land" or "ENV 14: Safeguarding Agricultural Soils."

7.12 ENV 15: Agritech Development and Community Growing Spaces

- 7.12.1. Natural England welcomes ENV 15 and the protection of existing community food growing spaces and support for new community growing spaces near housing estates.

7.13 Integration of the Environmental Policies (ENV...) with Other Policies

- 7.13.1. We advise that many of the policies which aim to protect and enhance the environment are also mutually supportive of other policies and aims within the Local Plan. For example, a healthy, nature-rich and highly accessible environment provides multiple health benefits (as per the aims of Policies COM 01, COM 02, INF 01 and INF 02) and can help reduce flood risk (as per the aims of Policy INF 03). Stronger cross-referencing between these policies would help highlight the multifunctional benefits of a healthy natural environment for people and nature.

8. Design Quality and Principles

8.1. DES 02: Integrating development with nature

- 8.1.1. Natural England is supportive of this policy's aim to retain existing mature landscape features including existing gaps to maintain local character. This approach protects the wider countryside and landscape. We welcome the requirement for landscape strategies to be considered early in the design stage. We also welcome the policy's general aim to integrate development and nature. The Norfolk LNRS maps 'potential measures' within allocated development sites where these overlap across the county. This presents an excellent opportunity for developers to use those measures to create nature-rich developments which

³⁶ Research Briefing - Regenerative Farming. Available at: <https://post.parliament.uk/research-briefings/post-pn-0748/>

align with Norfolk’s habitat and species priorities, maximising the benefits for nature and people.

9. Community

9.1 COM 01: Healthy Lifestyles

- 9.1.1. Natural England welcomes the holistic approach of this policy and the recognition of the importance of facilitating active travel and providing green infrastructure to create healthy places to live.
- 9.1.2. The natural environment plays an important role in healthy placemaking through the ecosystem services it provides. Accessible greenspace can, directly or indirectly, reduce morbidity and mortality, improve mental health and wellbeing and improve quality of life throughout the entire life course.
- 9.1.3. The Plan should consider health needs and health inequalities of the community in planning green infrastructure and greenspace. Using local health data, such as the Joint Strategic Needs Assessment or Joint Health and Wellbeing Strategy³⁷ alongside Natural England’s green infrastructure and greenspace tools in the Green Infrastructure Framework³⁸ can assist in aligning priorities for both health and the natural environment to maximize outcomes.

10. Resilient and adaptable infrastructure

10.1 INF 01: Sustainable Transport

- 10.1.1. Natural England welcomes this policy in the plan. As supported by our previous comments in this letter, we support the prioritisation of active travel for the many benefits it provides for people and nature. This includes improvement to health and wellbeing, air quality and noise pollution. Further advice and evidence on active travel is available in Natural England’s Green Infrastructure Principles³⁹.

10.2 INF 03: Flood Risk & Surface Water Drainage

- 10.2.1. Natural England welcomes this policy and supports the use of SuDS to manage surface water disposal. These systems can be used to create wetland habitats for wildlife in an attractive aquatic setting – the SuDS Manual⁴⁰ provides useful information about integrating SuDS and biodiversity. The maintenance of SuDS should be provided for the lifetime of a project.
- 10.2.2. However, as highlighted in our comments for ENV 03, when delivering GI for developments, there is a risk that developers may overly rely on these features to meet GI requirements, potentially reducing the delivery of multifunctional spaces. We advise that SuDS should complement rather than substitute other GI elements, and advise this should be made clear within the INF 03 policy.
- 10.2.3. Natural England supports the policy in reducing flood risk and welcomes the inclusion of assessing opportunities to undertake river restoration. We would welcome the policy wording to include the following,

“wherever practicable, have a positive impact on the risk of surface water flooding in the surrounding area adjacent to the development and having a positive impact on aquifer recharge”.

³⁷ Joint Strategic Needs Assessment, Norfolk Insight (2020). Available at: <https://www.norfolkinsight.org.uk/jsna/>

³⁸ Introduction to the Green Infrastructure Framework - Principles and Standards for England, Natural England (2023). Available at: <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx>

³⁹ Green Infrastructure Principles, Natural England (2023). Available at: <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Principles/GIPrinciples.aspx>

⁴⁰ The SuDS Manual, CIRIA (December 2015). Available at: <https://www.ciria.org/ItemDetail?iProductCode=C753F&Category=FREEPUBS>

Ensuring groundwater aquifers refill is important to protect against drought.

10.3 INF 04: Renewable Energy Development

- 10.3.1. Natural England is committed to helping deliver more renewable and low carbon energy in a sustainable manner which avoids adverse impacts on the natural environment. We therefore support the above policy.
- 10.3.2. We advise schemes should deliver 'high nature, low carbon', recognising that the climate and nature crises are inextricably linked, and both emergencies must be tackled together. Renewable and low carbon energy development should not be delivered at the expense of the natural environment. The siting of renewable and low carbon energy development should not exacerbate climate change impacts (for example, developing on woodland or peatland), nor diminish our ability to mitigate impacts through Nature-based Solutions such as peatland restoration.
- 10.3.3. Natural England advises against development activities which put additional pressures on protected sites, as well as those that negatively impact areas outside of protected sites that support habitats known to be important for biodiversity and carbon storage and sequestration. Development should avoid, reduce or minimise potential impacts through good site selection, responsive design and other mitigation and management measures.
- 10.3.4. Proposals should assess cumulative impacts and potential unintended consequences and regional disparities resulting from a sudden expansion of renewable energy development in certain parts of the country. The necessary rapid deployment of renewable and low carbon energy solutions does not negate the need for adequate assessment of alternatives, the correct application of the mitigation hierarchy or for suitable compensatory measures to be secured.
- 10.3.5. We also advise this policy should be consistent with policy ENV 14: Regenerative Farming to prevent the irreversible loss of high-quality agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification (ALC)) from development.

Annex 2 – Draft Local Plan housing allocations and key impact pathways and strategic solutions that should be considered in a project level HRA. Within this table we also highlight for major allocated sites the potential LNRS measures which could be delivered. PLEASE NOTE: THIS IS ONLY INDICATIVE AND NOT AN EXHAUSTIVE LIST.

Allocation/Site with number of dwellings in brackets	Nutrient Neutrality (NN)	Breckland SPA 1.5km Constraint Zone	Breckland Forest SSSI 400m Buffer	Norfolk GIRAMS	Green Infrastructure provision	Other Comments	LNRS mapped potential measures which could be wholly or partially delivered through the allocation
Policy							
RB 1: Robertson Barracks	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Any existing dwellings may not fall within scope of NN or GIRAMS, but any new dwellings would be within scope.	
Strategic Development Areas							
SDA 1: LPRC4S25DEV034 East Tuddenham SDA (1000)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		Habitats: Deciduous woodland restoration and creation; Scrub creation; Arable field margin creation; Other neutral grassland creation; still water restoration and creation; Habitat mosaic creation. Species: Measures benefitting turtle dove; great crested newt; water vole. Wider environmental benefits: Creating habitats which provide water quality and flood mitigation benefits/nature-based solutions
SDA 2: LPRC4S25DEV035 Barkers Farm (700 of 3,000)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		Habitats: Deciduous woodland restoration; Scrub creation; Arable field margin creation; Other neutral grassland creation; Calcareous grassland creation; Lowland meadows and pastures restoration and creation; Wet grassland and grazing marshes restoration and creation; River, riparian and floodplain habitat creation; Still water creation (pingos); habitat mosaic creation. Species: measures benefitting great crested newt; water vole. Wider environmental benefits: Creating habitats which provide water quality and flood mitigation benefits/nature-based solutions
SDA 3: LPRC4S25DEV036 Roudham & Larling (700 of 3,000)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	See comments above in section 3.1 of Annex 1.	Habitats: Deciduous woodland restoration; Scrub creation; Arable field margin creation; Other neutral grassland creation; Calcareous grassland creation; Lowland meadows and pastures restoration and

Allocation/Site with number of dwellings in brackets	Nutrient Neutrality (NN)	Breckland SPA 1.5km Constraint Zone	Breckland Forest SSSI 400m Buffer	Norfolk GIRAMS	Green Infrastructure provision	Other Comments	LNRS mapped potential measures which could be wholly or partially delivered through the allocation
							creation; Wet grassland and grazing marshes creation; River, riparian and floodplain habitat creation; Still water restoration and creation; Lowland fen creation; Veteran trees restoration; Habitat mosaic creation. Species: Lapwing; Eurasian curlew; European eel; Serotine bat; Water vole. Wider environmental benefits: Creating habitats which provide water quality and flood mitigation benefits/nature-based solutions
Market Towns							
Attleborough							
ATT 1 (110) LPRC4S25DEV110 Land West of Hargham Road (120)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Dereham							
DER 1 (079) LPRC4SDEV079 Dereham Hospital Extension (30)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
DER 4 (144) LPRC4SDEV144 Dumpling Green (300)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
DER 5 (164) LPRC4SDEV164 Land North of Dereham Road (in Scarning Parish) (70)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
DER 2 (344) LPRC4SDEV344 Swanton Road (120)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
DER 3 (032) LPRC4SDEV032 The Old Maltings, Norwich Road, Dereham (120)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Swaffham							
SWA 6 (069) LPRC4S25DEV069 Land at Norwich Road (400)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		

Allocation/Site with number of dwellings in brackets	Nutrient Neutrality (NN)	Breckland SPA 1.5km Constraint Zone	Breckland Forest SSSI 400m Buffer	Norfolk GIRAMS	Green Infrastructure provision	Other Comments	LNRS mapped potential measures which could be wholly or partially delivered through the allocation
SWA 5 (070) LPRC4S25DEV070 Land off North Pickenham Road (100)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
SWA 3 (179) LPR/C4S/DEV/179: East of Sporle Road (180)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
SWA (195) LPR/C4S/DEV/195: South of Sporle Road (120)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
SUE (074) LPRC4S25DEV074 Norwich Road (500)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		None
SWA4 (077) LPRC4S25DEV077 Stoneycroft House, Sporle Road (12)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
SUE (072) LPRC4S25DEV072 Norwich Road (400)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		None
SUE (073) LPRC4S25DEV073 Norwich Road (300)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		None
SUE (075) LPRC4S25DEV075 Norwich Road (500)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		None
Thetford							
SUE (079) LPRC4S25DEV079 (Part N A11 47ha) (500)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	We note that these are part of the Kingsfleet Grove SUE	Habitats: Deciduous woodland restoration and creation; Scrub creation; Arable field margins creation; Heathland creation; Acid grassland restoration and creation; Calcareous grassland creation; Habitat mosaic creation; Still water creation.
SUE (079) LPRC4S25DEV079 (Part Kilverstone Road 89ha) (750)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		Species: Measures benefitting Eurasian curlew; serotine bat; water vole. Wider environmental benefits: Creating habitats which provide water quality and flood mitigation benefits/nature-based solutions
SUE (079) PROPOSAL Kingsfleet Grove SUE (2000)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	See comments above in HOU 02 – Advise Early engagement	

Allocation/Site with number of dwellings in brackets	Nutrient Neutrality (NN)	Breckland SPA 1.5km Constraint Zone	Breckland Forest SSSI 400m Buffer	Norfolk GIRAMS	Green Infrastructure provision	Other Comments	LNRS mapped potential measures which could be wholly or partially delivered through the allocation
Watton							
SUE (225) LPR/CS4/DEV/225: Land North and East of Shrublands (700)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		Habitats: Deciduous woodland restoration; scrub restoration; Arable field margins creation; Open mosaic on previously developed land restoration; River, riparian and floodplain habitat creation; Still water restoration; Veteran trees restoration. Species: Measures benefitting water vole; barbastelle bat; great crested newt. Wider environmental benefits: Creating habitats which provide water quality and flood mitigation benefits/nature-based solutions
SUE (223) LPRC4SDEV223 Land East of Summer Lane (100)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
WAT 4 (289) LPRC4SDEV289 Land West of Thetford Road (140)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	SSSI Impact Assessment required for Wayland Wood SSSI	
SUE (086) LPR/CS4/DEV/086: Land to rear of Shrublands (10)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
SUE (339) LPRC4SDEV339 Shrublands (1) Carbrooke (10)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
SUE (340) LPRC4SDEV340 Shrublands (2) Carbrooke (20)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Ex MOD Comms Building, Elworthy Road (BLR) (20)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
WAT 2 (085) LPRC4S25DEV085 Land East of Shackleton Road, Former RAF Airbase (75)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
WAT 3 (088) LPRC4S25DEV088 Land North of Thetford Road (350)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	SSSI Impact Assessment required for Wayland Wood SSSI	

Allocation/Site with number of dwellings in brackets	Nutrient Neutrality (NN)	Breckland SPA 1.5km Constraint Zone	Breckland Forest SSSI 400m Buffer	Norfolk GIRAMS	Green Infrastructure provision	Other Comments	LNRS mapped potential measures which could be wholly or partially delivered through the allocation
Market Towns							
East Harling							
HAR 3 (398) LPRC4SDEV398 Kenninghall Road (30)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
HAR 2 (133) LPRC4SDEV133 Land at Garboldisham Road (4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
HAR 1 (212) LPRC4SDEV212 Off Lopham Road, East Harling (190)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Mattishall							
MAT (307) LPRC4SDEV307 North of Thynne's Lane (100)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
MAT 2 (357) LPRC4SDEV156: 149 Dereham Road (50)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Necton							
NEC 1 (005) LPRC4SDEV005 Off Brackenwood (50)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
NEC 2 (302) LPRC4SDEV302 North Pickenham Road Phase 3 (50)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Primary Parishes							
Banham							
(BEN 1 (013) LPRC4S25DEV013 Land West of Mill Road, Banham (70)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Bawdeswell							
BAWD 1 (161) LPRC4SDEV161 Land North of Foxley Road (140)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	SSSI Impact Assessment required for Foxley Wood SSSI	

Allocation/Site with number of dwellings in brackets	Nutrient Neutrality (NN)	Breckland SPA 1.5km Constraint Zone	Breckland Forest SSSI 400m Buffer	Norfolk GIRAMS	Green Infrastructure provision	Other Comments	LNRS mapped potential measures which could be wholly or partially delivered through the allocation
Kenninghall							
KEN 2 (031) LPRC4SDEV031 Land opposite Kenninghall Primary School (50)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
KEN 1 (167) LPRC4SDEV167 Powell Close (20)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Litcham							
LIT 1 (257) LPRC4SDEV257: Lexham Road up to 100+ due to PC wishes (100)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Mundford							
MUN 1 (361) LPRC4SDEV361 West Hall Drive (30)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Consideration of GI provision due to distance to Breckland Forest SSSI As above.	
MUN 2 (360) LPRC4SDEV361 Bracken Rise (10)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Narborough							
NAR 2 (103) LPRC4SDEV103 Chalk Lane 1 (30)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	SSSI Impact Assessment required for Narborough Railway SSSI. Consider GI provision in combination with other Chalk Lane allocation. As above.	
NAR 1 (105) LPRC4SDEV105 Chalk Lane 2 (70)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
North Elmham							
NEL 2 (330) LPRC4SDEV330 Back Lane (50)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
NEL 1 (205) LPRC4SDEV205 Land South of Eastgate Street	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		

Allocation/Site with number of dwellings in brackets	Nutrient Neutrality (NN)	Breckland SPA 1.5km Constraint Zone	Breckland Forest SSSI 400m Buffer	Norfolk GIRAMS	Green Infrastructure provision	Other Comments	LNRS mapped potential measures which could be wholly or partially delivered through the allocation
(30)							
Old Buckenham							
OLD 1 (111) LPRC4SDEV111 Hargham Road (8)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Secondary Parishes							
Ashill							
ASH 1 (320) LPR/C4SDEV/320: The Willows (20)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
ASH 2 (319) LPR/C4S/DEV/319: Greenacre Close (45)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Beetley							
BEET 1 (134) LPR/CS4/DEV/134: Fakenham Road (10)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Caston							
CAS 1 (024) LPRC4SDEV024 Home Farm, North Acre (5)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Fransham							
FRAN 1 (001) LPRC4SDEV001 West Station Road (10)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Garboldisham							
GARB 1 (057) LPRC4SDEV057 North of Smallworth Lane (8)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Griston							
GRIS 1 (347) LPR/CS4/DEV/347: Caston Road (20)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Former Quantrill's Industrial Estate (37)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		

Allocation/Site with number of dwellings in brackets	Nutrient Neutrality (NN)	Breckland SPA 1.5km Constraint Zone	Breckland Forest SSSI 400m Buffer	Norfolk GIRAMS	Green Infrastructure provision	Other Comments	LNRS mapped potential measures which could be wholly or partially delivered through the allocation
Hockering							
HOC 1 (400) LPRC4SDEV400 The Street (100)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Hockham							
GHOC 1 (109) LPRC4SDEV109: West of Watton Road (80)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Lyng							
LYNG 1 (091) LPRC4S25DEV091 Land North of Heath Road part (50)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
North Lopham							
N-LOP 1 (054) LPRC4S25DEV054 Land to the Rear of Bell Farm, South of Primrose Lane (20)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Rocklands							
ROC 1 (065) LPR/C4S/DEV/065 – North of The Street (10)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
ROC 2 (064) LPR/C4S/DEV/064 – South of Bell Road (15)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Saham Toney							
SAHAM 1 (072) LPRC4SDEV072 West of Hills Road (20)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Sporle							
SPL 1 (370) LPRC4SDEV370 Bunkers Hill (small part) (30)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
SPL 2 (146) LPR/C4S/DEV/146 Land off the street (30)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		

Allocation/Site with number of dwellings in brackets	Nutrient Neutrality (NN)	Breckland SPA 1.5km Constraint Zone	Breckland Forest SSSI 400m Buffer	Norfolk GIRAMS	Green Infrastructure provision	Other Comments	LNRS mapped potential measures which could be wholly or partially delivered through the allocation
Yaxham							
YAX 1 (094) LPR/C4S/DEV/094 St Peter's Close / Norwich Road (50)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Tertiary Parishes							
Beeston							
BEES 1 (028) LPRC4DEV028: Back Lane (10)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
BEES 3 (058) LPRC4SDEV058 Beeston Playing Field And Dereham Road (5)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
BEES 4 (204) LPRC4SDEV: School Farm Paddock (5)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
BEES 5 (059) LPRC4SDEV059: Rose Cottage Syers Lane (5)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
BEES 2 (203) LPRC4SDEV203 Back Lane (8)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Brisley							
BRIS 1 (006) LPRC4SDEV006 Land North of Gately Road, Potthorpe (10)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Colkirk							
COL 1 (155) LPRC4SDEV155 Land East of Hall Lane (10)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Garvestone, R&T							
GARV 1 (088) LPRC4SDEV088 Land North of Dereham Road, (10)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
GARV 2 (087) LPRC4SDEV087 Site B,	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		

Allocation/Site with number of dwellings in brackets	Nutrient Neutrality (NN)	Breckland SPA 1.5km Constraint Zone	Breckland Forest SSSI 400m Buffer	Norfolk GIRAMS	Green Infrastructure provision	Other Comments	LNRS mapped potential measures which could be wholly or partially delivered through the allocation
North of Dereham Road (5)							
Great Dunham							
GDUN 1 (256) LPRC4SDEV256 East of Litcham Road (10)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Shropham							
SHROP 1 (142) LPR/C4S/DEV/142: East of Rocklands Road (20)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
South Lopham							
S-LOP 1 (276) LPR/C4S/DEV/276 Option 1 - Land to West of Church Road (10)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Thompson							
THOM 1 (170) LPR/C4S/DEV/170 LAND OFF TOTTINGTON ROAD, THOMPSON (5)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
THOM 2 (108) LPR/C4S/DEV/108 Land to the east of Watton Road (25)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Weasenham St Peter							
WEAS 1 (227) LPRC4SDEV227 School Road (10)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		

**Annex 3 – Draft Local Plan Employment Land policy/allocations and key impact pathways that should be considered in a project level HRA.
PLEASE NOTE: This Information is based on Natural England’s Impact Risk Zones. THIS IS ONLY INDICATIVE AND NOT AN EXHAUSTIVE LIST.**

Policy/Allocation	Natural England Comments
EMP 02: Employment Land Provision	<p>Natural England advises that proposals within Class B2 (General Industrial Use) and Class B8 (Storage and Distribution, including warehouses) may require a project-level Habitats Regulations Assessment (HRA) where certain activities are proposed. Specifically, a HRA will be required should the development include:</p> <ul style="list-style-type: none"> • Air emissions (to be assessed through an air quality assessment); • Discharges exceeding 5m³/day to ground (e.g., infiltration/seepage), or to surface water such as streams or becks; • Significant water consumption, which could affect water-dependent habitats.
EMP 03: Reserve Employment Allocation	As Above
Snetterton	
SNETT-EMP 1: Land at Falcon Road (Site ref: 286)	<p>Natural England advises that proposals within Class B2 (General Industrial Use) and Class B8 (Storage and Distribution, including warehouses) may require a project-level Habitats Regulations Assessment (HRA) where certain activities are proposed. Specifically, a HRA will be required should the development include:</p> <ul style="list-style-type: none"> • Air emissions (to be assessed through an air quality assessment); • Discharges exceeding 5m³/day to ground (e.g., infiltration/seepage), or to surface water such as streams or becks; • Significant water consumption, which could affect water-dependent habitats.
SNETT-EMP 2: Parcels P and Q - Land adjacent to Snetterton Heath (Site ref: 267)	As above
SNETT-EMP 3: Land at Harling Road (Site ref: 298)	As above
SNETT-EMP 4: West of Snetterton Employment Allocation 1	As above

Policy/Allocation	Natural England Comments
SNETT-EMP 5: Land at Hargham Road and Chalk Lane (Site ref: 366)	As above
SNETT-EMP 6: Land at Hargham Road West (LPRC4S25REN003)	As above
Dereham	
DER-EMP 1: Land at Moorfields (Site ref: 129)	<p>If a hotel (Use Class C1) is proposed consideration of Nutrient Neutrality will need to be required within a HRA. Natural England advises that proposals within Class B2 (General Industrial Use) and Class B8 (Storage and Distribution, including warehouses) may still require a project-level Habitats Regulations Assessment (HRA) where certain activities are proposed. Specifically, a HRA will be required should the development include:</p> <ul style="list-style-type: none"> • Air emissions (to be assessed through an air quality assessment); • Discharges exceeding 5m³/day to ground (e.g., infiltration/seepage) or to surface water such as streams or becks; • Significant water consumption, which could affect water-dependent protected sites
Swaffham	
SWA-EMP 1: Land north of the A47 Swaffham (Site ref: 076)	<p>Natural England advises that proposals within Class B2 (General Industrial Use) and Class B8 (Storage and Distribution, including warehouses) may still require a project-level Habitats Regulations Assessment (HRA) where certain activities are proposed. Specifically, a HRA will be required should the development include:</p> <ul style="list-style-type: none"> • Air emissions (to be assessed through an air quality assessment); • Discharges exceeding 5m³/day to ground (e.g., infiltration/seepage) or to surface water such as streams or becks <p>Noting there are no water dependent protected sites nearby to this allocation, hence the criteria for significant water consumption not also being included.</p> <p>LNRS potential measures – Habitats: Arable field margins creation; Veteran trees restoration. Wider environmental benefits: Creating habitats which provide water quality and flood mitigation benefits/nature-based solutions</p>

Annex 4 - Standard Advice for Air Quality Impacts for Local Plans

Local Plans are likely to generate increased emissions of nitrogen oxides (NO_x) and ammonia, and additional nitrogen deposition as a result of increased traffic generation associated with new development. As impacts from individual development management proposals would be difficult to quantify without an overarching assessment of the cumulative impacts from Local Plan development, it is necessary for this to be considered strategically at plan level. Natural England would expect the environmental assessment of the plan including the Sustainability Appraisal (SA) and the Habitats Regulations Assessment (HRA) to consider any detrimental impacts on the natural environment from these emissions. It should also suggest appropriate avoidance or mitigation measures where applicable. Technical guidance about the ecological impacts from road transport can also be found in the [Natural England research report 'The ecological effects of air pollution from road transport: an updated review' \(NECR199\)](#).

Protected sites are 'sites of special scientific interest' (SSSIs) and 'habitats sites' (also called 'European sites'). For the purposes of this advice, Habitats Sites are Special Areas of Conservation (SACs), possible SACs, Special Protection Areas (SPAs), Potential SPAs, Ramsar sites, and sites identified, or required, as compensatory measures for adverse effects on Habitats Sites.

Although their regulatory frameworks differ, the general principles and approach for air pollution assessment outlined for Habitats Sites are also relevant for SSSIs. Where the following advice applies to both, we use the term protected sites. Where the advice or approach differs, the individual terms are used.

Habitats Sites and SSSIs at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition and/or acidification. Natural England provides the following standard advice on air pollution. This advice relates to the protection of protected sites under the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) and the Wildlife and Countryside Act 1981 and should also be taken as Natural England's formal representation under the Town & Country Planning (Local Planning) Regulations 2012. This standard advice is applicable to all stages of the Local Plan process. This includes advice on information that is required to assess air quality and how to interpret the results of air quality modelling for your LPA to conclude whether air quality impacts would have an adverse effect on the integrity of a Habitat site or a SSSI. Detailed guidance on how to undertake a Habitats Regulations Assessment for air pollution impacts generated from traffic can be found here [Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations \(NEA001\)](#).

You should also consider any relevant caselaw that could affect how you carry out any air quality assessments.

Air pollutants

This advice covers the following air pollutants:

ammonia (NH₃)

nitrogen oxides (NO, NO₂ or NO_x)

nitrogen deposition

acid deposition

sulphur dioxide (SO₂)

Standing advice on air pollution and development is also available

here: <https://www.gov.uk/guidance/air-pollution-and-development-advice-for-local-authorities>

Whilst the standing advice does not cover Local Plans, it does include additional technical advice which may prove useful. However, in summary, Table 1 provides the steps that we advise should be taken by local planning authorities.

Table 1: Sequential approach to air quality assessments

Stage	Step	Supplemental evidence/ basis for judgment
Initial screening for credible risk of an effect	1	<p>Check Distance criteria - could significant emissions reach a protected site? Yes = move to Step 2 No = no further HRA required</p> <p>The Air Pollution Information System (APIS) includes an introduction to air pollution.</p> <p>APIS provides site specific information on the interest features of individual protected sites and the sensitivity to air quality impacts of those features.</p> <p>For road traffic impacts, roads on the affected road network that lie within 200m of a designated site should be considered.</p> <p>Use Magic Map to check the location of designated sites. Search for the location then select the 'Designations' option.</p>
	2	<p>Check if the qualifying habitats or supporting habitat of qualifying species are sensitive to air quality impacts. Yes = move to Step 3 No = no further HRA required</p> <p>APIS Site relevant Critical Loads and Levels (based on literature and professional judgement) http://www.apis.ac.uk/src/</p> <p>Some habitats may not have a critical load because there is not enough data. In these cases, you should find the critical load for a similar habitat type or feature.</p> <p>The qualifying features of Habitats Sites can be identified in the relevant Site Conservation Objectives and Supplementary advice packages, which include a definitive list of legally qualifying features. These objectives are available here. Alternatively, a list of qualifying features can also be found by searching for the Habitats Site and SSSIs on Designated Sites View, alongside Conservation Objectives and Supplementary Advice for Habitats Sites.</p> <p>The above links will also show whether any of the qualifying features for Habitats Sites have a Restore or Maintain Conservation Objective in relation to air quality thresholds (critical levels or loads).</p> <p>If the site is a SPA or an SAC/SSSI designated for an animal species (as opposed to a habitat), determine whether the predicted pollution effects on the supporting habitat will have a negative effect on the notified species.</p>
Detailed AQ modelling	3	<p>Undertake detailed modelling using a recognised dispersal model – i.e. Atmospheric Dispersion Modelling System (ADMS) - Roads</p> <p>Air Quality modelling for Local Plans should include relevant scenarios that are clearly identified. We advise an allowance is also made for windfall development.</p> <p>Unless robust site-specific evidence is provided, we advise the lower range of the critical load should be used in modelling. If there are site specific reasons why it is more appropriate to use the higher end of the range, then this should be clearly evidenced.</p> <p>One such example of scenarios is a baseline plus future forecasts as follows: Baseline, future baseline (at end of plan period taking into account background trends for each pollutant), do nothing (without plan), do something (with plan).</p> <p>The Institute of Air Quality Management (IAQM) has produced the following document to assist its members in the assessment of the air quality impacts of development on designated nature conservation sites: air-quality-impacts-on-nature-sites-2020.pdf</p>
Applying screening thresholds	4a	<p>Apply Screening Threshold Alone If below threshold alone, move to step 4b. If above = move straight to step 5</p> <p>Ascertain the Process Contribution (PC) from the plan or project (emissions and predicted deposition). Apply Screening threshold (1% of critical level or load) alone using the <u>annual averages</u>.</p> <p>If the process contribution is less than 1% of the relevant long-term benchmark (Environmental Assessment Level, Critical Level or Critical</p>

			Load), the emission is not likely to have a significant effect <u>alone</u> irrespective of the background levels.
	4b	Apply Screening Threshold In-combination. If below threshold in-combination = no LSE/significant risk of damage etc and no further assessment required. If above = move straight to step 5	Use information from competent authorities (Planning Portal or Environmental Permitting register) to determine if there are plans or projects in the pipeline (not included in the current baseline) that should be considered in-combination for emission from roads/ increase in traffic. For example, add emissions & deposition from other Local Plans together and apply 1% to that sum. If the process contribution is less than 1% of the relevant long-term benchmark (Environmental Assessment Level, Critical Level or Critical Load), the emission is not likely to have a significant effect <u>in-combination</u> irrespective of background levels.
Detailed Assessment of ecological impacts	5	This step is to consider the ecological impacts of AQ on the interest features of the designated site and is not based only on numerical figures. If it is not certain whether sensitive features are located within the areas to be impacted, a site visit may be helpful to determine this. For SSSIs, this step should provide all the information necessary, including any required mitigation, for the LPA to determine if there would be an adverse effect on a SSSI. Should an adverse effect not be ruled out, this will need consideration within the Local Plan Sustainability Appraisal and consideration of the tests of the NPPF (para 193b). If Habitats Sites are impacted by the proposals, move to Step 6.	The following information is likely to be helpful for the LPA: Is the sensitive feature(s) located within the pollution footprint? Should it be there for the site to meet its Conservation Objectives or is there some other, natural reason (e.g. hydrology), why the sensitive feature(s) would not be expected to occur there? Check APIS Trends Tab for reasonable expectation on whether background pollution may be decreasing or not. Assess likely scale and duration of impacts on habitats from emissions. Check whether any strategic initiatives in the area (such as shared nitrogen action plans) would be compromised by the proposals.
Appropriate Assessment (AA) for habitats sites	6	LPA to undertake their AA to conclude whether or not there will be an adverse effect on integrity (AEOI) of habitats sites. Any mitigation proposed by the applicant should also be assessed at this point. Should the AA conclude that the Local Plan would have an AEOI that cannot be excluded with mitigation measures, consider derogation route of the HRA process. Should compensation measures be required under derogation, please contact Natural England for specific advice. Note: If an AA has been undertaken of the proposals <u>alone</u> and concluded that there will not be an adverse effect on integrity, if there are residual impacts that are not fully mitigated, these will need to be considered in combination with other plans or projects	Where mitigation is required to enable a conclusion of no adverse effect on integrity to be reached the AA must be able to show that mitigation measures can be relied upon to avoid adverse effects over the full lifetime of the plan. To be viable, such measures should be effective, reliable, timely, guaranteed and of sufficient duration. The assessment of such measures should be supported by evidence. When deciding on whether the proposals set out in the plan will have an adverse effect on Integrity on a Habitats Site, the Conservation Objectives and any supplementary advice should be taken into account. Including whether the site is already exceeding the environmental thresholds for ammonia, nitrogen oxides and nitrogen deposition and has a restore conservation objective.

Additional advice

For many protected sites, the current background pollution may already be exceeding the relevant critical load/level from a different source type to the project being assessed (e.g. the main source of background exceedance is due to agriculture, but the proposal is a road scheme). Proposals must consider their own impacts against the relevant environmental thresholds. There are many reasons why background levels are high, but the conservation objective is to 'maintain or restore' air pollutants to within these benchmarks. The objective would be undermined by proposals that add further emissions, including if it compromises any strategic initiatives to reduce air pollution levels.

Where an air quality report concludes that only a very small area of the site will be impacted, the assessment of effects on integrity or damage to the site, should take into account the interest features of the site, their distribution and how they will be impacted by proposals rather than on specific percentages of site. Dependent on features being present in the area to be impacted, this could have a disproportionate impact on the site if an area of a rare habitat type were lost rather than a judgement just on the percentages of habitat.

Improvements in vehicle technology and a move to further electrification of the vehicle fleet will, over time, result in lower background levels of nitrogen deposition and Nitrogen Oxide pollution near to roads. As most sites are currently over the relevant thresholds and have a "restore" objective, this should be noted as a "retardation" of the restore objective and expressed in months and years. Retardation of less than one year is acceptable as air quality is considered against an annual average. Please note that ammonia impacts cannot be assessed in this manner as there is no certainty of a declining trend.

Common Standards Monitoring¹⁴ is used to define the ecological condition of a protected site. It is undertaken on a broader level and does not currently consider air quality impacts. The relevant benchmark for assessing impacts is the critical thresholds. Therefore, the existing status of a designated site should not be the sole reason for judgement on potential impact.

Defra Emissions Factor Toolkit

The Defra Emission Factor Toolkit (EFT) allows for gradual introduction of electric vehicles into the fleet (cars and LGVs) up to 2050. These are the emission factors we advise that Local Plans should be using (which we advise should also consider ammonia emissions as well as NO_x – using one of three sets of emission factors available). However, the User Guide to the EFT highlights that calculation tools only support assessment years 2018 up to 2030, reflecting that predictions and assumptions beyond then become less certain. Where EFT calculated emissions are to be used after 2030 to inform air quality assessments, the EFT indicates that appropriate caveats around the limitations of the analysis must be included to accompany the assessment.

We therefore advise that emission factors no later than 2030 are used for HRAs – which would mean percentages of EVs are at predicted 2030 levels. A key concern is that, although EVs themselves have no tailpipe emissions, and the percentage of them will increase, the remaining combustion engine vehicles on the road may become more polluting as they age as selective catalytic reduction technology may create 'ammonia slip' over time. Ammonia slip is the unreacted ammonia (NH₃) that escapes from a selective catalytic reduction (SCR) or selective non-catalytic reduction (SNCR) system used to reduce NO_x in exhaust gases.

Motorways within the affected road network

There is potentially an added complexity to the need for in-combination assessments when considering traffic on motorways, as including these roads can mean that the assessment takes account of traffic growth related to strategic factors or long range (external) trips that are independent of the specific plan or project and neighbouring plans or projects. These roads are strategically important and tend to have high volumes of traffic as well as being well represented in

traffic models. The air quality assessment should therefore include traffic flows on these roads, but the external trips can be excluded from the initial screening assessment. A justification and explanation of which journeys are included and excluded in the traffic model should be provided. The conclusions reached on the air pollution impacts of the HRA must be incorporated into the wider HRA conclusions for other impact pathways identified for the local plan.

How to Use this Advice in Decision Making

Provided you have followed the above advice and have been able to conclude there would be no adverse effects on any protected sites we would be able to agree with the conclusions of your HRA in relation to air quality impacts and that the Local Plan is sound in this regard.

Local plan policy Advice:

Natural England would expect the plan to address the impacts of air quality on the natural environment. In particular, it should address the traffic impacts associated with new development, particularly where this impacts on protected sites. If the Local Plan would result in other air quality impacts apart from traffic, then this will also need to be addressed.

Local authorities should consider including a local plan policy based on the suggestion below to address air pollution impacts on Habitat Sites and SSSIs. The local plan policy could include the following:

Proposals should not significantly delay the date for compliance with environmental thresholds for air pollutants for Habitats Sites or SSSIs that are currently in exceedance of environmental benchmarks (critical levels and loads).

Proposals emitting air pollutants which impact Habitats Sites must rule out adverse effects on the integrity of such sites. Where this is not possible the derogations route of the Habitats Regulations should be followed.

To avoid and minimise air pollution impacts any development requiring Habitats Regulations Assessment, Environmental Impact Assessment (EIA) or impacts to SSSIs unrelated to EIA development should consider:

*the measures included which will minimise air pollution impacts on SSSIs and Habitats Sites and SSSIs during the design process of the development; and
how air quality improvements have informed the design choices made about the location of the development, its layout, and distribution of buildings, on-site activities, amenity spaces and infrastructure.*

A local plan could go on to set out what would be required for different development types in more detail. This may be important where there is strong evidence that particular sources of air pollution are preventing nature recovery. For example, where agricultural development is known to be one of the main sources of air pollution, a policy could specify a buffer around a protected site within which new or intensified agricultural proposals would not be permitted, apart from in exceptional circumstances.^[2]

^[1] [Common Standards Monitoring | JNCC - Adviser to Government on Nature Conservation](#)

^[2] Joint Nature Conservation Committee's (JNCC) Nitrogen Futures Project, available at: <https://jncc.gov.uk/our-work/nitrogen-futures/>

Railfuture East Anglia Response to the draft Breckland Local Plan

Railfuture East Anglia welcomes the opportunity to comment on the draft Breckland Local Plan. Railfuture is Britain's leading independent organisation campaigning for a bigger and better railway.

High-quality rail services play a vital role in improving connectivity, supporting economic growth and enabling sustainable communities. Rail reduces dependency on private cars and provides access to employment, services and amenities. It is therefore important that, wherever possible, new housing and employment developments are located where they can benefit from convenient access to rail services. This approach aligns with the Government's recent "default yes" policy for development near railway stations.

Summary of Key Points

We support the Plan's focus on continued growth along the A11 corridor, where good access to rail services already exists at Thetford and Attleborough, and where there is also potential for enhanced use of Harling Road station.

However, we have concerns about major developments proposed at Swaffham and East Tuddenham, which lack rail connections and are located a considerable distance from the nearest stations.

We recommend that Breckland Council, working with Norfolk County Council and in collaboration with the Mid Norfolk Railway, should actively explore the reopening of the Wymondham to Dereham line to network passenger services. This would provide a much-needed railhead for Dereham and the northern part of the Breckland District.

Proposed Developments Along the A11 Corridor

In addition to ongoing expansion at Thetford and Attleborough, the Plan proposes a substantial new development at Barkers Farm, north of the A11, together with development at Roudham/Larling to the south of the A11. Combined, these sites could deliver up to 6,000 new homes.

The railway line runs to the south of these proposed developments and includes the existing but underused Harling Road station. While the Plan makes general reference to public transport provision, it should explicitly recognise the important role this station could play. Harling Road should be developed as a public transport hub, supported by connecting bus services serving the wider development area.

Upgrades to Harling Road station are likely to be required, alongside funding arrangements to support these improvements. In addition, a regular stopping service would need to be introduced, potentially as part of a local Thetford–Norwich service.

The East West Rail project presents an opportunity to enhance rail services along this corridor. However, it is essential that capacity and infrastructure improvements at Ely and Trowse are delivered to ensure the eastern section of the route benefits fully from an additional hourly service between Norwich and Cambridge, with onward connections to Oxford.

The Snetterton General Employment Area benefits from a rail-connected freight facility. This facility should be supported and promoted as part of the Council's wider industrial and logistics strategy. Eccles Road station lies a short distance from the employment area and could potentially benefit from the introduction of future stopping services.

Other Major Developments

The major developments proposed at Swaffham and East Tuddenham are poorly located in relation to the rail network. The nearest practical station for Swaffham is Downham Market, approximately 14 miles away. For East Tuddenham, the closest station is Wymondham, around 9 miles away by car, or Norwich, approximately 15 miles away when travelling by bus.

Aside from the Cambridge–Norwich rail line that runs broadly along the A11 corridor, there are currently no other Network Rail lines passing through the Breckland District.

Reopening the Wymondham–Dereham Line

Norfolk County Council's Rail Prospectus identifies potential for reinstating passenger services between Wymondham and Dereham. Given the pace of growth in Norfolk, we believe a robust business case should be developed as soon as possible. Early consideration of this proposal would help inform and shape future housing and employment planning within Breckland. Any proposals would, of course, be developed in close collaboration with the Mid Norfolk Railway.

There are several strong reasons for pursuing a business case:

- Dereham is a growing town, with the combined population of the town and surrounding parishes likely to reach 30,000 over the lifetime of the Plan.
- Dereham is the largest town in Norfolk without a railway station and the third largest unserved town in the East of England, after Wisbech and Haverhill.
- A reopened rail link would support economic growth and enable further sustainable housing development. Dereham has the largest commercial centre in Breckland after Thetford.
- Direct rail connections would provide improved access not only to Norwich but also to Cambridge, London and the wider national rail network.
- A Dereham railhead would significantly improve rail access for residents in the northern part of the Breckland District.
- A rail connection could play a key role in any future redevelopment of the former Robertson Barracks at Swanton Morley.

In considering the case for reopening the line, useful parallels can be drawn with the highly successful reinstatement of the Okehampton branch line in Devon.

15 December 2025

From: [Planning Department](#)
To: [Local Plan](#)
Subject: RE: Breckland Local Plan: Regulation 18 Consultation
Sent: 31/10/2025 08:10:28

Follow Up Flag: Follow up
Flag Status: Flagged

Good morning,

Thank you for consulting the Water Management Alliance. Having screened the information provided, whilst the area in question lies partially within the Internal Drainage Districts of the Waveney, Lower Yare and Lothingland and Norfolk Rivers Internal Drainage Boards, the proposed application does not meet our threshold for commenting as per our [Planning and Byelaw Strategy](#). Therefore, the Boards currently have no comments to make.

Yours sincerely,



Fern Crofts, BSc (Hons) (she, her, hers)
Assistant Sustainable Development Officer
Water Management Alliance
[Redacted]

Registered office: [Redacted]

What3Words: [caring.employ.visit](#)

WMA members: [Broads Drainage Board](#), [East Suffolk Water Management Board](#), [King's Lynn Drainage Board](#), [Norfolk Rivers Drainage Board](#), [Pevensy and Cuckmere Water Level Management Board](#), [South Holland Drainage Board](#), and [Waveney, Lower Yare and Lothingland Drainage Board](#)

Follow us: [Facebook](#) [Instagram](#) [LinkedIn](#) [Bluesky](#) [YouTube](#)



Your feedback is valuable to us, we continually review and work to improve our services. If you have any suggestions, recommendations, questions, compliments or complaints, please complete one of our online forms: [Feedback Form](#) | [Complaint Form](#)

The information in this e-mail, and any attachments, is confidential and intended solely for the use of the individual or entity to whom it is addressed. The views expressed in this e-mail may not represent those of the Board(s). Nothing in this email message amounts to a contractual or legal commitment unless confirmed by a signed communication. All inbound and outbound e-mails may be monitored and recorded. We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for any litigation. E-mail messages and attachments sent to or from the Water Management Alliance e-mail address may also be accessed by someone other than the sender or recipient, for business purposes.

If you receive this email late at night, early in the morning, or at the weekend - it means I am working flexibly. Flexibility works for me, but please do not feel that you should have to pick this up outside of your own normal working hours.

With our commitment to ISO 14001, please consider the environment before printing this e-mail.

Defenders of the Lowland Environment

From: Local Plan <LocalPlan@breckland.gov.uk>
Sent: 30 October 2025 23:01
To: Local Plan <LocalPlan@breckland.gov.uk>
Subject: Breckland Local Plan: Regulation 18 Consultation

You don't often get email from localplan@breckland.gov.uk. [Learn why this is important](#)

Breckland Local Plan: Regulation 18 Consultation (Preferred Options)

The Council is carrying out a public consultation on the Draft Plan from Friday 31 October 2025 until 23:59 on Monday 15th December 2025. This stage of the local plan (known as Regulation 18) sets out the Council's draft policies and growth strategy and is an important stage in the plan-making process. It provides an early opportunity for our communities, businesses, landowners, developers, partners and stakeholders to 'have a say' and comment on the draft Local Plan before it is considered further and then finalised for the next (Regulation 19) stage. Consultation will also take place at the Regulation 19 stage.

Documents can be viewed at the link below

<https://www.breckland.gov.uk/local-plan-2025>

Consultation events

The Council is committed to ongoing engagement with communities. In addition to making the Plan publicly available via the council's website the Council will be holding a number of drop-in events where the Plan can be seen and where Council Officers will be available to explain it and discuss matters.

Information on the dates and times of public events are available on the website

We are keen for local people to tell us their views, and we would therefore encourage you to get involved and have your say on this draft version of the Plan. If you wish to comment on the Draft Plan, please use the Form that is available at the following link

<https://breckland.govocal.com/>

Please note: You will be able to browse public documents but in order to make representations on the Draft Local Plan you will need to Register or verify your email. This helps to ensure that you are the actual owner of the email address.

You will then be asked to fill out a profile page and make some choices about how we may contact you. Please note: these questions are not mandatory, however it is really useful for us to know who our consultations are reaching and helps us to ensure we are meeting the requirements of consultation and the Council's Statement of Community Involvement.

Please note that all representations must be received by 23:59 on December 15 2025.

All comments will be considered as part of the process of preparing the next version of the Local Plan, known as the 'Pre-Submission' or 'Regulation 19' version. This will be subject to further consultation in 2026.

Breckland Council
Elizabeth House, Walpole Loke, Dereham, Norfolk, NR19 1EE



@Breckland Council



breckland-council

www.breckland.gov.uk



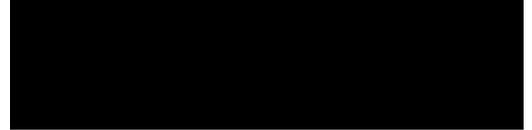
Defence Infrastructure Organisation

Christopher Waldron



Your reference:
Regulation 18 Consultation (Preferred Options)
Our reference:
10053389

Mobile:



E-mail:

Planning Policy Team
Breckland District Council
Elizabeth House
Walpole Loke
Dereham
Norfolk
NR19 1EE

15th December 2025

Dear Sir/Madam

I write to confirm the statutory safeguarding position of the Ministry of Defence (MOD) in relation to Breckland Council's local plan regulation 18 preferred options consultation document.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate.

For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other parts of the MOD.

Paragraph 102 of the National Planning Policy Framework (December 2024) requires that planning policies and decisions take into account defence requirements by '*ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.*' Statutory consultation of the MOD occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued to Local Planning Authorities by the Ministry of Housing, Communities & Local Government (MHCLG) in accordance with the provisions of that Direction.

Copies of these relevant plans, in both GIS shapefile and .pdf format are issued to Local Planning Authorities by MHCLG. An assurance review was conducted by the MOD in 2023 which confirmed that, at that time, Local Planning Authorities held the most recent relevant safeguarding data. Any subsequent updates to those plans were then issued by MHCLG. If there is a requirement for replacement data, a request can be made through the above email address.

The Breckland Council's local plan options consultation authority area both contains and is washed over by safeguarding zones that are designated to preserve the operation and capability of defence assets and sites including RAF Marham, RAF Lakenheath, RAF Mildenhall, East 2 WAM Network and RAF Honington.

Should any Ministry of Defence operational site or asset cease to be operational and/or no longer require the benefit of a designated Statutory Safeguarding Zone, the MOD will notify MHCLG to initiate the withdrawal of those plans.

The review or drafting of planning policy provides an opportunity to better inform developers of the statutory requirement that MOD is consulted on development that triggers the criteria set out on Safeguarding Plans, and the constraints that might be applied to development as a result of the requirement to ensure defence capability and operations are not adversely affected.

New development may have detrimental impacts depending on site location relative to safeguarded sites and assets

To provide an illustration of the various issues that might be fundamental to MOD assessment carried out in response to statutory consultation, a brief summary of the relevant safeguarding zone is provided below. Depending on the statutory safeguarding zone within which a site allocation or proposed development falls, different considerations will apply.

- The airspace above and surrounding aerodromes is safeguarded to ensure that development does not form a physical obstruction to the safe operation of aircraft using that aerodrome. Within designated zones proposed development that exceeds given trigger heights necessitates that statutory consultation of the MOD takes place. This consultation allows the MOD to carry out assessment of development and to understand how the height of development would impact on the protected airspace above and surrounding an aerodrome and whether any form of mitigation is necessary or viable. These zones also indicate areas where development, by virtue of its height, scale, massing, or external materials might reduce the capability or otherwise compromise the operation of technical assets such as communications, navigation, or surveillance systems including radar. In addition to permanent physical development within these zones, the use of cranes, piling rigs or other tall plant or equipment to implement development may also be of concern.
- Birdstrike safeguarding zones with a radius of 12.87km are designated around certain military aerodromes. Aircraft within these zones are most likely to be approaching or departing aerodromes and therefore being at critical stages of flight. These statutory consultation zones are designed to allow birdstrike risk created by or increased by proposed development to be identified and mitigated. The creation of environments attractive to those large and flocking bird species that pose a hazard to aviation safety can have a significant effect. This can include landscaping schemes associated with large developments, as well as the creation of new waterbodies such as ponds, wetlands and/or attenuation basins. This would also include both on and off-site provision of Biodiversity Net Gain (BNG). The creation of open water, whether permanent and temporary, may provide a range of habitats for wildlife, including potentially increasing the creation of attractant environments for large and flocking bird species hazardous to aviation and therefore may be subject to design requirements or for management plans to be applied.
- Statutory safeguarding zones are designated around Military explosives storage sites, to ensure that development and land uses will be compatible with MOD capability. Within these zones, where applicable, requirements relating to the siting, design, and construction of buildings, or changes to land use may apply. In principle, the MOD does not object to land in the outer explosives safeguarding zone being developed for residential, commercial, and industrial land use purposes. Any buildings within this zone must be 'non-vulnerable' to blast effects, that is of robust construction, so should an explosive event occur, the structure would not collapse or sustain damage that could cause critical injury to the occupants. Of particular concern within this zone are tall buildings (in excess of 3 storeys), light weight construction and large areas of glazing. The MOD will object to development proposals which support people living, working and congregating within the inner explosives safeguarding zone.

- Finally, those technical assets that facilitate air traffic management, primarily radar, navigation, and communications systems are safeguarded to limit the impact of development on their capability and operation. The height, massing and materials used to finish a development may all be factors in assessing the impact of a given scheme. Developments that incorporate renewable energy systems may be of particular concern given their potential to introduce large expanses of metal or electromagnetic interference, which may be a particular issue where solar PV systems are developed, or moving surfaces which may be visible to and detectable by radar systems such as the blades of a wind turbine.

In addition to the safeguarding zones identified, the MOD may also have an interest where development is of a type likely to have any impact on operational capability. Usually this will be by virtue of the scale, height, or other physical property of a development. Examples these types of development include, but are not limited to:

- Any development that would exceed a height of 50m above ground level. Both tall (of or exceeding a height of 50m above ground level) structures and wind turbine development introduce physical obstacles to low flying aircraft.
- Development, regardless of height, outside MOD safeguarding zones but in the vicinity of military training estate or property.

Within policy ENV 03: Improving Biodiversity section on Biodiversity net gain (BNG), the MOD note the proposed intention for the final drafted local plan to include or be informed by BNG. The MOD request that; when drafting policy and guidance which addresses biodiversity, ecology, and BNG; Breckland Council bear in mind that some forms of environmental improvement or enhancement may not be compatible with aviation safety. Where off-site provision is to provide BNG, the locations of both the host development and any other site should both/all be assessed against statutory safeguarding zones and MOD consulted where any element falls within the marked statutory safeguarding zone.

The MOD notes the provision within INF 04: Renewable Energy Development for the potential support for the generation of energy from renewable sources.

The MOD has, in principle, no objection to any renewable energy development, though some infrastructure enabling renewable energy production, for example wind turbine generators can, by virtue of their physical dimensions and properties, impact upon military aviation activities, cause obstruction to protected critical airspace surrounding military aerodromes, or impede the operation of safeguarded defence technical installations.

Where turbines are erected in line of sight to defence radars and other types of defence technical installations, the rotating motion of their blades can degrade and cause interference to the effective operation of these types of installations potentially resulting in detriment to aviation safety and operational capability. This potential is recognised in the Government's online Planning Practice Guidance which contains, within the Renewable and Low Carbon Energy section, specific guidance that both developers and Local Planning Authorities should consult the MOD where a proposed turbine has a tip height of, or exceeding 11m, and/or has a rotor diameter of, or exceeding 2m.

Solar PV development can compromise the operation of communications and other technical assets by introducing substantial areas of metal that degrade signals and, depending on the location of development, may produce glint and glare to the detriment of aviation safety.

Additionally, it may be necessary in certain circumstances for MOD to require the removal of permitted development rights, where the use of these rights introduces elements that would not be compatible with MOD safeguarding requirements.

The MOD recommend any emerging policy provides a broad representation of MOD interests, and to ensure prospective developers are aware of the implications of developing within an area containing MOD safeguarded zones, policy wording that makes clear that only those applications for development which would not compromise, restrict or otherwise degrade the operational capability of safeguarded MOD sites and/or assets will be supported.

A number of the sites allocated in the Breckland Council's local plan regulation 18 Preferred Options fall within statutory safeguarding zones. For your convenience, please find a table at Appendix A which provides a summary of the safeguarding criteria that would apply to those potential development sites identified. MOD recommend that any more detailed policies for these sites include wording which indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets. The table below provides a summary of those sites and the triggers for statutory safeguarding consultation that would apply:

I trust this clearly explains our position on this update. Please do not hesitate to contact me should you wish to consider these points further.

Yours sincerely



Chris Waldron
DIO Assistant Safeguarding Manager

Appendix A

POTENTIAL SITE ALLOCATION REF	SAFEGUARDING ZONE(S) AFFECTED	DEVELOPMENT TRIGGERING STATUTORY SAFEGUARDING CRITERIA
Swaffham SUE (072)	RAF Marham (height, and birdstrike safeguarding zones)	<ul style="list-style-type: none"> Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily
Swaffham SUE (073)	RAF Marham (height, and birdstrike safeguarding zones)	<ul style="list-style-type: none"> Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily
Swaffham SUE (074)	RAF Marham (height, and birdstrike safeguarding zones)	<ul style="list-style-type: none"> Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an

		environment attractive to hazardous bird species to be formed temporarily
Swaffham SUE (075)	RAF Marham (height, and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.
SWA 2 (195)	RAF Marham (height, and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily
SWA 3 (179)	RAF Marham (height, and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement, • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.
Kingsfleet Grove SUE (079)	RAF Lakenheath (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.
NEC 1 (005)	RAF Marham (height safeguarding zone)	<ul style="list-style-type: none"> • Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement.
NEC 2 (302)	RAF Marham (height safeguarding zone)	<ul style="list-style-type: none"> • Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement.
MUN 1 (361)	RAF Lakenheath (height safeguarding zone)	<ul style="list-style-type: none"> • Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement.
MUN 2 (360)	RAF Lakenheath (height and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.

NAR 1 (105)	RAF Marham (height, technical and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement. • Development of any structure with elevations clad or partly clad in metallic type materials or roofing clad or partly clad in metallic type materials will trigger statutory consultation. • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.
NAR 2 (103):	RAF Marham (height, technical and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement. • Development of any structure with elevations clad or partly clad in metallic type materials or roofing clad or partly clad in metallic type materials will trigger statutory consultation. • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.
SPL 1 (370):	RAF Marham (height, and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Development of, or exceeding, 45.7m in height above ground level will trigger statutory consultation requirement. • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily
SPL 2 (146):	RAF Marham (height, and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily
SWA-EMP 1	RAF Marham (height, and birdstrike safeguarding zones)	<ul style="list-style-type: none"> • Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily



Defence
Infrastructure
Organisation



United Kingdom

Telephone [MOD]: [REDACTED]

E-mail: [REDACTED]

Breckland District Council
Planning Department - Policy
Elizabeth House
Walpole Loke
Dereham
Norfolk
NR19 1EE

12 December
2025

By E-Mail only

Dear Sir or Madam,

**BRECKLAND LOCAL PLAN FULL UPDATE
PREFERRED OPTIONS (REGULATION 18) - DECEMBER 2025
REPRESENTATIONS ON BEHALF OF THE MINISTRY OF DEFENCE**

The Defence Infrastructure Organisation (DIO), on behalf of the Ministry of Defence (MOD), welcomes the opportunity to comment on the Breckland Local Plan Preferred Options document. The DIO manages the Defence Estate on behalf of the MOD.

The largest Ministry of Defence land holding within Breckland is the Stanford training area and ranges. The military training area of Stanford forms part of the distinctive Breckland landscape region and has been in use since 1942 when a battle training area was required during the second world war. There is a continuing need for military training and operations on the Stanford training estate and at other defence sites within Breckland. Please note that the site of Robertson Barracks, an MOD disposal site, is the subject of separate representations to this consultation.

MOD Specific Policy for Inclusion in the Local Plan

The DIO made representations to the Regulation 18 Local Plan Issues and Options Development Strategy consultation dated 16 February 2024 and to the Regulation 18 Preferred Options consultation dated 11 July 2024; seeking the inclusion of a defence

specific policy within the Plan to support the ongoing military training and operations within the district.

It was noted in the MOD's last representations that in the Breckland Draft Issues and Options Consultation Feedback Report May 2024 (page 256) the Councils 'Planning Policy Comments' in response to the original MOD representations is: "*Comment noted – the Council will consider inclusion of such a policy.*" However there was no mention in the Preferred Options Local Plan that went out for consultation in July 2024, nor in the current Preferred Options consultation version of the Plan; of the military operations in Breckland (apart from with respect to the disposal site of Robertson Barracks) and no such defence policy has been included.

The MOD welcomes the opportunity to work closely with Planning Authorities in the development of policies and strategies within the Development Plan. In line with the National Planning Policy Framework (NPPF) it is important that planning authorities and development plans recognise that MOD Establishments are of strategic military importance to the UK. It is important that Planning Authorities consult with the MOD during the preparation of their plans and take into account the need to safeguard operational sites.

To support the ongoing military training and operations within the district it is considered that the inclusion of a specific policy in the Local Plan to recognise these requirements would be beneficial and accord with national planning policy.

Paragraph 102 of the National Planning Policy Framework (December 2024) states that planning policies and decisions should promote public safety and take into account wider security and defence requirements including by '*b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.*'

The importance of operational capability is recognised by virtue that the MOD are exempt from action under the Environmental Protection Act for noise nuisance. In addition, paragraph 200 of the NPPF and the 'agent of change' principle protects MOD's continuing and future military needs of operational sites from any unreasonable restrictions being places on it as a result of development permitted after it was established.

It is important that the MOD estate is considered within the new Local Plan for two principal reasons, firstly, ongoing operational defence needs and secondly, to protect operational defence land from being affected adversely from third party development proposed in the area.

Proposed Policy Wording

1. Proposals associated with defence and military operations will be supported in principle at existing sites within Breckland where they would enhance or sustain operational capabilities.
2. Non-military or non-defence related development within or in the areas around a defence or military site will not be supported where it would adversely affect military operations or capability, unless it can be demonstrated that there is no longer a defence or military need for the site.

The authority is invited to consider examples of similar policies within adopted Plans at West Berkshire, Central Lincolnshire, Cheshire West and Chester, Northumberland, West Suffolk and Wiltshire. A copy of these policies is included as Appendix 1.

Kingsfleet SUE Thetford (ref. 079)

It is noted that the proposed Sustainable Urban Extension to the northeast of Thetford will abut land within MOD ownership. This land forms an active part of the Stanford Training Estate and is used for live firing.

The MOD is concerned that the construction of new dwellings close to the training area where live firing takes place could restrict operational activities. The MOD is currently subject to restrictions on land known as the 'STANTA North Extension' where the number of training days per year is limited, live firing is prohibited, restrictions apply to nighttime and weekend training, and there are exclusions on training within approximately 300 metres of a privately owned dwelling.

Given this experience the MOD would request that a buffer is provided to the active training estate land that lies immediately east of the proposed Kingsfleet SUE to protect its interests in accordance with national planning policy. This provides an example of exactly why an MOD specific policy is required in the Local Plan.

The MOD would welcome further consultation on the next stages of the Local Plan review and any work to masterplan the SUE should the proposal be confirmed and form part of the adopted Local Plan; to ensure that a suitable buffer is provided to protect MOD operational interests.

Please do not hesitate to contact me should you have any queries on the above or require further details.

Yours faithfully

Christine Ide
Senior Town Planner
Estates

From: [REDACTED]
To: [Planning Policy Team](#)
Subject: 20251212-Breckland Local Plan Update (Preferred Options Reg 18 Consultation)-Ministry of Defence Representations.
Attachments: [MOD Reg 18 Reprs Dec 25 Appendix 1 - Examples of adopted military establishment planning policies.docx](#);20251209-Breckland LP Reprs-O.docx;
Sent: 12/12/2025 11:42:36

You don't often get email from [REDACTED] [Learn why this is important](#)

Dear Sir or Madam

On behalf of the Ministry of Defence please find attached representations to the current Regulation 18 Breckland Local Plan Consultation which ends on Monday 15 December 2025.

I trust that these are self-explanatory however please do not hesitate to contact me should you have any queries or require further details.

I would be grateful if you could please acknowledge receipt of this email and attachments.

Thanks very much.

Regards
Christine

Christine Ide | Senior Town Planner BA (Hons) MRTPI | **Town Planning Team**

Ministry of Defence | National Armaments Director Group | Strategy & Plans Estates Division

St George's House | Defence Infrastructure Organisation Head Office |

DMS Whittington | Lichfield | Staffordshire | WS14 9PY

MOD Mobile: [REDACTED]

MS Teams: [REDACTED]

Email: [REDACTED]

Working days: Tuesday, Wednesday and Thursday

 National Armaments Director Group
One Group • Many Strengths • Single Mission

West Berkshire Local Plan Review (document currently awaiting final presentation version, but has been adopted).

Local Plan Review 2023-2041 version for adoption June 2025	

Local Plan Review 2023-2041 version for adoption June 2025

Policy DM33**RAF Welford and Denison Barracks**

Development within the site boundary of RAF Welford and/or Denison Barracks will be supported where it directly sustains the functioning of these defence establishments.

Development in the areas around RAF Welford and/or Denison Barracks will not be supported where it would adversely affect the defence related operation or capability of these sites and/or the safety and wellbeing of those within the relevant statutory safeguarding zones.

Supporting Text

12.14 RAF Welford and Denison Barracks provide important outputs that support national defence activities. The NPPF outlines that planning policies and decisions should recognise and support development required for operational defence and security purposes.

12.15 National policy also seeks to ensure that operational sites are not affected adversely by the impact of other development proposed in the area and that existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established.

12.16 RAF Welford is safeguarded due to its capacity as a military explosive storage area and as such it has statutory safeguarding zones to ensure that development and land uses will be compatible with MOD capability. The inner and outer safeguarding zones ⁽⁵²⁾are defined on the Policies Map and within the safeguarded area of RAF Welford the MOD is a statutory consultee under the provisions of the Town and Country Planning (safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2022 (DfT/ODPM Circular 01/2003).

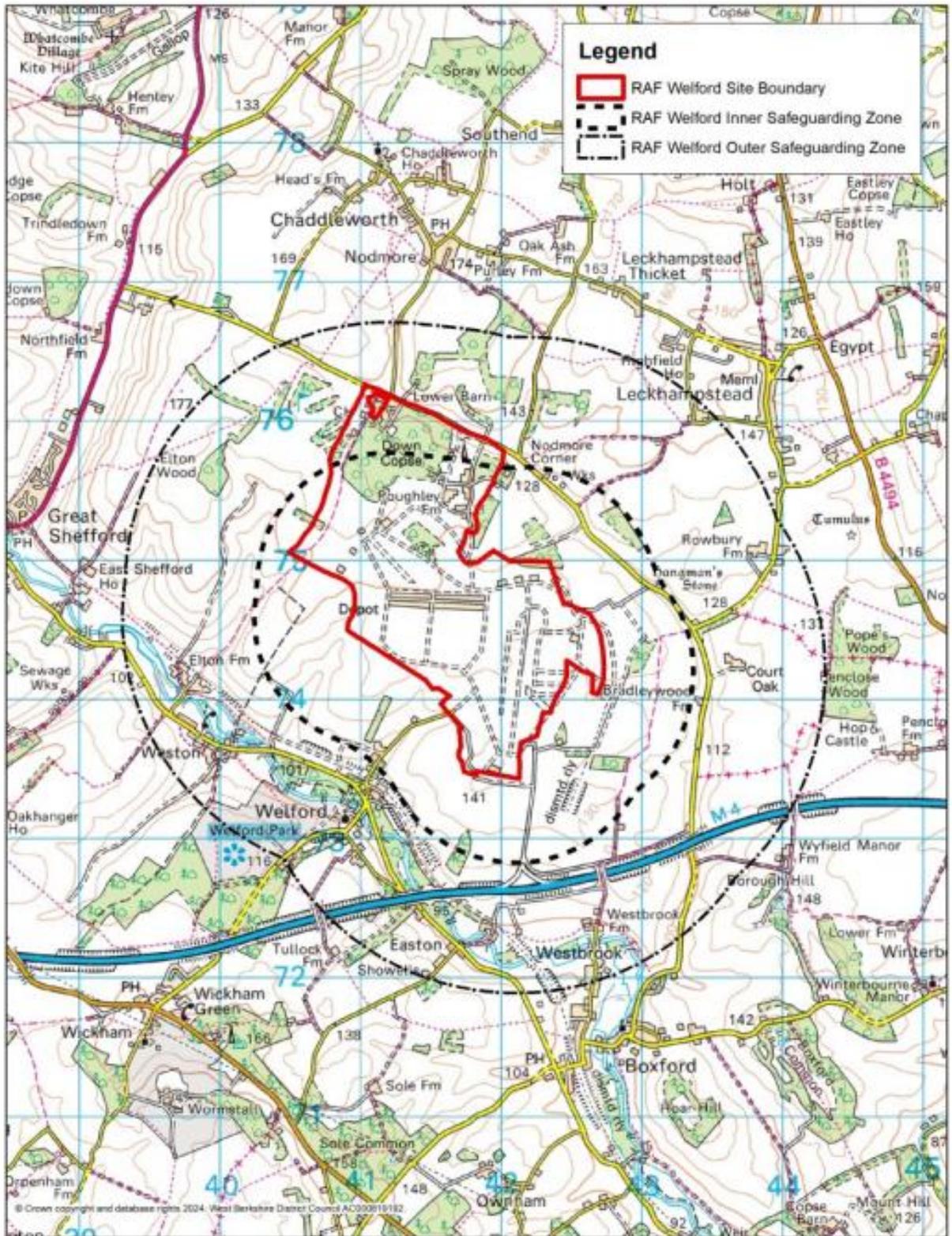
12.17 The MOD will object to development proposals which support people living, working, or congregating within the inner safeguarding zone of RAF Welford. In principle, the MOD does not object to land in the outer safeguarding zone being developed for residential, commercial and/or industrial land use purposes. However, within this zone, where applicable, requirements relating to the siting, design and construction of buildings, or changes to land use may apply.

12.18 Whilst Denison Barracks in Hermitage does not have safeguarding zones around the site, consideration should be given to the impact of development proposals on the operation and capability of the site as a defence establishment and the local planning authority will consult with Denison Barracks and/or MOD as appropriate.

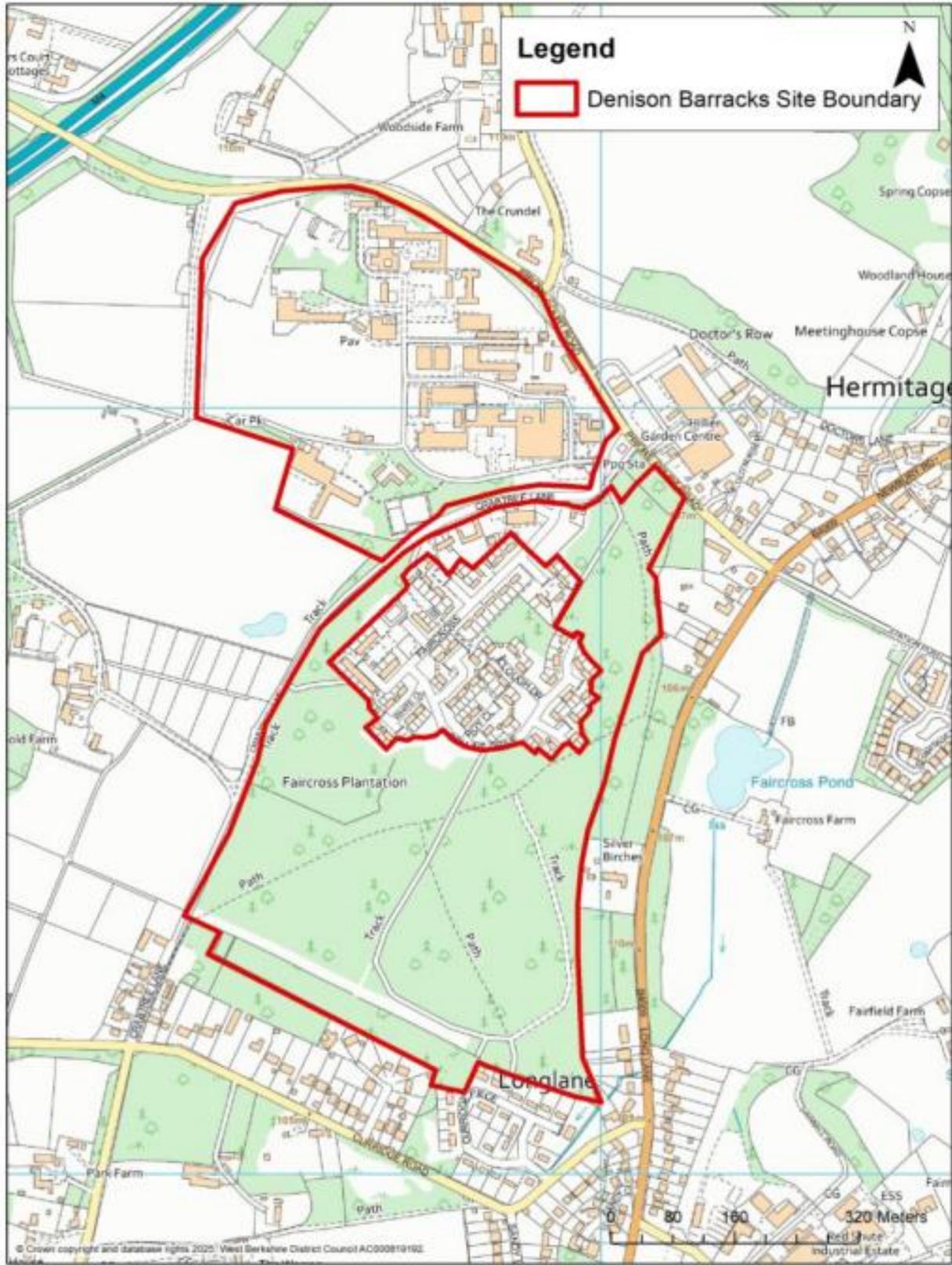
52 The extent of the safeguarding zones shown on the Policies Map could change before the Plan is updated or superseded. Policy DM33 will be applied to the latest version of the RAF Welford safeguarding zones as determined by the MOD

Local Plan Review 2023-2041 version for adoption June 2025

RAF Welford



Denison Barracks



CENTRAL LINCOLNSHIRE

Local Plan



Adopted
April 2017



Central Lincolnshire 2012
LOCAL PLAN 2036

Development Sites

- c. Must have sufficient space for vehicle manoeuvring and parking within the site; and
- d. Should provide an acceptable standard of amenity for the site's occupants, and will not have an unacceptable impact on the amenity of nearby residents (in accordance with Policy LP26); and
- e. Should be adequately serviced, or capable of being adequately serviced, preferably by mains connections; and
- f. For non-allocated sites, should be located within reasonable travelling distance to both primary health care facilities and schools, preferably by walking, cycling or public transport. An exception to this may be allowed in the case of Travelling Showpeople, where there is a need to locate the development close to the primary road network: in such event, access to primary health care and schools should still be achievable.

Ministry of Defence Establishments

10.3.12 The Ministry of Defence (MOD) is one of the largest land owners in the UK, with an estate consisting of a wide range of facilities such as barracks, depots and airfields. Large areas of Central Lincolnshire have been used for MOD purposes throughout the last century and the military presence has brought, and continues to bring, many benefits, particularly to the economy.

10.3.13 The MOD is committed to making the most efficient use of its existing estate by:

- Maximising the utilisation of sites;
- Identifying sites which can be released, particularly high value sites; and
- Consolidating on fewer, larger sites where resources can be better deployed.

10.3.14 The re-use of MOD sites which are, or are known to be shortly, surplus to MOD operational purposes presents a significant opportunity for new housing, economic development and/or regeneration. The following policy will assist in considering the determination of such proposals. However, the policy also acknowledges that there may be some MOD land and assets that are isolated in the countryside, or only adjacent to hamlets or small settlements. In such circumstances, redevelopment as a significant civilian community may not be suitable or follow the principles of sustainable development, and could conflict with the spatial strategy of the plan set by LP2.

Policy LP57: Ministry of Defence Establishments

Development related to operational purposes

Defence related development within or adjoining an operational MOD site that is required for operational purposes will be supported in principle.

Development of MOD land and assets surplus to Defence requirements

The redevelopment or change of use of currently or recently operational MOD land and facilities which are, or are known to shortly become, surplus to MOD requirements, whether for the whole or part of the MOD landholding in that area, will be supported provided that:

- a. Where feasible the majority of the proposal is on brownfield land;
- b. Any increase in traffic likely to arise as a result of the development can be safely accommodated on the local road infrastructure;

- c. The proposal would not conflict with the existing land uses on neighbouring land;
- d. In cases where large scale redevelopment of a site is planned, a comprehensive masterplan is prepared and agreed to ensure the holistic planning of the site and avoid piecemeal development.

Where the proposal is to create a civilian community, proposals must also:

- include appropriate infrastructure and community facilities; and
- demonstrate that the new community can access higher level services (such as jobs, leisure, retail and culture) either within the development or at other nearby settlement(s) by sustainable modes of travel; and
- set out the extent of any increase in population compared with the previous use of the site, and where the increase in population is significant the presumption will be against such proposals unless it accords with the overall spatial strategy and settlement hierarchy in Policy LP2.

Further to policy LP16, an Unexploded Ordnance Certificate and Land Quality Assessment (LQA) may be required (where relevant) as part of a proposal, or required through condition to a grant of permission, in order to assess and identify the necessary remedial action for defence specific contaminants.

Cheshire West & Chester Council

Local Plan

(Part Two) Land Allocations
and Detailed Policies



Visit: cheshirewestandchester.gov.uk



Cheshire West
and Chester

Residential development must be directly related to uses on the health park. Other forms of residential development will only be supported where;

13. it is in accordance with the above criteria;
14. it is demonstrated that the land is surplus to medical requirements; and
15. it would support improvements to operational services, as part of a comprehensive approach to new development within the health park.

Explanation

7.9 Local Plan (Part One) policy [STRAT 9](#) recognises that the Countess of Chester Health Park was previously identified as a major developed site in the Green Belt. The Council will continue to work with the NHS Trust to understand future development needs on the site for medical purposes. This is to ensure that the site remains capable of meeting modern health care needs, whilst respecting the Green Belt location. The Countess of Chester has identified a key challenge for the future will be to modernise the existing hospital estate to offer both acute and preventative care and meet the increased demographic demands placed on particular departments, such as the Accident and Emergency service and responding to the needs of an ageing population.

7.10 Where necessary and justified, a development brief will be prepared for the site to ensure that a comprehensive approach is taken towards new development within the health park. Any surplus land should be retained for medical or related purposes to ensure that new development would not undermine the long term role of the health park. The NHS have identified the need for residential training opportunities, together with specific types of residential development such as step-down beds, directly related to the health care facilities and to support future service provision. The policy gives priority to residential uses that are directly related to and necessary to support uses on the health park. Other forms of residential development may be considered as part of a comprehensive redevelopment plan for the site, where it is clearly demonstrated the land is surplus to future health care needs and the development could support operational improvements in the quality or range of services provided.

Policy GBC 1.C

Dale Barracks

Development proposals in connection with the operational use of the site as a military base will be supported where they are in line with Local Plan (Part Two) policy GBC 1. In addition, in the event of any part of the land becoming surplus to military activities, partial or complete redevelopment proposals should be comprehensively planned in line with an agreed development brief which meets all of the following:

1. is compatible with any retained military uses within or adjacent the site;

2. sets out the appropriate scale, layout, type of uses and phasing of development within the site including the buildings for retention or redevelopment;
3. retains existing residential properties and is compatible with residential amenity;
4. any new residential development includes a mix of housing types, tenure and sizes, including affordable housing;
5. retains existing community facilities and uses within the site where appropriate;
6. retains and where necessary enhances open space, sport and recreation facilities in line with Local Plan (Part Two) policies DM 35 and DM 36;
7. retains and where possible enhances landscaping within the site taking account of site topography and landscape character of the site and it's surroundings;
8. is in line with policy DM 48;
9. maintains and enhances links to surrounding ecological networks and green infrastructure;
10. considers potential transport impacts in combination with surrounding developments and makes provision for suitable highways/access arrangements;
11. makes appropriate infrastructure provision, including water supply and capacity and drainage.

Explanation

7.11 The Dale Barracks is an operational military base to the north of Chester. The Ministry of Defence is reviewing its national land and property portfolio to enhance the quality and performance of the defence estate. It is aimed at utilising the estate as efficiently as possible and improving military capability. A Better Defence Estate (2016) sets out the long term strategic approach towards the future of the estate to 2040. It identifies (a) sites that will be subject to further investment to optimise their military use and (b) sites that are surplus to military requirements and likely to be disposed. The Dale Barracks site, Chester was included within the announcement as a potential site for future disposal. This policy is therefore necessary to (i) support continuing existing military operations on the site and (ii) to provide a framework for the potential long term use of the site, in the context of national and local planning policy. It enables a planned approach to retain important existing uses/facilities and ensure infrastructure provision is appropriate to the types of future development on the site. A development brief/masterplan for the site will be prepared in partnership with the Council and other key stakeholders.

7.12 There are a wide range of buildings and facilities within and around the site, used in connection with the military use. This includes medical and dental facilities, sports facilities, community centre and welfare areas, local shops, service family accommodation and some market housing. The operational site is situated in the grounds of Moston Hall (built 1789) and some of the associated parkland/gardens remains. There is also extensive landscaping and open space within the site. Where appropriate, community uses, landscaping and open space should be retained and where possible enhanced, particularly where they contribute towards the openness of the greenbelt.

7.13 Outside of the operational boundary there are residential properties some of which are privately owned. The policy seeks to protect residential amenity for these properties, together with neighbouring and future occupiers. This part of the site should be considered in the context of the wider masterplan.



Northumberland
County Council

Adopted March 2022

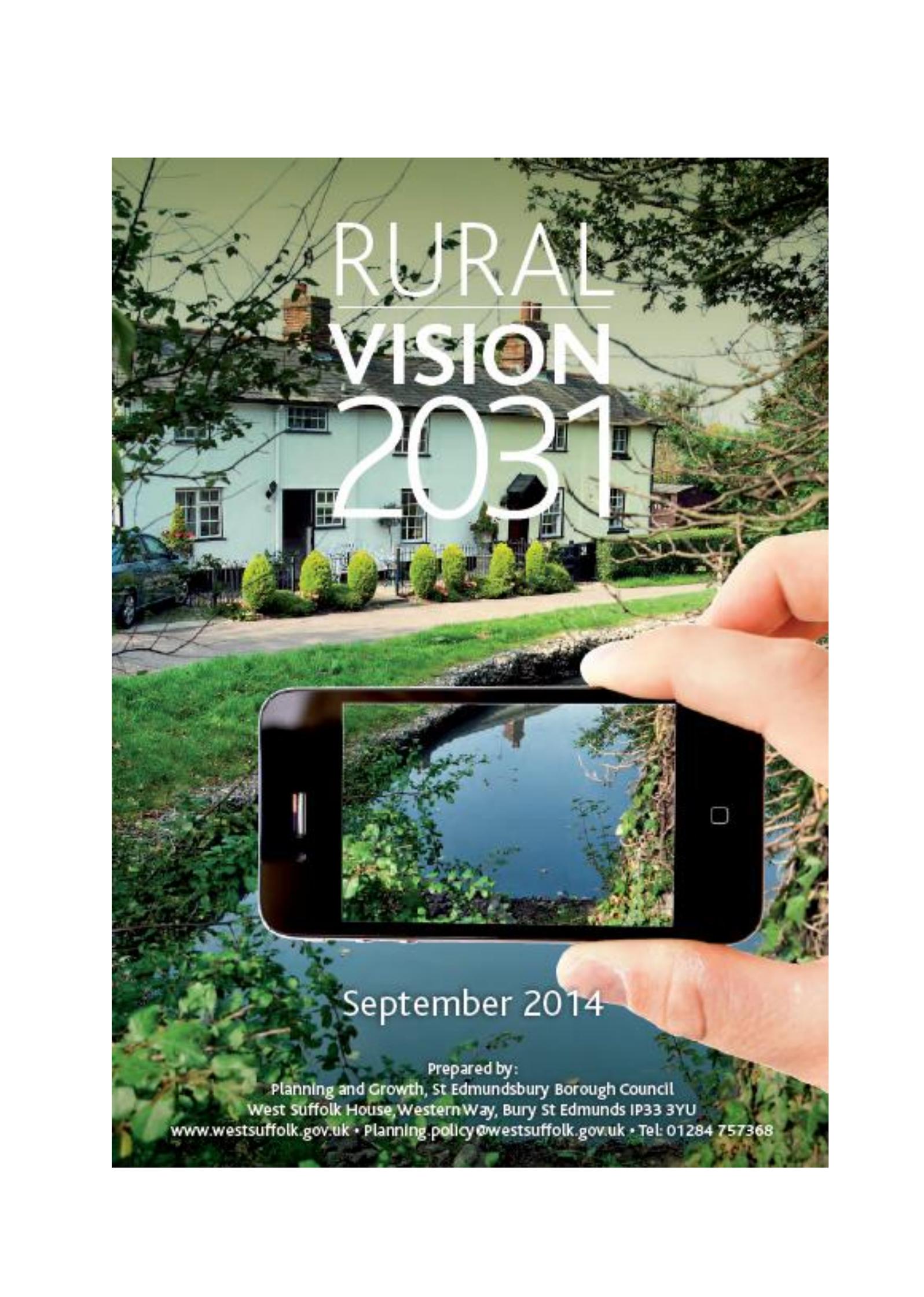


Northumberland Local Plan 2016 - 2036

Policy ECN 17

Military establishments

1. Subject to national Green Belt policy, proposals associated with defence and military operations will be supported at existing sites where they would enhance or sustain operational capabilities.
2. Non-military or non-defence related development within or in the areas around a defence or military site will not be supported where it would adversely affect military operations or capability, unless it can be demonstrated that there is no longer a defence or military need for the site.
3. Subject to national Green Belt policy, proposals for the redevelopment, conversion and re-use of redundant defence sites will be supported.
4. Proposals for both military and defence related development and the redevelopment of redundant defence sites should:
 - a. Be sympathetic to the character of the site and its surrounding area and where possible, retain and enhance areas for wildlife, green space and landscaping; and
 - b. Provide mitigation in terms of any adverse effects on local infrastructure arising from the proposal.
5. A masterplan should be prepared in liaison with the Local Planning Authority where major redevelopment on existing defence sites for military or defence purposes is proposed or where the development of redundant sites for alternative uses is proposed.



RURAL VISION 2031

September 2014

Prepared by:
Planning and Growth, St Edmundsbury Borough Council
West Suffolk House, Western Way, Bury St Edmunds IP33 3YU
www.westsuffolk.gov.uk • Planning.policy@westsuffolk.gov.uk • Tel: 01284 757368

Policies on protection of special uses

- 10.12 There are some existing government land uses in the rural areas which need to be protected and afforded the opportunity to expand, due to the special circumstances under which they operate. These are the military and prison uses at Barnham Camp, RAF Honington and HMP Highpoint, Stradishall. RAF Honington and Barnham Camp lie within a designated 1500m Breckland Special Protection Area (SPA) buffer zone which is identified in Core Strategy Policy CS2. The aim of the buffer zone is to ensure the protection of Annex 1 bird species and the part of Breckland Special Area of Conservation (SAC) being within Barnham Camp. Strategic landscaping for military sites should also be encouraged which will help to contribute to the Breckland Green Infrastructure action zones within the council's Green Infrastructure Study (2009). The policy below safeguards these special uses and seeks to protect and mitigate against any potential impact on the SPA and SAC.

POLICY RV5: PROTECTION OF SPECIAL USES

Special circumstances apply for military and prison establishments and in the areas listed below, and as identified on the Policies Map, proposals for operational development will be considered favourably, taking into account existing constraints and statutory guidelines and in accordance with the Core Strategy and Development Management Development Plan Documents (DPD).

- a. Barnham Camp
- b. RAF Honington
- c. HMP Highpoint North and South

Proposals for operational development at Barnham Camp and RAF Honington will need to take particular account of issues relating to the protection of Breckland Special Protection Area (SPA) and Breckland Special Area of Conservation (SAC). Evidence will need to be provided, alongside any proposals for development, that there will be no adverse impact on the SPA, SAC or its constituent features.

Aspiration 5

NEW TECHNOLOGY AND DIGITAL SERVICES ENABLES BUSINESSES TO THRIVE IN RURAL LOCATIONS.

- 10.13 Information technology represents the best hope of stimulating the rural economy because it enables businesses to be located in rural areas. Although much effort has gone into ensuring good broadband coverage, and recent surveys of rural areas suggest that broadband coverage is better than it used to be, broadband is so important to

rural businesses and communities that its continued improvement remains a priority. The broadband infrastructure is being upgraded in both towns and is slowly extending to the rural areas.

10.14 The action to achieve the aspiration is:

- a. Investigate the opportunities offered by new technologies and faster broadband.



Wiltshire Local
Development
Framework



Wiltshire Core Strategy

Adopted January 2015

Core Policy 36

Economic regeneration

Regeneration of brownfield sites will be supported in the Principal Settlements, Market Towns and Local Service Centres where the proposed uses help to deliver the overall strategy for that settlement, as identified in Core Policy 1 (Settlement Strategy) and in any future community-led plans, including neighbourhood plans, and/or enhance the vitality and viability of the town centre by introducing a range of active uses that complement the existing town centre.

Core Policy 37: Military establishments

6.21 Large areas of Wiltshire have been used by the military for training purposes throughout the last century. The presence of the military has brought many benefits, particularly to the environment and the economy. In recent years there has been a



rationalisation of operational facilities and establishments. The MoD has significant assets across Wiltshire and there is a need to plan for important changes to existing facilities and address the challenge of finding appropriate re-use for redundant facilities.

6.22 The re-use of any significant redundant MoD sites will be determined through masterplans, developed with the local planning authority in conjunction with the local community, in order to ensure the holistic planning of a site or sites in a locality, rather than piecemeal development. Significant sites are those that would be classed as major development. The preparation of the masterplan should normally occur in advance of site disposal by the MoD. Due to the rural nature of many MoD sites consideration should also be given to:

- the location of sites in terms of accessibility
- the suitability for conversion and retention of existing buildings

- infrastructure capacity including impacts on transportation routes
- retaining areas of biodiversity, appropriate green space and landscaping measures
- consolidation of the buildings on a site and reversion of land to open countryside.

6.23 Applications for the development of operational facilities which conflict with other policies in the Core Strategy must be accompanied by a reasoned justification as to why the development should nonetheless be considered suitable²⁵. During the plan period, provision of new housing on MoD land to accommodate military personnel, including service family accommodation and other operational facilities, will be required as a result of the Army Rebasing on Salisbury Plain (Army 2020)²⁶. A single masterplan should be developed with the council, including front-loaded consultation and partnership working with the local community and other stakeholders. The masterplan should address these requirements and ensure that infrastructure needs arising from the proposed development are an integral part of any planned development in accordance with Core Policy 37, as well as other policy requirements within the plan.

Core Policy 37

Military establishments

New development and changes of use at operational facilities that help enhance or sustain their operational capability will be supported.

Redevelopment, conversion or change of use of redundant MoD sites and buildings will be supported provided they are well related to an existing settlement in terms of both location and scale. Sites that are remote from settlements should only be considered where the existing buildings and infrastructure on the site are suitable for redevelopment, conversion or change of use. Redevelopment proposals will not exceed the existing building footprint and floorspace unless they are well located to an existing settlement. The focus will be on employment-led development and other uses should be determined through a masterplanning approach with the local community.

Development at operational or redundant sites should enhance the overall character of the site. All development at operational or redundant sites should mitigate any adverse impacts on local infrastructure, and not erode the character

of the surrounding area. All proposals must ensure that the cultural and historical significance of the military facilities located on the site are understood and inform the scope of future development of that site.

Core Policy 38: Retail and leisure

Enhancing the vitality and viability of town centres

6.24 The Core Strategy seeks to enhance the vitality and viability of the town centres in Wiltshire through policies promoting the regeneration of central areas and delivery of new growth at settlements to support the vitality of centres. There is a



challenge to ensure that the larger towns of Wiltshire, particularly the Principal Settlements of Chippenham, Salisbury and Trowbridge, strengthen their roles as shopping destinations to reduce the 'leakage' of trade to other larger competing centres such as Bath, Swindon and Southampton.

6.25 In line with government policy town centres, as well as primary and secondary retail frontages, should be identified on the policies map, with policies making clear which uses will be permitted in such locations. The larger centres of Chippenham, Salisbury and Trowbridge, and the Market Towns of Amesbury, Bradford on Avon, Calne, Corsham, Cricklade, Devizes, Malmesbury, Marlborough, Melksham, Warminster, Westbury and Royal Wootton Bassett, have designated frontages and corresponding policies in the relevant District/Local Plans, and these designations and policies will be carried forward. The relevant policies are as follows:

- Kennet Local Plan: Policies ED17 (Town centre development), ED18 (Prime shopping areas), ED19 (Devizes and Marlborough town centres) and ED20 (Retail development in Devizes town centre).



Our Ref: MV/ 15B901605

08 December 2025



Breckland Council
LocalPlan@breckland.gov.uk
via email only

Dear Sir / Madam

**Draft Local Plan – Full Update Preferred Options (Regulation 18) Consultation
October – December 2025
Representations on behalf of National Gas Transmission**

National Gas Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Gas Transmission

National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK’s four gas distribution networks where pressure is reduced for public use.

Proposed sites crossed by or in close proximity to National Gas Transmission Assets

Following a review of the above document we have identified one or more proposed development sites as being crossed or in close proximity to National Gas Transmission assets.

Details of the sites affecting National Gas Transmission assets are provided below.

Development Plan Document Site Reference	Asset Description
Kingsfleet Grove SUE (079)	Gas Transmission Pipeline, route: ROUDHAM HEATH TO GREAT WILBRAHAM
ROC 2 (064): South of Bell Road	Gas Transmission Pipeline, route: BACTON TO ROUDHAM HEATH

A plan showing details of the site locations and details of National Gas Transmission’s assets is attached to this letter. Please note that the plan is illustrative only.

Without appropriate acknowledgement of the National Gas Transmission assets present within the site, these policies should not be considered effective as they cannot be delivered as proposed; unencumbered by the constraints posed by the presence of National Gas Transmission infrastructure.



We propose modifications to the above site allocations and/or policies to include wording to the following effect:

Kingsfleet Grove SUE (079)

“Development Proposals Must:

n) include a strategy for responding to the National Gas Transmission high-pressure gas pipeline present within the site which demonstrates how the National Gas Transmission Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design.”

Proposal ROC 2 (064): South of Bell Road

“Development Proposals Must:

l) include a strategy for responding to the National Gas Transmission high-pressure gas pipeline adjoining the site which demonstrates how the National Gas Transmission Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design.”

Please see attached information outlining guidance on development close to National Gas Transmission infrastructure. National Gas Transmission also provides information in relation to its assets at the website below.

- <https://www.nationalgas.com/land-and-assets/network-route-maps>

Utilities Design Guidance

The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Gas Transmission infrastructure.

National Gas Transmission advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around underground gas transmission pipelines and other National Gas Transmission assets.

Further Advice

National Gas Transmission is happy to provide advice and guidance to the Council concerning their networks.

Please see attached information outlining further guidance on development close to National Gas Transmission assets. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

██
██

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Gas Transmission wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Gas Transmission on any Development Plan Document (DPD) or site-specific proposals that could affect National Gas Transmission's assets.

We would be grateful if you could add our details shown below to your consultation database, if they are not already included:

Matt Verlander, Director

[Redacted]

[Redacted]

Kam Liddar, Asset Protection Lead

[Redacted]

[Redacted]

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

[Redacted]

**Matt Verlander MRTPI
Director**

[Redacted]

For and on behalf of Avison Young

National Gas Transmission is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Gas Transmission's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Gas Transmission have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Gas Transmission's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

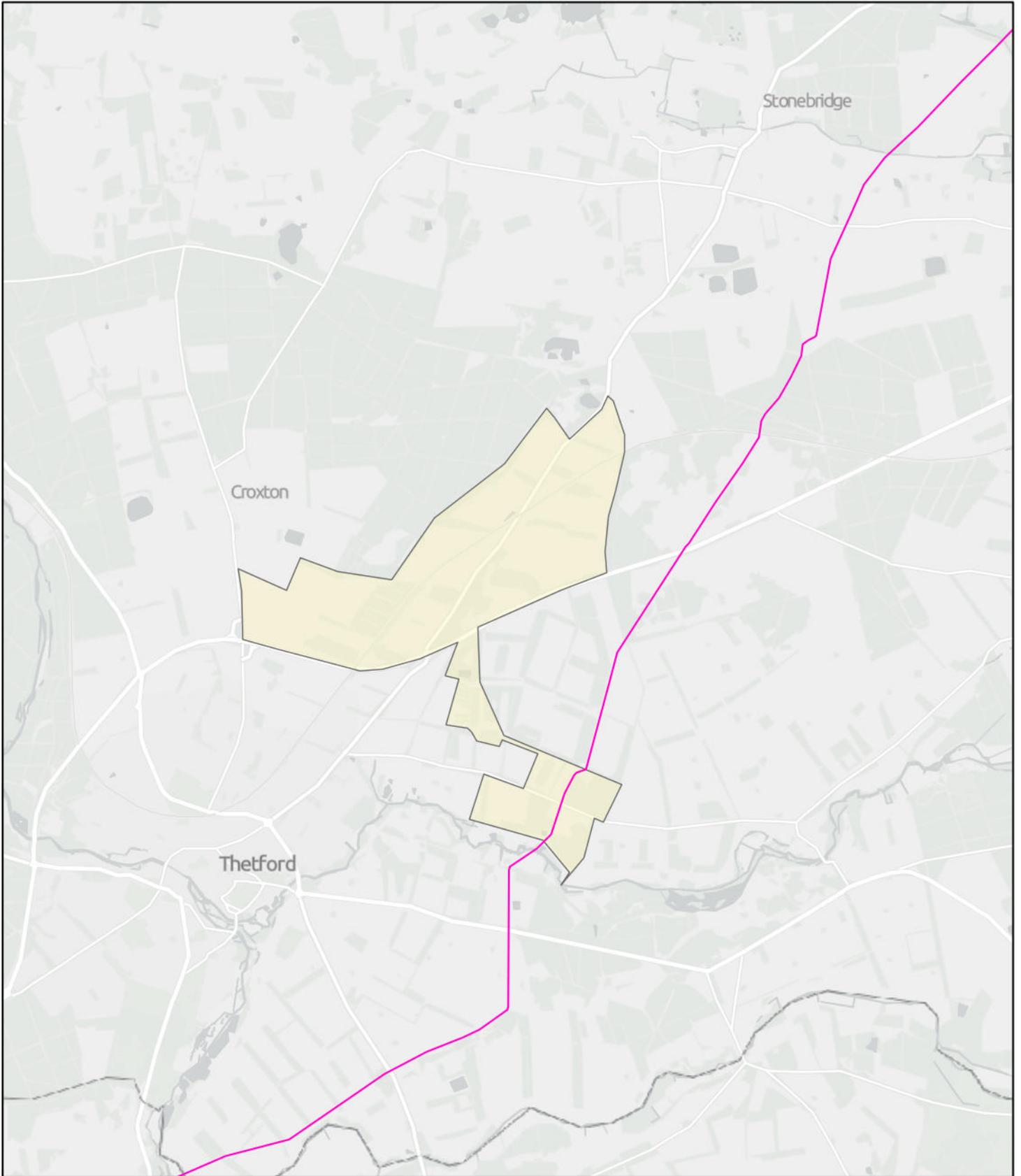
National Gas Transmission's '*Guidelines when working near National Gas Transmission assets*' can be downloaded here: <https://www.nationalgas.com/document/82951/download>

How to contact National Gas Transmission

If you require any further information in relation to the above and/or if you would like to check if National Gas Transmission's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

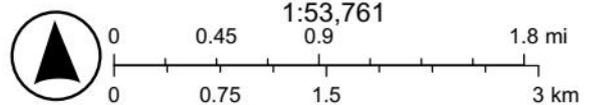
For local planning policy queries, please contact: nationalgas.uk@avisonyoung.com

Kingsfleet Grove SUE (079)



08/12/2025, 09:51:05

-  Gas Pipe
-  Development Sites



Contains OS data © Crown Copyright and database right 2025
Contains data from OS Zoomstack

From: [National Gas](#)
To: [Local Plan](#)
Subject: RE: Breckland Local Plan: Regulation 18 Consultation
Attachments: [08-12 National Gas.pdf](#); [ROC 064 South of Bell Road.pdf](#); [Kingsfleet Grove SUE.pdf](#);
Sent: 08/12/2025 10:11:52

Dear Sir / Madam

On behalf of our client National Gas Transmission please see the attached letter of representation in respect of the current consultation.

If you have any queries please contact [REDACTED]

Kind Regards
Tom

Tom Wignall
Planner

[REDACTED]

From: Local Plan <LocalPlan@breckland.gov.uk>
Sent: 03 November 2025 11:28
To: Local Plan <LocalPlan@breckland.gov.uk>
Subject: Breckland Local Plan: Regulation 18 Consultation

CAUTION: External Sender

Breckland Local Plan: Regulation 18 Consultation (Preferred Options)

The Council is carrying out a public consultation on the Draft Plan from Friday 31 October 2025 until 23:59 on Monday 15th December 2025. This stage of the local plan (known as Regulation 18) sets out the Council's draft policies and growth strategy and is an important stage in the plan-making process. It provides an early opportunity for our communities, businesses, landowners, developers, partners and stakeholders to 'have a say' and comment on the draft Local Plan before it is considered further and then finalised for the next (Regulation 19) stage. Consultation will also take place at the Regulation 19 stage.

Documents can be viewed at the link below

<https://www.breckland.gov.uk/local-plan-2025>

Consultation events

The Council is committed to ongoing engagement with communities. In addition to making the Plan publicly available via the council's website the Council will be holding a number of drop-in events where the Plan can be seen and where Council Officers will be available to explain it and discuss matters.

Information on the dates and times of public events are available on the website

We are keen for local people to tell us their views, and we would therefore encourage you to get involved and have your say on this draft version of the Plan. If you wish to comment on the Draft Plan, please use the Form that is available at the following link

<https://breckland.govocal.com/>

Please note: You will be able to browse public documents but in order to make representations on the Draft Local Plan you will need to Register or verify your email. This helps to ensure that you are the actual owner of the email address.

You will then be asked to fill out a profile page and make some choices about how we may contact you. Please note: these questions are not mandatory, however it is really useful for us to know who our consultations are

reaching and helps us to ensure we are meeting the requirements of consultation and the Council's Statement of Community Involvement.

Please note that all representations must be received by 23:59 on December 15 2025.

All comments will be considered as part of the process of preparing the next version of the Local Plan, known as the 'Pre-Submission' or 'Regulation 19' version. This will be subject to further consultation in 2026.

Breckland Council
Elizabeth House, Walpole Loke, Dereham, Norfolk, NR19 1EE



@Breckland Council

in

breckland-council

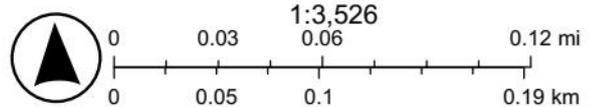
www.breckland.gov.uk

ROC 2 (064): South of Bell Road



08/12/2025, 09:55:17

-  Gas Pipe
-  Development Sites





Norfolk County Council

Norfolk County Council Comments on Breckland Council's: Local Plan – Full Update, Preferred Options (Regulation 18), October 2025 – Updated Comments

27 January 2026

1. Introduction

- 1.1. Thank you for consulting Norfolk County Council on the Draft Local Plan – Full Update, Preferred Options (Regulation 18), October 2025. These officer level comments have been submitted following consultation with the Executive Member for Highways, Infrastructure and Transport.
- 1.2. Norfolk County Council (NCC) welcomes the opportunity to comment Draft Local Plan. NCC has not sought to comment on all sections of the document, but has instead focused on the key strategic issues and, in particular, those that affect the Authority in respect of its role as:
 - Infrastructure provider for services such as Education, Libraries and Fire and Rescue – ensuring that adequate provision is made for the infrastructure that is necessary to support planned growth.
 - Highways Authority – ensuring the delivery of safe, sustainable and integrated transport across Norfolk, maintaining the highway in a condition that safe and usable for all users.
 - Minerals and Waste Authority – ensuring that the Council Council's policies and projects are appropriate reflects and not compromised.
 - Landowner – ensuring that suitable land within the County Council's ownership is allocated to support the district's obligations for sustainable growth.
- 1.3. Unless otherwise stated, where amendments to policies are sought, or further evidence requirements identified, NCC considers that these changes, or evidence is necessary to ensure that Plan can be deemed sound and suitable for submission.
- 1.4. Notwithstanding any changes, or further evidence sought, NCC remains committed to supporting Breckland in the preparation of its Local Plan. To this end, NCC welcomes the opportunity to continue to work with Breckland District Council to address the issues identified.

2. Key Strategic Issues

Breckland's Strategic Vision

- 2.1. NCC welcomes the positive vision for the district for Breckland set out within the plan. In particular NCC welcomes the references to development being:

“directed to locations that are co-ordinated with transport provision, have good access to supporting services, community facilities and open space.”

and the commitment to:

“delivering planned growth and the infrastructure required to support development so that communities can grow in a sustainable and cohesive manner.”

- 2.2. In NCC's view, it is essential that these key principles of the vision are consistently applied in the drafting of the plans policies, and in establishing its choice of allocations. This will help ensure that the plan contributes to the achievement of sustainable development.

GEN 02: Parish Hierarchy and Spatial Development Strategy

- 2.3. Overall NCC supports Breckland's proposal to direct most of the planned growth to Strategic Development Areas (SDA), Sustainable Urban Extensions (SUE) and its Market Towns, whilst also providing for appropriate growth in smaller rural settlements at a scale which is consistent with their relative access to services, facilities and employment opportunities.
- 2.4. NCC does however have concerns that, as currently drafted, not all policies of the draft plan, and in particular those that relate to the SDAs, ensure that the plan will effectively contribute to or enable the achievement of sustainable development as required by national policy. Nor on the basis of current policy and accompanying evidence can it currently conclude that the SDA policies will result in development that has good access to supportive services, community facilities or, overall, the infrastructure required for those communities to grow in a sustainable and cohesive manner as expected in the Plan's vision for Breckland.
- 2.5. As such, revisions are required to the policies of the draft plan so that the Spatial Development Strategy ensures that sufficient provision is made for, amongst other things, transport infrastructure and community facilities. In certain cases, amendments to policies will also need to be supported by further evidence, which adequately demonstrates that the sites can effectively deliver development which is sustainable.
- 2.6. NCC provides further details on the policy revisions and further evidence required to ensure the plan is “sound” in subsequent sections.

HOU 05: Development Viability

- 2.7. Norfolk County Council welcomes the local plan's approach to a transparent and open assessment to viability, and the clear statement that the Council will seek to refuse applications to vary the terms of an agreed S106 within the first five years of a permission. NCC does however object to the proposal to prioritise the delivery of affordable housing above all other potential contributions where viability issues arise.
- 2.8. Whilst affordable housing is clearly a very important development contribution, so are other infrastructure necessary to ensure that "*communities can grow in a sustainable and cohesive manner*" as expected within Breckland's vision for the district. Such infrastructure will include (where applicable) contributions to education and transport.
- 2.9. As set out in the National Planning Policy Framework (NPPF), the purpose of the planning system is to contribute to the achievement of sustainable development, this requires not only the provision of homes and commercial development but also the necessary supporting infrastructure to ensure development is achieved in a sustainable manner. In respect of Education, paragraph 100 of the NPPF expects local planning authorities to take a proactive, positive and collaborative approach to planning for education, giving great weight to the need to create, expand or alter early years, schools and post-16 facilities through the preparation of plans and decisions on applications. In respect of transport, paragraph 109 the NPPF clearly expects the planning system to, amongst other things, actively manage patterns of growth to address the impacts of development on the transport network. Paragraph 115 expecting that the assessment of sites for development ensures that any significant impact from a development on the transport network, or on highway safety, can be cost effectively mitigated to an acceptable degree.
- 2.10. The policy's blanket prioritisation of affordable housing over other forms of contribution is inconsistent with the delivery of sustainable development. This is because it unjustifiably restricts the ability of decision makers to reach a balanced decision, which is best placed to improve the economic, social and environmental conditions – including through the provision of appropriate community (e.g. education) and transport infrastructure.
- 2.11. NCC's concern in this regard is compounded by the heavy reliance of the plan on strategic scale allocations, which are likely to have significant abnormal infrastructure costs. NCC could not establish that such abnormal costs have currently been assessed in the Council's published viability evidence. The Council also has concerns about the scale of S106 costs that have been assessed within the Council's viability assessment, and whether the reference sites considered can be considered to be typical of what is likely to be required in development. Further commentary on the Council's viability appraisal is included in the Council's comments on Policy INF 06: Development Contributions.

INF 06: Developer Contributions

- 2.12. NCC welcomes the policy's positive intent to secure infrastructure and the acknowledgement of County Council standards. However, In NCCs view further clarifying text should be added to INF06. In particular, NCC feels that it would be beneficial to clearly set out in the policy that it is the responsibility of the applicant to set out the particular circumstances that justify the need for a viability assessment at the application stage, explaining why the situation differs from that assessed in the plan. This is particularly relevant for allocated sites where it is the responsibility of the site promoter to engage in plan making to ensure proposals for development are policy compliant. NCC would also welcome reference being added to the start of the policy which states that: *"development will not be permitted where it would result in significant negative effects on the capacity of existing services, facilities and infrastructure"*.
- 2.13. The reference to County Council Planning Obligation Standards is also welcomed. NCC does however consider that the policy should be clear that education contributions include contributions to mainstream and SEND education facilities and the provision of home to school transport contributions. It is important that policy requirements are clear so they can be accurately accounted in the price paid for land, and so that site promoters can ensure proposals for development are policy compliant. NCC notes that the significant growth proposed in rural villages is likely to result in significant, in-perpetuity, demands on home to school transport provisions and this should be adequately provided for within the policy.
- 2.14. NCC notes the decision to exclude rural exception sites from contributions. NCC could not identify the rationale for this in the policy's supporting text. However, NCC anticipates this is based on the viability issues identified with 100% affordable housing sites in the Council's viability report. NCC is concerned however that without wider contributions that exception sites might not benefit from the range of supporting services and infrastructure required to ensure sustainable development, particularly in lower order settlements. In order to balance this risk, NCC would recommend narrowing the range of settlements identified as suitable for meeting Breckland wide affordable housing needs in Policy HOU 07, this could be limited for example to only Market Towns and Key Service Parishes. This narrowing would help ensure that exception sites, which cannot sustain planning obligation contributions are focused in the most sustainable settlements.
- 2.15. In respect of the Viability Assessment undertaken to support the plan. NCC is unclear about whether the reviewed planning applications used to estimate typical S106 costs, which are largely smaller sites, have incorporated the costs of SEND provision, early years, home to school transport and active travel measures, as they are likely to occur in the allocated and future developments sites. Nor is it clear that the £4,500 reasonable reflection of likely S106 costs, particularly for larger sites. Indeed, the two, non-retirement, 100+ home schemes both exceed this threshold, with one exceeding it by over 100%. NCC

is therefore concerned that the viability assessment may not accurately reflect the likely S106 costs associated with the allocated development sites and allow for an appropriate assessment of whether it is appropriate to include additional policy standards. Underestimation of S106 costs at the plan making stage increases the risk of the need for further viability assessment, and a reduction in planned contributions at the planning application stage. This is of a particular concern given the proposed blanket prioritisation given to affordable housing under policy HOU 5.

- 2.16. The updated IDP published as part of the evidence for the plan is welcomed. However, as referenced in the plan this document still appears to require further updating. As such it does not yet provide a full evidence base for the Local Plan, which, set out the anticipated funding from developer contributions, how these contributions will be used and how the Local Planning Authority intend to address any funding shortfalls to ensure the delivery of infrastructure throughout the plan period.
- 2.17. NCC would welcome engagement across all County Council services, in the updating of the IDP. This will ensure that matters relating to transport, education, public health, social care, cultural/community, green infrastructure, biodiversity and flood risk, which are referenced as infrastructure categories are adequately considered. NCC would welcome further engagement in the refinement and completion of the IDP. It is also important that policy INF06 reflects the breadth of infrastructure where contributions may be required, to ensure comprehensive planning and avoid gaps in service provision, or if contributions will not be sought to specific infrastructure how Breckland intends to achieve the delivery of infrastructure required to support growth.
- 2.18. Finally, the IDP's ranking system (critical/essential/desirable) should be carefully applied to County Council services. Many of these services are foundational to sustainable development. At the very least Education, Transport and Flood Risk management infrastructure should be considered essential in any IDP. This will ensure that this is an appropriate basis for securing contributions during the development management stage.

Strategic Development Areas

SDA 1: Frans Green, East Tuddenham

- 2.19. As drafted, SDA1 appears to propose a major, 2,000 home, residential estate in a location with limited existing services and weak sustainable transport options. Whilst it is possible that a large new village in this location could be a sustainable form of development, SDA1, and its supporting evidence, does not yet demonstrate how 2,000 homes in this location can be delivered as a coherent, connected community supported by appropriate levels of infrastructure and services.
- 2.20. National policy expects large sites to be shaped by a clear settlement structure, a strong movement framework and the early coordination of infrastructure. These elements are not currently sufficiently evidenced. As shown on the policies map, the proposed allocation site itself doesn't appear to cover a coherent area that ensures that there will be the potential for linkages to infrastructure such as Wood Lane, or connections back through Hockering. Consideration should be given to working with local landowners to identify whether a more coherent land allocation can be achieved, this will avoid the need for compromises in the quality of the design, or effective functionality of the new settlement.
- 2.21. It is notable that outside of the other SDAs, the scale of development proposed here is not seen other than as a sustainable urban extension (SUE) to one of the district's market towns. The nearest settlement to the allocation is Hockering, which is identified only as a secondary parish. It is therefore clear, that a range of additional or expanded services, facilities and infrastructure are likely to be needed if this proposed allocation is to be made acceptable in planning terms.
- 2.22. Another central concern is the absence of a credible access and movement strategy. Development of this scale should seek to maximise opportunities for walking, cycling and public transport usage. Safe and direct links to Hockering are likely to be particularly important to ensure early access to existing facilities, including primary school provision, in the early phases of development and future access from Hockering to new services and facilities within the new development once delivered. Consideration should be given to how the neighbouring allocations in Hockering can be combined with this SDA to improve such links. Without confirmed public transport provision, strategic active-travel routes, or clear connections to local services, the scheme risks being unduly car-dependent.
- 2.23. Good large-scale planning also requires infrastructure to guide the form of development. Education capacity (including mainstream SEND), early years provision, health services, utilities upgrades, and community facilities are all key considerations at the plan-making stage and will need to be integrated into the overall structure of the site. The current policy wording does not currently resolve these matters. This creates uncertainty about the long-term vision for the delivery of this substantial development, the infrastructure required to

support it, whether there is a reasonable prospect such a development can viably be achieved and the long-term functionality of the settlement.

- 2.24. In addition, successful new communities need a legible layout, accessible public spaces and green corridors that support everyday activity and local identity.
- 2.25. On this basis, significant revisions will be needed to the policy so that it includes sufficient detail to provide clarity to developers, local communities and other interested parties about the nature and scale of development. This further detail should, amongst other things, establish the design principles for this allocation and addresses the provision of infrastructure and community facilities, safeguarding land as necessary.
- 2.26. In order to demonstrate that there is a reasonable prospect that this site can be delivered in accordance with such an appropriately detailed policy it is important for Breckland to add significant further detail to its infrastructure delivery statement, this should set out the anticipated funding from developer contributions, how these contributions will be used and how the Local Planning Authority intend to address any funding shortfalls so that it is able to demonstrate that infrastructure requirements are not beyond what could reasonably be considered to be achievable within the planned timescales. Consideration should also be given to the potential impact of strategic infrastructure proposals on this site. Options for a revised Norwich Western Link are currently being explored by the County Council, some of which may impact on SDA 1 and vice versa. Whilst this does not mean that the proposed allocation should not proceed, it will be important that there is a continued dialogue to understand the opportunities and avoid conflicts between the two.
- 2.27. In addition to the further work required on the infrastructure delivery plan, NCC considers that further viability work needs to be undertaken in respect of the Strategic Development Allocations. NCC has not been able to identify any viability assessment other than the Local Plan Viability Testing, September 2025 by CP Viability Ltd. As far as NCC has been able to establish, the maximum scale of development considered is 500 homes, which clearly does not relate to a new village scale development of circa 2,000 homes in a relatively isolated position, where there are likely to be significant abnormal costs.
- 2.28. NCC does not consider that it can conclude the proposed allocation is likely to result in an appropriate form of development until further work is undertaken to demonstrate the site can operate as a sustainable, well-connected and properly serviced new community.
- 2.29. Separate appendices are provided containing the individual highway and education comments in respect of this site.

SDA 2: Barkers Farm Larling and SDA 3: Roudham & Larling

- 2.30. As currently drafted, the policies of the Breckland Local Plan set out two completely separate and unrelated policies for either side of the A11. As written they appear to propose substantial and isolated residential housing estates that relate poorly to existing services and facilities. Such development, taken forwards separately, would be contrary to the the principles of sustainable development as set out in the National Planning Policy Framework (NPPF), are inconsistent with the policies of Norfolk County Council's Local Transport Plan (LTP) and are incompatible with the vision and objectives set out within Breckland's own Draft Local Plan. As such, NCC cannot see how the current proposals could be found "Sound" when looked at as two separate allocations.
- 2.31. However, it is possible that a single allocation, covering both sites, may provide the basis for the delivery of a sustainable development which incorporates requirements for, and enables the delivery of an appropriate range of services, facilities and supporting infrastructure.
- 2.32. In this regard, NCC notes that the "Breckland Infrastructure Delivery Plan – Breckland Local Pan Update – Regulation 18, 2025" includes reference to the landowners being encouraged to work together, alongside acknowledgement that higher order services including a health care centre and primary and secondary schools may be required.
- 2.33. The achievement of sustainable development in this location is likely to be strongly linked to the concurrent, coherent and coordinated development of both sites. As such, NCC considers that Breckland needs to go beyond encouraging the developers to work together and set out a single policy for the development across both identified sites. Given the substantial significance of this allocation, it is of critical importance that sufficient detail is included within the policy to provide clarity to developers, local communities and other interested parties about the nature and scale of development. This further detail should, amongst other things, establish the design principles for this allocation and addresses the provision of infrastructure and community facilities, safeguarding land as necessary.
- 2.34. In order to demonstrate that there is a reasonable prospect that this site can be delivered in accordance with an appropriately detailed policy it is important for Breckland to add significant further detail to its infrastructure delivery statement, this should set out the anticipated funding from developer contributions, how these contributions will be used and how the Local Planning Authority intend to address any funding shortfalls so that it is able to demonstrate that infrastructure requirements are not beyond what could reasonably be considered to be achievable within the planned timescales.
- 2.35. In addition to the further work required on the infrastructure delivery plan, NCC considers that further viability work needs to be undertaken in respect of the Strategic Development Area Allocations. NCC has not been able to identify any viability assessment other than the Local Plan Viability Testing,

September 2025 by CP Viability Ltd. NCC is concerned about whether the S106 costs assessed here accurately reflect what is typical for larger sites, where more mitigations or contributions are likely to be required. As far as NCC has been able to establish that maximum scale of development considered is 500 homes, which clearly does not relate to a new settlement scale development of circa 6,000 homes. It is understood, however, that this will be dealt with through a “stage two” viability assessment, which is welcomed.

2.36. Separate appendices are provided containing the individual highway and education comments in respect of this site.

2.37. Should you have any queries with the above comments please contact Paul Harris at [REDACTED].

3. **Highway Authority**

3.1. Thank you for consulting Norfolk County Council Highways on this stage of the Breckland Local Plan. Highway comments are included on a spreadsheet that forms appendix A to this response.

3.2. Should you have any queries with the above comments please contact Richard Doleman (Principal Infrastructure Development Planner) at [REDACTED].

4. **Children’s Services**

4.1. Thank you for consulting Children’s Services on this stage of the Breckland Local Plan. Education comment are included in the spreadsheet that forms appendix B to this response.

4.2. Should you have any queries with the above comments please contact Paul Harker (Place Planning Manager) at [REDACTED].

5. **Natural Environment**

5.1. **Ecology:**

5.2. Policy: ENV 03: Improving Biodiversity, p208-209, states:

“An ecological assessment will be required for all major applications and any proposals that fall within ecologically sensitive areas, e.g. SSSIs, SPAs, SACs and areas impacted by these” (p209 of plan).

Suggested change – include following insert:

An ecological assessment “...in the form of an HRA...” will be required for all major applications...

5.3. In addition, the plan currently states:

*“Locally defined ecological networks will be identified in the Norfolk Local Nature Recovery Strategy (LNRS) which is **currently being** prepared by Norfolk County Council, and these will be the focus for the delivery of offsite and landscape scale biodiversity net gain” (p209 of plan).*

Suggested change - replace with:

*“...**which has been** ...”, [as the LNRS is now available].*

- 5.3.1. Should you have any queries with the above comments please contact the Natural Environment Team at [REDACTED]

6. **Lead Local Flood Authority**

- 6.1. Thank you for your consultation on the above submission, received on 04 November 2025. We have reviewed the submitted information and have the following comments to make.
- 6.2. In section 4.16, the paragraph has not identified the key flood risk principle in NPPF which is to ensure there is no increase in flood risk onsite or elsewhere from the proposed development. The LLFA requests that this principle is included in section 4.16.
- 6.3. In GEN 01 there is no mention of not increasing flood risk due to development and the focus of the GEN 01 is on water quality. Therefore, the preceding text in section 4.16 does not interlink with the Gen 01 - Design and Sustainable Development. The LLFA requests that not increasing or even reducing flood risk is mentioned in the policy.
- 6.4. In HOU 02, the wording on page 73 the LLFA is supportive of the need for developers to demonstrate discussions with the LLFA have taken place. However, it does imply that developers do not need to consider flood risk in other areas. The LLFA requests the wording in amended to reflect that surface water and flood risk management measures should be considered to be implemented as appropriate on all proposed development but that additional consideration is required on sites in the listed locations.
- 6.5. In ENV 01 there appears to be some formatting issues that need to be addressed to ensure point e. on flood risk and drainage is more readily identified. The LLFA also acknowledges the promotion of water saving in new properties but notes there is no mention or consideration of rainwater capture and re-use. In a water stressed area it would be appropriate to request developers consider the opportunities for rainwater capture and reuse. Further consideration is requested.
- 6.6. In the Green Blue Infrastructure section, there is no interlinking of potential opportunities from the proposed sustainable drainage (SuDS) scheme that would be sought in accordance with paragraph 182 of NPPF. However, in ENV 02 there

is a brief mention of "natural SuDS features". It is also noted that there is no mention of the potential that Green Blue features can provide in the managing and reducing of existing flood risk. The LLFA request that further discussion in the preceding text and consideration is undertaken.

- 6.7. In section 8.112 and in the Policy ENV 11, the LLFA notes the LPA reference consulting the Environment Agency in relation to flood risk for major development sites. However, there is no mention of the LLFA as a statutory consultee in relation to consultation on flood risk, even though in section 11.16 the LPA acknowledge the LLFA's role more accurately. The LLFA reminds the LPA that in relation to local sources of flood risk, such as surface water, the LLFA is the lead, while the Environment Agency leads on strategic flood risk such as designated main rivers and the sea. The points a. to f. listed in the flood risk section of ENV 11, predominately relate to the management of surface water runoff. Therefore, the LLFA would need to be consulted.
- 6.8. In relation to 8.113, the LLFA notes the emphasis is on reducing flood risk from development. The LLFA takes the opportunity to remind the LPA that NPPF requires that there is no increase in flood risk and that where possible the existing flood risk is reduced.
- 6.9. Furthermore, in section 8.112, the LPA states that "All SuDs features should be designed in accordance with Ciria SuDs Manual" rather than referring the applicant to the LLFA's Developer Guidance. Please be reminded the LLFA is a Statutory Consultee and that in accordance with NPPF paragraph 182 (a) developers in their design of sustainable drainage systems "should take account of advice from the Lead Local Flood Authority". This guidance has been given considerable weight in previous appeal considerations by the Planning Inspectorate and it would be appropriate for the Local Plan to reference the LLFA Developer Guidance that is freely available on our webpages. Therefore, the LLFA request that direct reference to the LLFA Developer Guidance is provided.
- 6.10. The LLFA notes that in section 8.130, the LPA propose that new allotments are included in for developments of 100 or more properties. The LLFA encourages that a sustainable non-potable water is included that could potentially use surface water runoff to support the Allotments.
- 6.11. Section 11.14 states "*All new development should be located so as to minimise flood risk resulting from that development and cumulatively from other development in the vicinity.*"
- 6.12. The LPA has not correctly reflected national planning policy which requires that proposed development does not increase flood risk on site or elsewhere (paragraphs 170, 171 and 181). Therefore, the first sentence of this section of

the LPA will need to be corrected to be consistent with national policy.

- 6.13. The LLFA suggests that text relating to the high level description of groundwater flooding in section 11.15. The LLFA suggests the LPA review section 8.4 in the LLFA's Developer Guidance to better understand the groundwater flooding mechanisms in order to better reflect them in the local plan text.
- 6.14. In relation to section 11.16, the LPA has not correctly described the LLFA's role in relation to development and flood risk. The LLFA is a statutory consultee to planning and provides responses to inform the local planning authority in their decision making process as to whether a proposed development is in accordance with national, local and relevant guidance. Therefore, while the LLFA provides technical advice to the LPA about flood risk and surface water management on developments, it is the responsibility of the LPA to manage "the take up of sustainable drainage systems". The LLFA recommend that the LPA amend and correct this section as appropriate.
- 6.15. In relation to section 11.17, it should be noted by the LPA that the Water Cycle Study is not listed in NPPF as a source for strategic policies in relation to flood risk and planning. Therefore, the LLFA suggests the emphasis of the text in the local plan should be on the SFRA and SWMP rather than the Water Cycle Study.
- 6.16. In section 11.18 the LPA has indicated that the drainage systems are important to the form and visual appearance of the proposed development. However, the LPA have not mentioned the use of sustainable drainage systems (SuDS). The LPA then goes on to state that "Where necessary the Council will seek to impose Grampian conditions to ensure that appropriate upgrades are completed to the sewerage network in advance of new development taking place." This implies the LPA is not using the discharge hierarchy appropriately as discharging surface water into a sewer network is the lowest ranked discharge option. Further consideration and improvements to this section of text are recommended.
- 6.17. In section 11.19, the LPA should note that Swales are a conveyance feature rather than a storage feature. In addition, there should be better reference to the four pillars of SuDS (water quantity, water quality, biodiversity and amenity) as described in paragraph 182 of NPPF.
- 6.18. In INF 03 b), the LLFA note that more emphasis could be placed on the need for sustainable surface water drainage rather than just surface water drainage.
- 6.19. In INF 03 d) please note that greenfield is all one word. Furthermore, please note that NPPF is clear that there should be no increase in flood risk from any source either on site or elsewhere. At present the wording in d) and e) are focused on surface water rather than all sources of flood risk. The wording should be amended to reflect national policy and address all sources of flood risk. The wording in INF 03 focuses on the defined fluvial flood zones to identify the areas

of high and medium risk. The LLFA reminds the LPA that the surface water flood risk mapping is also available and identifies areas of high and medium areas of flood risk. The LLFA advises the LPA that there is a difference in the definition of high and medium surface water flood risk and the flood risk zones. For example, Flood Zone 3 is up to the 1% AEP event (1 in 100 year event), while the high surface water flood risk extent is for the 3.33% AEP event (or 1 in 30 year event). Therefore, the high risk surface water event has the equivalent probability as the functional floodplain (Flood Zone 3b). While Flood Zone 3a that is also high risk of fluvial flooding has the 1% AEP event (1 in 100 year event) which is equivalent to the medium flood risk for surface water. These differences and inconsistencies in national policy can cause a lack of clarity for local plans and policies and should be taken into consideration when preparing local policies to ensure that flood risk from all sources is managed consistently.

- 6.20. There are a couple of typos within the text of the paragraph starting "Enhancement opportunities" in INF 03. This includes a reference to "de converting" which is assumed to be de-culverting. In relation to culverting the LLFA reminds the LPA that consents are likely to be needed from the Environment Agency, LLFA or IDB, and, depending on the river classification, will vary the risk management authority involved and the consents required.
- 6.21. In relation to the policy around unallocated sites, the LLFA notes that NPPF is clear in paragraph 173 that "A sequential risk-based approach should also be taken to individual applications in areas known to be at risk now or in future from any form of flooding, by following the steps set out below." This applies to all unallocated sites.
- 6.22. In addition, the proposed policy further departs from national policy in relation to the availability of alternative sites. The LPA have stated that "In the case of major development on unallocated sites, if a District-wide sequential test shows that it isn't possible to use an alternative site, the applicant will need to submit an additional exception test in line with national policy on Flood Risk Assessments." Whereas paragraph 174 of NPPF states "Within this context the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test." While paragraph 177 confirms the exception test is required "if it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives)" it does not specifically relate to unallocated sites. It appears the local plan has a lack of clarity and potentially some inconsistency with national policy that needs to be resolved.
- 6.23. In the final paragraph, the LPA has referenced the LLFA Developer Guidance April 2024. This guidance is currently being updated and is updated frequently. The LLFA recommends that the LPA just references the latest version of the

LLFA Developer Guidance to prevent the local plan becoming out of date quickly.

- 6.24. In the final INF 03 policy paragraph, the LPA should be aware that NPPF in paragraph 182 c) states "have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development." Therefore, it is national policy requirement to provide a plan for the maintenance and management arrangements.
- 6.25. The final two sentences of the final paragraph in policy INF 03 are out of place in the policy and should be reconsidered as to where they are positioned within the policy. In addition, these sentences could do with some further reconsideration as they are not clear in their meaning or objective.
- 6.26. In relation to INF 04, the LLFA requests that flood risk and surface water runoff are included in the list of adverse effects and impacts in order to ensure flood risk is considered appropriately as an effect and / or impact.
- 6.27. In Policy INF 06 g), the LLFA suggests a minor amendment to "SUDs" to be either "*SuDS or sustainable surface water management*".
- 6.28. The LLFA notes there is no inclusion for a drainage strategy for In Proposal SWA2, SWA3, Watton SUE, BEET 1, FRAN 1, GRIS 1, HOC 1, GHOC 1. This is inconsistent when compared to other sites. In addition, the LLFA notes the employment sites lack any reference for the need for a drainage strategy. The LLFA requests this is included.
- 6.29. Should you have any queries with the above comments please contact the Lead Local Flood Authority at [REDACTED].

7. Public Health

- 7.1. Thank you for the opportunity to provide feedback on the Breckland Local Plan (Regulation 18 Consultation). Norfolk County Council (NCC) Public Health welcomes Breckland Council's commitment to shaping sustainable growth. Our comments focus on the relationship between the built and natural environment and health outcomes, informed by local health data and priorities.

Ageing Population and Housing Design

- 7.2. Breckland's ageing population, with those aged 65+ projected to reach 32% by 2040, requires housing that supports healthy ageing. NCC Public Health welcomes the consideration of ageing population needs and housing trend surveys within the Local Plan under Raising Accessibility standards of New Homes and supports Policy HOU 16 as a key mechanism for enabling health ageing and ensuring long-term independence.

- 7.3. It is also recommended that developments for older people are located within good proximity to essential services and established travel routes to reduce isolation and promote independence.

Green Infrastructure and Physical Activity

- 7.4. Obesity rates in Breckland are high, affecting 72% of adults and 36.4% of Year 6 children. Increasing physical activity is a key strategy for reducing obesity, and access to green and blue infrastructure is essential for creating active environments. NCC Public Health supports Policy ENV 02's commitment to ensuring accessible green and blue infrastructure, particularly the requirement that developments must provide green and blue infrastructure on site and that this delivers multiple benefits. Furthermore, NCC Public Health recommends that:
- Any green and blue infrastructure provided is multi-functional, ensuring that spaces are accessible and create recreation opportunities for residents and local communities.
 - Any green infrastructure provides or expands safe walking and cycling networks, linking housing with schools and other local services.
 - Natural England's Accessible Natural Greenspace Standards (ANGSt) are applied to new developments.

Food Outlets and Health

- 7.5. Access to healthy, affordable food is a critical determinant of health. Evidence shows that areas with a high density of fast-food outlets are associated with increased obesity and poor diet quality. NCC Public Health recommend the Local Plan:
- Explicitly limits the density of fast-food outlets.
 - Requires Health Impact Assessments (HIAs) for fast-food planning applications.

Transport and Access to Services

- 7.6. Average travel times to key services in Breckland exceed 30 minutes by public transport or walking. The Local Plan addresses transport well, including requirements for transport assessments and developer contributions to public transport. NCC Public Health has no further comments on this section.

Access to affordable housing

- 7.7. The availability of good-quality, affordable housing is a key determinant of health, helping to reduce inequalities, support stability, and improve both physical and mental wellbeing. NCC Public Health welcomes the policies relating to the provision of affordable housing, and supports the provision of affordable housing in deprived areas.

Addressing Health and Wellbeing

- 7.8. NCC Public Health welcomes the inclusion of specific health and wellbeing policies within the Draft Local Plan and the explicit reference to the Norfolk Planning in Health Protocol¹. In particular, NCC Public Health welcomes the expectation under policy COM 02 that developments of 5 dwellings or more or 1,000m² of non-residential development or more undertake a Healthy Planning Checklist, as found in the Planning in Health Protocol.
- 7.9. The expectation for Health Impact Assessments (HIA) is also welcomed, however NCC Public Health would recommend clearer criteria for when developers must complete a HIA. During the recent examination for North Norfolk's local plan, the inspector determined that a threshold of 250 dwellings for an HIA is justified, given the rural nature of the district. NCC Public Health would support a similar threshold for Breckland and would welcome the opportunity to work with Breckland Council to determine appropriate thresholds.
- 7.10. The Local Plan represents a vital opportunity to create environments that enable residents to live longer, healthier lives. Incorporating these recommendations will help ensure growth supports health and wellbeing for all.
- 7.11. Please do not hesitate to contact [REDACTED] for clarification on any of the points raised.

8. Minerals and Waste

Introduction

- 8.1. Paragraph 1.5 should state that the development plan for Breckland includes the Norfolk Minerals and Waste Local Plan.

RB 1: Robertson Barracks

- 8.2. This site is located on a Mineral Safeguarding Area for sand and gravel and is over 2ha in size. Therefore, Policy MP11 (Mineral Safeguarding Areas and Mineral Consultation Areas) of the Norfolk Minerals and Waste Local Plan will apply to development at this site and the following specific site requirement needs to be included in the allocation policy: "This site is underlain by a defined Mineral Safeguarding Area for sand and gravel resources; therefore investigation and assessment of the mineral will be required, to the satisfaction of the Mineral Planning Authority, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resources does not take place."

ENV 01 Climate responsive design

- 8.3. It would be beneficial for the Breckland Local Plan to encourage the use of recycled and secondary aggregates in construction in relation to the Sustainability Statement referred to in Policy ENV 01 as this can both reduce the amount of primary mineral that has to be extracted and reduce the quantity of construction and demolition waste disposal. We are pleased to note that requirement d of Policy ENV 01 does refer to site waste management and use of materials.

INF 04: Renewable Energy Development

- 8.4. paragraph 11.30 recognises that Anaerobic Digestion proposals are regarded as waste treatment facilities, where feedstock is classified as waste under relevant legislation and so relevant related national and county best practice guidance and policies will apply. We advise that the paragraph should also make clear that where an anaerobic digestion proposal is regarded as a waste treatment facility it will be a County Matter and any application will be determined by Norfolk County Council as the Waste Planning Authority in accordance with the policies in the Minerals and Waste Local Plan.

12.1 Strategic Development Areas (SDA)

SDA 1: Frans Green, East Tuddenham

- 8.5. Approximately 3ha of the southern part of the site are located on a Mineral Safeguarding Area for sand and gravel. Therefore, Policy MP11 (Mineral Safeguarding Areas and Mineral Consultation Areas) of the Norfolk Minerals and Waste Local Plan will apply to development at this site and the following specific site requirement needs to be included in the allocation policy: “This site is partially underlain by a defined Mineral Safeguarding Area for sand and gravel resources; therefore investigation and assessment of the mineral will be required, to the satisfaction of the Mineral Planning Authority, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resources does not take place.”
- 8.6. The north-western corner of the site is also within the consultation area for a safeguarded waste management facility on the Frans Green Industrial Estate. Therefore, Policy WP17 (Safeguarding waste management facilities) of the Norfolk Minerals and Waste Local Plan will apply to development at this site and the following specific requirement needs to be included in the allocation policy: “The site is within the consultation area for a safeguarded waste management facility and the development must not prevent or prejudice the use of the existing safeguarded waste management facility unless suitable alternative provision is made, or the facility is demonstrated to no longer be required.”

12.2 Market Towns

ATT 1 (110): Land West of Hargham Road

- 8.7. This site is located on a Mineral Safeguarding Area for sand and gravel and is over 2ha in size (5.7ha). Therefore, Policy MP11 (Mineral Safeguarding Areas and Mineral Consultation Areas) of the Norfolk Minerals and Waste Local Plan will apply to development at this site and the following specific site requirement needs to be included in the allocation policy: “This site is underlain by a defined Mineral Safeguarding Area for sand and gravel resources; therefore investigation and assessment of the mineral will be required, to the satisfaction of the Mineral Planning Authority, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resources does not take place.”

DER 5 (164): North of Dereham Road

- 8.8. The majority of this site is within 400m of Dereham Water Recycling Centre and therefore Policy WP17 (safeguarding waste management facilities) of the Norfolk Minerals and Waste Local Plan, will apply to development at this site and the following specific site requirements needs to be included in the allocation policy: “The site is within the consultation area for a safeguarded Water Recycling Centre (WRC) and the development must not prevent or prejudice the use of the existing safeguarded WRC unless suitable alternative provision is made, or the facility is demonstrated to no longer be required.”

Watton SUE (225): North and East of Shrublands

- 8.9. This site is located on a Mineral Safeguarding Area for sand and gravel and is over 2ha in size. Therefore, Policy MP11 of the Norfolk Minerals and Waste Local Plan will apply to development on this site and the following specific site requirement needs to be included in the allocation policy: “This site is partially underlain by a defined Mineral Safeguarding area for sand and gravel resources; therefore investigation and assessment of the mineral will be required, to the satisfaction of the Minerals Planning Authority, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resources does not take place.”
- 8.10. The eastern area of the Watton SUE site is also located within 250m of a safeguarded mineral extraction site (Carbrooke Quarry) and associated waste management facility. Carbrooke Quarry currently has planning permission for mineral extraction until 2027, however, an extension to Carbrooke Quarry is allocated in the Norfolk Minerals and Waste Local Plan and a planning application has been submitted for the extension area. If permitted, the extension area would increase the time period for extraction at Carbrooke Quarry for a further eight years. Therefore, Policy MP11 and WP17 of the Norfolk Minerals and Waste Local Plan will apply to development on this site and the County Council, as Minerals and Waste Planning Authority, will object to development proposals which would prevent or prejudice the use of the safeguarded site for the permitted and allocated minerals and waste management operations. Therefore, we advise that either the boundary of the Watton SUE needs to be set back a suitable distance from Carbrooke Quarry, or for development within 250m of Carbrooke Quarry to not take place until extraction at the quarry has ceased and the site has been restored. Therefore, as a minimum, the following specific site requirement needs to be included in the allocation policy: “The site is within the consultation area for a safeguarded mineral extraction site and waste management facility and the development must not prevent or prejudice the use of the existing safeguarded sites unless suitable alternative provision is made, or the facility is demonstrated to no longer be required.”

Watton SUE (223): East of Summer Lane

- 8.11. This site is located adjacent to a safeguarded mineral extraction site (Carbrooke Quarry) and associated waste management facility. Carbrooke Quarry currently has planning permission for mineral extraction until 2027, however, an extension to Carbrooke Quarry is allocated in the Norfolk Minerals and Waste Local Plan

and a planning application has been submitted for the extension area. If permitted, the extension area would increase the time period for extraction at Carbrooke Quarry for a further eight years. Therefore, Policy MP11 and WP17 of the Norfolk Minerals and Waste Local Plan will apply to development on this site and the County Council, as Minerals and Waste Planning Authority, will object to development proposals which would prevent or prejudice the use of the safeguarded site for the permitted and allocated minerals and waste management operations. Therefore, we **object** to the allocation of this site, unless development will not take place until extraction at the quarry has permanently ceased and the site has been restored. Therefore, as a minimum, the following specific site requirement needs to be included in the allocation policy: “The site is within the consultation area for a safeguarded mineral extraction site and waste management facility and the development must not prevent or prejudice the use of the existing safeguarded sites unless suitable alternative provision is made, or the facility is demonstrated to no longer be required.”

12.3 Key Service Parishes

MAT 1 (307): Thynne’s Lane

- 8.12. This site is located on a Mineral Safeguarding Area for sand and gravel and is over 2ha in size (5.9ha). Therefore, Policy MP11 (Mineral Safeguarding Areas and Mineral Consultation Areas) of the Norfolk Minerals and Waste Local Plan will apply to development at this site and the following specific site requirement needs to be included in the allocation policy: “This site is underlain by a defined Mineral Safeguarding Area for sand and gravel resources; therefore investigation and assessment of the mineral will be required, to the satisfaction of the Mineral Planning Authority, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resources does not take place.”

MAT 2 (156): North of Dereham Road

- 8.13. This site is located on a Mineral Safeguarding Area for sand and gravel and is over 2ha in size (5.6 ha). Therefore, Policy MP11 (Mineral Safeguarding Areas and Mineral Consultation Areas) of the Norfolk Minerals and Waste Local Plan will apply to development at this site and the following specific site requirement needs to be included in the allocation policy: “This site is underlain by a defined Mineral Safeguarding Area for sand and gravel resources; therefore investigation and assessment of the mineral will be required, to the satisfaction of the Mineral Planning Authority, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resources does not take place.”

NEC 1 (005): Brackenwoods

- 8.14. This site is located on a Mineral Safeguarding Area for sand and gravel and is over 2ha in size (2.44 ha). Therefore, Policy MP11 (Mineral Safeguarding Areas and Mineral Consultation Areas) of the Norfolk Minerals and Waste Local Plan will apply to development at this site and the following specific site requirement needs to be included in the allocation policy: “This site is underlain by a defined Mineral Safeguarding Area for sand and gravel resources; therefore investigation

and assessment of the mineral will be required, to the satisfaction of the Mineral Planning Authority, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resources does not take place.”

NEC 2 (302): Phase 3, North Pickenham Road

- 8.15. This site is located on a Mineral Safeguarding Area for sand and gravel and is over 2ha in size (2.1 ha). Therefore, Policy MP11 (Mineral Safeguarding Areas and Mineral Consultation Areas) of the Norfolk Minerals and Waste Local Plan will apply to development at this site and the following specific site requirement needs to be included in the allocation policy: “This site is underlain by a defined Mineral Safeguarding Area for sand and gravel resources; therefore investigation and assessment of the mineral will be required, to the satisfaction of the Mineral Planning Authority, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resources does not take place.”

12.4 Primary Parishes

LIT 1 (257): Lexham Road

- 8.16. This site is located on a Mineral Safeguarding Area for sand and gravel and is over 2ha in size (14.23ha). Therefore, Policy MP11 (Mineral Safeguarding Areas and Mineral Consultation Areas) of the Norfolk Minerals and Waste Local Plan will apply to development at this site and the following specific site requirement needs to be included in the allocation policy: “This site is underlain by a defined Mineral Safeguarding Area for sand and gravel resources; therefore investigation and assessment of the mineral will be required, to the satisfaction of the Mineral Planning Authority, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resources does not take place.”

NEL 2 (330): Back Lane

- 8.17. This site is located on a Mineral Safeguarding Area for sand and gravel and is over 2ha in size (2.4 ha). Therefore, Policy MP11 (Mineral Safeguarding Areas and Mineral Consultation Areas) of the Norfolk Minerals and Waste Local Plan will apply to development at this site and the following specific site requirement needs to be included in the allocation policy: “This site is underlain by a defined Mineral Safeguarding Area for sand and gravel resources; therefore investigation and assessment of the mineral will be required, to the satisfaction of the Mineral Planning Authority, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resources does not take place.”

12.5 Secondary Parishes

GHOC 1 (109): West of Watton Road

- 8.18. This site is located on a Mineral Safeguarding Area for sand and gravel and is over 2ha in size (4.65 ha). Therefore, Policy MP11 (Mineral Safeguarding Areas and Mineral Consultation Areas) of the Norfolk Minerals and Waste Local Plan will apply to development at this site and the following specific site requirement needs to be included in the allocation policy: “This site is underlain by a defined

Mineral Safeguarding Area for sand and gravel resources; therefore investigation and assessment of the mineral will be required, to the satisfaction of the Mineral Planning Authority, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resources does not take place.”

LYNG 1 (091): North of Heath Road

- 8.19. This site is located on a Mineral Safeguarding Area for sand and gravel and is over 2ha in size (14.6ha). Therefore, Policy MP11 (Mineral Safeguarding Areas and Mineral Consultation Areas) of the Norfolk Minerals and Waste Local Plan will apply to development at this site and the following specific site requirement needs to be included in the allocation policy: “This site is underlain by a defined Mineral Safeguarding Area for sand and gravel resources; therefore investigation and assessment of the mineral will be required, to the satisfaction of the Mineral Planning Authority, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resources does not take place.”

13.Site Specific Policies – Employment

SNETT-EMP 1: Land at Falcon Road (Site ref: 286)

- 8.20. This site is located on a Mineral Safeguarding Area for sand and gravel and is over 2ha in size (54.23 ha). Therefore, Policy MP11 (Mineral Safeguarding Areas and Mineral Consultation Areas) of the Norfolk Minerals and Waste Local Plan will apply to development at this site and the following specific site requirement needs to be included in the allocation policy: “This site is underlain by a defined Mineral Safeguarding Area for sand and gravel resources; therefore investigation and assessment of the mineral will be required, to the satisfaction of the Mineral Planning Authority, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resources does not take place.”

SNETT-EMP 2: Parcels P and Q - Land adjacent to Snetterton Heath (Site ref: 267)

- 8.21. This site is located on a Mineral Safeguarding Area for sand and gravel and is over 2ha in size (5.6 ha). Therefore, Policy MP11 (Mineral Safeguarding Areas and Mineral Consultation Areas) of the Norfolk Minerals and Waste Local Plan will apply to development at this site and the following specific site requirement needs to be included in the allocation policy: “This site is underlain by a defined Mineral Safeguarding Area for sand and gravel resources; therefore investigation and assessment of the mineral will be required, to the satisfaction of the Mineral Planning Authority, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resources does not take place.”

SNETT-EMP 3: Land at Harling Road (Site ref: 298)

- 8.22. This site is an unrestored former mineral extraction void. The site is unrestored because the originally permitted infill scheme cannot be carried out due to

engineering issues related to the adjacent historic landfill, which is contains biodegradable waste and is unlined. Consideration should also be given to the management of surface water drainage from the adjacent closed landfill site.

SNETT-EMP 4: West of Snetterton Employment Allocation 1

- 8.23. This site is located on a Mineral Safeguarding Area for sand and gravel and is over 2ha in size (13.2 ha). Therefore, Policy MP11 (Mineral Safeguarding Areas and Mineral Consultation Areas) of the Norfolk Minerals and Waste Local Plan will apply to development at this site and the following specific site requirement needs to be included in the allocation policy: “This site is underlain by a defined Mineral Safeguarding Area for sand and gravel resources; therefore investigation and assessment of the mineral will be required, to the satisfaction of the Mineral Planning Authority, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resources does not take place.”

SNETT-EMP 5: Land at Hargham Road and Chalk Lane (Site ref: 366)

- 8.24. This site is located on a Mineral Safeguarding Area for sand and gravel and is over 2ha in size (35 ha). Therefore, Policy MP11 (Mineral Safeguarding Areas and Mineral Consultation Areas) of the Norfolk Minerals and Waste Local Plan will apply to development at this site and the following specific site requirement needs to be included in the allocation policy: “This site is underlain by a defined Mineral Safeguarding Area for sand and gravel resources; therefore investigation and assessment of the mineral will be required, to the satisfaction of the Mineral Planning Authority, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resources does not take place.”

SNETT-EMP 6: Land at Hargham Road West (LPRC4S25REN003)

- 8.25. This site is located within a Mineral Safeguarding Area for sand and gravel and is over 2ha in size (17.6 ha). Therefore, Policy MP11 (Mineral Safeguarding Areas and Mineral Consultation Areas) of the Norfolk Minerals and Waste Local Plan will apply to development at this site and the following specific site requirement needs to be included in the allocation policy: “This site is underlain by a defined Mineral Safeguarding Area for sand and gravel resources; therefore investigation and assessment of the mineral will be required, to the satisfaction of the Mineral Planning Authority, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resources does not take place.”

Policies Map

- 8.26. The Policies Map accompanying the Breckland Local Plan should include the Mineral Consultation Areas for both resources, infrastructure and extraction locations, and the consultation areas for safeguarded existing waste management facilities and key water recycling centres (wastewater treatment works). These safeguarded sites and mineral resources and associated consultation areas form part of the Development Plan through the Norfolk Minerals and Waste Local Plan and are a material planning consideration when

a relevant new development is proposed, and GIS shapefiles have been provided to Breckland Council.

Glossary

- 8.27. The following relevant terms relating to minerals and waste planning should be included in the glossary:
- a. Mineral Safeguarding Area: An area defined by the Mineral Planning Authority to identify a mineral resource which would be subject to safeguarding to prevent unnecessary sterilisation by non-mineral developments; used in conjunction with Mineral Consultation Area.
 - b. Mineral Consultation Area: An area identified in order to ensure consultation between the relevant LPA and the Mineral Planning Authority before certain non-mineral planning applications made within the area are determined. In Norfolk these are a contiguous boundary to Mineral Safeguarding Areas.
 - c. Recycled aggregates: Aggregates produced from recycled construction waste such as crushed concrete, plainings from road surfacing etc.
 - f. Minerals and Waste Planning Authority: An organisation with statutory planning powers relating to mineral development and waste management development, in Norfolk this is the County Council.
- 8.28. Should you have any queries with the above comments please contact Caroline Jeffrey (Principal Planner, Minerals and Waste Policy) at [REDACTED] or call [REDACTED].

Policy	Site Name	Location	Dwellings	Early Years	Primary	Secondary	Post 16	SEND
ASH 1	The Willows	Ashill	20	Provision exists within close proximity to the local development area capacity at existing provision will need expanding to meet demand	Housing delivery will support the local school, and being in close proximity to the existing school will support sustainable modes of transport	Development will fall within the Watton Wayland secondary school catchment and could require additional contributions for expanding provision as well as transport to support children getting to school.	Majority of pupils receive their Post 16 need in multiple location across the county mainly in areas such as Attleborough/Dereham/Wymondham which will require transport provision to support the smaller numbers of pupils requiring transport	Proportionate contributions towards SEND would be required.
ASH 2	Greenacre Close 45	Ashill	45	Provision exists within close proximity to the local development area capacity at existing provision will need expanding to meet demand	Housing delivery will support the local school, and being in close proximity to the existing school will support sustainable modes of transport	Development will fall within the Watton Wayland secondary school catchment and could require additional contributions for expanding provision as well as transport to support children getting to school.	Majority of pupils receive their Post 16 need in multiple location across the county mainly in areas such as Attleborough/Dereham/Wymondham which will require transport provision to support the smaller numbers of pupils requiring transport	Proportionate contributions towards SEND would be required.
ATT 1	Land West of Hargham Road	Attleborough	120					
BAN 1	West of Mill Road	Banham	70	Provision exists in reasonable distance to the proposed development; this size of development will generate additional pupils requiring EY provision contributions for enhancement to existing will be required	Local school provision should be able to meet demand from this development	Local school provision should be able to meet demand from this development	Local school provision should be able to meet demand from this development at Attleborough or Wymondham, transport obligations will be required	Proportionate contributions towards SEND would be required.
BAWD 1	North of Foxley Road	Bawdeswell	140	Quantum of housing will present a challenge for the existing EY provider to meet demand; the next nearest provision would be Dereham where additional enhancement would be required to accommodate the size and scale of this type.	Existing Primary school is small and confined on the existing site, this will sustain a level of pupil demand if the right mix of housing is included in the site. It could lead some families having to seek education elsewhere which will require transport based on the proximity of surrounding schools	Reepham High school would have capacity to meet demand although development is beyond the statutory safe walking/cycling routes. Contributions would be sought for improvement or provision of transport accordingly	Children from development could have their Post 16 provision met at Reepham High school that offers sixth form education	Proportionate contributions towards SEND would be required.
BEES 1	Back Lane 10	Beeston	10	Nearest childcare could be accommodated within Litcham area, and this may require additional enhancement in order to meet additional demand from multiply developments in this area	This level of development should sustain the school dependant on the type and mix of housing design. There is limited capacity for additional pupils or expansion opportunities on site. Some transport obligations could be sought based on pace of surrounding developments	Litcham High school should have capacity to meet demand within the local catchment; transport links may not be sustainable within statutory walking/cycling routes and therefore contributions could be sought from this development	Children from development could have their Post 16 provision met at Dereham High schools that offers sixth form education, but most children will require transport to their nearest setting	Proportionate contributions towards SEND would be required.

Policy	Site Name	Location	Dwellings	Early Years	Primary	Secondary	Post 16	SEND
BEES 3	Beeston Playing Field and Dereham Road 5	Beeston	5	Nearest childcare could be accommodated within Litcham area, and this may require additional enhancement in order to meet additional demand from multiply developments in this area	This level of development should sustain the school dependant on the type and mix of housing design. There is limited capacity for additional pupils or expansion opportunities on site. Some transport obligations could be sought based on pace of surrounding developments	Litcham High school should have capacity to meet demand within the local catchment; transport links may not be sustainable within statutory walking/cycling routes and therefore contributions could be sought from this development	Children from development could have their Post 16 provision met at Dereham High schools that offers sixth form education, but most children will require transport to their nearest setting	Proportionate contributions towards SEND would be required.
BEES 4	School Farm Paddock 5	Beeston	5	Nearest childcare could be accommodated within Litcham area, and this may require additional enhancement in order to meet additional demand from multiply developments in this area	This level of development should sustain the school dependant on the type and mix of housing design. There is limited capacity for additional pupils or expansion opportunities on site. Some transport obligations could be sought based on pace of surrounding developments	Litcham High school should have capacity to meet demand within the local catchment; transport links may not be sustainable within statutory walking/cycling routes and therefore contributions could be sought from this development	Children from development could have their Post 16 provision met at Dereham High schools that offers sixth form education, but most children will require transport to their nearest setting	Proportionate contributions towards SEND would be required.
BEES 5	Rose Cottage Syers Lane 5	Beeston	5	Nearest childcare could be accommodated within Litcham area, and this may require additional enhancement in order to meet additional demand from multiply developments in this area	This level of development should sustain the school dependant on the type and mix of housing design. There is limited capacity for additional pupils or expansion opportunities on site. Some transport obligations could be sought based on pace of surrounding developments	Litcham High school should have capacity to meet demand within the local catchment; transport links may not be sustainable within statutory walking/cycling routes and therefore contributions could be sought from this development	Children from development could have their Post 16 provision met at Dereham High schools that offers sixth form education, but most children will require transport to their nearest setting	Proportionate contributions towards SEND would be required.
BEES 2	Back Lane 8	Beeston	8	Nearest childcare could be accommodated within Litcham area, and this may require additional enhancement in order to meet additional demand from multiply developments in this area	This level of development should sustain the school dependant on the type and mix of housing design. There is limited capacity for additional pupils or expansion opportunities on site. Some transport obligations could be sought based on pace of surrounding developments	Litcham High school should have capacity to meet demand within the local catchment; transport links may not be sustainable within statutory walking/cycling routes and therefore contributions could be sought from this development	Children from development could have their Post 16 provision met at Dereham High schools that offers sixth form education, but most children will require transport to their nearest setting	Proportionate contributions towards SEND would be required.
BEET 1	Fakenham Road 10	Beetley	10	Nearest childcare could be accommodated within Dereham area, and this may require additional enhancement in order to meet additional demand	Existing primary can meet this small-scale department within its existing accommodation	Children from this development feed into Dereham secondary provision where capacity may exist, transport links may not be sustainable within statutory walking/cycling routes and therefore contributions could be sought from this development	Children from development could have their Post 16 provision met at Dereham High schools that offers sixth form education, but most children will require transport to their nearest setting	Proportionate contributions towards SEND would be required.

Policy	Site Name	Location	Dwellings	Early Years	Primary	Secondary	Post 16	SEND
				from multiply developments in this area				
BRIS 1	Land North of Gately Road, Potthorpe 10	Brisley	10	Nearest childcare could be accommodated within Litcham area, and this may require additional enhancement in order to meet additional demand from multiply developments in this area	Scale of development will support the school to remain sustainable; there is capacity and likely to be sustainable routes to get to school for families	Litcham High school should have capacity to meet demand within the local catchment; transport links may not be sustainable within statutory walking/cycling routes and therefore contributions could be sought from this development	Children from development could have their Post 16 provision met at Dereham High schools that offers sixth form education, but most children will require transport to their nearest setting	Proportionate contributions towards SEND would be required.
CAS 1	Home Farm, North Acre, 5	Caston	5	Small development with limited impact on existing provision	Scale of development will support the school to remain sustainable; there is capacity and likely to be sustainable routes to get to school for families	Transport obligations are likely based on walking/cycle requirements to the nearest secondary of Wayland Academy	Children from development could have their Post 16 provision met at the High school that offers sixth form education, but most children will require transport to their nearest setting	Proportionate contributions towards SEND would be required.
COL 1	Land East of Hall Lane 10	Colkirk	10	Small development with limited impact on existing provision	Scale of development will support the school to remain sustainable; there is capacity and likely to be sustainable routes to get to school for families	Transport obligations are likely based on walking/cycle requirements to the nearest secondary of Fakenham Academy	Children from development could have their Post 16 provision met at Fakenham High school most children will require transport to their nearest setting	Proportionate contributions towards SEND would be required.
DER 2	SE of Swanton Road	Dereham	120	Some enhancement of existing provision maybe required to meet the additional demand from this development.	Schools in close proximity to this development should be able to meet demand in the medium to long term, sustainable routes to school will be key to ensure they are in place for this development, being slightly disconnected from the central area	Options to expand either of the existing secondary schools would need further consideration, with the expectation of contributions from developers to mitigate the impact of development on both expansions. Contributions could be sought for sustainable walking cycling routes to school if routes exist	Children from this development could have their Post 16 provision met at the local sixth form provision but some children may need their needs met in alternative locations away from the local area which will require contributions towards transport of this group.	Proportionate contributions towards SEND would be required.
DER 3	The Maltings, Norwich Road	Dereham	120	Additional nursery provision could be mitigated with additional contributions to ensure capacity in the central area can be maintained	Connection into the local school estate maybe impacted by the railway line, if required there could be a need for improvement to walking and cycling routes to ensure families can seek places in the local schools across the town. There should be an element of capacity available in local schools dependant on timing of this and other developments in this locality.	Options to expand either of the existing secondary schools would need further consideration, with the expectation of contributions from developers to mitigate the impact of development on both expansions. Contributions could be sought for sustainable walking cycling routes to school if routes exist	Children from this development could have their Post 16 provision met at the local sixth form provision but some children may need their needs met in alternative locations away from the local area which will require contributions towards transport of this group.	Proportionate contributions towards SEND would be required.

Policy	Site Name	Location	Dwellings	Early Years	Primary	Secondary	Post 16	SEND
DER 1	Dereham Hospital, Northgate	Dereham	30	Additional nursery provision could be mitigated with additional contributions to ensure capacity in the central area can be maintained	There will be capacity in local schools for a development of this size, connection to the nearest local school would be required in order to promote sustainable walking /cycling routes	Options to expand either of the existing secondary schools would need further consideration, with the expectation of contributions from developers to mitigate the impact of development on both expansions. Contributions could be sought for sustainable walking cycling routes to school if routes exist	Children from this development could have their Post 16 provision met at the local sixth form provision but some children may need their needs met in alternative locations away from the local area which will require contributions towards transport of this group.	Proportionate contributions towards SEND would be required.
DER 4	Land at Dumpling Green	Dereham	300	Nursery provision could meet some of this capacity, but it may require additional contributions or new provision to support the widespread growth from this development. This may be via expansion of existing if capacity exists or provision of a new nursery provision may support the community this development will serve.	Capacity could exist in the nearest schools dependant on timing of the delivery of the scheme. Sustainable walking/cycling routes could be required in order to ensure families can get to the nearest school and access is supported into the wider estate.	Options to expand either of the existing secondary schools would need further consideration, with the expectation of contributions from developers to mitigate the impact of development on both expansions. Contributions could be sought for sustainable walking cycling routes to school if routes exist	Children from this development could have their Post 16 provision met at the local sixth form provision but some children may need their needs met in alternative locations away from the local area which will require contributions towards transport of this group.	Proportionate contributions towards SEND would be required.
DER 5	Land North of Dereham Road (Scarning)	Dereham	70	Additional nursery provision could be mitigated with additional contributions to ensure capacity in the central area can be maintained	This could present some capacity issues to the local catchment and therefore some offsite mitigation maybe required in order to promote sustainable walking/cycling routes to the next nearest schools in the central town where capacity could exist	Options to expand either of the existing secondary schools would need further consideration, with the expectation of contributions from developers to mitigate the impact of development on both expansions. Contributions could be sought for sustainable walking cycling routes to school if routes exist	Children from this development could have their Post 16 provision met at the local sixth form provision but some children may need their needs met in alternative locations away from the local area which will require contributions towards transport of this group.	Proportionate contributions towards SEND would be required.
HAR 1	Off Lopham Road, East Harling 190	East Harling	190	Provision for nursery will need to be mitigated for either expansion or contributions for PVI settings in close proximity of this development to support the demand this development may require.	Initially provision will require expansion to meet demand as the school is not able to meet the local demand, it could accommodate some expansion on the existing site, but with the wider allocation coming forward as part of SPD01 it should be considered new provision on this larger site allows for relocation and expansion of the primary provision on this site. This will require a minimum of 2.3HA for a 2FE primary school allowing this development to meet the	This development could lead to contributions to enhance the existing secondary provision to meet additional demand or support sustainable transport obligations to transport pupils to the nearest secondary school of Old Buckenham High	Children from this development are likely going to need to be transported to the nearest sixth form or Post 16 provision in either Attleborough or Thetford, contributions towards transport could be required unless any new provision is provided as part of SPD01.	Proportionate contributions towards SEND would be required.

Policy	Site Name	Location	Dwellings	Early Years	Primary	Secondary	Post 16	SEND
					demand of the additional 1FE of capacity being required to meet this and other developments in the area.			
Har 2	Garboldisham Road	East Harling	15	Additional nursery provision could be mitigated with additional contributions to ensure capacity in the central area can be maintained	Any additional demand this development creates will require contributions to new provision as part of SPD01 and ensuring there are suitable safe walking/cycling routes to school from this development	This development could lead to contributions to enhance the existing secondary provision to meet additional demand or support sustainable transport obligations to transport pupils to the nearest secondary school of Old Buckenham High	Children from this development are likely going to need to be transported to the nearest sixth form or Post 16 provision in either Attleborough or Thetford, contributions towards transport could be required unless any new provision is provided as part of SPD01.	Proportionate contributions towards SEND would be required.
HAR 3	Kenninghall Road	East Harling	30	Additional nursery provision could be mitigated with additional contributions to ensure capacity in the central area can be maintained	Any additional demand this development creates will require contributions to new provision as part of SPD01 and ensuring there are suitable safe walking/cycling routes to school from this development	This development could lead to contributions to enhance the existing secondary provision to meet additional demand or support sustainable transport obligations to transport pupils to the nearest secondary school of Old Buckenham High	Children from this development are likely going to need to be transported to the nearest sixth form or Post 16 provision in either Attleborough or Thetford, contributions towards transport could be required unless any new provision is provided as part of SPD01.	Proportionate contributions towards SEND would be required.
SDA 1	Frans Green East Tuddenham	East Tuddenham	2,000	Additional EY provision will be required to meet demand; this could be part of the primary build scheme as part of the wider programme for expansion	To meet the additional need it is anticipated a new 2FE primary school could be required on a 2.3 HA site allowing for either nursery or SEND provision. Developer contributions to support the development of a new school would be required with associated costs for expansion of Mattishall which is partly the catchment school for this area and could provide some space for expansion on its existing site.	contributions for expansion for either of the secondary schools in Dereham would be required, with further assessment required to assess feasibility. In addition, transport costs would be needed to meet the increased cost in transporting pupils to schools at this age range.	contributions towards transport to the local post 16 provision will be required. The likely draw for children is Dereham or into Norwich to have their Post 16 education met.	If any new build were to take places as part of SDA1 it is highly likely additional SEND provision will be required which this development will need to support via developer contributions and transport obligations.
FRAN 1	West Station Road 10	Fransham	10	A level of demand from this scale of development could be met locally	Primary school provision could meet this scale of development	secondary school provision could meet this scale of development, possible contributions for transport of pupils to the nearest available school	Transport obligations would be required to the nearest Post 16 provision	SEND provision could meet this scale of development, with consideration of transport obligations for pupils to the nearest provision available.

Policy	Site Name	Location	Dwellings	Early Years	Primary	Secondary	Post 16	SEND
GARB 1	North of Smallworth Lane 8	Garboldisham	8	A level of demand from this scale of development could be met locally	Primary school provision could meet this scale of development	secondary school provision could meet this scale of development, possible contributions for transport of pupils to the nearest available school	Transport obligations would be required to the nearest Post 16 provision	SEND provision could meet this scale of development, with consideration of transport obligations for pupils to the nearest provision available.
GARV 1	Land North of Dereham Road, 10	Garvestone	10	A level of demand from this scale of development could be met locally	Primary school provision could meet this scale of development	secondary school provision could meet this scale of development, possible contributions for transport of pupils to the nearest available school	Transport obligations would be required to the nearest Post 16 provision	SEND provision could meet this scale of development, with consideration of transport obligations for pupils to the nearest provision available.
GARV 2	Site B, North of Dereham Road 5	Garvestone	5	A level of demand from this scale of development could be met locally	Primary school provision could meet this scale of development	secondary school provision could meet this scale of development, possible contributions for transport of pupils to the nearest available school	Transport obligations would be required to the nearest Post 16 provision	SEND provision could meet this scale of development, with consideration of transport obligations for pupils to the nearest provision available.
GDUN 1	East of Litcham Road 10	Great Dunham	10	A level of demand from this scale of development could be met locally	With the recent closure of Great Dunham any development here will have its local primary provision met by Beeston. Contributions could be sought for safe walking or cycling routes to support sustainable transport in this area	secondary school provision could meet this scale of development, possible contributions for transport of pupils to the nearest available school	Transport obligations would be required to the nearest Post 16 provision	SEND provision could meet this scale of development, with consideration of transport obligations for pupils to the nearest provision available.
GHOC 1	West of Watton Road 80	Great Hockering	80	Additional nursery provision could be mitigated with additional contributions to ensure capacity in the central area can be maintained	Limited capacity to expand on the existing school site, this could present some challenge to the ability for the school to meet demand based on current numbers in the area. If the site goes ahead there is likely a need for transport mitigation to the next nearest school to make the development sustainable.	contributions to support secondary expansion or the new build earmarked for SDA2 could be a requirement. In addition to contributions for transport mitigation to support sustainable routes to school	contributions to support secondary expansion assuming post 16 provision could be considered, or the new build earmarked for SDA2 could be a requirement. In addition to contributions for transport mitigation to support sustainable routes to school	If any new build were to take places as part of SDA2 or SDA3 it is highly likely additional SEND provision will be required which this development will need to support via developer contributions and transport obligations.
GRIS 1	Caston Road 20	Griston	20	A level of demand from this scale of development could be met locally	Primary school provision could meet this scale of development or transport maybe required to offset this mitigation	secondary school provision could meet this scale of development, possible contributions for transport of pupils to the nearest available school	Transport obligations would be required to the nearest Post 16 provision	SEND provision could meet this scale of development, with consideration of transport obligations for pupils to the nearest provision available.

Policy	Site Name	Location	Dwellings	Early Years	Primary	Secondary	Post 16	SEND
HOC 1	The Street 100	Hockering	100	Additional EY provision will be required to meet demand, this could be part of the primary build scheme as part of the wider programme for expansion, links to SDA1	To meet the additional need it is anticipated a new 2FE primary school could be required on a 2.3 HA site allowing for either nursery or SEND provision. Developer contributions to support the development of a new school would be required with associated costs for expansion of Mattishall which is partly the catchment school for this area and could provide some space for expansion on its existing site. Links to SDA 1	contributions for expansion for either of the secondary schools in Dereham would be required, with further assessment required to assess feasibility. In addition, transport costs would be needed to meet the increased cost in transporting pupils to schools at this age range. Links to requirements for SDA1	contributions towards transport to the local post 16 provision will be required. The likely draw for children is Dereham or into Norwich to have their Post 16 education met. Links to SDA1	If any new build were to take places as part of SDA1 it is highly likely additional SEND provision will be required which this development will need to support via developer contributions and transport obligations.
KEN 1	Powell Close	Kenninghall	20	Additional nursery provision could be mitigated with additional contributions to ensure capacity in the central area can be maintained	Primary school is constrained with limited ability to expand. A level of mitigation could be required to enhance the next nearest primary school where some children in this area do attend. In addition, transport obligations would be required. If this and KEN2 came forward together	contributions to support secondary expansion or the new build earmarked for SDA2 could be a requirement. In addition to contributions for transport mitigation to support sustainable routes to school	contributions to support secondary expansion assuming post 16 provision could be considered, or the new build earmarked for SDA2 could be a requirement. In addition to contributions for transport mitigation to support sustainable routes to school	If any new build were to take places as part of SDA2 or SDA3 it is highly likely additional SEND provision will be required which this development will need to support via developer contributions and transport obligations.
KEN 2	Kings Oak	Kenninghall	50	Additional nursery provision could be mitigated with additional contributions to ensure capacity in the central area can be maintained	Primary school is constrained with limited ability to expand. A level of mitigation could be required to enhance the next nearest primary school where some children in this area do attend. In addition, transport obligations would be required. If this and KEN1 came forward together	contributions to support secondary expansion or the new build earmarked for SDA2 could be a requirement. In addition to contributions for transport mitigation to support sustainable routes to school	contributions to support secondary expansion assuming post 16 provision could be considered, or the new build earmarked for SDA2 could be a requirement. In addition to contributions for transport mitigation to support sustainable routes to school	If any new build were to take places as part of SDA2 or SDA3 it is highly likely additional SEND provision will be required which this development will need to support via developer contributions and transport obligations.
LIT 1	Lexham Road	Litcham	100	Additional nursery provision could be mitigated with additional contributions to ensure capacity in the central area can be maintained	This allocation as LIT1 will impact the school from any further expansion that may be required to meet additional demand. The school is undersized for an effective educational model and would require an additional class bases to meet additional demand of this nature. contributions for expansion would be sought.	The secondary site could meet some of this development but contributions towards sustainable walking/cycling routes might be considered to support the development.	contributions to support children getting to their nearest post 16 provision may be necessary due to the rural nature of this settlement	contributions to support children getting to their nearest SEND provision may be necessary, due to the rural nature of this settlement.

Policy	Site Name	Location	Dwellings	Early Years	Primary	Secondary	Post 16	SEND
LYNG 1	Land North of Heath Road part 50	Lyng	50	A level of demand from this scale of development could be met locally	Primary school provision could meet this scale of development	secondary school provision could meet this scale of development, possible contributions for transport of pupils to the nearest available school	Transport obligations would be required to the nearest Post 16 provision	SEND provision could meet this scale of development, with consideration of transport obligations for pupils to the nearest provision available.
MAT 1	North of Thynne's Lane 100	Mattishall	100	Additional nursery provision could be mitigated with additional contributions to ensure capacity in the central area can be maintained	To meet the additional need it is anticipated a new 2FE primary school could be required on a 2.3 HA site allowing for either nursery or SEND provision. Developer contributions to support the development of a new school would be required with associated costs for expansion of Mattishall which is partly the catchment school for this area and could provide some space for expansion on its existing site. Links to SDA 1	contributions for expansion for either of the secondary schools in Dereham would be required, with further assessment required to assess feasibility. In addition, transport costs would be needed to meet the increased cost in transporting pupils to schools at this age range. Links to requirements for SDA1	contributions towards transport to the local post 16 provision will be required. The likely draw for children is Dereham or into Norwich to have their Post 16 education met. Links to SDA1	If any new build were to take places as part of SDA1 it is highly likely additional SEND provision will be required which this development will need to support via developer contributions and transport obligations.
MAT 2	149 Dereham Road 50	Mattishall	50	Additional nursery provision could be mitigated with additional contributions to ensure capacity in the central area can be maintained	To meet the additional need it is anticipated a new 2FE primary school could be required on a 2.3 HA site allowing for either nursery or SEND provision. Developer contributions to support the development of a new school would be required with associated costs for expansion of Mattishall which is partly the catchment school for this area and could provide some space for expansion on its existing site. Links to SDA 1	contributions for expansion for either of the secondary schools in Dereham would be required, with further assessment required to assess feasibility. In addition, transport costs would be needed to meet the increased cost in transporting pupils to schools at this age range. Links to requirements for SDA1	contributions towards transport to the local post 16 provision will be required. The likely draw for children is Dereham or into Norwich to have their Post 16 education met. Links to SDA1	If any new build were to take places as part of SDA1 it is highly likely additional SEND provision will be required which this development will need to support via developer contributions and transport obligations.
MUN 1	West Hall Drive	Mundford	30	Additional nursery provision could be mitigated with additional contributions to ensure capacity in the central area can be maintained	Primary school provision could meet this scale of development	secondary school provision could meet this scale of development, possible contributions for transport of pupils to the nearest available school	Transport obligations would be required to the nearest Post 16 provision	SEND provision could require contributions to support expansion, with consideration of transport obligations for pupils to the nearest provision available.
MUN 2	Bracken Rise	Mundford	20	Additional nursery provision could be mitigated with additional contributions to ensure	Primary school provision could meet this scale of development	secondary school provision could meet this scale of development, possible contributions for transport of pupils to the nearest available school	Transport obligations would be required to the nearest Post 16 provision	SEND provision could require contributions to support expansion, with consideration of transport obligations for pupils to

Policy	Site Name	Location	Dwellings	Early Years	Primary	Secondary	Post 16	SEND
				capacity in the central area can be maintained				the nearest provision available.
NAR 1	East of Chalk Lane	Narborough	70	Additional nursery provision could be mitigated with additional contributions to ensure capacity in the central area can be maintained	The school is quite constrained on its existing site and demand will need to be met in the next nearest school which may need transport obligations or sustainable routes for cycling and walking.	Contributions will be required to meet the additional demand at secondary in Swaffham with support to transport of pupils also required.	Transport obligations would be required to the nearest Post 16 provision	SEND provision could require contributions to support expansion, with consideration of transport obligations for pupils to the nearest provision available.
NAR 2	West of Chalk Lane	Narborough	30	Additional nursery provision could be mitigated with additional contributions to ensure capacity in the central area can be maintained	The school is quite constrained on its existing site and demand will need to be met in the next nearest school which may need transport obligations or sustainable routes for cycling and walking.	Contributions will be required to meet the additional demand at secondary in Swaffham with support to transport of pupils also required.	Transport obligations would be required to the nearest Post 16 provision	SEND provision could require contributions to support expansion, with consideration of transport obligations for pupils to the nearest provision available.
NEC 1	Off Brackenwood 50	Necton	50	Additional nursery provision could be mitigated with additional contributions to ensure capacity in the central area can be maintained	Primary school provision could meet this scale of development	Contributions will be required to meet the additional demand at secondary in Swaffham with support to transport of pupils also required.	Transport obligations would be required to the nearest Post 16 provision	SEND provision could require contributions to support expansion, with consideration of transport obligations for pupils to the nearest provision available.
NEC 2	North Pickenham Road Phase 3 50	Necton	50	Additional nursery provision could be mitigated with additional contributions to ensure capacity in the central area can be maintained	Primary school provision could meet this scale of development	Contributions will be required to meet the additional demand at secondary in Swaffham with support to transport of pupils also required.	Transport obligations would be required to the nearest Post 16 provision	SEND provision could require contributions to support expansion, with consideration of transport obligations for pupils to the nearest provision available.
NEL 1	South of Eastgate Street	North Elmham	30	Some capacity exists to meet this demand	Primary school provision could meet this scale of development	Local school provision should be able to meet demand from this development	Transport obligations would be required to the nearest Post 16 provision	SEND provision could require contributions to support expansion, with consideration of transport obligations for pupils to the nearest provision available.
NEL 2	Back Lane	North Elmham	50	Some capacity exists to meet this demand	Primary school provision could meet this scale of development	Local school provision should be able to meet demand from this development	Transport obligations would be required to the nearest Post 16 provision	SEND provision could require contributions to support expansion, with consideration of transport obligations for pupils to the nearest provision available.

Policy	Site Name	Location	Dwellings	Early Years	Primary	Secondary	Post 16	SEND
N LOP 1	Land to the Rear of Bell Farm, South of Primrose Lane 20	North Lopham	20	Some capacity exists to meet this demand	Primary school provision could meet this scale of development or transport maybe required to offset this mitigation	Local school provision should be able to meet demand from this development	Transport obligations would be required to the nearest Post 16 provision	SEND provision could require contributions to support expansion, with consideration of transport obligations for pupils to the nearest provision available.
OLD 1	Hargham Road	Old Buckenham	8	Some capacity exists to meet this demand	Primary school provision could meet this scale of development or transport maybe required to offset this mitigation	Local school provision should be able to meet demand from this development	Transport obligations would be required to the nearest Post 16 provision	SEND provision could require contributions to support expansion, with consideration of transport obligations for pupils to the nearest provision available.
ROC 1	North of The Street 10	Rocklands	10	Some capacity exists to meet this demand	Primary school provision could meet this scale of development or transport maybe required to offset this mitigation	Local school provision should be able to meet demand from this development	Transport obligations would be required to the nearest Post 16 provision	SEND provision could require contributions to support expansion, with consideration of transport obligations for pupils to the nearest provision available.
ROC 2	South of Bell Road 15	Rocklands	15	Some capacity exists to meet this demand	Primary school provision could meet this scale of development or transport maybe required to offset this mitigation	Local school provision should be able to meet demand from this development	Transport obligations would be required to the nearest Post 16 provision	SEND provision could require contributions to support expansion, with consideration of transport obligations for pupils to the nearest provision available.
SDA2	Barkers Farm	Roudham and Larling	3000	It is likely development of this size will impact the EY provision required across this area, where some will likely come from the new primary provision, but some places could be required in Private nursery provision to have a blended offer across the area. Contributions to support expansion will be required, or land within the development will form part of the developers' options in this matter.	This development, being relatively disconnected from existing settlements, will be required to meet localised demand to mitigate its impact on education. This will require substantial education provision across this and SDA3. Across both sites there could be demand for up to 4 x 2FE primary, one could include the relocation and expansion of the existing East Harling primary. A minimum of 2.3Ha is required for each primary school with further contributions required from the developers to fund the delivery of the projects. Primary School provision would include either a	A site to mitigate the impact of development for secondary provision would be required. With both sites including SDA3, development in this location it is likely to yield a substantial proportion of pupils to support a secondary school. However, the long-term viability of a secondary school is likely to be based on accommodating children across a wider catchment who would otherwise have to be transported to provision in either Thetford, Attleborough or Watton. It would be expected that, collectively, this site and SDA 3 will provide land for a new secondary school which had the ability to expand and meet some of the Post 16 provision yielded from	Mitigation required for transport or until the secondary/post 16 provision is provided would be required.	If any new build were to take places as part of SDA2 or SDA3 it is highly likely additional SEND provision will be required which this development will need to support via developer contributions and transport obligations.

Policy	Site Name	Location	Dwellings	Early Years	Primary	Secondary	Post 16	SEND
					nursery or SEND provision as part of delivery. Home to school transport mitigation would be needed ahead of the delivery of new provision on site.	this proposed development. The site area would be 10-12 HA meeting the requirement of 6-8FE and sixth form provision. Developer contributions would be sought to fund the project too. Home to school transport mitigation would be needed ahead of the delivery of new provision on site.		
SDA3	Roudham and Larling	Roudham and Larling	3000	It is likely development of this size will impact the EY provision required across this area, where some will likely come from the new primary provision, but some places could be required in Private nursery provision to have a blended offer across the area. Contributions to support expansion will be required, or land within the development will form part of the developer's options in this matter.	This development, being relatively disconnected from existing settlements, will be required to meet localised demand to mitigate its impact on education. This will require substantial education provision across this and SDA2. Across both sites there could be demand for up to 4 x 2FE primary, one could include the relocation and expansion of the existing East Harling primary. A minimum of 2.3Ha is required for each primary school with further contributions required from the developers to fund the delivery of the projects. Primary School provision would include either a nursery or SEND provision as part of delivery. Home to school transport mitigation would be needed ahead of the delivery of new provision on site.	A site to mitigate the impact of development for secondary provision would be required. With both sites including SDA2, development in this location it is likely to yield a substantial proportion of pupils to support a secondary school. However, the long-term viability of a secondary school is likely to be based on accommodating children across a wider catchment who would otherwise have to be transported to provision in either Thetford, Attleborough or Watton. It would be expected that, collectively, this site and SDA 2 will provide land for a new secondary school which had the ability to expand and meet some of the Post 16 provision yielded from this proposed development. The site area would be 10-12 HA meeting the requirement of 6-8FE and sixth form provision. Developer contributions would be sought to fund the project too. Home to school transport mitigation would be needed ahead of the delivery of new provision on site.	Mitigation required for transport or until the secondary/post 16 provision is provided would be required.	If any new build were to take places as part of SDA2 or SDA3 it is highly likely additional SEND provision will be required which this development will need to support via developer contributions and transport obligations.
SAHAM 1	West of Hills Road 20	Saham Toney	20	Some capacity exists to meet this demand	Primary school provision could meet this scale of development or transport maybe required to offset this mitigation	Contributions will be required to meet the additional demand at secondary in Watton with support to transport of pupils also required.	Transport obligations would be required to the nearest Post 16 provision	SEND provision could require contributions to support expansion, with consideration of transport obligations for pupils to the nearest provision available.
SHROP 1	East of Rocklands Road 20	Shropham	20	Some capacity exists to meet this demand	Primary school provision could meet this scale of development	Contributions will be required to meet the additional demand at secondary	Transport obligations would be required to the nearest Post 16 provision	SEND provision could require contributions to support expansion, with consideration of transport

Policy	Site Name	Location	Dwellings	Early Years	Primary	Secondary	Post 16	SEND
					or transport maybe required to offset this mitigation	in Old Buckenham with support to transport of pupils also required.		obligations for pupils to the nearest provision available.
SLOP 1	Option 1 - Land to West of Church Road 10	South Lopham	10	Some capacity exists to meet this demand	Primary school provision could meet this scale of development or transport maybe required to offset this mitigation	Contributions will be required to meet the additional demand at secondary in Diss with support to transport of pupils also required.	Transport obligations would be required to the nearest Post 16 provision	SEND provision could require contributions to support expansion, with consideration of transport obligations for pupils to the nearest provision available.
SPL 1	Bunkers Hill (small part) 30	Sporle	30	Some capacity exists to meet this demand	Primary school provision could meet this scale of development or transport maybe required to offset this mitigation	Contributions will be required to meet the additional demand at secondary in Swaffham with support to transport of pupils also required.	Transport obligations would be required to the nearest Post 16 provision	SEND provision could require contributions to support expansion, with consideration of transport obligations for pupils to the nearest provision available.
SPL 2	Land off the street 30	Sporle	30	Some capacity exists to meet this demand	Primary school provision could meet this scale of development or transport maybe required to offset this mitigation	Contributions will be required to meet the additional demand at secondary in Swaffham with support to transport of pupils also required.	Transport obligations would be required to the nearest Post 16 provision	SEND provision could require contributions to support expansion, with consideration of transport obligations for pupils to the nearest provision available.
SWA 2	Land to the east of Sporle Road	Swaffham	180	It is likely development of this size will impact the EY provision required across this area, where some will likely come from the new primary provision, but some places could be required in Private nursery provision to have a blended offer across the area. Contributions to support expansion will be required, or land within the development will form part of the developer's options in this matter. Additional expansion may be required before any new site is delivered to meet earlier phases of any development in Swaffham.	Sites across this settlement area will impact the capacity of the local schools in this area. There are surrounding schools which through their own growth will not have capacity to accommodate any push out from this localised area. It would also reduce the need for unsustainable transport to push families out of the localised town. To meet demand will require a site to be earmarked for a 2FE new school site which will require 2.3HA. Additional demand will require contributions to support delivery and potential expansion of Swaffham Primary if all housing is recognised.	Contributions will be required to meet the additional demand at secondary in Swaffham with support to transport of pupils also required.	Transport obligations would be required to the nearest Post 16 provision	Some expansion for SEND will be required to meet new demand from the scale of housing in this area. As part of any new build primary provision for SEND could be considered as well as provision within the secondary school if deemed necessary. It could lead to transport obligations to respond to growth to get pupils to the nearest provision available.

Policy	Site Name	Location	Dwellings	Early Years	Primary	Secondary	Post 16	SEND
SWA 2	Land to the south of Sporle Road	Swaffham	120	It is likely development of this size will impact the EY provision required across this area, where some will likely come from the new primary provision, but some places could be required in Private nursery provision to have a blended offer across the area. Contributions to support expansion will be required, or land within the development will form part of the developer's options in this matter. Additional expansion may be required before any new site is delivered to meet earlier phases of any development in Swaffham.	Sites across this settlement area will impact the capacity of the local schools in this area. There are surrounding schools which through their own growth will not have capacity to accommodate any push out from this localised area. It would also reduce the need for unsustainable transport to push families out of the localised town. To meet demand will require a site to be earmarked for a 2FE new school site which will require 2.3HA. Additional demand will require contributions to support delivery and potential expansion of Swaffham Primary if all housing is recognised.	Contributions will be required to meet the additional demand at secondary in Swaffham with support to transport of pupils also required.	Transport obligations would be required to the nearest Post 16 provision	Some expansion for SEND will be required to meet new demand from the scale of housing in this area. As part of any new build primary provision for SEND could be considered as well as provision within the secondary school if deemed necessary. It could lead to transport obligations to respond to growth to get pupils to the nearest provision available.
SWAFF SUE	North of Norwich Road	Swaffham	300	It is likely development of this size will impact the EY provision required across this area, where some will likely come from the new primary provision, but some places could be required in Private nursery provision to have a blended offer across the area. Contributions to support expansion will be required, or land within the development will form part of the developer's options in this matter. Additional expansion may be required before any new site is delivered to meet earlier phases of any development in Swaffham.	Sites across this settlement area will impact the capacity of the local schools in this area. There are surrounding schools which through their own growth will not have capacity to accommodate any push out from this localised area. It would also reduce the need for unsustainable transport to push families out of the localised town. To meet demand will require a site to be earmarked for a 2FE new school site which will require 2.3HA. Additional demand will require contributions to support delivery and potential expansion of Swaffham Primary if all housing is recognised.	Contributions will be required to meet the additional demand at secondary in Swaffham with support to transport of pupils also required.	Transport obligations would be required to the nearest Post 16 provision	Some expansion for SEND will be required to meet new demand from the scale of housing in this area. As part of any new build primary provision for SEND could be considered as well as provision within the secondary school if deemed necessary. It could lead to transport obligations to respond to growth to get pupils to the nearest provision available.

Policy	Site Name	Location	Dwellings	Early Years	Primary	Secondary	Post 16	SEND
SWA 5	South of North Pickenham Road	Swaffham	100	It is likely development of this size will impact the EY provision required across this area, where some will likely come from the new primary provision, but some places could be required in Private nursery provision to have a blended offer across the area. Contributions to support expansion will be required, or land within the development will form part of the developer's options in this matter. Additional expansion may be required before any new site is delivered to meet earlier phases of any development in Swaffham.	Sites across this settlement area will impact the capacity of the local schools in this area. There are surrounding schools which through their own growth will not have capacity to accommodate any push out from this localised area. It would also reduce the need for unsustainable transport to push families out of the localised town. To meet demand will require a site to be earmarked for a 2FE new school site which will require 2.3HA. Additional demand will require contributions to support delivery and potential expansion of Swaffham Primary if all housing is recognised.	Contributions will be required to meet the additional demand at secondary in Swaffham with support to transport of pupils also required.	Transport obligations would be required to the nearest Post 16 provision	Some expansion for SEND will be required to meet new demand from the scale of housing in this area. As part of any new build primary provision for SEND could be considered as well as provision within the secondary school if deemed necessary. It could lead to transport obligations to respond to growth to get pupils to the nearest provision available.
SWAF SUE	South of Norwich Road (East)	Swaffham	500	It is likely development of this size will impact the EY provision required across this area, where some will likely come from the new primary provision, but some places could be required in Private nursery provision to have a blended offer across the area. Contributions to support expansion will be required, or land within the development will form part of the developer's options in this matter. Additional expansion may be required before any new site is delivered to meet earlier phases of any development in Swaffham.	Sites across this settlement area will impact the capacity of the local schools in this area. There are surrounding schools which through their own growth will not have capacity to accommodate any push out from this localised area. It would also reduce the need for unsustainable transport to push families out of the localised town. To meet demand will require a site to be earmarked for a 2FE new school site which will require 2.3HA. Additional demand will require contributions to support delivery and potential expansion of Swaffham Primary if all housing is recognised.	Contributions will be required to meet the additional demand at secondary in Swaffham with support to transport of pupils also required.	Transport obligations would be required to the nearest Post 16 provision	Some expansion for SEND will be required to meet new demand from the scale of housing in this area. As part of any new build primary provision for SEND could be considered as well as provision within the secondary school if deemed necessary. It could lead to transport obligations to respond to growth to get pupils to the nearest provision available.

Policy	Site Name	Location	Dwellings	Early Years	Primary	Secondary	Post 16	SEND
SWA 4	Stoneycroft House, Sporle Road	Swaffham	12	It is likely development of this size will impact the EY provision required across this area, where some will likely come from the new primary provision, but some places could be required in Private nursery provision to have a blended offer across the area. Contributions to support expansion will be required, or land within the development will form part of the developer's options in this matter. Additional expansion may be required before any new site is delivered to meet earlier phases of any development in Swaffham.	Sites across this settlement area will impact the capacity of the local schools in this area. There are surrounding schools which through their own growth will not have capacity to accommodate any push out from this localised area. It would also reduce the need for unsustainable transport to push families out of the localised town. To meet demand will require a site to be earmarked for a 2FE new school site which will require 2.3HA. Additional demand will require contributions to support delivery and potential expansion of Swaffham Primary if all housing is recognised.	Contributions will be required to meet the additional demand at secondary in Swaffham with support to transport of pupils also required.	Transport obligations would be required to the nearest Post 16 provision	Some expansion for SEND will be required to meet new demand from the scale of housing in this area. As part of any new build primary provision for SEND could be considered as well as provision within the secondary school if deemed necessary. It could lead to transport obligations to respond to growth to get pupils to the nearest provision available.
SWAF SUE	North of Norwich Road (West)	Swaffham	400	It is likely development of this size will impact the EY provision required across this area, where some will likely come from the new primary provision, but some places could be required in Private nursery provision to have a blended offer across the area. Contributions to support expansion will be required, or land within the development will form part of the developer's options in this matter. Additional expansion may be required before any new site is delivered to meet earlier phases of any development in Swaffham.	Sites across this settlement area will impact the capacity of the local schools in this area. There are surrounding schools which through their own growth will not have capacity to accommodate any push out from this localised area. It would also reduce the need for unsustainable transport to push families out of the localised town. To meet demand will require a site to be earmarked for a 2FE new school site which will require 2.3HA. Additional demand will require contributions to support delivery and potential expansion of Swaffham Primary if all housing is recognised.	Contributions will be required to meet the additional demand at secondary in Swaffham with support to transport of pupils also required.	Transport obligations would be required to the nearest Post 16 provision	Some expansion for SEND will be required to meet new demand from the scale of housing in this area. As part of any new build primary provision for SEND could be considered as well as provision within the secondary school if deemed necessary. It could lead to transport obligations to respond to growth to get pupils to the nearest provision available.

Policy	Site Name	Location	Dwellings	Early Years	Primary	Secondary	Post 16	SEND
SWA 6	South of Norwich Road	Swaffham	300	It is likely development of this size will impact the EY provision required across this area, where some will likely come from the new primary provision, but some places could be required in Private nursery provision to have a blended offer across the area. Contributions to support expansion will be required, or land within the development will form part of the developer's options in this matter. Additional expansion may be required before any new site is delivered to meet earlier phases of any development in Swaffham.	Sites across this settlement area will impact the capacity of the local schools in this area. There are surrounding schools which through their own growth will not have capacity to accommodate any push out from this localised area. It would also reduce the need for unsustainable transport to push families out of the localised town. To meet demand will require a site to be earmarked for a 2FE new school site which will require 2.3HA. Additional demand will require contributions to support delivery and potential expansion of Swaffham Primary if all housing is recognised.	Contributions will be required to meet the additional demand at secondary in Swaffham with support to transport of pupils also required.	Transport obligations would be required to the nearest Post 16 provision	Some expansion for SEND will be required to meet new demand from the scale of housing in this area. As part of any new build primary provision for SEND could be considered as well as provision within the secondary school if deemed necessary. It could lead to transport obligations to respond to growth to get pupils to the nearest provision available.
SWAF SUE	South of Norwich Road (West)	Swaffham	500	It is likely development of this size will impact the EY provision required across this area, where some will likely come from the new primary provision, but some places could be required in Private nursery provision to have a blended offer across the area. Contributions to support expansion will be required, or land within the development will form part of the developer's options in this matter. Additional expansion may be required before any new site is delivered to meet earlier phases of any development in Swaffham.	Sites across this settlement area will impact the capacity of the local schools in this area. There are surrounding schools which through their own growth will not have capacity to accommodate any push out from this localised area. It would also reduce the need for unsustainable transport to push families out of the localised town. To meet demand will require a site to be earmarked for a 2FE new school site which will require 2.3HA. Additional demand will require contributions to support delivery and potential expansion of Swaffham Primary if all housing is recognised.	Contributions will be required to meet the additional demand at secondary in Swaffham with support to transport of pupils also required.	Transport obligations would be required to the nearest Post 16 provision	Some expansion for SEND will be required to meet new demand from the scale of housing in this area. As part of any new build primary provision for SEND could be considered as well as provision within the secondary school if deemed necessary. It could lead to transport obligations to respond to growth to get pupils to the nearest provision available.

Policy	Site Name	Location	Dwellings	Early Years	Primary	Secondary	Post 16	SEND
SDP03	Robertson Barracks	Swanton Morley	2000	Any new provision of a primary school could include a nursery provision. A development of this scale will require a mix of EY provision across the area to better meet new demand. This could be separate from the school between 0.3 to 0.5Ha of land for delivery along with financial contributions to support delivery	Swanton Morley is the catchment school which has 1FE capacity, it would be possible to expand using the large site at this location, but to ensure better connectivity to this new community it would be a suitable option to have up to 2FE primary school earmarked on a 2.3HA site. Developer contributions would be required to meet delivery of both the new and expansion project to mitigate the impact of new development. If expansion of Swanton Morley were considered suitable and sustainable walking/cycling routes would be required to ensure pupils can get to the school safely.	Contributions will be required to meet the additional demand at secondary in Dereham with support to transport of pupils also required.	Transport obligations would be required to the nearest Post 16 provision	Some expansion for SEND will be required to meet new demand from the scale of housing in this area. As part of any new build primary provision for SEND could be considered as well as provision within the secondary school if deemed necessary. It could lead to transport obligations to respond to growth to get pupils to the nearest provision available.
SUE-KG	Kingsfleet Grove SUE	Thetford	2000	Contributions towards new nursery provision will be required that may be supported as part of the delivery of a new school or as part of provision offered by a PVI setting that would be delivered by the developer as part of the wider development.	Existing schools planned as part of the wider Kingsfleet development will meet some early demand from the proposal. To meet this level of demand will require additional 2FE primary school and may require based on mix of housing expansion of existing schools. Land requirement for a new 2FE school would be 2.3HA supporting nursery and SRB provision as may be required.	Contributions will be required to meet the additional demand at secondary in Thetford with support to transport of pupils. This could require contributions to support expansion if additional demand is recognised.	Transport obligations would be required to the nearest Post 16 provision	Some expansion for SEND will be required to meet new demand from the scale of housing in this area. As part of any new build primary provision for SEND could be considered as well as provision within the secondary school if deemed necessary. It could lead to transport obligations to respond to growth to get pupils to the nearest provision available.
THOM 1	LAND OFF TOTTINGTON ROAD, THOMPSON 5	Thompson	5	Some capacity exists to meet this demand	Primary school provision could meet this scale of development or transport maybe required to offset this mitigation	Contributions will be required to meet the additional demand at secondary in Wayland with support to transport of pupils also required.	Transport obligations would be required to the nearest Post 16 provision	SEND provision could require contributions to support expansion, with consideration of transport obligations for pupils to the nearest provision available.
THOM 2	Land to the east of Watton Road 25	Thompson	25	Some capacity exists to meet this demand	Primary school provision could meet this scale of development	Contributions will be required to meet the additional demand at secondary	Transport obligations would be required to the nearest Post 16 provision	SEND provision could require contributions to support expansion, with consideration of transport

Policy	Site Name	Location	Dwellings	Early Years	Primary	Secondary	Post 16	SEND
					or transport maybe required to offset this mitigation	in Wayland with support to transport of pupils also required.		obligations for pupils to the nearest provision available.
WAT SUE	Land North and East of Shrublands	Watton	1000	Additional EY provision will be required to meet demand; this could be part of the primary build scheme as part of the wider programme for expansion	To meet the additional need it is anticipated a new 2FE primary school could be required on a 2.3 HA site allowing for either nursery or SEND provision. Developer contributions to support the development of a new school would be required with associated costs for expansion of the next nearest school to the catchment.	contributions for expansion for either of the secondary schools in Watton would be required, with further assessment required to assess feasibility. In addition, transport costs would be needed to meet the increased cost in transporting pupils to schools at this age range.	contributions towards transport to the local post 16 provision will be required. The likely draw for children across the wider area, and this could impact additional capacity with the site at Roudham and Larling or Thetford.	If any new build were to take places as part of wider development for Watton it is highly likely additional SEND provision will be required which this development will need to support via developer contributions and transport obligations.
WAT SUE	Land East of Summer Lane 100	Watton	100	Additional EY provision will be required to meet demand; this could be part of the primary build scheme as part of the wider programme for expansion	To meet the additional need it is anticipated a new 2FE primary school could be required on a 2.3 HA site allowing for either nursery or SEND provision. Developer contributions to support the development of a new school would be required with associated costs for expansion of the next nearest school to the catchment.	contributions for expansion for either of the secondary schools in Watton would be required, with further assessment required to assess feasibility. In addition, transport costs would be needed to meet the increased cost in transporting pupils to schools at this age range.	contributions towards transport to the local post 16 provision will be required. The likely draw for children across the wider area, and this could impact additional capacity with the site at Roudham and Larling or Thetford.	If any new build were to take places as part of wider development for Watton it is highly likely additional SEND provision will be required which this development will need to support via developer contributions and transport obligations.
WAT 4	Land West of Thetford Road 140	Watton	140	Additional EY provision will be required to meet demand; this could be part of the primary build scheme as part of the wider programme for expansion	To meet the additional need it is anticipated a new 2FE primary school could be required on a 2.3 HA site allowing for either nursery or SEND provision. Developer contributions to support the development of a new school would be required with associated costs for expansion of the next nearest school to the catchment.	contributions for expansion for either of the secondary schools in Watton would be required, with further assessment required to assess feasibility. In addition, transport costs would be needed to meet the increased cost in transporting pupils to schools at this age range.	contributions towards transport to the local post 16 provision will be required. The likely draw for children across the wider area, and this could impact additional capacity with the site at Roudham and Larling or Thetford.	If any new build were to take places as part of wider development for Watton it is highly likely additional SEND provision will be required which this development will need to support via developer contributions and transport obligations.
WAT SUE	Land to rear of Shrublands 10	Watton	10	Additional EY provision will be required to meet demand; this could be part of the primary build scheme as part of the wider programme for expansion	To meet the additional need it is anticipated a new 2FE primary school could be required on a 2.3 HA site allowing for either nursery or SEND provision. Developer contributions to support the development of a new school would be required with associated costs for expansion of the next nearest school to the catchment.	contributions for expansion for either of the secondary schools in Watton would be required, with further assessment required to assess feasibility. In addition, transport costs would be needed to meet the increased cost in transporting pupils to schools at this age range.	contributions towards transport to the local post 16 provision will be required. The likely draw for children across the wider area, and this could impact additional capacity with the site at Roudham and Larling or Thetford.	If any new build were to take places as part of wider development for Watton it is highly likely additional SEND provision will be required which this development will need to support via developer contributions and transport obligations.

Policy	Site Name	Location	Dwellings	Early Years	Primary	Secondary	Post 16	SEND
WAT SUE	Shrublands (1) Carbrooke 10	Watton	10	Additional EY provision will be required to meet demand; this could be part of the primary build scheme as part of the wider programme for expansion	To meet the additional need it is anticipated a new 2FE primary school could be required on a 2.3 HA site allowing for either nursery or SEND provision. Developer contributions to support the development of a new school would be required with associated costs for expansion of the next nearest school to the catchment.	contributions for expansion for either of the secondary schools in Watton would be required, with further assessment required to assess feasibility. In addition, transport costs would be needed to meet the increased cost in transporting pupils to schools at this age range.	contributions towards transport to the local post 16 provision will be required. The likely draw for children across the wider area, and this could impact additional capacity with the site at Roudham and Larling or Thetford.	If any new build were to take places as part of wider development for Watton it is highly likely additional SEND provision will be required which this development will need to support via developer contributions and transport obligations.
WAT SUE	Shrublands (2) Carbrooke 20	Watton	20	Additional EY provision will be required to meet demand; this could be part of the primary build scheme as part of the wider programme for expansion	To meet the additional need it is anticipated a new 2FE primary school could be required on a 2.3 HA site allowing for either nursery or SEND provision. Developer contributions to support the development of a new school would be required with associated costs for expansion of the next nearest school to the catchment.	contributions for expansion for either of the secondary schools in Watton would be required, with further assessment required to assess feasibility. In addition, transport costs would be needed to meet the increased cost in transporting pupils to schools at this age range.	contributions towards transport to the local post 16 provision will be required. The likely draw for children across the wider area, and this could impact additional capacity with the site at Roudham and Larling or Thetford.	If any new build were to take places as part of wider development for Watton it is highly likely additional SEND provision will be required which this development will need to support via developer contributions and transport obligations.
	Ex MOD Comms Building, Elworthy Road (BLR) 20	Watton	20	Additional EY provision will be required to meet demand; this could be part of the primary build scheme as part of the wider programme for expansion	To meet the additional need it is anticipated a new 2FE primary school could be required on a 2.3 HA site allowing for either nursery or SEND provision. Developer contributions to support the development of a new school would be required with associated costs for expansion of the next nearest school to the catchment.	contributions for expansion for either of the secondary schools in Watton would be required, with further assessment required to assess feasibility. In addition, transport costs would be needed to meet the increased cost in transporting pupils to schools at this age range.	contributions towards transport to the local post 16 provision will be required. The likely draw for children across the wider area, and this could impact additional capacity with the site at Roudham and Larling or Thetford.	If any new build were to take places as part of wider development for Watton it is highly likely additional SEND provision will be required which this development will need to support via developer contributions and transport obligations.
WAT 2	Land East of Shackleton Road, Former RAF Airbase 75	Watton	75	Additional EY provision will be required to meet demand; this could be part of the primary build scheme as part of the wider programme for expansion	To meet the additional need it is anticipated a new 2FE primary school could be required on a 2.3 HA site allowing for either nursery or SEND provision. Developer contributions to support the development of a new school would be required with associated costs for expansion of the next nearest school to the catchment.	contributions for expansion for either of the secondary schools in Watton would be required, with further assessment required to assess feasibility. In addition, transport costs would be needed to meet the increased cost in transporting pupils to schools at this age range.	contributions towards transport to the local post 16 provision will be required. The likely draw for children across the wider area, and this could impact additional capacity with the site at Roudham and Larling or Thetford.	If any new build were to take places as part of wider development for Watton it is highly likely additional SEND provision will be required which this development will need to support via developer contributions and transport obligations.

Policy	Site Name	Location	Dwellings	Early Years	Primary	Secondary	Post 16	SEND
WAT 3	Land North of Thetford Road 350	Watton	350	Additional EY provision will be required to meet demand; this could be part of the primary build scheme as part of the wider programme for expansion	To meet the additional need it is anticipated a new 2FE primary school could be required on a 2.3 HA site allowing for either nursery or SEND provision. Developer contributions to support the development of a new school would be required with associated costs for expansion of the next nearest school to the catchment.	contributions for expansion for either of the secondary schools in Watton would be required, with further assessment required to assess feasibility. In addition, transport costs would be needed to meet the increased cost in transporting pupils to schools at this age range.	contributions towards transport to the local post 16 provision will be required. The likely draw for children across the wider area, and this could impact additional capacity with the site at Roudham and Larling or Thetford.	If any new build were to take places as part of wider development for Watton it is highly likely additional SEND provision will be required which this development will need to support via developer contributions and transport obligations.
WEAS 1	School Road 10	Weasenham	10	There is limited provision in this community, and this will lead families having to travel long distances to obtain a place to meet need. The nearest provision may be situated in Litcham.	A school recently closed in this area, and it will lead to significant distances to their nearest school, the closest school being Great Massingham or Litcham so contributions will be required for safe walking/cycling routes or transport obligations	Contributions will be required to meet the additional demand at secondary in Litcham with support to transport of pupils also required.	Transport obligations would be required to the nearest Post 16 provision	SEND provision could require contributions to support expansion, with consideration of transport obligations for pupils to the nearest provision available.
YAX 1	St Peter's Close / Norwich Road 50	Yaxham	50	Additional EY provision will be required to meet demand; this could be part of the primary build scheme as part of the wider programme for expansion	Primary school provision could meet this scale of development or transport maybe required to offset this mitigation including creation of safe walking/cycling routes	Contributions will be required to meet the additional demand at secondary in Dereham with support to transport of pupils also required.	Transport obligations would be required to the nearest Post 16 provision	SEND provision could require contributions to support expansion, with consideration of transport obligations for pupils to the nearest provision available.

Breckland Council Local Plan - Regulation 18 Consultation

Highway Authority response.

1. General

1.1. The interactive maps do not provide a consistent boundary to features depending on the scale viewed at. Consequently, the exact boundary of proposed policy areas and allocations cannot be determined and therefore it is not possible to comment on the relationship the highway boundary and in some cases the ability to access the site. This factor needs to be considered in all the following comments that relate to Green Spaces and Site Allocations.

2. Policy

Policy Gen 01

2.1. Development must be designed to promote active travel.

Paragraphs 4.27 – 4.30 and Policy RB1

2.2. Oddly placed up front amongst the GEN policies and would make more sense being grouped with the site allocation policies.

Paragraph 4.29

2.3. The Local Plan criteria-based approach to Robertson Barracks is supported. This approach recognises the nature of the site and the opportunity for redevelopment. The Highway authority remains concerned about the scale of proposal that can be satisfactorily accommodated in this location and at this time there is no agreed evidence to support the 2,000 figure. This should be removed and replaced with text that sets out that the scale of redevelopment will be determined through an assessment of local constraints and potential mitigation.

Policy ENV 13 – Local green space

2.4. The green space designation has the potential to conflict with the powers of the Highway Authority. The Highway Authority objects to any area of public highway being dedicated as local green space in the plan. The following green space designations appear to include land dedicated as highway based on the mapping provided.

- 009 Cranworth Village Green, Cranworth appears to include public highway. Amend to exclude highway land
- 023 Land to north of Lolly Moor, Westfield, Dereham appears to include public highway. Amend to exclude highway land
- 068 Dereham Road/Old Hall Road, Mattishall appears to include public highway. Amend to exclude highway land

- 033 Rayners Way / Dereham Road, Mattishall appears to include public highway. Amend to exclude highway land
- 041 Prince William Wood, Orchard Close, North Elmham appears to include public highway. Amend to exclude highway land
- 012 Open space at Swans Nest, Otter Road (site including Play Area adjacent Clover Road), Swaffham appears to include public highway. Amend to exclude highway land
- 018 Village Hall Playing Fields, Swanton Morley appears to include part of Harker's Lane. Amend to exclude highway land
- 019 Playing field, Manns Lane, Swanton Morley appears to include public highway. Amend to exclude highway land
- 020 Cricket Club, The Angel, Swanton Morley appears to include public highway. Amend to exclude highway land

2.5. The green space designations must be reviewed and amended to ensure that no dedicated highway is included within them.

Policy INF 01 Sustainable Transport

2.6. The introduction paragraph should include all bodies responsible for transport (LTA, National Highways, Network Rail, train operators.....)

2.7. In regards points b, c, d and e; should these relate to development? Otherwise, is it unclear what is the purpose of these points in the local plan, and what can it do about these issues? The highway authority considers that it would make more sense, and be clearer if they were combined with the final 4 points under Development should:

Site Specific Policies Housing

Ref	Site	Scale	Transport Comments
Strategic Development Areas & Strategic Urban Extensions			
SDA1	Frans Green, East Tuddenham	2,000	<p>No access strategy has been provided. Local highway network may need improvement to support large scale development. Likely to connect to the detrunked section of A47 following completion of the Easton /Tuddenham improvement currently under construction. National Highways views should be sought over impacts on the current A47 improvement works.</p> <ul style="list-style-type: none"> • Scale is unlikely to provide for higher order services so is likely to generate significant vehicular trips and be reliant on the car. • Remote with limited services, employment public and public transport. • Closest settlement is Hockering with poor active travel links. <p>The catchment secondary school is Dereham, so likely to require significant contribution for secondary school home/school transport that could impact viability.</p> <p>This proposed allocation needs to connect to both the HOC 1 allocation and the village to the west. The LTA is content for the proposed allocation to move forward into the next stage of plan making, however more detail around the access strategy and its relationship to HOC 1 is required. A unified policy for both sites needed.</p> <p>Options for a revised Norwich Western Link are currently being explored by the County Council. This work is progressing and although there is no preferred option at this stage it is possible that some of the options may impact on SDA 1 and vice versa. This does not mean that the proposed allocation should not proceed, however as work on the Local Plan and the NWL progresses there will need to be continued dialogue to understand the opportunities and avoid conflicts between the two.</p>

Ref	Site	Scale	Transport Comments
079	Thetford, Kingsfleet Grove	1250	<p>Evidence is required to consider the impacts on the A11 trunk road junctions and determine the scale and nature of any improvements necessary. This must be scoped and agreed by National Highways but should include Thetford and Barton Mills junctions.</p> <p>There are concerns over severance from Thetford due to A11. Any development NW of the A11 will require active and sustainable links across A11 and the rail line, likely in form of bridges or attractive underpasses.</p> <p>Smart Traffic Management proposals put forward in the submission are not supported. The proposals should not impact on the strategic function of the A11, the A134 and A1075 and will require junction capacity improvements where required.</p> <p>Though this site should continue to be considered for inclusion in the next Local Plan, further evidence is required to support deliverability and viability and maintain the strategic function of the Strategic, Major and Principal Road networks.</p> <p>The LTA maintains a holding objection until evidence in regard to access strategy, impact on A11 and local highway network, active travel, transport strategy has been provided.</p>
SDA2	Barkers Farm	3,000	<p>The proposal relies on a single point of access to the A11.</p> <p>The surrounding local highway network is poor and unsuitable to support significant development.</p> <p>Junctions on A11 are likely to need upgrading. Evidence is required to consider the impacts on the A11 trunk road junctions and determine the scale and nature of improvements necessary. This must be scoped and agreed by National Highways but should include Thetford and Barton Mills junctions.</p> <p>LTP policy compliance issues:</p>

Ref	Site	Scale	Transport Comments
			<ul style="list-style-type: none"> • Scale is unlikely to provide for higher order services so is likely to generate significant vehicular trips and be reliant on the car. • Remote with no local services, employment and public transport provision. • Closest settlement is East Harling, although there are no active travel connections and segregated by the A11. <p>The catchment secondary school is Old Buckenham so likely to require significant contribution for secondary school home/school transport that could impact viability.</p> <p>Not supported for inclusion in the next stage of plan making as a stand-alone site.</p>
SDA3	Larling and Roudham	3,000 100,000sqm Commercial	<p>The proposal relies on a single point of access to the A11.</p> <p>The surrounding local highway network is poor and unsuitable to support significant development.</p> <p>Junctions on A11 are likely to need upgrading. Evidence is required to consider the impacts on the A11 trunk road junctions and determine the scale and nature of improvements necessary. This must be scoped and agreed by National Highways but should include Thetford and Barton Mills junctions.</p> <ul style="list-style-type: none"> • Scale is unlikely to provide for higher order services so is likely to generate significant vehicular trips and be reliant on the car. • Remote with no local services, employment and public transport provision. • Closest settlement is East Harling, although there are no active travel connections and segregated by the A11.

Ref	Site	Scale	Transport Comments
			<p>The catchment secondary school is Old Buckenham so likely to require significant contribution for secondary school home/school transport that could impact viability.</p> <p>Not supported for inclusion in the next stage of plan making as a stand-alone site.</p>
SDA2 and SDA3 in combination	Larling and Roudham	6,000	<p>Likely to have a significant impact on the A11/B1111 junction requiring a significant upgrade. Will need to assess impact on the A11 Thetford Junctions and Barton Mills.</p> <p>There is concern over severance created by the A11 and a number of safe and attractive active travel crossings will need to be formed in addition to improved active travel provision on the B1111 (particularly under the A11).</p> <p>The in-combination site will need to deliver a secondary school, to serve this development and accommodate demand from surrounding development. Home to School Transport contributions for Primary and Secondary education will need to be provided to account for needs ahead of on-site delivery and for the whole site if appropriate school provision cannot be provided.</p> <p>There are concerns that this combination will not deliver the required infrastructure, on site services and active travel links required.</p> <p>Holding objection: The LTA needs to see further evidence in regard to access strategy, impact on A11 and local highway network, active travel, transport strategy. If this is to go forward, it will need to be considered as a single allocation.</p>
072, 073, 074, 075	Swaffham SUE Parcels 1-4, Norwich Road Swaffham	1,700	Land south of A47 adjacent to the existing settlement that offers a range of services and opportunities including a secondary school.

Ref	Site	Scale	Transport Comments
			<p>Impact on the A47 junction will need to be considered in consultation with National Highways.</p> <p>Could meet LTP objectives, subject to detail and provision of sufficient active and sustainable travel facilities.</p> <p>The catchment secondary school is in Swaffham</p> <p>No significant issues to prevent the proposal site moving forward to the next stage of plan making, subject to more detailed transport assessment to identify transport impacts and a package of suitable transport mitigation.</p> <p>All sites need to be brought together into a single allocation along with those adjacent sites identified in the current local plan (SWA2,3,4 and 6). This is required to understand the cumulative impacts of the individual sites put forward and to ensure there is a single clear and consistent policy to secure and deliver the required mitigation.</p>
076	Swaffham SUE Parcel 5, North of the A47	13ha Employment	Land north of A47 not suitable for development as A47 severs the site from Swaffham. Further discussions on specific uses relating to A47 may remove objection.
086, 339, 340, 225, 223	Watton SUE, North of Norwich Road	1,400	<p>Distant from the centre of Watton.</p> <p>Active travel links exist though additional required to improve links with Watton.</p> <p>Poor active travel links to the catchment primary school in Carbrooke. Scale likely to provide for a new primary school.</p> <p>Detail required on access requirements. Two points of access from B1108. Issues on local network need to be addressed. Access to village and school need consideration. Pedestrian and cycle links required back to Watton.</p> <p>Possible for inclusion though further detail is required.</p>

Ref	Site	Scale	Transport Comments
			All sites need to be brought together into a single allocation along with those adjacent sites identified in the current local plan. This is required to understand the cumulative impacts of the individual sites put forward and to ensure there is a single clear and consistent policy to secure and deliver the required mitigation. Further details of transport strategy needed.
Market Towns			
DER 1 (079)	Land Behind Dereham Hospital, Northgate, Dereham	30	Objection: Site is remote form the highway. Unclear how access can be achieved as the hospital is private. Site must be accessed from adopted highway. Site could be considered if access direct from public highway could be demonstrated. Existing access roads within the hospital grounds are not adequate to cater for development.
DER 2 (344)	Southeast of Swanton Road, Dereham	120	Suitable access achievable. Speed limit to be extended beyond the site frontage. Connection into footways currently being built as part of the Abel Homes development. Second point of access onto Swanton Road needed for proposed dwelling numbers with a link through to the existing housing estate.
DER 3 (032)	Land at Norwich Road, Dereham	120	Supported, subject to detail and connectivity into existing footpaths.
DER 4 (144)	Land at Dumpling Green, Dereham	300	Ok, subject to delivery of new roundabout at the primary site access / junction of Westfield Road and shared 3m wide pedestrian / cycle facility along the site frontage.
DER 5	Land off Dereham Road	70	Access from Dereham Road only. Appropriate sustainable links to the town centre will require improvement.

Ref	Site	Scale	Transport Comments
SWA 2 (195)	Sporle Road, South	120	<p>Subject to securing acceptable visibility along with carriageway widening to 6.0m minimum at site frontage. Would require widening of Sporle Road carriageway to a minimum of 6.0m between site access and A47, this would require 3rd party land including from site reference 177/179a. Would also require improvements to provide continuous off-carriageway walking & cycling route between the site & Swaffham Town Centre. NH would need to provide a view on access to the A47.</p> <p>SWA 2, 3, 4, 6 need to be considered as part of a single allocation for Swaffham, including the SUE parcels of land.</p>
SWA 3 (179)	Sporle Road East, Swaffham	180	<p>Unlikely to be considered in isolation as site can only be accessed through SWA 2 and SWA 4. Sporle Road would require widening to 6m. Reliant on SWA2 for road widening and ped connections.</p> <p>SWA 2, 3, 4, 6 need to be considered as part of a single allocation for Swaffham, including the SUE parcels of land.</p>
SWA 4 (077)	Stoneycroft House, Sporle Road, Swaffham	12	<p>Reliant on SWA 2 for ped connections. Sporle Road to be widened to 6m.</p> <p>SWA 2, 3, 4, 6 need to be considered as part of a single allocation for Swaffham, including the SUE parcels of land.</p>
SWA 5 (070)	North Pickenham Road, Swaffham	100	<p>Objection: No opportunity to provided adequate carriageway width and footway connectivity demonstrated.</p>
SWA 6 (069)	South of Norwich Road, Swaffham	300	<p>2 points of access required. Subject to detail design, suitable junction form and suitable infrastructure to support active travel.</p> <p>SWA 2, 3, 4, 6 need to be considered as part of a single allocation for Swaffham, including the SUE parcels of land.</p>

Ref	Site	Scale	Transport Comments
WAT 2 (085)	Land East of Shackleton Road, Former RAF Airbase, Watton	75	Unclear how access from Norwich Road is to be achieved. Policy is contradictory as it refers links to the west. The LTA maintains a holding objection until further detail on access strategy is provided.
WAT 3 (088)	Land North of Thetford Road, Watton	350	Objection: Priority junction access form unsuitable for A1075. Insufficient space to provide additional roundabout for site access between new roundabout serving Barratt site and Wayland Wood. Concerns whether suitable access to public transport can be achieved. This site has been looked at in detail through highway pre-app, where no solution to access issues could be found.
WAT 4 (289)	West of Thetford Road, Watton	140	Subject to link road formed through development joining Merton Road and Watton Road, carriageway widening on Merton Road and Thurton Road to 5.5m, ped and cycle connectivity from site to Wayland High School. Potential upgrade to PROW Watton FP 7.
Key Service Centre			
HAR 1 (212)	Lopham Road, East Harling	190	Subject to realignment of Lopham Road to achieve site access onto Garboldisham Road with suitable visibility, new footway along Lopham Road between Garboldisham Road and existing footway provision, Review of crossing points on Hamblings Piece / Kerridges. Explore potential to dedicate link between The Crescent and Jubilee Avenue as PROW.
HAR 2 (133)	West of Garboldisham Road, East Harling	15	Objection: Inadequate footway connectivity. Any access would require removal of frontage hedge to secure appropriate visibility. Concerns with forward visibility around bend on Garboldisham Road to the south.
HAR 3 (398)	North of Kenninghall Road, East Harling	30	Objection: Carriageway insufficient width to cater for development. No pedestrian facilities.

Ref	Site	Scale	Transport Comments
MAT 1 (307)	Land North of Thynne's Lane, Mattishall	100	Objection: Scale of development inappropriate for local road network. It is unclear whether carriageway widening, and suitable pedestrian connectivity can be achieved. Potential adverse impact on the wider highway network to the east. The site is located on an unlit, single-track road where no pedestrian facilities exist and where forward visibility is limited. The LTA has previously resisted pre-app proposals at this location.
MAT 2 (357)	North of Dereham Road, Mattishall	50	Objection: Scale of development inappropriate for local road network. It is unclear whether carriageway widening, and suitable pedestrian connectivity can be achieved. Potential adverse impact on the wider highway network to the east.
NEC 1 (005)	Brackenwood, Necton	50	Subject to detailed design. Multiple points for vehicular access off Brackenwood achievable. Good pedestrian connectivity. No access off Ramms Lane. Holding Objection: The policy allows for access onto Ramms Lane, however Ramms lane is unsuitable to serve development traffic. NEC1 North has no means of access to Brackenwood. Subject to achieving access from Brackenwood, the initial section of Brackenwood needs to be widened to 5.5m with the remainder of Brackenwood widened to a minimum of 4.8m with all side road junctions having adequate visibility and Brackenwood made subject to 20mph speed limit.
NEC 2 (302)	Phase 3, North Pickenham Road, Necton	50	Subject to detailed design. Carriageway widened along entire site frontage to 5.5m Significant hedge removal required for carriageway widening and securing visibility. Connection into existing footway provision on north Pickenham Road.
Primary Parish			

Ref	Site	Scale	Transport Comments
BAN 1 (013)	West of Mill Road, Banham	70	Subject to widening out footway to 2m and carriageway 6m along site frontage on Mill Road. Bus stop to be provided. Assessment of walking routes to village centre to be undertaken to identify appropriate mitigation on sections of narrow footway. Potential improvements required to FP23.
BAWD 1 (161)	North of Foxley Road, Bawdeswell	140	Subject to suitable visibility splays at site access(es). Requires frontage footway along with improvements to provide safe pedestrian route to access public transport and village centre. Community car park provision would improve highway safety in vicinity of site during school drop-off/pick-up. No objection subject to policy being re-worded: policy requirements are not clear and are repetitious. Foxley Road needs to be widened to 5.5.m and traffic calmed. Two points of access needed.
KEN 1 (167)	Powell Close, Kenninghall	20	Holding objection: Access details not shown.
KEN 2 (031)	Kings Oak, Land Opposite Primary School, Kenninghall	50	Subject to detailed design. Access off Lopham Road. Hedge removal required for visibility. Extension of 30mph speed limit along site frontage. Implementation of part time 20mph speed limit near primary school. Appropriate crossing facilities over Lopham Road to school / playing field. Assessment and potential improvements of footways linking to bus stops and village centre. Bus stops on The Butts to be improved. FP18 to potentially be upgraded.
LIT 1 (257)	Lexham Road, Litcham	100	Holding objection: Access to B1145 needs to be adequately demonstrated. No vehicular access to Pound Lane. Pedestrian route to school at Pound Lane required. Local highway network constrained with lack of off-carriageway walking/cycling facilities. Sub-standard visibility at B1145 junction with Butt Lane. No continuous footpath of appropriate width to secondary school. Further information is required to assess the site further.

Ref	Site	Scale	Transport Comments
MUN 1 (361)	West Hall Drive, Mundford	30	West Hall Drive is private. It will need to be demonstrated that a safe and suitable access can be achieved, and West Hall Drive will need to be brought up to adoptable standards. MUN 1 and MUN 2 should be considered as one allocation.
MUN 2 (360)	Bracken Rise, Mundford	10	The policy must state that the site is to be accessed via Bracken Rise. MUN 1 and MUN 2 should be considered as one allocation.
NAR 2 (105)	Land East of Chalk Lane, Narborough (Revised Boundary of Preferred Option Site 105)	30	Satisfactory access achievable subject to removal of frontage hedge. Access potentially achievable via site to north. Subject to continuous footway linking with existing provision to the north.
NAR 1 (103)	Chalk Lane West, Narborough	70	Vehicular access at Swaffham Road only subject to detail to satisfaction of Highway Authority. Vehicular access at Chalk Lane may be achievable but available frontage is limited and would require the removal of all frontage vegetation. Policy will need to require a frontage footway at Swaffham Road, extending northwest to link with existing and along Chalk Lane, frontage footway would be required to link with the existing provision.
NEL 1 (205)	South of Eastgate Street, North Elmham	30	Access to Eastgate Street Only – Allocation acceptable subject to suitable visibility and access through 80 Eastgate Street and provision of frontage footway and localised carriageway widening to 5.5.m. The walk to school route school is on carriageway so the allocation policy will need to require speed management measures to ensure pedestrian safety.
NEL 2 (330)	Back Lane, North Elmham	50	Objection Would result in slow stopping and turning movements on a main distributor route. No footway facilities. Poor connectivity back to village.

Ref	Site	Scale	Transport Comments
OLD 1 (111)	Hargham Road, Old Buckenham	8	Objection: Hargham Road is of insufficient width and there is no reasonable prospect of extending the footway to the site.
Secondary Parish			
ASH 1	Hale Road	20	Holding objection: Site remote from adopted highway. It is unclear whether adequate visibility can be achieved. Further information would be required to re assess the proposed allocation.
ASH 2 (319)	Greenacre Close, Ashill	45	Policy to require vehicular access via Dunnets Close. Dunnets Close will require widening to 5.5m and continuous footways to Hale Road. Further pedestrian access to Lewis Close to be provided.
BEET 1 (134)	Fakenham Road, Beetley	20	For the site to be allocated it needs to be demonstrated that a suitable access can be achieved which is not clear from the information available. A pedestrian crossing facility on Fakenham Road will be required. To achieve highway safety requirements, the proposal will require the removal of a significant length of existing mature hedge.
CAS 1 (024)	Home Farm, North Acre. Caston	5	Objection: The highway adjacent to the site has no footways and the carriageway is of insufficient width to allow 2 vehicles to safely pass and to cater for further development.
GARB 1 (057)	Smallworth Lane, Garboldisham	8	Holding objection: It is unclear how a suitable access into the allocation will be achieved.
GHOC 1 (109)	Watton Road, Hockham	80	An access onto Watton Road can be achieved. The policy should require connectivity into existing footway provision, a crossing over Watton Road to the school, road widening to 6m, and introduction a part time 20mph speed limit outside school should be provided.

Ref	Site	Scale	Transport Comments
GRIS 1 (347)	Caston Road, Griston	20	Objection: Highway network inadequate to accommodate development of this scale. No pedestrian footways on Caston Road.
HOC 1 (400)	The Street, Hockering	100	Unable to consider until A47 realignment works are completed. Footway along The Street would require widening to 2m. Needs to be considered alongside SDA1, however should it come forward on its own, there would be no objection subject to access, walking and cycling, realignment of A47. No objection subject to widening of A47.
LYNG 1 (091)	North of Heath Road, Lyng	50	Objection until details of pedestrian connectivity and justification of the scale of development in this location can be provided.
N-LOP 1 (054)	Land to the Rear of Bell Farm, South of Primrose Lane	10	Objection: Insufficient land available to provide an adoptable standard road. Poor forward visibility around bend.
ROC 1 (065)	North of The Street, Rocklands	10	Objection The local highway network is not of a suitable standard to support development. Insufficient carriageway width and no footways.
ROC 2 (064)	South of Bell Road, Rocklands	15	Objection: The local highway network is not of a suitable standard to support development with insufficient carriageway width and no footways.
SAHAM 1 (072)	West of Hills Road, Saham Toney	20	Objection: The local highway network is not of a suitable standard to support development with insufficient carriageway width and no footways. Potential issue with forward visibility onto Chequers Lane.
SPL 1 (370)	Bunkers Hill Left, Sporle	30	Objection: The local highway network is not of a suitable standard to support development with insufficient carriageway width and no footway. Inability to connect to any surrounding footways.

Ref	Site	Scale	Transport Comments
SPL 2 (146)	West of The Street, Sporle	30	Adequate visibility at site access may be an issue due to size of allocation. Connectivity into frontage footway on adjacent application site. Carriageway widening needed along frontage. Further information required to assess site further.
YAX 1 (094)	North of Norwich Road, Yaxham	50	No objection subject to detail design. Connectivity into existing footway provision and access through existing development or via Mill Lane. Mill Lane would need to be widened 5.5m to site access. Footway widening to 2.0m required from site to Yaxham Primary
Tertiary Parish			
BEES 1 (028)	Back Lane (West), Beeston	10	Objection: The local highway network is not of a suitable standard to support development with insufficient carriageway width and no footway. The Highway Authority objects to this allocation.
BEES 2 (203)	Back Lane (East), Beeston	8	Objection: The local highway network is not of a suitable standard to support development with insufficient carriageway width and no footway.
BEES 3 (058)	Playing Field and Dereham Road, Beeston	5	Objection: Dereham Road is of insufficient carriageway width to support development that will require widening of to 5.5 m and provision of a 1.8m footway to Syers Lane. The development is unlikely to be of a scale that can provide the required improvements. The necessary off-site works will require 3rd party land to provide safe and suitable access.
BEES 4 (204)	School Farm Paddock, Beeston	5	Objection: Dereham Road is of insufficient carriageway width to support development that will require widening of to 5.5 m and provision of a 1.8m footway to Syers Lane. The development is unlikely to be of a scale that can provide the required improvements.

Ref	Site	Scale	Transport Comments
BEES 5 (059)	Rose Cottage, Syers Lane, Beeston	5	Holding Objection: Unsuitable highway network not of a standard suitable to support development. Further information required to assess site further.
BRIS 1 (006)	North of Gately Road, Brisley	10	Allocation is acceptable subject to carriageway widening to 5.5m and footway provision along the site frontage connecting to existing footway to the west
COL 1 (155)	East of Hall Lane, Colkirk	10	Objection: Unsuitable highway network not of a standard suitable to support development.
GARV 1 (088)	Site A - North of Dereham Road, Garvestone	10	Holding objection: Unable to secure appropriate visibility within site frontage. Would require 3rd party land. Land from GARV 2 would be needed to secure appropriate visibility splays. Combined allocation for both GARV 1 and GARV 2 may make allocation suitable.
GARV 2 (087)	Site B - North of Dereham Road, Garvestone	15	Subject to appropriate junction form, frontage footway required with crossing over to southern side / school.
GDUN 1 (256)	East of Litcham Road, Great Dunham	10	Concern as unclear how safe access could be formed. However, if an access can be formed, subject to appropriate access and frontage footway.
SHROP 1 (142)	Site 142 - East of Rocklands Road, Shropham	20	Objection: The local highway network is not of a suitable standard to support development with insufficient carriageway width and no footway. Inability to connect to any surrounding footways.
S-LOP 1 (276)	West of Church Road, South Lopham	40	Breckland have advised site to be removed from allocations - planning permission granted and built out/partially built out 3PL/2020/0540/F and 3PL/2022/0105/F

Ref	Site	Scale	Transport Comments
THOM 1 (170)	Tottington Road, Thompson	5	Objection The local highway network is not of a suitable standard to support development with insufficient carriageway width and no footway. Inability to connect to any surrounding footways.
THOM 2 (108)	East of Watton Road, Thompson	25	Objection The local highway network is not of a suitable standard to support development with insufficient carriageway width and no footway. Inability to connect to any surrounding footways.
WEAS 1 (227)	School Road, Weasenham	10	Holding objection: Narrow carriageway. Would result in crossing movements over 50mph A-road to access school. Small frontage development at Massingham Road may be acceptable subject to further information.

Local Plan Team
Breckland Council

Our ref: PL00772963

Telephone: [REDACTED]

11 December 2025

Dear Planning Policy Team

Breckland Draft Local Plan (Regulation 18) October 2025

We note that the Breckland Draft Local Plan is currently out for consultation. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully considered at all stages and levels of the local planning process.

The largely rural district of Breckland comprises five market towns at Thetford, Attleborough, Dereham, Swaffham and Watton together with many villages. Named after the distinctive landscape of sandy heath, gorse and pine trees, Breckland boasts a rich heritage with nearly 1,600 listed buildings, 132 scheduled monuments, 50 conservation areas and 9 Registered Parks and Gardens.

The high number of scheduled monuments relative to most local authorities reflects the importance of the archaeological record within Breckland, where the unique combinations of differing landscapes have been exploited by local people since the Palaeolithic period and have been continuously occupied ever since. Breckland's largely rural character has contributed to the survival of archaeological remains.

In addition, the area has been the focus of population in Roman, Saxon, Viking and Medieval periods which have all left their contribution to the historic environment whether archaeology, surviving buildings or settlement patterns.

It is for this reason that Historic England is keen to ensure that the emerging plan gives full consideration to the historic environment, both in the choice of site allocations and policy criteria for sites, as well as through a robust and clear suite of historic environment and other policies that seek to both protect but also enhance the historic environment.

We have reviewed the Draft Plan and consultation material with a view to providing advice on heritage matters.

As a general comment, Historic England welcomes emerging plan and work undertaken to date.

Telephone [REDACTED] | [REDACTED]

We have however identified three key issues to be addressed in progressing the next iteration of the Plan;

1. Heritage Impact Assessments
2. Policy Wording for sites
3. Historic Environment Section

These issues are explored in more detail below.

This letter should be read in conjunction with **Appendix A** which provides more detailed comments on these and other more minor issues.

Key Issues

1. Heritage Impact Assessments

a) New Allocations

To date, the assessment of sites is fairly high level and brief. As we have advised previously, further assessment of heritage in terms of significance, impact on that significance, potential mitigation and enhancements etc will be needed for the site allocations. There is currently an insufficient evidence base in this regard.

Heritage Impact Assessments (HIAs) must be prepared now, **prior to the next draft of the Local Plan**. HIAs should be proportionate (both to the scale of the site and the assets affected) and should follow the 5-step methodology in [HEAN3](#). The HIAs must cover both designated and non-designated heritage assets including archaeology. The HIAs should explore whether the site is suitable, the degree of harm to heritage, and should make clear recommendations for mitigation and enhancement. This might include things like density, height, open space, landscaping, heritage buffers, key views, restoration of heritage assets, heritage interpretation etc. If the site is suitable, the HIA recommendations should then be incorporated into the policy wording (and may also inform your IDP). If the site is not suitable, the site should be deleted.

b) Existing allocations/extant permissions

For any **existing allocations/extant permissions** being carried forward into this Local Plan as allocations you will need to decide if an HIA is required. In this instance, the HIA is less about the principle of development (that has already been established through the previous local plan or development management process) and more about exploring capacity, height, density and any heritage mitigation and enhancement opportunities so that these can then be included in the policy wording.

We would recommend that where there are heritage sensitivities, then a high level HIA should be prepared before the next draft of the Local Plan.

We recommend that you either appoint consultants to prepare the HIAs for you or prepare them in house with your Conservation Officers (or a hybrid approach).

It was helpful to meet you recently as part of the ongoing joint working when we were able to discuss the need for the HIAs. We are keen to support you in ensuring an appropriate, proportionate evidence base for the historic environment. We reiterate our offer to review a sample draft HIA if that would be helpful to you.

2. Policy Wording for sites

There is currently insufficient policy wording within the site allocations that specifically relates to heritage.

If, having completed the heritage impact assessments, it is concluded that a site is suitable for allocation, any recommendations from the HIAs should be included in the policy wording appropriate policy criteria.

For policies to be effective, it is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the **NPPF** states that policies should provide ‘*a clear indication of how a decision maker should react to a development proposal*’.

Planning Practice Guidance Paragraph: 002 Reference ID: 61-002-20190315 Revision date: 15 03 2019 also makes it clear that, ‘*Where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interested parties about the nature and scale of development.*’

Historic England’s Advice Note on Site Allocations [HEAN3](#) (referenced in Planning Practice Guidance Paragraph: 045 Reference ID: 61-045-20190315 Revision date: 15 03 2019) makes it clear that assessment should consider maximising enhancements and avoiding harm through (amongst other things) identifying design requirements including open space, landscaping, protection of key views, design, layout etc.

The advice note also includes a section on site allocation policies at paragraphs 3.1 – 3.2. It states, ‘*The level of detail required in a site allocation policy will depend on aspects such as the nature of the development proposed and the size and complexity of the site. However, it ought to be detailed enough to provide information on what is expected, where it will happen on the site and when development will come forward including phasing. **Mitigation and enhancement measures identified as part of the site selection process and evidence gathering are best set out within the policy to ensure that these are implemented.***’

Where a site has the potential to affect a heritage asset, we would expect to see the following typical wording within the policy:

Development should conserve or where appropriate enhance the significance of heritage assets including [list heritage assets on site and nearby] including any contribution made to their significance by their setting. Appropriate mitigation [and enhancement] measures identified in the Heritage Impact Assessment including[add recommendations from HIA for mitigation and enhancement...]will be required.'

For larger sites or where there are very complex heritage issues we would expect to see a policy requirement for masterplanning informed by both the Council's HIA and also a further, more detailed, heritage impact assessment.

In terms of heritage policy wording for sites, we suggest the use of the phrase 'Conserve or where appropriate enhance...'. We also recommend that the specific heritage assets are mentioned in the policy. In addition, the policy should specify appropriate mitigation and enhancements as identified through the HIA.

It can be helpful to refer to an HIA in the policy wording. Concept diagrams can also sometimes be useful to include in the plan to illustrate key site considerations/recommendations.

Policies should also include criterion relating to archaeology requirements where appropriate.

We also advise that the allocations of extant planning permissions / previous allocations should also have policy criteria in the Plan.

Please refer to the more detailed advice we give on policy wording in the attached table. Again we reiterate our offer to review draft sample policy wording.

3. Historic Environment Section

We welcome the inclusion of policies for the historic environment. Policy wording should be **in line with the NPPF but we are also looking for a local flavour**. Policies should be spatially specific, unique to the area, describing the local characteristics of the area and responding accordingly with policies that address the local situation.

We welcome the existing historic environment policies, but they could be improved in a number of ways:

- A strategic policy for the Historic Environment is needed
- In the policy for designated heritage assets, either remove emphasis on Listed buildings or have a short section on each type of designated heritage asset (LB, SM, RPG and CA) perhaps each with a sub-heading. Consider including the various different tests e.g. for substantial and less than substantial harm etc and
- The historic environment policies should be more locally specific.
- Add policy for Heritage at Risk
- Include the criteria for the Local List as an Appendix to the Plan. Include link to your actual Local List (if you have one). If not, include a commitment to commence one.

- Include a commitment to review Conservation Area Appraisal and Management Plans eg 5 per year on a rolling basis
- Clarify the timing for archaeological assessment (ie should be pre-determination – may be desk-based assessment or, very occasionally field evaluation) to inform design and layout/ masterplanning).
- Prepare a Historic Environment topic paper outlining the basis/rationale and development of historic environment policies. This could also include hyperlinks to your heritage impact assessments.

Sustainability Appraisal

We do not have capacity to look at the Sustainability Appraisal in detail.

The heritage impact assessments, once prepared, will be helpful in better informing the Sustainability Appraisal process. The SA should be reviewed in light of the HIAs when they have been prepared.

Other comments

In preparation of the forthcoming Breckland Local Plan, we encourage you to draw on the knowledge of local conservation officers, archaeologists and local heritage groups.

Please note that absence of a comment on an allocation or document in this letter does not mean that Historic England is content that the allocation or document forms part of a positive strategy for the conservation and enjoyment of the historic environment or is devoid of historic environment issues.

Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.

We trust that these comments are helpful to you in developing the Local Plan. Should you have any queries, please do not hesitate to contact us.

Please get in touch if you would like any clarification on our comments or to if you would like us to review a draft sample heritage impact assessment and draft policy wording for the historic environment policies and site allocations.

Yours sincerely

Debbie Mack
Historic Environment Planning Adviser

Telephone [REDACTED] | [REDACTED]

From: [Local Plan](#)
To: [Mack, Debbie](#); [Local Plan](#);
Cc: [Parnell, Andrew](#); [Faulkner, James](#); [Manthorpe, Gemma](#); [Darcy, Andrew](#); [Tollitt, Nick](#);
Subject: RE: Breckland Reg 18 Local Plan Historic England Response
Sent: 16/12/2025 10:06:04

Hi Debbie,

Thank you for sending this across. I can confirm receipt of this email and documents attached.

If you have any queries, please do not hesitate to get in touch.

Kind regards,

James Faulkner

Apprentice Planning Policy Officer
Breckland Council

T: [01362656299](tel:01362656299)
M: [07901873595](tel:07901873595)



@Breckland Council
in
breckland-council
www.breckland.gov.uk

From: Mack, Debbie <[REDACTED]>
Sent: 16 December 2025 10:00
To: Local Plan <LocalPlan@breckland.gov.uk>
Cc: Parnell, Andrew <Andrew.Parnell@breckland.gov.uk>; Faulkner, James <James.Faulkner@breckland.gov.uk>; Manthorpe, Gemma <Gemma.Manthorpe@breckland.gov.uk>; Darcy, Andrew <Andrew.Darcy@breckland.gov.uk>; Tollitt, Nick <Nick.Tollitt@breckland.gov.uk>
Subject: Fw: Breckland Reg 18 Local Plan Historic England Response

James

Resending our response as it seems that the response sent last Thursday may not have got through. We apologise that we have been experiencing issues with our e-mail system.

Kind regards

Debbie

Mrs Debbie Mack BA MSc MRTPI
Historic Environment Planning Adviser: East Region
[REDACTED]

My usual working days are Monday to Wednesday, finishing at 2.45pm.



Ensuring our heritage lives on and is loved for longer.
historicengland.org.uk

This e-mail (and any attachments) is confidential and may contain personal views which are not the views of Historic England unless specifically stated. If you have received it in error, please delete it from your system and notify the sender immediately. Do not use, copy or disclose the information in any way nor act in reliance on it. Any information sent to Historic England may become publicly available. For information about our use of your personal data please visit: historicengland.org.uk/terms/privacy

From: Mack, Debbie <[REDACTED]>
Sent: Thursday, December 11, 2025 5:21 PM
To: Local Plan <LocalPlan@breckland.gov.uk>
Cc: Parnell, Andrew <andrew.parnell@breckland.gov.uk>; Faulkner, James <james.faulkner@breckland.gov.uk>; Manthorpe, Gemma <gemma.manthorpe@breckland.gov.uk>; Darcy, Andrew <Andrew.Darcy@breckland.gov.uk>; Tollitt, Nick <nick.tollitt@breckland.gov.uk>
Subject: Breckland Reg 18 Local Plan Historic England Response

Dear Planning Policy Team

Further to our meeting on Monday with Andrew and James, we have completed our response to the Regulation 18 Plan. Please find our comments attached in the letter and table.

As discussed on Monday, perhaps the most significant issue relates to the evidence base and in particular the preparation of Heritage Impact Assessments (HIA). It is important that these are prepared as a matter of urgency prior to the next draft of the Local Plan to support your allocations, to inform decisions about the suitability or otherwise of sites and also to help frame suitable policy wording for sites. We re-iterate our offer to review a sample HIA and sample policy wording in the New Year.

Historic England will also need to see any HIAs where there are particularly significant heritage impacts or where the sites are very large and have heritage implications.

We hope you will find our comments helpful. Please confirm receipt of our response and we look forward to hearing from you in the New Year.

Yours sincerely

Debbie Mack

Mrs Debbie Mack BA MSc MRTPI

Historic Environment Planning Adviser: East Region

[Redacted]

[Redacted]

www.historicengland.org.uk

My usual working days are Monday to Wednesday, finishing at 2.45pm.

Appendix A: Table of Historic England’s comments on the Draft Breckland Local Plan October 2025

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
21	Para 2.10	Object	We suggest adding another couple of sentences summarising the historic environment. At the moment, the description is still weighted towards the natural environment.	<i>Add another couple of sentences summarising the historic environment – for example referencing scheduled monuments, archaeology, registered parks and gardens and heritage at risk.</i>
36	GEN01 Design and Sustainable Development	Object	<p>Criterion c should be amended to read <i>Improvements to the built historic and natural environment</i></p> <p>Criterion e should be amended to read <i>The natural and historic environment, general amenity, and the tranquillity of the wider rural area, including noise and light pollution;</i></p>	<p><i>Amend criterion c to read Improvements to the built historic and natural environment</i></p> <p><i>Amend criterion e to read The natural and historic environment, general amenity, and the tranquillity of the wider rural area, including noise and light pollution;</i></p>
38	GEN02 Parish Hierarchy and Spatial Development Strategy	Object	<p>We comment on the proposed allocations under individual policies.</p> <p><i>Recommend including policies for existing Thetford and Attleborough SUE in this Plan (more than just the reference in the table in Policy HOU 02).</i></p>	<i>Recommend including policies for existing Thetford and Attleborough SUE in this Plan (more than just the reference in the table in Policy HOU 02).</i>
43	RB 1: Robertson Barracks	Object	<p>We note that this is a longer-term development opportunity.</p> <p>There are a number of designated heritage assets within the site boundary including three Pickett-Hamilton forts at Swanton Morley airfield which are scheduled monuments. The Control Tower is also listed at grade II.</p> <p>There are several other designated heritage assets nearby including two scheduled monuments, two conversation areas, and a number of listed buildings most notably the grade I listed church of St Peter at Billingford and the grade II* church of St Margaret to the west. Any</p>	<p><i>Undertake HIA to assess potential heritage impacts, and help determine whether the sites are suitable from a historic environment perspective and to identify any mitigation measures or opportunities for enhancement</i></p> <p><i>If the site is found suitable, the policy wording should reference heritage assets, HIA, and potential mitigation and enhancements.</i></p>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			<p>development of the site has the potential to impact on the significance of these designated heritage assets through development within their settings.</p> <p>We note reference to heritage in criterion g.</p> <p>It will be important to assess potential impacts on the historic environment as part of the feasibility assessment and evidence to support this proposal. We recommend that you complete a Heritage Impact for the site now to determine whether or not the sites are suitable from a historic environment perspective and to identify any mitigation measures or opportunities for enhancement.</p>	
46	GEN 03: Built Form	Object	We welcome the reference to listed buildings and conservation areas in criterion j. This should also include scheduled monuments and registered parks and gardens.	<i>Add scheduled monuments and registered parks and gardens to criterion j.</i>
65	HOU 02: Distribution of Housing Development	Object	We note that Thetford SUE and Attleborough SUE are being carried forward. We recommend including policies for existing Thetford and Attleborough SUE in this Plan (more than just the reference in the table in Policy HOU 02).	<i>Recommend including policies for existing Thetford and Attleborough SUE in this Plan (more than just the reference in the table in Policy HOU 02).</i>
81	HOU 04: Large Housing Sites Development Principles	Object	The policy should introduce the requirement for a masterplanning or concept framework exercise, which is informed by a more detailed Heritage Impact Assessment (HIA), to be undertaken ahead of a planning application being submitted. This should reflect the findings of the Council's HIA.	<i>Add requirement for detailed HIA to inform masterplanning. This should reflect the findings of the Council's HIA.</i>
113	HOU 15: Rural Worker's Dwellings	Support	We welcome reference to heritage at criterion f.	-
128	HOU20 residential Development on Backland and Garden Sites	Support	We welcome criterion e and the reference to the historic environment.	-
136	HOU 22: Provision for	Object	We recommend adding reference to heritage impact in criterion h.	<i>Add reference to heritage impact in criterion h.</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
	Travellers and Travelling Showpeople			
140	HOU 23: Re-use of Agricultural Buildings in the Countryside	Support	We welcome criterion c.	-
151	Saved Employment Allocations Paragraphs 6.23 – 6.28	Object	<p>There is reference to several Saved Employment Allocations. These allocations should also include policies.</p> <p>Where there are potential heritage impacts, these sites should have a Heritage Impact Assessment.</p> <p>For existing allocations being carried forward into this Local Plan, the HIA is less about the principle of development (that has already been established through previous plan allocation) and more about exploring capacity, height, density and any heritage mitigation and enhancement opportunities so that these can then be included in the updated policy wording.</p>	<p><i>Complete HIAs where needed.</i></p> <p><i>Include policies in Plan for saved allocations.</i></p>
151	Paragraph 6.24 Snetterton Employment Allocation 1:	Support	No designated heritage assets on site or nearby. No comments	
151	Snetterton Employment Allocation 2:	Support	No designated heritage assets on site or nearby. No comments	
151	Swaffham Site SW2: Land to the North of the Eco-Tech Centre	Support	No designated heritage assets on site or nearby. No comments	
151	Swaffham Site SW3: 6.3ha situated to the west of the	Support	No designated heritage assets on site or nearby. No comments	

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
	Ecotech Business Park in Swaffham.			
152	Thetford Sustainable Urban Extension (SUE)	Object	<p>Part of this site contains the scheduled monument, an Iron Age religious site and associated enclosures on Gallows Hill, Thetford. There are several listed buildings just to the south of this site including the grade II* Church of St Andrew, and several grade II listed buildings centred on Kilverstone Hall. Any development of the site has the potential to impact on the significance of the scheduled monument and listed buildings through development within their settings.</p> <p>A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the scheduled monument and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<p><i>Undertake HIA to assess potential heritage impacts, and help determine whether the sites are suitable from a historic environment perspective and to identify any mitigation measures or opportunities for enhancement</i></p> <p><i>The policy wording should reference heritage assets, HIA, and potential mitigation and enhancements.</i></p>
152	Land at Thetford Enterprise Park	Object	<p>Whilst there are no designated heritage assets onsite, the scheduled monument, an Iron Age religious site and associated enclosures on Gallows Hill, Thetford. Any development of the site has the potential to impact on the significance of the scheduled monument through development within their settings.</p> <p>A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the scheduled monument and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<p><i>Undertake HIA to assess potential heritage impacts, and help determine whether the sites are suitable from a historic environment perspective and to identify any mitigation measures or opportunities for enhancement</i></p> <p><i>The policy wording should reference heritage assets, HIA, and potential mitigation and enhancements.</i></p>
153	EMP 02: Employment Land Provision	Comment	This policy allocates several sites for employment. Detailed comments on each of these sites, including whether they require	-

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			Heritage Impact Assessment, is included in the individual site policies later in this table.	
158	EMP 03: Snetterton General Employment Area	Object	There are several designated heritage assets nearby (see detailed comments below on individual land parcels). A heritage impact assessment is needed. The policy should also refer to heritage assets and their settings, and any mitigation identified through the HIA.	<i>A heritage impact assessment is needed.</i> <i>The policy should also refer to heritage assets and their settings and any mitigation identified through the HIA.</i>
160	EMP 04: Reserve Employment Allocation	Support	No designated heritage assets on site or nearby. No comments	-
169	EMP 07: Employment Development Outside Existing and Allocated Employment Sites - Sustaining a Prosperous Rural Economy	Support	We welcome criterion j relating to heritage	-
191	Policy EC05 Farm Diversification	Support	We welcome the reference to character of traditional farm buildings in criterion b and encouragement of re-use of existing buildings in criterion c.	-
194	Policy EC06 Tourism related facilities and attractions	Support	We welcome reference to heritage and the historic environment in criterion c and h.	
195	EC07: Tourist accommodation – Camping, caravanning and holiday lets	Object	Add reference to heritage assets to criterion c.	<i>Add reference to heritage assets to criterion c.</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
201	ENV01: Climate Responsive design	Object	<p>We welcome the reference to the reuse of existing buildings. Heritage assets can also be a valuable aid to achieving sustainable development, in both climate change mitigation and adaptation, rather than a constraint. Reusing our buildings is one of the most effective ways to reduce carbon emissions and eliminate unnecessary waste. By adapting our historic buildings appropriately, we can reduce carbon emissions, improve quality of life and nurture the skills needed for a green economy</p> <p>The policy should also refer to Energy efficiency and historic buildings. The policy and supporting text should refer to HEAN 18: Adapting Historic Buildings for Energy and Carbon Efficiency.</p> <p>Historic England recommends taking a whole building approach, which is a systematic process for devising and implementing suitable, coordinated, balanced and well-integrated solutions. This should be included in the policy.</p> <p>The policy should also encourage retrofitting of older properties to save energy and cut carbon emission. Advice on retrofitting of older buildings can be found here: Save Energy and Reduce Carbon Footprint in an Old House Historic England.</p>	<p><i>Reference whole Building Approach.</i></p> <p><i>Add reference to Energy Efficiency and historic Buildings including HEAN 18.</i></p> <p><i>Add reference to Retrofitting.</i></p>
203	Paragraph 8.21	Object	<p>We recommend that you refer in this paragraph to role of GI in conserving and enhancing the historic environment.</p>	<p><i>Refer in policy and supporting text to role of GI in conserving and enhancing the historic environment.</i></p>
204	ENV02: Green and Blue Infrastructure	Object	<p>Historic England would highlight that Green Infrastructure should not only be considered in terms of the natural environment, health and</p>	<p><i>Refer in policy and supporting text to role of GI in conserving and enhancing the historic environment.</i></p>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			<p>recreation but also the role it can play in conserving and enhancing the historic environment. It can be used to:</p> <ul style="list-style-type: none"> • conserve and enhance heritage assets • improve setting of heritage assets • improve access to heritage assets • create a sense of place and tangible link with local history • create linkages between heritage assets and other green infrastructure <p>Conservation and enhancement of the natural environment is an important facet of sustainable development. There is an important synergy between the historic and natural environment. Countryside, landscape parks and the open spaces in our cities, towns and villages often have heritage interest, and it would be helpful to highlight this. It is important not to consider ‘multi-functional’ spaces only in terms of the natural environment, health and recreation.</p> <p>We recommend that you refer in the policy and text to the role GI can have to play in enhancing and conserving the historic environment. It can be used to improve the condition and setting of heritage assets and to improve access to them. Likewise, the historic environment can help contribute to the quality, character and distinctiveness of green spaces by helping to create a sense of place and a tangible link with local history.</p> <p>Opportunities can be taken to link new GI networks into already existing green spaces in town or existing historic spaces such as churchyards to improve the setting of historic buildings or historic townscape.</p>	<p><i>Add reference to seeking opportunities to link historic green spaces through new development and public realm improvements</i></p>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
210	ENV04: Protection and Enhancement of the Landscape	Comment	<p>We broadly welcome this policy.</p> <p>Do your Landscape Character Assessments or Landscape and Settlement Character Assessment incorporate Historic Landscape Characterisation? If not, we recommend that you address this gap in the evidence base.</p>	<p><i>Do your Landscape Character Assessments or Landscape and Settlement Character Assessments incorporate Historic Landscape Characterisation? If not, we recommend that you address this gap in the evidence base.</i></p>
212	ENV05: Trees, Hedgerows and Development	Object	<p>Large scale tree planting</p> <p>Tree planting can be part of a positive strategy in facilitating a low carbon/net zero future.</p> <p>Trees make a strong contribution to heritage by lining streets, defining and accenting parks and open spaces. Specific trees or tree groups can take on historic and communal significance in their own right due to their age, character and location. As part of the historic environment, trees have a powerful role in place-making, helping to define spaces and neighbourhoods and contributing to local identity.</p> <p>Mass tree planting could significantly change the landscape character of an area and therefore careful consideration should be given to the wider impacts of such an approach.</p> <p>Much of the District's most significant and sensitive heritage lies within open spaces containing numerous trees. Buried archaeology, above-ground historic structures and the layout and features of historic parks and open spaces can be highly susceptible to damage from unmanaged tree growth, windthrow, and fallen limbs as well as routine arboricultural operations such as pruning, felling and tree planting. As such, any proposed operations or tree planting proposals within important heritage sites require careful consideration, with the protection and enhancement of the historic environment a key part of</p>	<p><i>Include reference in policy to trees being part of a positive strategy in facilitating a low carbon/net zero future.</i></p> <p><i>Add reference to contribution to heritage</i></p> <p><i>Consideration should be given to landscape character of area in tree planting. Breckland has very distinctive character in terms of trees (Brecks).</i></p> <p><i>The policy should say that tree planting should be avoided in scheduled monuments.</i></p>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			<p>planning and decision-making.</p> <p>Generally, the Council should avoid tree planting within Scheduled Monuments if possible, recognising that any operations which do come forward are likely to require Scheduled Monument consent and necessitate consultation with Historic England.</p> <p>It is also important to highlight that there may be incidences where tree planting will be detrimental to the historic environment.</p>	
213	Historic Environment - Evidence Base	Object	<p>It is important that your plan is underpinned by appropriate evidence. We would recommend that the following evidence for the historic environment is used in the preparation of your Local Plan.</p> <p>Any evidence base should be proportionate. However, with a local plan we would expect to see a comprehensive and robust evidence base. Sources include:</p> <ul style="list-style-type: none"> • National Heritage List for England. www.historicengland.org.uk/the-list/ • Heritage Gateway. www.heritagegateway.org.uk • Historic Environment Record. • National and local heritage at risk registers. www.historicengland.org.uk/advice/heritage-at-risk • Non-designated or locally listed heritage assets (buildings, monuments, parks and gardens, areas) • Conservation area appraisals and management plans • Historic characterisation assessments e.g. the Extensive Urban Surveys and Historic Landscape Characterisation Programme or more local documents. www.archaeologydataservice.ac.uk/archives/view/EUS/ • Environmental capacity studies for historic towns and cities or for historic areas e.g. the Craven Conservation Areas 	<p><i>Ensure robust evidence base for the historic environment – see checklist.</i></p> <p><i>This includes preparation of Heritage Impact Assessments for site allocations (see table below)</i></p> <p><i>Prepare Historic Environment Topic Paper</i></p>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			<p>Assessment Project. www.cravenc.gov.uk/CHttpHandler.ashx?id=11207&p=0</p> <ul style="list-style-type: none"> • Detailed historic characterization work assessing impact of specific proposals. • Heritage Impact Assessments looking into significance and setting especially for strategic sites or sites with specific heritage impacts. • Visual impact assessments. • Archaeological assessments. • Topic papers. <p>We welcome the preparation of the North Norfolk Landscape Character Assessments (and have made brief comment on these documents in our covering letter) and The North Norfolk Settlement profiles.</p> <p>However, there would appear to be a lack of heritage evidence to date. It is important that your plan is built on a sound and robust evidence base.</p> <p>We advise you to carefully consider the list above.</p> <p>We advocate the preparation of a topic paper in which you can catalogue the evidence you have gathered and to show how that has translated into the policy choices you have made. Do this from the start, as a working document, that you add to throughout the plan preparation process, not just before EiP.</p> <p>It is also useful to include in this any heritage impact assessments of site allocations, identifying any heritage issues, what you have done to address them and how this translates into the wording in your policy for that site allocation policy.</p>	
213	Para 8.43	Object	We welcome reference to designated and non-designated heritage assets at the start of this paragraph.	<i>Rename tile to Heritage Assets</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			<p>The title should be renamed Heritage Assets to reflect the NPPF terminology.</p> <p>The second sentence should be amended to read '<i>Breckland has a wealth of historic <u>designated heritage assets including listed buildings, conservation areas, scheduled monuments, registered parks and gardens and ...</u></i>'</p>	<p>Amend second sentence to read '<i>Breckland has a wealth of historic <u>designated heritage assets including listed buildings, conservation areas, scheduled monuments, registered parks and gardens and ...</u></i>'</p>
214	Para 8.46	Object	Not all designated heritage assets are the responsibility of Historic England e.g. grade II listed buildings – local authority remit, Conservation Areas designated by local authority etc. So, suggest changing the first sentence.	<i>Amend first sentence.</i>
214	Para 8.47	Object	We recommend including a link to the HER.	<i>Include link to HER</i>
214	Para 8.48	Object	<p>Whilst we welcome the reference to the Heritage at Risk Register, we suggest you change English Heritage to Historic England.</p> <p>We strongly recommend the inclusion of a policy to address Heritage at Risk. Similarly, we welcome positive local solutions for addressing all heritage at risk, whether nationally or locally identified. We also recommend the creation and management of a local Heritage at Risk register for Grade II listings.</p>	<p><i>Change English Heritage to Historic England</i></p> <p><i>Add policy for Heritage at Risk.</i></p> <p><i>Consider positive local solutions to address Heritage at Risk and consider including these in the Plan.</i></p> <p><i>Create Local Heritage at Risk Register for GII.</i></p>
214	Strategic Policy for the Historic Environment	Object	We recommend including a Strategic policy for the historic environment	<i>Include a strategic policy for the historic environment</i>
217	ENV 06 Designated Historic Assets	Object	<p>We recommend the policy title is changed to Designated Heritage Assets, not historic. This is the preferred NPPF term.</p> <p>The second paragraph could be shortened to read:</p>	<p><i>Change title to Designated Heritage Assets.</i></p> <p><i>Shorten second paragraph to read</i></p>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			<p>Development that will affect any designated heritage asset will be subject to comprehensive assessment and should conserve or, wherever possible, enhance the <u>significance architectural and historic character, appearance and setting</u> of the asset. Where a proposed development will affect the character or setting of a Listed Building, particular regard will need to be given to the protection, conservation, and potential enhancement of any features of historic or architectural interest.</p> <p>Alternatively, you could have a short section on each type of designated heritage asset (LB, SM, RPG and CA) perhaps each with a sub-heading.</p> <p>It would be helpful to add reference to the need for great weight to be given to the assets' conservation.</p> <p>There are currently no references to the tests set out in the NPPF in the policy (in contrast to the policy on non-designated heritage assets). The policies should be consistent – either both should include the appropriate tests or neither.</p>	<p>Development that will affect any designated heritage asset will be subject to comprehensive assessment and should conserve or, wherever possible, enhance the <u>significance architectural and historic character, appearance and setting</u> of the asset. Where a proposed development will affect the character or setting of a Listed Building, particular regard will need to be given to the protection, conservation, and potential enhancement of any features of historic or architectural interest.</p> <p>Include a short section on each type of designated heritage asset (LB, SM, RPG and CA) perhaps each with a sub-heading.</p> <p>Add reference to the need for great weight to be given to the assets' conservation.</p> <p>Decide if policies ENV06 and ENV07 should include NPPF tests or not for consistency.</p>
219	ENV07: Non-Designated Heritage Assets	Object	We welcome the inclusion of a policy for non-designated heritage assets.	<i>We recommend that you include Local List criteria in your Plan and link this to the policy.</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			<p>We would encourage the Council to make provision for the identification and protection of non-designated heritage assets through the Local Plan.</p> <p>Robust provision for these heritage assets will increase the soundness of your forthcoming plan.</p>	
220	ENV08: Archaeological Sites	Object	<p>We recommend that the second sentence should be amended to read: An archaeological evaluation will be required <u>pre-determination</u> for development sites that are known or thought to have the potential to include non-designated heritage assets with archaeological interest.</p> <p>We recommend that the third sentence should be amended to read: Where appropriate, archaeological remains should be left in situ <u>through design and layout or the development</u> following further design/engineering work.</p>	<p><i>Amend second sentence to read: An archaeological evaluation will be required <u>pre-determination</u> for development sites that are known or thought to have the potential to include non-designated heritage assets with archaeological interest</i></p> <p><i>Amend third sentence to read: Where appropriate, archaeological remains should be left in situ <u>through design and layout or the development</u> following further design/engineering work.</i></p>
236	Para 8.113	Object	<p>Policies on Sustainable Urban Drainage Systems (SuDS) should advise that they need to be designed so that they do not impact on archaeology. Impacts can be caused by draining waterlogged archaeology or introducing surplus water and pollution from surface runoff into archaeological sediments via soakaways. Consideration</p>	<p><i>Add reference to archaeology in this paragraph.</i></p>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			should be given to the most appropriate course of action to protect buried waterlogged archaeology through the design of SuDS.	
237	8.117 – 8.118	Support	We welcome the references to heritage assets and the historic environment in these paragraphs.	-
237	ENV11 Agricultural Intensification.	Object	The reference to SuDS should also mention archaeology. We welcome the section on the historic environment.	<i>Add reference to archaeology in relation to SuDS</i>
257	Para 9.3	Comment	Priorities 1 and 7 are repeated.	<i>Delete duplicate priority</i>
260	DES 01: Development that complements and enhances its context	Object	We broadly welcome this policy but suggest the addition of the following sentence in line with the National Design Guide. <u>'This should include an understanding of local history, culture and heritage and how the place has evolved.'</u>	<i>Add <u>'This should include an understanding of local history, culture and heritage and how the place has evolved.'</u></i>
262	DES 03 Distinctive local identity	Support	We welcome the references to local character, retention of existing buildings and design.	-
263	Paragraph 9.9	Object	We welcome the reference to the Action Zone. Please amend reference to read 'Historic England's High Street Heritage Action Zone Programme.' The same principles behind this highly successful programme can be replicated elsewhere to secure further improvements. We welcome the recognition of this potential in the paragraph.	Please amend reference to read <u>'Historic England's High Street Heritage Action Zone.'</u>
264	Policy DES 04 Shop Fronts, Advertising and Signage	Support	We welcome the addition of the following criterion: <u>'Historic shopfronts should be retained or restored.'</u> This is important both in terms of the positive contribution historic shop fronts make to the character of an area, but also the economic benefit of providing traditional and bespoke shopping units to shop owners	-
269	Policy COM 01 Healthy Lifestyles	Object	Heritage also has a role in promoting well-being. See some of our case study research https://historicengland.org.uk/research/current/social-and-economic-research/wellbeing/wellbeing-and-heritage-case-studies/	Add a new criterion to read <u>'encourage access to heritage to promote well-being'</u> .

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			Therefore, we recommend a new criterion to read ' <u>encourage access to heritage to promote well-being</u> '.	
285	Policy INF 03 Flood Risk and Surface Water Drainage	Object	Policies on Sustainable Urban Drainage Systems (SuDS) should advise that they need to be designed so that they do not impact on archaeology. Impacts can be caused by draining waterlogged archaeology or introducing surplus water and pollution from surface runoff into archaeological sediments via soakaways. Consideration should be given to the most appropriate course of action to protect buried waterlogged archaeology through the design of SuDS.	<i>Add reference to archaeology in relation to SuDS in policy and supporting text</i>
291	Paragraph 11.33	Support	We welcome the reference to heritage assets in this paragraph	-
291	INF04 Renewable Energy Development	Object	<p>Historic England is broadly supportive of renewable energy development. Our advice note <u>Commercial Renewable Energy Development Historic Environment Advice Note 15</u> provides further advice on Local Plans and renewable energy including site selection and development of policies and maps in plans.</p> <p>We broadly welcome the proposal to include a policy for renewable energy projects in the Plan. We welcome the reference to designated and non-designated heritage assets in criterion a but recommend you add the words '<u>and their settings</u>' after the word assets.</p> <p>The policy should also mention the need for detailed Heritage Impact Assessment and Landscape and Visual Impact Assessment at planning application stage.</p> <p>The following text should be included in the supporting text: <u>A detailed heritage impact assessment will be required during the planning application process for each site to consider all designated and non-designated heritage assets and their settings. Applications</u></p>	<p><i>Criterion a – add the words '<u>and their settings</u>' after the word assets.</i></p> <p><i>Add reference in policy and supporting text to the need for detailed Heritage Impact Assessment and Landscape and Visual Impact Assessment at planning application stage.</i></p> <p><i>Add reference to potential impacts on archaeology in supporting text.</i></p>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			<p><u>should include visualisations showing the relationship to heritage assets and settings. Viewpoints should be agreed in consultation with interested parties.</u></p> <p>We welcome the reference to cumulative impacts.</p> <p>Biofuel crops such as short rotation coppice (willow) and Miscanthus can have a substantial below ground impact on buried archaeology, especially waterlogged archaeology. Palaeochannels, peats, kettle holes and other glacial features that preserve waterlogged sediments are often the very areas targeted for growing energy crops. Many of these impacts on the archaeological resource are covered by the Preservation of Archaeological Remains guidance (i.e. such as the impacts of dewatering sensitive waterlogged features):</p> <p><u>https://historicengland.org.uk/images-books/publications/water-features-historic-settings/</u></p> <p>It might be helpful to add reference to this in the supporting text.</p>	
297	11.46	Object	<p>Heritage assets and cultural attractions may be considered as infrastructure. Therefore, we recommend that you add heritage assets and cultural attractions to list of off-site infrastructure.</p> <p>The Planning Act 2008 (as amended) sets out that CIL can be used to fund the provision, improvement, replacement, operation or maintenance of a wide range of infrastructure in support of the development of the charging area. This can include the maintenance and on-going costs associated with a range of heritage assets including, for example, transport infrastructure such as historic</p>	<p><i>Add heritage assets and cultural attractions to list of off-site infrastructure.</i></p>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			<p>bridges, green and social infrastructure such as historic parks and gardens, civic spaces and public places.</p> <p>Historic England therefore encourages charging authorities to consider identifying the ways in which CIL, and S106 agreements can be used to implement Local Plan policy and proposals relating to the conservation of the historic environment, heritage assets and their setting. This will help to satisfy national planning policy (NPPF paragraphs 8, 20 and 196).</p> <p>It is now well established that heritage is not an adjunct to a healthy economy but an important component of growth, a source of employment and a community resource. We therefore suggest that the Council should consider whether any heritage - related projects within the district would be appropriate for CIL funding.</p> <p>The Local Plan's evidence base may demonstrate the specific opportunities for CIL to help deliver growth and in so doing meet the Plan's objectives for the historic environment. Historic England requests that the infrastructure lists contained in future Infrastructure Funding Statements include reference to 'improvements to historic assets related to social, economic or environmental infrastructure' as a type of infrastructure project which the authority intends may be wholly, or partially, funded by CIL.</p> <p>Without prejudice to the above, development specific planning obligations and S106 agreements will continue to offer opportunities for funding improvements to heritage assets and the mitigation of adverse impacts on the historic environment. These may include, but are not limited to, archaeological investigations, access and</p>	

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			interpretation, and the repair and reuse of buildings or other heritage assets. You may wish to clarify this matter in your schedule.	
12. Site Specific Policies - Housing				
303ff	Site Assessment	Object	<p>We are concerned that there is insufficient evidence in relation to the historic environment to support some of the site allocations.</p> <p>Therefore, as previously advised, Heritage Impact Assessments (HIAs) following the five-step methodology for site allocations set out in our Advice note 3 on site allocations https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/ should be prepared for a number of sites. This is imperative to ensure a robust evidence base for the Local Plan. These should be prepared in advance of the next draft of the Plan to inform whether some sites are suitable, but for the majority of sites to inform the potential mitigation and the policy wording. This is a matter of priority, given the timetable for the Plan.</p> <p>The HIAs should assess the suitability (or otherwise) of each area for development and the impact on the historic environment. The HIA should consider the issue of the capacity of the site including issues in relation to height and the impact on the historic environment. It should consider significance of assets (include any contribution made to that significance by setting), the impact of development upon the significance of those assets (level of harm etc), and make recommendations about potential mitigation (density, height, layout, open space landscaping etc).</p> <p>The HIAs must cover both designated and non-designated heritage</p>	<i>Complete Heritage Impact Assessments where appropriate. – see below.</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			<p>assets including archaeology.</p> <p>Should the HIA conclude that development in the area could be acceptable and the site be allocated, the findings of the HIA should inform the Local Plan policy including development criteria and ideally a strategy diagram which expresses the development criteria in diagrammatic form.</p> <p>We would remind you that paragraph 32 of the NPPF makes it clear that significant adverse impacts should be avoided wherever possible and alternative options pursued. Only where these impacts are unavoidable should suitable mitigation measures be proposed.</p>	
303ff	General comment of site allocations and policy wording	Object	<p>General comments on allocations</p> <p>It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.</p> <p>The policy wording should mention the specific designated heritage assets both on site and nearby.</p> <p>The policy and supporting text should also refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set back/breathing space etc.</p> <p>Typical wording for the policy criterion might be:</p> <p>Development should conserve or where appropriate enhance the significance of heritage assets including <i>[list heritage assets on site and nearby – these should include designated and non-designated heritage assets]</i> including any contribution made to their significance</p>	<p><i>Update policy wording to include reference to historic environment and in light of Heritage Impact Assessment recommendations.</i></p> <p><i>Policies should also include criterion relating to archaeology requirements</i></p>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			<p>by their settings. Appropriate mitigation measures [as identified through the Heritage Impact Assessment] including ... will be required.'</p> <p>It is also important to include an appropriate criterion relating to archaeology where needed. This should include what level of assessment likely to be required and when – e.g. desk based/field evaluation to inform masterplanning/pre-determination/as condition).</p> <p>Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above, based on the Heritage Impact Assessments where appropriate.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p> <p>Given the inclusion of reference to significance and setting we suggest that these terms (which are quite technical) are included in a glossary.</p>	
Strategic Development Areas (SDA)				
304	SDA 1: Frans Green, East Tuddenham	Object	<p>Although there are no designated heritage assets within the site boundary, there are a number of designated heritage assets in the area including the grade II listed Green Farm House, Berry Hall, Yew Tree Farmhouse and Overgate House.</p> <p>Any development of the site has the potential to impact on the significance of these designated heritage assets through development within their settings.</p> <p>There is currently no reference to the historic environment in the policy.</p>	<p><i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i></p> <p><i>Include requirement for masterplan to be informed by HIA in the policy wording</i></p>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			It is important to assess potential impacts on the historic environment. We recommend that you complete a Heritage Impact for the site now to determine whether or not the site is suitable from a historic environment perspective and to identify any mitigation measures or opportunities for enhancement.	
308	SDA 2: Barkers Farm, Larling	Object	<p>Although there are no designated heritage assets within the site boundary, there are a number of designated heritage assets in the area including the grade II listed The Beeches, Fen Lane Farmhouse, Barker's Farmhouse, a cluster of listed buildings at Manor Farm and slightly further to the west the Church of St Andrew listed at grade II*.</p> <p>Any development of the site has the potential to impact on the significance of these designated heritage assets through development within their settings.</p> <p>There is currently no reference to the historic environment in the policy.</p> <p>It is important to assess potential impacts on the historic environment. We recommend that you complete a Heritage Impact for the site now to determine whether or not the site is suitable from a historic environment perspective and to identify any mitigation measures or opportunities for enhancement.</p>	<p><i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i></p> <p><i>Include requirement for masterplan to be informed by HIA in the policy wording</i></p>
311	SDA 3: Roudham & Larling	Object	<p>Although there are no designated heritage assets within the site boundary, the site completely encircles the GII listed Larlingford Farmhouse and lies adjacent to Shrubbs Fram Cottages also listed at grade II. There are further clusters of listed buildings to the north of the A11 and to the south. To the south-west of the site lies the large scheduled monument of Roudham deserted medieval village and there are five further grade II listed buildings in the village of Roudham itself. Any development of the site has the potential to impact on the significance of these designated heritage assets through development within their settings.</p> <p>There is currently no reference to the historic environment in the policy.</p>	<p><i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i></p> <p><i>Include requirement for masterplan to be informed by HIA in the policy wording</i></p>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			It is important to assess potential impacts on the historic environment. We recommend that you complete a Heritage Impact for the site now to determine whether or not the site is suitable from a historic environment perspective and to identify any mitigation measures or opportunities for enhancement.	
Market Towns				
314	Attleborough			
315	PROPOSAL ATT 1 (110): Land West of Hargham Road	Support	No designated heritage assets on site or nearby. No comments	-
317	Dereham			
317	PROPOSAL DER 1 (079): Land Behind Dereham Hospital	Object	<p>The site lies close to the GII Water Tower. Any development of the site has the potential to impact on the significance of this designated heritage asset through development within its setting.</p> <p>There is currently no reference to the historic environment in the policy.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>
320	PROPOSAL DER 2 (344): Southeast of Swanton Road	Support	No designated heritage assets on site or nearby. No comments	-
323	PROPOSAL DER 3 (032):	Object	The northern part of the site lies within the Dereham Conservation Area. The GII* listed Dereham Maltings lies just to the north of the	<i>Complete an HIA now to inform the allocation of the site including any</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
	The Maltings, Norwich Road		<p>site. Any development of the site has the potential to impact on the significance of these designated heritage assets through development within their settings.</p> <p>There is currently no reference to the historic environment in the policy.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>mitigation, enhancement and policy wording</i>
324	PROPOSAL DER 4 (144): Dumpling Green	Object	<p>Whilst there are no designated heritage assets within the site, there are three GII listed buildings nearby – Green Farmhouse, Old Jolly Farmers and Borrow Hall.</p> <p>Any development of the site has the potential to impact on the significance of these designated heritage assets through development within their settings.</p> <p>There is currently no reference to the historic environment in the policy.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
329	PROPOSAL DER 5 (164): North of Dereham Road Swaffham	Support	No designated heritage assets on site or nearby. No comments	
332	PROPOSAL Swaffham SUE (072): North of Norwich Road (West)	Object	<p>Whilst there are no designated heritage assets within the site boundary, the Swaffham SUE is a large allocation. There are a couple of grade II listed buildings to the south-west of the SUE and the Swaffham Conservation Area including the GII* Manor House lies to the west of the site.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p> <p>The masterplan for the SUE should be informed by the findings of the HIA. This requirement should be included in the policy.</p>	<p><i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i></p> <p><i>Include requirement for masterplan to be informed by HIA in the policy wording</i></p>
335	PROPOSAL Swaffham SUE (073): North of Norwich Road (East)	Object	<p>Whilst there are no designated heritage assets within the site boundary, the Swaffham SUE is a large allocation. There are a couple of grade II listed buildings to the south-west of the SUE and the Swaffham Conservation Area including the GII* Manor House lies to the west of the site.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<p><i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i></p> <p><i>Include requirement for masterplan to be informed by HIA in the policy wording</i></p>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			The masterplan for the SUE should be informed by the findings of the HIA. This requirement should be included in the policy.	
338	PROPOSAL Swaffham SUE (074): South of Norwich Road (West)	Object	<p>Whilst there are no designated heritage assets within the site boundary, the Swaffham SUE is a large allocation. There are a couple of grade II listed buildings to the south-west of the SUE and the Swaffham Conservation Area including the GII* Manor House lies to the west of the site.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p> <p>The masterplan for the SUE should be informed by the findings of the HIA. This requirement should be included in the policy.</p>	<p><i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i></p> <p><i>Include requirement for masterplan to be informed by HIA in the policy wording</i></p>
341	PROPOSAL Swaffham SUE (075): South of Norwich Road (East)	Object	<p>Whilst there are no designated heritage assets within the site boundary, the Swaffham SUE is a large allocation. There are a couple of grade II listed buildings to the south-west of the SUE and the Swaffham Conservation Area including the GII* Manor House lies to the west of the site.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<p><i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i></p> <p><i>Include requirement for masterplan to be informed by HIA in the policy wording</i></p>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			The masterplan for the SUE should be informed by the findings of the HIA. This requirement should be included in the policy.	
344	PROPOSAL SWA2: South Of Sporle Road, Swaffham	Support	There are no designated heritage assets within the site or nearby. We welcome the first criterion for the masterplan which refers to designated and non-designated heritage assets.	-
347	PROPOSAL SWA 3 (179): East of Sporle Road, Swaffham	Support	There are no designated heritage assets within the site or nearby. We welcome the first criterion for the masterplan which refers to designated and non-designated heritage assets.	-
350	PROPOSAL SWA 4 (077): Stoneycroft House, Sporle Road	Support	There are no designated heritage assets within the site or nearby.	-
353	PROPOSAL SWA 5 (070): South of North Pickenham Road	Object	Whilst there are no designated heritage assets within the site, there are two GII listed buildings nearby – Crown Cottage, adjacent to the site, and Wood Farmhouse. Any development of the site has the potential to impact on the significance of these designated heritage assets through development within their settings. A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
356	PROPOSAL SWA 6 (069): South of Norwich Road	Object	<p>Whilst there are no designated heritage assets within the site, the GII listed Wood Farmhouse lies to the south-west of the site.</p> <p>Any development of the site has the potential to impact on the significance of these designated heritage assets through development within their settings.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>
	Thetford	-		-
359	PROPOSAL Kingsfleet Grove SUE (079)	Object	<p>Whilst there are no designated heritage assets within the site, the Croxton Conservation Area including the grade I listed Church of All Saints and a number of grade II listed buildings are located to the north of the site. There are also a number of listed buildings including the GII* St Andrews Church and several grade II listed buildings to the south-west of the site.</p> <p>Any development of the site has the potential to impact on the significance of these designated heritage assets through development within their settings.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<p><i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i></p> <p><i>Include requirement for masterplan to be informed by HIA in the policy wording</i></p>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			The masterplan for the SUE should be informed by the findings of the HIA. This requirement should be included in the policy.	
	Watton			
362	PROPOSAL Watton SUE (225): North and East of Shrublands	Object	<p>Whilst there are no designated heritage assets within the site boundary, there are a number of grade II listed buildings nearby including Caudle Green Farmhouse, West Cottage and Pendle Cottage, The White House (White Hall), The White House, The Old Rectory, Windmill, Mill House and Rokeles Hall. Any development of the site has the potential to impact on the significance of these designated heritage assets through development within their settings.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p> <p>The masterplan for the SUE should be informed by the findings of the HIA. This requirement should be included in the policy.</p> <p>We welcome the second criterion for the masterplan which refers to designated and non-designated heritage assets. However, this wording will need to be refined to reflect the findings of the HIA.</p>	<p><i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i></p> <p><i>Include requirement for masterplan to be informed by HIA in the policy wording</i></p>
365	PROPOSAL Watton SUE (223): East of Summer Lane	Object	<p>This site is part of the larger Watton SUE.</p> <p>Whilst there are no designated heritage assets within the site boundary, there are a number of grade II listed buildings nearby</p>	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			<p>including a Windmill and Mill House. Any development of the site has the potential to impact on the significance of these designated heritage assets through development within their settings.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p> <p>The masterplan for the SUE should be informed by the findings of the HIA. This requirement should be included in the policy.</p>	<p><i>Include requirement for masterplan to be informed by HIA in the policy wording</i></p>
368	PROPOSAL Watton SUE (086): Rear of Shrublands (West)	Object	<p>Whilst there are no designated heritage assets within this site or nearby, this site is part of the larger Watton SUE.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p> <p>The masterplan for the SUE should be informed by the findings of the HIA. This requirement should be included in the policy.</p>	<p><i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i></p> <p><i>Include requirement for masterplan to be informed by HIA in the policy wording</i></p>
370	PROPOSAL Watton SUE (339):	Object	<p>Whilst there are no designated heritage assets within this site or nearby, this site is part of the larger Watton SUE.</p>	<p><i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i></p>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
	Shrublands Site 1 (Centre)		<p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p> <p>The masterplan for the SUE should be informed by the findings of the HIA. This requirement should be included in the policy.</p>	<i>Include requirement for masterplan to be informed by HIA in the policy wording</i>
372	PROPOSAL Watton SUE (340): Shrublands Site 2 (East)	Object	<p>Whilst there are no designated heritage assets within this site or nearby, this site is part of the larger Watton SUE.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p> <p>The masterplan for the SUE should be informed by the findings of the HIA. This requirement should be included in the policy.</p>	<p><i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i></p> <p><i>Include requirement for masterplan to be informed by HIA in the policy wording</i></p>
375	PROPOSAL WAT 2 (085): Former RAF Base, Shackleton Road	Support	No designated heritage assets on site or nearby. No comments	-

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
378	PROPOSAL WAT 3 (088): North of Thetford Road	Support	No designated heritage assets on site or nearby. No comments	-
381	PROPOSAL WAT 4 (289): West of Thetford Road	Support	No designated heritage assets on site or nearby. No comments	-
Key Service Parishes				
	East Harling			
384	PROPOSAL HAR 1 (212): Lopham Road	Object	<p>Whilst there are no designated heritage assets within the site boundary, there are a number of grade II listed buildings to the north of Lopham Road which form the Crescent. This group of houses were designed by George Skipper in 1919-20 and were designed for Norfolk County Council. Any development of the site has the potential to impact on the significance of these designated heritage assets through development within their settings.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>
387	PROPOSAL HAR 2 (133): Garboldisham Road	Object	<p>Whilst there are no designated heritage assets within the site boundary, there are two grade II listed buildings nearby including Pear Tree Cottage and Old World Cottage and attached Cottage to south. Any development of the site has the potential to impact on the significance of these designated heritage assets through development within their settings.</p>	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.	
390	PROPOSAL HAR 3 (398): North of Kenninghall Road	Object	<p>Whilst there are no designated heritage assets within the site boundary, the grade II listed Mill lies to the south-west of the site. Any development of the site has the potential to impact on the significance of this listed building through development within its setting.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>
	Mattishall			
393	PROPOSAL MAT 1 (307): Thynnes Lane	Support	<p>No designated heritage assets on site or nearby.</p> <p>We welcome reference to archaeological assessment in criterion c.</p> <p>We welcome reference to heritage at criterion j.</p>	-
396	PROPOSAL MAT 2 (357): North of Dereham Road	Object	<p>Whilst there are no designated heritage assets within the site, the grade II listed Quaker House lies adjacent to the south-west of the site.</p> <p>Any development of the site has the potential to impact on the significance of this listed building through development within its setting.</p>	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.	
	Necton			
399	PROPOSAL NEC 1 (005): Brackenwoods	Support	No designated heritage assets on site or nearby. No comments	-
402	PROPOSAL NEC 2 (302): North Pickenham Road (Phase 3)	Support	No designated heritage assets on site or nearby. No comments	-
Primary Parishes				
Banham				
405	PROPOSAL BAN 1 (013): West of Mill Road	Object	<p>Whilst there are no designated heritage assets within the site boundary, there are two grade II listed buildings nearby including the adjacent Hillcrest and a row of 4 cottages on the opposite side of Mill Road. Any development of the site has the potential to impact on the significance of these designated heritage assets through development within their settings.</p> <p>We note reference to heritage assessment in criterion e.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is</p>	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			allocated and if it is, the policy criterion including any mitigation and enhancement.	
	Bawdeswell			
408	PROPOSAL BAWD 1 (161): North of Foxley Road	Object	<p>Part of this site lies within the Bawdeswell Conservation Area.</p> <p>Any development of the site has the potential to impact on the significance of the Conservation Area and its setting.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>
	Kenninghall			
411	PROPOSAL KEN 1 (167): Powell Close	Object	<p>Part of the site lies within the Kenninghall Conservation Area. There are numerous listed buildings within the Conservation Area including the grade I listed St Marys Church. Any development of this site therefore has the potential to affect the Conservation Area and its setting including views into and out of the Conservation Area and to affect the settings of listed buildings.</p> <p>A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the Conservation Area and listed buildings and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>
414	PROPOSAL KEN 2 (031): Kings Oak	Support	No designated heritage assets on site or nearby. No comments	-
	Litcham			

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
417	PROPOSAL LIT 1 (257): Lexham Road	Object	<p>Whilst there are no designated heritage assets within the site boundary, site is adjacent to the Litcham Conservation Area and Litcham Hall, a grade II listed building. Any development of the site has the potential to impact on the significance of these designated heritage assets through development within their settings.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>
	Mundford			
420	PROPOSAL MUN 1 (361):West Hall Drive	Object	<p>Whilst there are no designated heritage assets within the site boundary, site is adjacent to West Hall, a grade II* listed building. Any development of the site has the potential to impact on the significance of this listed building through development within its setting.</p> <p>We have significant concerns in relation to this site.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.</i>
423	PROPOSAL MUN 2 (360):Bracken Rise	Object	<p>Whilst there are no designated heritage assets within the site boundary, the grade II* listed West Hall lies to the north of the site. Any development of the site has the potential to impact on the</p>	<i>Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			<p>significance of the listed building through development within its setting.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	
	Narborough			
426	PROPOSAL NAR 1 (105): East of Chalk Lane	Object	<p>Part of the site lies within the Narborough Conservation Area There are numerous listed buildings within the Conservation Area including the grade I listed St Marys Church. Any development of this site therefore has the potential to affect the Conservation Area and its setting including views into and out of the Conservation Area and to affect the settings of listed buildings.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>
429	PROPOSAL NAR 2 (103):West of Chalk Lane	Support	No designated heritage assets on site or nearby. No comments	-
	North Elmham			
432	PROPOSAL NEL 1 (205):	Object	This site lies adjacent to the North Elmham Conservation Area and there are two grade II listed buildings to the north-east of the site: Old	<i>Complete an HIA now to inform the allocation of the site including any</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
	South of Eastgate Street		<p>Hall Farm Barn and Old Hall Farmhouse. Any development of the site has the potential to impact on the significance of these heritage assets through development within their settings.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>mitigation, enhancement and policy wording</i>
435	PROPOSAL NEL 2 (330): Back Lane	Object	<p>The site lies adjacent to the North Elmham Conservation Area. Any development of the site has the potential to impact on the significance of the Conservation Area through development within its setting.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>
	Old Buckenham			
438	PROPOSAL OLD 1 (111): Hargham Road	Support	No designated heritage assets on site or nearby. No comments	-
Secondary Parishes				
	Ashill			
440	PROPOSAL ASH 1 (320): The Willows	Object	Whilst there are no designated heritage assets within the site boundary Devils Dyke scheduled monuments lies to the east of the site. However, the intervening woodland would mean that any	<i>Complete an HIA now to inform the allocation of the site including any</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			development is unlikely to have a significant impact on the setting of the asset.	<i>mitigation, enhancement and policy wording</i>
443	PROPOSAL ASH 2 (319): Greenacre Close	Object	<p>Whilst there are no designated heritage assets within the site boundary there are two scheduled monuments nearby: Devils Dyke and the Site of Panworth Hall and Medieval Settlement. Any development of the site has the potential to impact on the significance of these designated heritage assets through development within their settings.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on the scheduled monuments and determine if allocation of this site is appropriate, and if it is what mitigation an enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>
	Beetley			
446	PROPOSAL BEET 1 (134): Fakenham Road	Support	No comments	-
	Caston			
449	PROPOSAL CAS 1 (024): Home Farm, North Acre	Support	No comments	-
	Fransham			
451	PROPOSAL FRAN 1 (001): West of Station Road	Object	<p>Whilst there are no designated heritage assets within the site boundary, the grade I listed St Marys Church and GII listed War memorial lie to the east of the site. Any development of the site has the potential to impact on the significance of these designated heritage assets through development within their settings.</p> <p>We note that criterion g refers to the church. However, this mitigation should be informed by an HIA.</p>	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on the scheduled monuments and determine if allocation of this site is appropriate, and if it is what mitigation an enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.	
	Garboldisham			
454	PROPOSAL GARB 1 (057): Smallworth Lane	Support	No comments	-
	Griston			
456	PROPOSAL: GRIS 1 (347): Caston Road	Object	<p>Whilst there are no designated heritage assets within the site boundary, there are several listed buildings nearby including the grade I listed Church of St Peter and 3 grade II listed buildings.</p> <p>Any development of the site has the potential to impact on the significance of these heritage assets through development within their settings.</p> <p>We have significant concerns about this site due to the proximity of the grade I listed church.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on the scheduled monuments and determine if allocation of this site is appropriate, and if it is what mitigation an enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>
	Hockering			

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
459	PROPOSAL HOC 1 (400): The Street Hockham	Support	No comments.	-
462	PROPOSAL GHOC 1 (109): West of Watton Road	Object	<p>The site lies adjacent to the Great Hockham Conservation Area. Any development of the site has the potential to impact on the significance of the Conservation Area through development within its setting.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>
465	PROPOSAL LYNG 1 (091): North of Heath Road	Support	No comments.	-
468	PROPOSAL N- LOP 1 (054): Rear of Bell Farm, South of Primrose Lane	object	<p>A small part of the site lies within the North Lopham Conservation Area. Any development of the site has the potential to impact on the significance of the Conservation Area and its setting.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
	Rocklands			
471	PROPOSAL ROC 1 (065): North of The Street	Object	Whilst there are no designated heritage assets within the site boundary, the grade I listed church lies just over 500 m to the north-east of the site and the grade II listed The Rookery lies to the south-east of the site. However, given the distance or intervening development we do not consider that development of the site would have a significant impact on the significance of these assets.	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>
474	PROPOSAL ROC 2 (064): South of Bell Road	Object	Whilst there are no designated heritage assets within the site boundary, the grade I listed church lies just over 500 m to the south-east of the site and the grade II listed Methodist Church lies to the east of the site. However, given the distance or intervening development we do not consider that development of the site would have a significant impact on the significance of these assets.	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>
	Saham Toney			
477	PROPOSAL SAHAM 1 (072): West of Hills Road	Object	<p>Whilst there are no designated heritage assets within the site boundary, the grade II listed Page's Place lies to the south-west of the site. Any development of the site has the potential to impact on the significance of this heritage asset through development within its setting.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>
	Sporle			
480	PROPOSAL SPL 1 (370): Bunkers Hill (Left)	Support	No comments	-

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
483	PROPOSAL SPL 2 (146): West of The Street	Object	<p>Whilst there are no designated heritage assets within the site boundary, the grade II listed Wolferton House lies to the south-west of the site. Any development of the site has the potential to impact on the significance of this heritage asset through development within its setting.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>
	Yaxham			
486	PROPOSAL YAX 1 (094): North of Norwich Road	Object	<p>Whilst there are no designated heritage assets within the site boundary, the Yaxham Conservation Area including the grade I listed St Peters Church and the grade II listed Yaxham House lie to the west of the site. Any development of the site has the potential to impact on the significance of these designated heritage assets through development within their settings.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>
Tertiary Parishes				
489	Beeston with Bittering			
489	PROPOSAL BEES 1 (028):	Support	No comments	-

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
	Back Lane (West)			
492	PROPOSAL BEES 2 (203): Back Lane (East)	Support	No comments	-
494	PROPOSAL BEES 3 (058): Playing Field & Dereham Road	Support	No comments	-
464	PROPOSAL BEES 4 (204): School Farm Paddock	Support	No comments	-
498	PROPOSAL BEES 5 (059): Rose Cottage, Syers Lane	Support	No comments	-
	Brisley			
500	PROPOSAL BRIS 1 (006): North of Gateley Road	Object	<p>The site lies adjacent to the Brisley Conservation Area. Any development of the site has the potential to impact on the significance of the Conservation Area through development within its setting.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>
	Colkirk			
503	PROPOSAL COL 1 (155):	Object	Whilst there are no designated heritage assets within the site boundary, there are a number of listed buildings nearby including the	<i>Complete an HIA now to inform the allocation of the site including any</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
	East of Hall Lane		<p>grade II* Hall Farmhouse, and several grade II listed buildings including Colkirk House which is set within extensive grounds opposite the proposed site.</p> <p>Any development of the site has the potential to impact on the significance of these heritage assets through development within their settings.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>mitigation, enhancement and policy wording</i>
	Garvestone Reymerston and Thuxton			
506	PROPOSAL GARV 1 (088): Site A – North of Dereham Road	Support	No comments	-
509	PROPOSAL GARV 2 (087): Site B – North of Dereham Road	Support	No comments	-
	Great Dunham			
512	PROPOSAL GDUN 1 (256): East of Litcham Road	Object	Whilst there are no designated heritage assets within the site boundary, there are a number of listed buildings nearby including the grade II listed Rookery Farmhouse and Piggery at Rookery Farm.	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			<p>Any development of the site has the potential to impact on the significance of these heritage assets through development within their settings.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	
	Shropham			
515	PROPOSAL SHROP 1 (142): East Of Rocklands Road	Object	<p>Whilst there are no designated heritage assets within the site boundary, there are two grade II listed buildings to the north of the site: Manor Farmhouse and the lodge to Manor Farm.</p> <p>Any development of the site has the potential to impact on the significance of these heritage assets through development within their settings.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>
	South Lopham			
518	PROPOSAL S- LOP 1 (276): West of Church Road	Object	<p>A small part of the site lies within the South Lopham Conservation Area. The grade I listed Church of St Andrew lies to the north of the site. Primrose Farmhouse and barn, both grade II listed lie to the east of the site. Any development of the site has the potential to impact on</p>	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			<p>the significance of the Conservation Area and listed buildings and their settings.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	
	Thompson			
521	PROPOSAL THOM 1 (170): Tottington Road	Object	<p>Whilst there are no designated heritage assets within the site boundary, there are two grade II listed buildings close to the site: Redbrick Farm Barns and Three Cottages.</p> <p>Any development of the site has the potential to impact on the significance of these heritage assets through development within their settings.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>
523	PROPOSAL THOM 2 (108): East of Watton Road	Object	<p>Whilst there are no designated heritage assets within the site boundary, there are two grade II listed buildings close to the site: 1 and 2 High Houses and The Thatched House.</p> <p>Any development of the site has the potential to impact on the significance of these heritage assets through development within their settings.</p>	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.	
	Weasenham St Peter			
526	PROPOSAL WEAS 1 (227): School Road	Object	<p>The site lies adjacent to the Weasenham St Peter Conservation Area. Any development of the site has the potential to impact on the significance of the Conservation Area through development within its setting.</p> <p>Any development of the site has the potential to impact on the significance of the Conservation Area through development within its setting.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>
13 Employment Allocations				
530	Snetterton			
530	SNETT-EMP 1: Land at Falcon Road (Site ref: 286)	Object	Whilst there are no designated heritage assets within the site boundary, there are two listed buildings to the north of the site: The grade I listed Church of All Saints and the Old Rectory (grade II).	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			<p>Any development of the site has the potential to impact on the significance of these heritage assets through development within their settings.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	
533	SNETT-EMP 2: Parcels P and Q - Land adjacent to Snetterton Heath (Site ref: 267)	Support	No comments	-
536	SNETT-EMP 3: Land at Harling Road (Site ref: 298)	Object	<p>Whilst there are no designated heritage assets within the site boundary, there is a scheduled monument (Gallows Hill Tumulus) to the east of the site.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>
538	SNETT-EMP 4: West of Snetterton	Object	Whilst there are no designated heritage assets within the site boundary, there are two listed buildings to the west of the site: The grade I listed Church of All Saints and the Old Rectory (grade II).	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
	Employment Allocation 1		<p>Any development of the site has the potential to impact on the significance of these heritage assets through development within their settings.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	
540	SNETT-EMP 5: Land at Hargham Road and Chalk Lane (Site ref: 366)	Object	<p>Whilst there are no designated heritage assets within the site boundary, there is a cluster of grade II listed buildings at North End to the north of the site. Further to the west of the site lie the grade I listed Church of All Saints and the Old Rectory (grade II).</p> <p>Any development of the site has the potential to impact on the significance of these heritage assets through development within their settings.</p> <p>A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>
542	SNETT-EMP 6: Land at Hargham Road West (LPRC4S25RE N003)	Object	<p>Whilst there are no designated heritage assets within the site boundary, there is a grade II listed stone cross to the north-east of the site.</p> <p>Any development of the site has the potential to impact on the significance of this listed structure through development within its setting.</p>	<i>Complete an HIA now to inform the allocation of the site including any mitigation, enhancement and policy wording</i>

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			A heritage impact assessment of the site should be undertaken now to assess the impact of the proposed development on designated and non-designated heritage assets and determine if allocation of this site is appropriate, and if it is what mitigation and enhancement may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.	
	Dereham			
544	DER-EMP 1: Land at Moorfields (Site ref: 129)	Support	No comments	-
	Swaffham			
547	SWA-EMP 1: Land north of the A47 Swaffham (Site ref: 076)	Object	The grade II listed Wolferton House lies to the east of the site but at approximately 750m and with intervening vegetation and so is unlikely to have a significant impact on the listed building.	-