

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	873890	Full Name	Mrs Faye LeBon	Organisation Details	Parish Clerk Swanton Morley Parish Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	5.44
Chapter Number			

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			
Do you wish to appear at the Examination in Public?		No					

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Three areas of local green space have been put forward by Swanton Morley Parish Council. All three areas comply with the NPPF whereby:: 1 where the green space is in reasonably close proximity to the community it serves; 2 where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and 3 where the green area concerned is local in character and is not an extensive tract of land. All three areas of land in the vicinity of Middleton Avenue in Swanton Morley meet these criteria so therefore should be designated as Local Green Space.

Local Plan Pre-Submission - Comments and Response Schedule

Breckland Council has denied this request, giving them the inferior protection of 'amenity land', despite the lands meeting all the above criteria. What Breckland Council has not specified is that they own these lands, and have since tried to submit one piece of these lands to be allocated for development. Breckland Council clearly has a financial interest in these lands which has gone undeclared. The decision on whether these lands should be allocated Local Green Space status should be made by the examiner and not a body with a financial interest which has since tried to allocate the land for development

Breckland Council Response

Officer Response

The sites were submitted and assessed during the Preferred Directions consultation stage. At this point it was stated that "collectively the sites already benefit from amenity space designation". It is accepted that these areas of open space meet the tests of being within close proximity to the community that they serves and are not extensive tracts of land. However, at no point has it been demonstrated how the green area is demonstrably special to the local community. It is therefore considered that the amenity space designation supported by emerging policy ENV 04 Open space, Sport & recreation and paragraph 74 of the NPPF provide adequate protection to open space. Neighbourhood Plans offer the opportunity to designate Local Green Space where it can be evidenced that the tests have been met.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	5.44
Chapter Number			

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	This is new text.		
Do you wish to appear at the Examination in Public?				No			

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

There are other Local Green Spaces in the district besides the two identified in Table 5.3 (for example see the Yaxham made Neighbourhood Plan). Therefore add the following text at the end of 5.44: "In addition refer to any made Neighbourhood Plans for the designation of Local Green Spaces in Neighbourhood Areas."

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted. Made Neighbourhood Plan policies will form part of the development plan for the district.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1032053 Full Name Dr Nicky Grandy
Agent ID Agent Name

Organisation Details
Agent Organisation

Comment Details

Title Paragraph Number 5.44
Chapter Number

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	New/revised text.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The section on Local Green Space and paragraph 5.44 in particular fails to recognise the Local Green Spaces that have been and will be designated through the Neighbourhood Plan process. A sentence/paragraph acknowledging this should be added.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted. Local Green Space allocated through Neighbourhood Plans will be updated on policies maps as NPs are made.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1032087	Full Name	Mr Chris Kennard	Organisation Details	Finance Director The Shadwell Estate Compan
Agent ID	1029372	Agent Name	Mr Paul Sutton	Agent Organisation	

Comment Details

Title	Breckland Local Plan Pre-Submission Publication	Number	
Chapter Number	1		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Pre-submission Publication Policies Maps- Thetford See comments in relation to Policy GEN 05 Settlement Boundaries and Policy HOU 02 " Level and Location of Growth, above.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment addressed in relevant sections.

Potential amendment to the plan

No amendment proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	874753	Full Name	Ms Heidi Frary	Organisation Details	Ovington Parish Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Breckland Local Plan Pre-Submission Publication	Number	
Chapter Number	1		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Some comments were made as part of the 'Preferred Direction' consultation, but a greater level of understanding has developed.		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

General Ambiguity There are 120 occurrences of the word in/appropriate/ly throughout the document, with little, or in most case no explanation as to what it or is not considered appropriate. This lack of clarity is an open invitation for policies to be challenged, especially by those with significant legal budgets. All occurrences should be removed and where this is not possible a clear and concise definition be provided to avoid any ambiguity. General Exceptions Some policies have exceptions written in to them, either explicitly or by implication. A planning committee has the power to make an exception to any policy but if the possibility of an exception is written in to the policy then the applicant (if turned down) can ask the planning

Local Plan Pre-Submission - Comments and Response Schedule

inspectorate to decide and appeal the committee decision. No policy should have an exception.

Breckland Council Response

Officer Response

Paragraphs 21, 50 and 157 of the NPPF makes it clear that policies should be flexible and not overly prescriptive.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129965	Full Name	Francesca Shapland	Organisation Details	Lead Advisor Natural England
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Breckland Local Plan Pre-Submission Publication	Number	
Chapter Number	1		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Natural England considers that the plan includes appropriate policies in line with all relevant aspects of the NPPF, as pertaining to out remit. In particular, it is consistent with the objectives of paragraphs 109-125, 157 and 165-168 concerning the natural environment and the need for robust evidence. We consider the plan sound on this basis.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Breckland Local Plan Pre-Submission Publication	Number	
Chapter Number	1		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Mapping We recommend that designated heritage assets are marked on maps, especially in relation to site allocation maps.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Designated heritage assets are included on policies maps.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1133646	Full Name	Mr Robert Feakes	Organisation Details	Suffolk County Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Breckland Local Plan Pre-Submission Publication	Number	
Chapter Number	1		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

See attached letter.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The attached letter states that Suffolk County Council has no objection to the draft Breckland Local Plan. The letter outlines how Suffolk County Council works with partners, including Breckland District Council on the Breaking New Ground project in the Brecks. This goes on to set out how the two authorities will work together on wider strategic issues going forward.

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1130821 Full Name Mr Pablo Dimoglou
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Breckland Key Diagram Number Figure 1.1
 Chapter Number 1

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	As a District Councillor I raised this at The Local Plan Working Group meetings where the Local Service Centre designations were discussed. In particular my views represented a parish in my Ward, Yaxham. I was not able to comment during a large part of the consultation as I had declared an interest.		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

I believe the Council has ignored the basis it has itself set for determining what is or is not a Local Service Centre and therefore the map in 1.20 is incorrect and should be amended. I feel that this was in order to appease a very dedicated, vociferous and aggressive Neighbourhood Plan Group. I do not believe it is for the Council to decide it is appropriate for a community to 'opt out' of being a Local Service Centre, just because they do not want further development. Yaxham Parish Council had

Local Plan Pre-Submission - Comments and Response Schedule

previously voted that Yaxham should be a Local Service Centre due to the plethora of services available within the Parish. After additional sites were put forward as part of the process, and with pressure from the Neighbourhood Plan Group, Yaxham Parish Council again debated the LSC status and voted against it. The representation made by officers to the Local Plan Working Group was incorrect. I believe the question of Local Service Centre designation should be reconsidered within Breckland Council and the map amended to show Yaxham as a Local Service Centre. Preventing a Parish from being deemed a Local Service Centre for no good reason is not in the spirit of the Local Plan - and it allows the negative NIMBY attitude to prosper, which is one of the reasons why Breckland Council has consistently fallen short of the five year housing land supply.

Breckland Council Response

Officer Response

Clint Green and Yaxham collectively have the services and facilities to be considered a Local Service Centre and this was originally proposed through the emerging Local Plan. Through Local Plan Working Groups it was argued that the distance between Yaxham and Clint Green is approximately 1km. The school is located in Clint Green and, therefore, the distance between the two settlements was considered to be too great for the settlements to be jointly designated as a Local Service Centre. Yaxham on its own merits would only have 4 of the services and facilities and, would therefore, fall under the policy HOU 04.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1130821 Full Name Mr Pablo Dimoglou
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Paragraph Number 1.41
 Chapter Number 1

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4 - Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	As District Councillor, I did raise issues at the Local Plan Working Group meetings but was unable to comment for much of the proceedings due to having declared a personal interest.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Breckland Council allowed Yaxham Parish Council and the subgroup of the Parish Council - The Neighbourhood Plan for Yaxham to rescind a previous decision which voted IN FAVOUR of the Local Service Centre designation. When the Extraordinary Parish Council Meeting was called, the reason given for reconsidering the Local Service Centre designation was not because of any shortfall in the amount of services available to villagers - it was simply because members of the Parish Council and Neighbourhood Plan Group had become aware that several applications had been made by local landowners to bring sites forward as possible preferred sites. It

cannot be sound to let certain, or favoured local Parishes dictate the policy which will be applied to them instead of following the guidelines laid down in national guidance and in the own text of the Local Plan document. The result of letting communities 'opt out' because they simply do not want more development in their backyard is to place an unfair burden on other communities and negates the efforts made by officers to ensure the Local Plan is fair, legal and consistent. I believe that the Strategic Objectives 1, 2 and 3 are failed by the above. As District Councillor in Breckland, Parish Councillor in Yaxham and having part owned by far the largest employer in Yaxham for ten years with a public facing business I came into contact virtually every day with young (and not so young) people who were unable to buy a house in their village as prices had been driven up by those commuting into Norwich or elsewhere and those choosing Yaxham for their retirement. These people may not turn up to Parish Meetings or take part in the Neighbourhood Plan meetings which I was told they felt were hostile - and I experienced this for myself - with the Chairperson on one part thanking me for help as a District Councillor and then denying me the opportunity of taking part in a meeting once it became apparent I was not going to go meekly along with what I say is there anti development objectives. I was threatened by the Vice Chairperson, that if I did not leave the meeting - he would call the police to make me leave. I feel that the Local Plan process at Breckland Council has given succour to restrictive objectives of the Neighbourhood Plan group rather than meet the greatly needed local demand for houses. Yaxham has a two shops - one currently closed due to the death of its owner and currently undergoing a major refurbishment with the aim of re-instating the Post Office service which existed in it previously and creating an additional shop. Despite Breckland Council issuing Business Rates Demands for the shop - when an officer made a presentation detailing the amount of services to the Local Plan Working Group - the second shop was completely ignored and this had a major effect on the determination of Breckland Council that they should allow Yaxham to be removed from the proposed Local Service Centres. Yaxham also has an extremely regular bus service - running to and from Dereham, Mattishall, The Norfolk & Norwich University Hospital, The University of East Anglia and Norwich. The service provided to my ward by the bus companies is first class. Yaxham has employment opportunities - with one single employer having circa 30 employees on the payroll on a permanent basis. In addition, according to the Yaxham Neighbourhood Plan there are an additional 40 or so businesses operating within Yaxham. Yaxham has a pub, although it is currently closed due to the ill health of its

Local Plan Pre-Submission - Comments and Response Schedule

owner - it is being marketed as a going concern. Like the second shop, Breckland Council was also led to believe that the pub had permanently closed in order for the Neighbourhood Plan group to side step the much needed and organic development being a Local Service Centre would bring Yaxham has a cafe which opened in 2009 and had a major extension in 2015 - resulting in a 180 plus cover restaurant. Yaxham has tourist opportunities. Yaxham has a vibrant Village Hall - built in 1977 to celebrate Her Majesty's Silver Jubilee and having operated sustainably since that time. Yaxham has a well attended and well loved Primary School For such services to survive and thrive, the village must be able to grow in a sustainable way that enables our young people to stay in the villages rather than let them become retirement ghettos. Yaxham Parish should clearly have been identified as a Local Service Centre which would have satisfied the Strategic Objectives of the Local Plan and would be in line with national guidance. The Strategic Objective (4) is failed by the above. The right type of houses in the right place will not be built, and failure to support local services is likely to result in their reduction or withdrawal altogether. By forcing our youngsters out of the villages - because their ability to afford housing stock of any type is outpaced by those working in the city with big jobs, or those retiring who are able to sell their house elsewhere and buy locally we cannot pretend we are meeting housing need. I see nothing in the Local Plan to suggest Breckland Council is seeking to resolve this anomaly and restricting development in certain favoured parishes only re-enforces the problems our young people have. Strategic objective (5) is failed.

Breckland Council Response

Officer Response

Clint Green and Yaxham collectively have the services and facilities to be considered a Local Service Centre and this was originally proposed through the emerging Local Plan. Through Local Plan Working Groups it was argued that the distance between Yaxham and Clint Green is approximately 1km. The school is located in Clint Green and, therefore, the distance between the two settlements was considered to be too great for the settlements to be jointly designated as a Local Service Centre. Yaxham on its own merits would only have 4 of the services and facilities and, would therefore, fall under the policy HOU 04.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1134647	Full Name	Mr Tony Needham	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title	Paragraph	Number	1.39
Chapter Number	1		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The Plan has not been positively prepared, there is not a clear link between the vision, the objectives and the policies with regard to economic development in Dereham. Third paragraph of the vision, while the A47 corridor is mentioned there are no significant policies to take advantage of the substantial Government investment committed to complete the dualing of the A47 between Dereham and Norwich. The A47 corridor in Breckland has not been identified as a growth area for employment. The employment land study was completed prior to the announcement of the dualing of the A47 and needs to be updated to take account of this significant change, policies then need to be refined to reflect the revised

Local Plan Pre-Submission - Comments and Response Schedule

study in order for the Plan to be sound. In order to be sustainable there needs to be employment growth along with housing growth. The emerging Dereham Neighbourhood Plan has a vision which would like to see a balanced approach taking advantage of the A47 improvements to deliver greater employment growth.

Breckland Council Response

Officer Response

With Highways England still consulting on potential routes for the A47 there is no certainty that development will commence in line with the proposed time line. The employment land study provides the most up-to-date and robust evidence in regards to employment.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1130929 Full Name Mr Dick Barwick
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Paragraph Number 1.15
 Chapter Number 1

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Only just heard from a colleague about consultation.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Site in Toftwood LP[025]030 is next to to river tud in the tud valley. Landscape would be destroyed if developed with badley moor sac very close.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The site in question has been subject to several rounds of consultation and no severe constraints have been raised. Natural England have raised no objections with the pre-submission publication document.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Introduction	Number	1
Chapter Number	1		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Chapter 1: Introduction Paragraph 1.29 of the supporting text helpfully outlines the diverse nature of Breckland as a district and specifies heritage as being a contributing factor to that diversity. This paragraph goes on to list the number of listed buildings and conservation areas within the Breckland but omits to mention scheduled monuments, registered parks and gardens or heritage at risk. In order to present a robust and accurate picture of the districts historic environment we would request that these are referred to alongside the assets already mentioned. The Breckland Strategic Vision seeks to cherish the natural and built assets which the District unique. In terms of wording we would recommend that the text is

Local Plan Pre-Submission - Comments and Response Schedule

amended to refer to the natural, built and historic environment rather than only "natural and built assets". The same paragraph goes on the outline the specific character of Brecklands towns and villages and the need to retain their characteristics. Whilst this is welcomed it would be more appropriate to outline a more comprehensive aspiration regarding the historic environment at this strategic vision level which includes the recognition that rural heritage has to play in determining the districts character. The vision refers to locating new development in locations that are co-ordinated with transport provision, good access to existing services, community facilities and open space. While this approach has a number of merits, care will need to be taken to ensure that specific locations avoid harming the significance of heritage assets, their settings, and the wider historic environment. Leading on from the Strategic Vision are the Strategic Objectives. We welcome the inclusion of objective 12 which represents a good strategic consideration to aid the delivery of the conservation and enhancement of the historic environment. We would however advise the term "non-designated" rather than "un-designated" is used. This objective would be strengthened and the soundness of the plan improved if it also sought to address heritage at risk. A relatively large number of entries within the Heritage at Risk (HAR) register are located within Breckland so it would be beneficial to outline the Councils overarching aspirations to address heritage at risk.

Breckland Council Response

Officer Response

Comment noted. In relation to the vision it is considered that the historic environment is encompassed within the terminology for the built environment and therefore it is not considered necessary to change the terminology within the vision. The representation also makes reference to the location of developments. Any application would need to be assessed against all policies within the Local Plan including ENV07 and ENV08 on the historic environment.

The support for the strategic objectives is noted. In relation to strategic objective 12 changing the reference to non-designated heritage asset rather than undesignated heritage asset would allow consistency with other elements of the plan and is therefore considered appropriate to amend.

Potential amendment to the plan

Change strategic objective 12 to state non-designated heritage asset rather than undesignated heritage asset

Amendment ID

PM/1/SO/A

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1032053 Full Name Dr Nicky Grandy
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Paragraph Number 1.33
 Chapter Number 1

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Have become more engaged in the process following involvement with the development of a Neighbourhood Plan.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

As drafted, Chapter 1 and this section on Breckland's Spatial Vision does not refer to the role of Neighbourhood Plans and the relationship they have with the Local Plan. Also BDC should make a clear commitment to supporting Neighbourhood Plan development and utilisation as an important element in the planning process. Text addressing these points should be included.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 976454 Full Name Mark Mendham
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Paragraph Number 1.15
 Chapter Number 1

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Toftwood site LP[025]030 is on a slope adjacent to river Tud. Any run-off contaminated water will enter the river which then flows through Badley Moor SAC a short distance away. This has not been fully considered.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Natural England raised no soundness objections with the pre-submission publication of the Local Plan.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 973437 Full Name Mr Peter Bush
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Paragraph Number 1.15
 Chapter Number 1

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Toftwood site LP[025]030 slopes towards the river Tud with Badley Moor SSSI only a short distance downstream. Contaminated run-off from the site will enter the river, this then runs through the SSSI creating pollution risk. This site should not be considered suitable due to the close proximity of a river and SSSI. This site is located on the southern boundary of Dereham away from town centre and high schools.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Natural England raised no soundness objections with the pre-submission publication of the Local Plan.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1137235	Full Name	Mr Mark Behrendt	Organisation Details	Planning Manager - Local Plans House Builders
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	1.16
Chapter Number	1		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4 - Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Effectiveness of duty to co-operate matters can only be considered at the submission of the local plan.		
Do you wish to appear at the Examination in Public?				Yes			

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The Plan is not sound as there is no effective mechanism in the Local Plan for maintaining co-operation and as such is not effective We are pleased to see that the Norfolk districts and boroughs alongside the County Council have prepared a strategic framework for the county. Whilst this framework is only in draft, it is a reasonable starting point from which to ensure improved co-operation across the County regarding housing delivery. However, we have concerns regarding the long-term effectiveness of this framework and the fact that its commitments have not been translated into policies within the Local Plan. As such whilst the Council would appear to have met the legal duty to co-operate we do not consider the local plan

Local Plan Pre-Submission - Comments and Response Schedule

to offer an effective approach to ensuring that co-operation continues beyond adoption of the Local Plan as required by paragraph 181 of the National Planning Policy Framework. The NPPF sets out that Local Plans should meet the housing needs of the HMA in full and in order to be effective the plan must consider how it supports delivery of these needs. As such it must be recognised in the Plan the needs arising within other authorities. Without recognition of wider HMA needs and the inclusion of monitoring and contingency measures in the plan there is little certainty of maintaining co-operation once the plan is adopted. At present the Breckland Local Plan makes little mention of delivery across the HMA and has no monitoring framework for considering delivery across the HMA. Unless such policies are included the plan cannot be considered sound. To achieve this the Council must set out in the Local Plan the housing needs for the Housing Market Area and how these needs are distributed and include shared contingency measures that will set out how under performance across the HMA will be addressed. The approach taken by the Councils within the HMA will mean that if one authority is unable to meet their needs, for whatever reason, then there is no mechanism to ensure that the other authorities in the HMA consider how to address this collectively. This is an important approach to co-operation and ensures that the expectations set out in paragraph 181 of the NPPF, that co-operation is on-going and extends into implementation, is achieved. We are also concerned that Breckland has decided to prepare a plan to different timescales to the other authorities. Every other authority in the HMA has considered it appropriate to prepare a plan starting in 2016. For the purposes of effective evidence gathering and monitoring across the HMA the Council should have prepared a plan that is in line with its partner authorities. Whilst not a soundness issue in its self, it does indicate an unwillingness to conform with the rest of the HMA and does not suggest a willingness to co-operate should another authority be unable to meet their own needs.

Breckland Council Response

Officer Response

Comment noted. The Breckland Duty to Cooperate Statement (2017) sets out in detail how the Local Plan has been developed in cooperation with DtC bodies in addressing strategic cross boundary issues and how this will continue after the Local Plan has been adopted. In addition, Breckland is a partner on the Norfolk Strategic Framework Member Forum which includes representatives from all Norfolk Authorities. The Norfolk Strategic Framework (NSF) is at an advanced stage of production having been subject to consultation and sets out a number of collective agreements which members, one of which is to address Objectively Assessed Need across the Housing Market Area. The nature of plan making is such that it is not always possible to conform to a collective starting point. Delay to the Local Plan timetable would have a negative impact on housing and economic growth in the District.

Local Plan Pre-Submission - Comments and Response Schedule

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	General Policies	Number	2
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Strategic policies are a very important part of the plan, particularly given the need for Neighbourhood Plans to be in conformity with these policies. Paragraph 156 of the NPPF makes it clear that, Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver conservation and enhancement of the natural and historic environment including landscape. Therefore we would strongly advise the inclusion of a strategic policy that addresses these matters.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted. Neighbourhood Plans within Breckland District will be required to be in general conformity with Policies ENV 07 Designated Heritage Assets and ENV 08 Non-Designated Heritage Assets of the Local Plan.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1132181	Full Name	Mr Daniel Hewett	Organisation Details	Taylor Wimpey UK Ltd
Agent ID	1132169	Agent Name	Mr Graeme Free	Agent Organisation	DLP Planning Ltd

Comment Details

Title		Number	GEN 1 - Sustainable Developme
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy GEN1 – Sustainable Development in Breckland

2.1 Our client generally supports the aspirations set out in Policy GEN1, which is generally consistent with the Framework and the presumption in favour of sustainable development. On balance we feel that this policy can generally be considered sound for the purposes of paragraph 182 of the Framework.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	GEN 1 - Sustainable Developme
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy GEN1: Sustainable Development in Breckland We welcome the Plans recognition of the protection and enhancement of the historic environment as a strand of sustainable development in paragraph 2.2 of the supporting text and again in bullet point 2 of the policy itself.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1032053 Full Name Dr Nicky Grandy
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number GEN 1 - Sustainable Developme
 Chapter Number 2

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Have become more engaged in the process since involvement with the development of a Neighbourhood Plan.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The last paragraph in this policy does not take account of any Neighbourhood Plan policies that might be relevant and that should be taken into account in decision-making. This absence should be addressed.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	GEN 1 - Sustainable Developme
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The principle in question was not included in the document at the time of previous consultations.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

In the principle "Support Breckland's wider rural economy helping to sustain local services and assist in helping rural communities adapt and grow proportionately to enhance their social and economic sustainability., the term "proportionately" lacks clarity or definition and would thus be difficult to apply consistently as a basis for planning decisions.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The Sustainable development policy seeks to provide overarching, locally distinctive sustainable development principles. The issue of proportionality is addressed through detailed policies within the Local Plan: Policy HOU 02 - Level and Location of Growth, Policy HOU 03 - Development outside the Boundaries of Local Service Centres, Policy HOU 04 - Rural Settlements with Boundaries and Policy HOU 05 - Small Villages and Hamlets Outside of Settlement Boundaries.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	GEN 2 Promoting High Quality D
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	This policy was not included at the time of previous consultations.		
Do you wish to appear at the Examination in Public?				No			

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

1) Almost all of the criteria for "high quality design" are subjective and therefore open to wide interpretation and difficult to apply consistently or reliably when making planning decisions. 2) This policy should additionally make reference to the local design requirements in any made Neighbourhood Plans. 3) The referenced Supplementary Planning Document on Design has not been made available for consultation and means the policy is incomplete with respect to that document.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

1) Design principles, by their nature, are subjective. Reference has been made to best practice to encourage consistency. 2) Neighbourhood plans can create policies that add to any of the policies within the Local Plan and do not need express permission to do so. Where a Neighbourhood Plan has been adopted the policies contained within will be given due weight. 3) The Supplementary Planning Document on Design would also be subject to future consultation and would seek to add to the policy.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	GEN 2 Promoting High Quality D
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy GEN2: Promoting High Quality Design We welcome the inclusion of a strategic level policy relating to high quality design. It is recommended that the policy makes specific reference to the historic environment and the development opportunities that there may be to enhance or better reveal its significance. Making reference to the historic environment at this point in the plan and within a design policy would recognise that development can result in positive enhancements to the historic environment and that good design can reinforce the areas character. These changes will strengthen the Plans conservation strategy. The production of a Supplementary Planning Document to support good design and to

Local Plan Pre-Submission - Comments and Response Schedule

provide additional advice is encouraged.

Breckland Council Response

Officer Response

Comment noted. Whilst the historic environment is not explicitly mentioned in the strategic design policy, the wording of the policy and supporting text is considered to have an overall positive effect on conserving and enhancing the historic environment as it refers to respecting character and context, reflecting local distinctiveness and contributing positively to the public realm and public spaces.
The significance of the historic environment is additionally reflected in criteria a of the detailed design policy (COM 01 - Design) and in policies for designated and non designated heritage assets (ENV 07 and ENV 08).

Potential amendment to the plan

No proposed amendments.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1134348	Full Name	Maggie Oechsle	Organisation Details	NP4Yaxham" Yaxham Neighbourhood Plan W
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	GEN 03 - Settlement Hierarchy
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Yaxham is therefore pleased to note that in the settlement hierarchy the parish's main settlements of Yaxham and Clint Green are expressly classed as within the third tier of the settlement boundary as "rural settlements have settlement boundaries" within General Policy GEN 03 and in Housing Policy HOU04 with Settlement Boundary Map 17 "Yaxham & Clint Green".

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	GEN 03 - Settlement Hierarchy
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The terminology in question was not used at the time of previous consultations		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

The designation of Saham Toney as a rural settlement with boundary is appropriate and correct and is supported.

13- If you feel the plan is unsound, please tell us why

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1131135	Full Name	Mr Ian Martin	Organisation Details	Yaxham Parish Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	GEN 03 - Settlement Hierarchy
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The focus of the Yaxham response is on how the overall Plan affects the parish of Yaxham and whether in this context it is considered to meet the test of "Soundness".

Yaxham is therefore pleased to note that in the settlement hierarchy the parish's main settlements of Yaxham and Clint Green are expressly classed as within the

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 868883 Full Name Mr David Cockburn
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number GEN 03 - Settlement Hierarchy
 Chapter Number 2

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Bawdeswell should not have been designated a Local Service Centre. Tweaking the criteria by removing certain requirements to include the village was wrong. The original criteria were valid and necessary.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

A range of options were set out in the Issues and Options Consultation (November 2014) : Retain definition of Local Service Centres used within the adopted Core Strategy; Define Local Service Centres around facilities regardless of population; and define Local Service Centres based around schooling and health provision. The majority of the responses to this consultation were in favour of defining Local Service Centres around facilities regardless of population. Following this the Local Service Centre topic paper set out what this would mean for the settlements within the district. This was updated through the consultation process to ensure that the information contained within the document was accurate.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1032208	Full Name		Organisation Details	Hans House Group of Companies
Agent ID	1032205	Agent Name	Mr Jamie Roberts	Agent Organisation	Pegasus Group

Comment Details

Title		Number	GEN 03 - Settlement Hierarchy
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy GEN3 establishes a settlement hierarchy for Breckland which identifies Attleborough as one of the two Key Settlements at the top of the hierarchy. This approach is supported. Attleborough benefits from a wide range of local services and employment, and good public transport connections by local buses and regional railway services on the Breckland Line. Given this range of services, it is self-evidently a sustainable location for development and our client supports the

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	GEN 03 - Settlement Hierarchy
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The terminology in question was not used at the time of previous consultations		
Do you wish to appear at the Examination in Public?		No					

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The term "Villages with boundaries" is inconsistent with other section of the Plan, most importantly Policy HOU 04. Amend to "Rural settlements with boundaries". In the final paragraph amend "development hierarchy" to "settlement hierarchy" to ensure consistency with the policy title and avoid potential confusion as to what is being referred to.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted.

Potential amendment to the plan

Amend the title of Policy HOU 04 to 'Villages with boundaries'.

Amendment ID

PM/H/04/A

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	2.14
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Terminology in question was not used at the time of previous consultations.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

In the first sentence the term "villages with settlement boundaries" is inconsistent with that used elsewhere in the Plan, most notable in Policy HOU 04, in which the term "rural settlements with boundaries" is used. Amend accordingly. Similarly in the criteria for transport amend "village" to "settlement". This is an important distinction, since settlement may be understood as an entire parish whereas village may be interpreted as just the inhabited centre of that parish.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comments noted.

Potential amendment to the plan

Proposed amendment to policy HOU 04 to changes the title to 'villages with settlement boundaries'

Amendment ID

PM/H/04/A

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1130821 Full Name Mr Pablo Dimoglou
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Paragraph Number 2.12
 Chapter Number 2

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4 - Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	As District Councillor, I did raise issues at the Local Plan Working Group meetings but was unable to comment for much of the proceedings due to having declared a personal interest		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

I understand that Breckland Council has set a figure to meet the amount of housing required in the district through the period. In my opinion, the target is much the same as is legally required. It is therefore entirely possible that the target could be missed. This danger is increased by the over reliance on major developments such as the one in Thetford. There is already a strong possibility that Thetford will not be able to deliver the amount of houses required due to infrastructure issues and lack of developer interest. Therefore, it is critical that the rest of the district is able to shoulder an additional part of the burden should it become necessary. An

Local Plan Pre-Submission - Comments and Response Schedule

important contribution to the housing provision will be made by Local Service Centres. A Parish within my ward as District Councillor, Yaxham has every service available to qualify as a Local Service Centre - and it was the recommendation of planning officers that it be classed so. Yaxham Parish Council voted in favour of the Local Service Centre designation (but overturned the decision at a later meeting when it was realised additional sites has been put forward for possible development). In my opinion the Neighbourhood Plan for Yaxham group has at the heart of it - through the Chairperson an anti development stance. She has lobbied aggressively for Yaxham not to be a Local Service Centre. On 21 May 2017 the Chairperson sent an email and letter to the Chairperson and Vice Chairperson of Yaxham Parish Council in what I, and other Parish Councillors see as a direct attempt to undermine local democracy in order to drive her own ambitions forward. I have included a verbatim extract from the letter and am happy to provide the whole document. "It is obvious that he (Pablo Dimoglou), Peter B (Peter Bennett - A parish councillor for some 50 years) nor David M (David Myhill - A parish councillor for some 50 years) and probably John H (John Harvey - Parish Councillor whose family have farmed Yaxham for generations) have any idea of the implications of the Plan when faced with Elm Close or Lanpro developers in the future." "However, I have a proposal which you may consider: David M and Peter B could be persuaded by you both as Chairman and Vice Chairman that it is in the best interest of the community at this particular time that they should resign as councillors." "Ian (Martin - the Vice Chairperson of the Neighbourhood Plan Group) and I (Margaret Oechsle - Chairperson of the Neighbourhood Plan Group) could be co-opted by the PC to take their places, to guide the Parish Council to get the Neighbourhood Plan firmly embedded into councillor thinking." "This could also be very beneficial in ensuring the departure of Pablo sooner rather than later as his allies would have gone from the table" "I have no real wish to give up yet more Thursday evenings on the village's behalf, so it would only be temporary to get to the next election. I will not stand by and let all our hard work on the Plan fall by the wayside. "If Tim Hay (my ex business partner) and Breckland (Council) can rid themselves of Pablo, I think we can too and this may be a solution to consider" Breckland Council should not have let itself be harangued by The Neighbourhood Plan Group and should have stood firm on the Local Service Centre designation rather than be dominated by the wishes of a small section of the community. I believe the consideration given to declassifying Yaxham as a Local Service Centre was more politically driven - with an eye for votes in future elections - rather than a

Local Plan Pre-Submission - Comments and Response Schedule

simple factual exercise of whether Yaxham was a Local Service Centre or not. To allow this to happen is to jeopardise the whole plan through under delivery - especially if this situation has been replicated elsewhere.

Breckland Council Response

Officer Response

Clint Green and Yaxham collectively have the services and facilities to be considered a Local Service Centre and this was originally proposed through the emerging Local Plan. Through Local Plan Working Groups it was argued that the distance between Yaxham and Clint Green is approximately 1km. The school is located in Clint Green and, therefore, the distance between the two settlements was considered to be too great for the settlements to be jointly designated as a Local Service Centre. Yaxham on its own merits would only have 4 of the services and facilities and, would therefore, fall under the policy HOU 04.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	2.15
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The text in question was not included at the time of previous consultations.		
Do you wish to appear at the Examination in Public?				No			

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Mention is made on an assessment as to the availability of services within each village. This is possibly the Council's Local Service Centre Topic Paper, but that is not made clear and hence this clause is not rigorous. Add reference to the document in which the noted assessment can be found.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1132181	Full Name	Mr Daniel Hewett	Organisation Details	Taylor Wimpey UK Ltd
Agent ID	1132169	Agent Name	Mr Graeme Free	Agent Organisation	DLP Planning Ltd

Comment Details

Title		Number	GEN 03 - Settlement Hierarchy
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy GEN3 – Settlement Hierarchy

2.2 We support the settlement hierarchy set out in policy GEN3 and specifically with regards to Dereham being identified as a Market Town and the focus of development in this area. The concentration of a greater amount of development in the more sustainable higher order settlements is consistent with national policy

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130821	Full Name	Mr Pablo Dimoglou	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title	Paragraph	Number	2.14
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4 - Is the plan positively prepared?	Yes
5 - Is the plan justified?	Yes	6 - Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10 - Have you raised this at Issues and Options?	No	11 - If you have not raised this issue before please state why	As District Councillor, I did raise issues at the Local Plan Working Group meetings but was unable to comment for much of the proceedings due to having declared a personal interest		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

I am a Parish Councillor in Yaxham and I am a District Councillor covering Yaxham as part of my ward. The Local Plan identifies certain factors which, simply speaking, classify the settlement as a Local Service Centre. Yaxham has:- One shop currently open and with a thriving trade. Another shop currently closed due to the death of the owner - which previously operated a Post Office service. This shop is currently being refurbished in preparation of re-opening in early 2018. A vibrant primary school A pub - currently closed due to the ill health of the owner but being marketed as a going concern. A cafe - having been greatly expanded in 2015 and

Local Plan Pre-Submission - Comments and Response Schedule

now seating circa 180 people. Employment opportunities - with the largest employer in the Parish employing circa 30 people and approximately 40 businesses based in the Parish. A train station (enthusiast line but with regular services to Dereham and Wymondham) A village hall - built in 1977 and having operated commercially since that time Sports and recreational facilities A superb public transport service via bus. Services at a very minimum hourly but often much more frequent. Running to and from Dereham, Mattishall, The Norfolk & Norwich University Hospital, The University of East Anglia, Norwich Despite the plethora of services, the village was not deemed a Local Service Centre due to political pressure from the Neighbourhood Plan for Yaxham Group. I believe this was brought to bear because of an anti development agenda. This cannot be acceptable. All communities must shoulder their fair share of development to meet the needs of local people. A rule applied to one community should be applied to all. There should be consistency in the decision to award Local Service Centre status.

Breckland Council Response

Officer Response

Clint Green and Yaxham collectively have the services and facilities to be considered a Local Service Centre and this was originally proposed through the emerging Local Plan. Through Local Plan Working Groups it was argued that the distance between Yaxham and Clint Green is approximately 1km. The school is located in Clint Green and, therefore, the distance between the two settlements was considered to be too great for the settlements to be jointly designated as a Local Service Centre. Yaxham on its own merits would only have 4 of the services and facilities and, would therefore, fall under the policy HOU 04.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130821	Full Name	Mr Pablo Dimoglou	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title	Paragraph	Number	2.12
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4 - Is the plan positively prepared?	Yes
5 - Is the plan justified?	Yes	6 - Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10 - Have you raised this at Issues and Options?	No	11 - If you have not raised this issue before please state why	As District Councillor, I did raise issues at the Local Plan Working Group meetings but was unable to comment for much of the proceedings due to having declared a personal interest		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

I do not believe Breckland Council has applied consistent policies with regard to determining the Settlement Hierarchy. The same test which has resulted in some Parishes being determined Local Service Centres was not applied to Yaxham Parish. I believe a powerful and vocal - but small number of people were able to dominate the Parish Council and Breckland Council so that they sidestepped the obvious truth of whether Yaxham should be a Local Service Centre.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Clint Green and Yaxham collectively have the services and facilities to be considered a Local Service Centre and this was originally proposed through the emerging Local Plan. Through Local Plan Working Groups it was argued that the distance between Yaxham and Clint Green is approximately 1km. The school is located in Clint Green and, therefore, the distance between the two settlements was considered to be too great for the settlements to be jointly designated as a Local Service Centre. Yaxham on its own merits would only have 4 of the services and facilities and, would therefore, fall under the policy HOU 04.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1132253	Full Name	Glavenhill Strategic Land	Organisation Details	Glavenhill Strategic Land
Agent ID	1132250	Agent Name	Jane Crichton	Agent Organisation	Lanpro Services

Comment Details

Title		Number	GEN 03 - Settlement Hierarchy
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	During the previous consultation periods the village was proposed to be designated as a Local Service Centre and my client's site was the preferred site LP[113]007. The declassification of the village and therefore the site happened in February 2017 outside of any formal consultation period. We did make representation to the Local Plan Working Group in March 2017.		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Yaxham was previously designated to be a Local Service Centre (LSC) and this was consulted at the regulation 18 stage (Sep-Oct 2016). It was Breckland officers professional opinion that Yaxham met the criteria as published in the preferred options consultation of the emerging Local Plan September 2016. Yaxham was proposed to be a LSC within the Breckland Emerging Local Plan as it was considered by your officers to meet Brecklands criteria of having all 5 local services within 800m (10 min walk) which are: Public Transport Community Facility Employment Shop/Post Office School This designation was informed by the Local Service Centre Topic Paper published in May 2015 and was prepared following the Issue and Options Consultation and included comments that had been received at that stage and provides an analysis and recommendation on the potential of LSC villages. Officers also confirmed this in their reports to the Local Plan Working Group (LPWG) dated 15th July 2016, 14th December 2016 and 3rd February 2017. At the meetings of the 15th July and 14th December 2016 this approach to Yaxham being a LSC was agreed and endorsed by the LPWG. The site was proposed to be the preferred site for growth in Yaxham in the Regulation 18 preferred site options (September 2016) the site (ref: LP[113]007) is noted as (emphasis added): The site itself is within 800m (10 minutes walking distance) to most key services, meaning that the site is sustainable and will limit the use of personal car journeys. There is a footpath to the school at Clint Green. The site sits within the Wensum and Tud Settled Tributary Farmland. Development considerations in this area should seek to conserve the existing rural road pattern, resist upgrade/calming measures which could have an urbanising influence; ensuring that any new development reflects the existing material and stylistic vernacular within the settlements No fundamental constraints to the development of the site have been identified. In the accompanying Sustainability Appraisal (SA) Breckland offices conclude that The Preferred Site LP[113]007 scores positively against the SA objectives, particularly in regards to Land, Water and Soil Resources, Inclusive Communities and Population and Human Health. The site does receive a negative outcome for SA objective 1 as it is greenfield but it also acknowledges that all sites submitted are greenfield and therefore all sites proposed scored a negative outcome. In the officers report to the LPWG of 3rd February 2017 the officers confirm that further work had been undertaken on certain settlements proposed to be a LSC specifically in relation to employment and public transport. This further work shows that Yaxham does meet the criteria which has been applied and undertaken in a consistent manner across the District. In conclusion to Yaxham, officers write Overall it is considered that the

Local Plan Pre-Submission - Comments and Response Schedule

services and facilities within the parish support the whole of the parish and LSC status will help to protect and maintain these facilities. At that meeting members voted contrary to officer recommendation to make Yaxham a LSC due to Yaxham school being over 800m walking distance from the village. Yaxham is now classified as being a Village with Boundaries and residential development is restricted to the principles set out in policy HOU4. It should be noted that the Guidelines for the Identification of Hazards and the Assessment of Risk of Walked Routes to School (October 2000) confirms that in accordance with the 1996 Education Act, suitable walking distances to schools are 2 miles (3.2km) for children under 8, and 3 miles (4.8km) for 8 years of age and older children. My client contends that the reasons for recommending that Yaxham be removed from the LSC list and now included within the list of settlements under Policy HOU4 are unclear. The assessment work by professional officers to-date is clear in that Yaxham meets the criteria for being a LSC. It would appear that Yaxham is only included in the HOU4 settlements on the basis that the previously allocated site in the emerging Local Plan is some 1020m distance from Yaxham Primary School. This distance equates to a 12 ¾ minute walk time as opposed to the 800m/10 minute walk time that is the LSC test in the emerging Local Plan. My client has serious concern that the 5-criteria tests for LSCs are not being applied consistently across all the emerging allocations within the LSC settlements. We have examined all the emerging allocations and can confirm that the emerging housing allocations in the Local Service Villages of Banham, Harling, Narborough, Mattishall, Old Buckenham, Shipdham and Sporle all fail at least one of the 800m/10 minute tests. In fact, the emerging allocations in Mattishall, Old Buckenham, Shipdham and Sporle all fail the 800m walk-distance to a Primary School test. Given the obvious lack of clarity and consistency in the assessment of sites and villages proposed to accommodate planned housing growth demonstrated by the decision to deselect Yaxham as a LSC it seems only appropriate that all settlements proposed as a LSC should be reassessed to ensure a consistent approach is taken if strict enforcement of an 800m distance is to be applied. Failure to do so would lead to a lack of consistency in decision making going forwards and a Local Plan which may be found to be unsound at examination.

Breckland Council Response

Officer Response

Clint Green and Yaxham collectively have the services and facilities to be considered a Local Service Centre and this was originally proposed through the emerging Local Plan. Through Local Plan Working Groups it was argued that the distance between Yaxham and Clint Green is approximately 1km. The school is located in Clint Green and, therefore, the distance between the two settlements was considered to be too great for the settlements to be jointly designated as a Local Service Centre. Yaxham on its own merits would only have 4 of the services and

Local Plan Pre-Submission - Comments and Response Schedule

facilities and, would therefore, fall under the policy HOU 04.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130821	Full Name	Mr Pablo Dimoglou	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title	Paragraph	Number	2.15
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4 - Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	As District Councillor, I did raise issues at the Local Plan Working Group meetings but was unable to comment for much of the proceedings due to having declared a personal interest		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

A presentation was made by an officer to The Local Plan Working Group in relation to the amount of services in Yaxham - and in particular it showed proximity of services by way of circles encompassing areas of the Parish - using any given service as a centre point. This presentation totally ignored the fact that a shop exists in Yaxham Clint Green, and has done for over 50 years. Recently, a Post Office service operated from the shop and it is entirely feasible that this could be re-instated. The previous elderly owner died around two years ago, and the shop had naturally closed pending a probate sale. It was in a poor state of repair and had suffered

Local Plan Pre-Submission - Comments and Response Schedule

through under investment. I sold my retail business on 28 April 2017 and bought the shop on 25 August 2017. I am planning to re-open the shop, having advertised it in Daltons Weekly and online. Despite Breckland Council issuing business rates demands for the shop (up to and beyond the present day) it was omitted from the presentation. This could have been an oversight - although I would expect officers to have thoroughly investigated the level of service and not just accepted what the Neighbourhood Plan Group told them. This issue was critical to the decision for Yaxham not to be a Local Service Centre. Similar applied to the pub, Yaxham Mill which is currently closed due to the ill health of the owner, but is currently for sale as a going concern on Fleuret's Breckland Council should be required to re-examine the issue of whether Yaxham is a Local Service Centre. Failure to have a robust test, fairly applied brings the whole Local Plan into question if it cannot be resolved.

Breckland Council Response

Officer Response

Clint Green and Yaxham collectively have the services and facilities to be considered a Local Service Centre and this was originally proposed through the emerging Local Plan. Through Local Plan Working Groups it was argued that the distance between Yaxham and Clint Green is approximately 1km. The school is located in Clint Green and, therefore, the distance between the two settlements was considered to be too great for the settlements to be jointly designated as a Local Service Centre. Yaxham on its own merits would only have 4 of the services and facilities and, would therefore, fall under the policy HOU 04.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 255168 Full Name Mr Chris Smith
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number GEN 03 - Settlement Hierarchy
 Chapter Number 2

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Hopkins Homes have long advocated that the spatial strategy for District should provide balanced growth proportionate to the size, role and function of the respective settlements throughout the District, in order to achieve 'sustainable' development. To this end, Hopkins Homes would continue to suggest that additional strategic growth should be apportioned to Dereham, as the administrative, economic and social centre of the District, along with the proportionate levels of growth to the Market Towns of Attleborough, Swaffham and Watton. Hopkins Homes would agree with the proposal to encompass additional, sustainable villages as 'Local Service Centre' Villages where similarly

Local Plan Pre-Submission - Comments and Response Schedule

proportionate levels of growth could be accommodated. Whilst acknowledging that the planned growth of Thetford will happen in the medium to longer term, Hopkins Homes remains of the view that the previously suggested levels of growth for Attleborough are wholly disproportionate to the existing size, role and function of the town, such that they are commercially and socially unachievable. It is disappointing that the Local Planning Authority continue to attempt to apportion undue levels of growth to Attleborough, given that the previous Plan failed to deliver such strategic growth in this location. The continued pursuit of this strategy is likely to result in the continued lack of a deliverable 5-year land supply in the District and development occurring on an ad-hoc rather than planned basis. To this end, the level of growth shown for Attleborough should be subsequently reduced, with the bulk of this then apportioned between Dereham, Watton and Swaffham, relative to the size of each town. Hopkins Homes would suggest that this is likely to result in new allocation of approximately 2,000 dwellings to Dereham and 750 dwellings each to both Watton and Swaffham, with the residual 500 dwellings remaining allocated to Attleborough. Such a strategy is likely to be far more deliverable and thus achieve the sustainable development of the District over the next Plan period than has unfortunately been the case to date.

Breckland Council Response

Officer Response

Policy GEN 04 - Development Requirements of Attleborough Strategic Urban Extension (SUE) sets out that at least 2,650 dwellings will come forward within the plan period with a further 1,350 dwellings coming forward after the plan period. These figures are based on the most up to date information in the form of the outline planning permission. The remainder of the 4,000 dwellings has been allocated to other sustainable locations as set out in the development hierarchy. 28% of the growth over the plan period is guided towards the Market Towns, with a further 15% to Local Service Centres. This approach is consistent with the spatial strategy, which was consulted upon at Issues and Options stage, where most respondents were supported over a balanced development pattern.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Breckland Local Plan Pre-Submission Publication	Number	
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4 - Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	This comment relates to the updated Saham Toney Policies Map Summer 2017 which although not part of the online consultation was sent to Saham Toney Parish Council together with the Local Plan.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Comments relating to the Saham Toney Policies Map summer 2017 are as follows:
 1) This map should be made available as part of the online consultation so that parishioners as well as the Parish Council can make comments on it should they wish. 2) The map does not show the full extent of the settlement boundary as it has been truncated at both top and bottom of the map. Similarly the full southern extent of open spaces and flood zones are not shown. 3) The map only shows the main developed part of the parish but Local Plan policies cover the whole parish. The policies map must be updated to show the whole parish of Saham Toney with

Local Plan Pre-Submission - Comments and Response Schedule

the parish boundary clearly identified. 4) Some of the sites shown as having planning permissions appear to have been granted that permission before 2011; the start of the Plan period. This would not appear logical in the context of the Plan period and they should be removed. 5) The map would be much easier to use if each site with planning permission was numbered and a separate list provided giving the planning application numbers for each. It would also be very useful to list the number of new houses granted permission against each site. 6) Alternatively to (5) the sites having planning permission should be removed from the map since this is just a "snapshot in time" and even between the Plan's consultation and adoption is likely to be added to. 7) The flood zones shown are a "snapshot in time" with no definition as to their source or date. They are also incorrect when compared with the latest online maps on the Government / Environment Agency's website, and therefore misleading. Such data will continue to change and be updated throughout the Plan period. At the very least this should be noted on the Policy map with a reference added to the up to date online maps. 8) As a result of the various shortcomings of the Policy map as noted above, it is recommended that the Council adopts regularly updated online Policy maps with a warning that paper versions downloaded may become out of date and that the online version should be used as the master copy.

Breckland Council Response

Officer Response

Comment noted.

Potential amendment to the plan

Amend the Saham Toney policies map

Amendment ID

PM/MAP/ST/A

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1127986	Full Name	Mrs Val Pitt	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title	Breckland Local Plan Pre-Submission Publication	Number
Chapter Number	2	

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

In light that govt. will release money to Breckland as long as they build houses, then it is sound. Also regarding Dereham south, the west Toftwood build is sensible.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1032208	Full Name		Organisation Details	Hans House Group of Companies
Agent ID	1032205	Agent Name	Mr Jamie Roberts	Agent Organisation	Pegasus Group

Comment Details

Title	Development Requirements of Attleborough Strategic Urban Extension (SUE)	Number	GEN 4 - Development Requirem
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The Attleborough SUE is anticipated to deliver approximately 4,000 dwellings of which 2,650 are to come forward within the LP period. A development of this significant scale will require the provision of substantial amounts of supporting infrastructure, including a link road to cross the railway. We are concerned that by pursuing policy GEN4 rather than allocating a range of smaller sites, the LPA is placing its eggs in one basket, so to speak. As such, we consider the LP is not justified and not effective. Deliverability of the SUE Paragraph 2.28 of the LP explains that the Attleborough SUE is the only allocated site for residential development in Attleborough. If the SUE fails to come forward in line with the

forecast trajectory (in terms of both timescales and delivery rates), it means that there is little opportunity, apart from windfall schemes, to deliver housing in this sustainable settlement, and to deliver on the sustainability objectives set out in the SA. This could place pressure on other settlements lower down the settlement hierarchy and undermine the wider plan strategy. Conversely, the allocation of smaller sites in Attleborough would result in a wider choice of sites and development locations in the town, meaning delivery rates could be maintained and thereby making best use of the opportunities for sustainable development in Attleborough. The Housing Trajectory envisages delivery at the site commencing in 2019/20. This is not realistic. Although a planning application was submitted for the site in August 2017 (LPA reference 3PL/2017/0996/O), it is subject to complex and unresolved issues which will need to be negotiated during the planning process. These include a holding objection from Highways England owing to insufficient information having been provided on potential impacts upon the A11 trunk road. There is also substantial local objection in respect of the impact the proposed SUE will have in terms of the amount of traffic to be routed through Hargham Road. If a resolution to grant permission is secured, it will be necessary to negotiate a Section 106 agreement. For a site of this scale, such an agreement will be extremely complex (taking into account deliverability, developers cash flow, trigger points for the provision of supporting infrastructure) and it is not unusual for such negotiations to be protracted. Other subsequent processes will include completion of necessary land transactions, the approval of reserved matters, the discharge of all relevant pre-commencement conditions, before construction can commence. The Thetford SUE provides a recent local example of the complexity and length of this process. An application for the SUE was submitted in July 2011 (LPA reference 3PL/2011/0805/O); over three years elapsed before its presentation to Planning Committee in April 2014 and a further twenty months elapsed before the Section 106 agreement was signed in November 2015 and the permission granted. It is now October 2017 and the Housing Trajectory still envisages completions from 2019/20 onwards “ a full eight years after the submission of the application. Past experience in Breckland clearly shows that delivery of the Attleborough SUE will likely be subject to significant delay against the published housing trajectory. This will naturally have implications for the five year housing land supply in Breckland and the ability of the LPA to meet the planned housing delivery tests which are expected to be introduced by Government as part of the package of planning reforms set out in its Housing White Paper of 2017. With no

other allocated sites, it will not be possible to deliver meaningful amounts of housing in Attleborough. This will increase pressure on the local housing market and may mean housing will need to come forward on a speculative basis in other locations in Breckland with comparatively fewer local services, employment opportunities or access to public transport. Meanwhile opportunities to deliver development in the sustainable location of Attleborough will simply be unable to be realised. The potential of land at White House Lane With the above in mind, we consider that the LP must take a different approach. Sustainable urban extensions are a valid way of meeting housing need but as we have identified, they are prone to lengthy lead-in times. In the meantime, there are sites which are able to come forward more promptly and as such, maintain the continuous rolling delivery of new homes in the district and the achievement of a five year housing land supply. The Local Plan should therefore take positive steps including allocation of additional sites. Such sites include land at White House Lane, Attleborough. This particular site is being promoted by the Hans House Group of Companies and can accommodate approximately 300 dwellings and public open space. There is also potential to provide a new primary school at the site. The smaller scale of the site means that the planning process is likely to be less complex and the infrastructure burden will be considerably smaller. It is noted that the 2014 SHLAA discounts the site (SHLAA reference A08) principally due to impact on the railway crossing. It otherwise notes that the site is suitable for development in all other respects. We consider that the reason for discounting the site is unfounded; the LPA evidently accepts there is capacity at the B1077 railway and within the local highway network crossing to accommodate 1,200 dwellings; that being the amount of development envisaged at the SUE under policy GEN4 before delivery of the link road is required. The figure of 1,200 is not reflective of the maximum capacity of the road network; the Transport Assessment supporting the planning application for the SUE (document reference 1409-42/TA/01, paragraph 4.27) models the impact of 1,650 dwellings prior to delivery of the link road and confirms there is adequate capacity within the local road network to accommodate that higher level of growth. Finally we note the SHLAA noted that the railway crossing would require automation; this has now been carried out by Network Rail as part of the modernisation and resignalling of the Breckland Line. As such, there is no substantiated or compelling reason why land at White House Lane could not come forward for development. The site also offers the potential to deliver other local benefits, as discussed below.

Linear park The Attleborough Neighbourhood Plan, which is at an advanced stage

Local Plan Pre-Submission - Comments and Response Schedule

of preparation, proposes a linear park around the eastern edge of Attleborough. The route includes White House Lane. By allocating land at White House Lane, there is potential to integrate the public open space of the scheme into the wider linear park, creating new opportunities for recreation and leisure (e.g. through the creation of continuous walking and cycling routes) within land which is currently inaccessible to the public and along a route which could be pleasant but which currently has no footway and few suitable locations for pedestrian refuge. Link road alternatives There is the potential to deliver a link road which takes an alternative alignment around the east of Attleborough (see Appendix 2). This would link the B1077 to the A11 at the limited access junction to the east of Attleborough which is grade-separated and free-flowing. This alternative route could be routed through another site north of the railway which is being promoted by Taylor Wimpey; it is noted that Taylor Wimpey carried out some initial feasibility work on the route of this during earlier stages of the Local Plan process. As part of an eastern link road, the A11 junction can be upgraded to an all-movements junction and the Hans House Group of Companies has been in preliminary discussions with Highways England as the operator of the A11 to explore how this may be achieved.

Facilitating new development in Attleborough town centre The delivery of a new school site would enable the relocation of existing school uses at the Attleborough Academy. The Hans House Group of Companies is promoting a town centre development scheme (see Appendix 3) which would deliver new retail and community floorspace to accommodate the needs of Attleborough and its hinterland as its population expands over the course of the Plan period. Such a scheme would secure the regeneration of the existing Queens Square car park which adjoins the Attleborough Academy site.

Breckland Council Response

Officer Response

Development options were considered and consulted on at the Issues and Options Stage, with Attleborough SUE identified as the option which would result in the most benefits for the community in terms of infrastructure delivery and the formation of a comprehensive development opportunity. The plan and policy for Attleborough has developed considerably during the plans production and the Council have invested in the development of evidence and liaison with the developer and stakeholders to ensure the site is deliverable, culminating in an outline planning application which is anticipated to be determined prior to Examination. Whilst alternative options could be delivered early in the plan process, when combined with the SUE, this would result in an oversupply of housing provision in Attleborough which would not accord with the overall spatial strategy. The plan for the SUE centres on the delivery of key infrastructure projects to the benefit of the new and existing community including improvements to the existing town centre, of which delivery would be threatened if either the level of housing allocated for the SUE is reduced, or the market is flooded with alternative housing sites. The Council is being proactive in trying to overcome any constraints to delivery and working with the developer to help bring the site forward. The housing trajectory has been revised a

Local Plan Pre-Submission - Comments and Response Schedule

number of times to reflect a realistic build out rate and commencement date, informed by evidence.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Development Requirements of Attleborough Strategic Urban Extension (SUE)	Number	GEN 4 - Development Requirem
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy GEN4: Development Requirements of Attleborough Strategic Urban Extension (SUE) We note that at a live planning application seeking outline permission for the strategic development at Attleborough has been submitted to the Council (ref. 3PL/2017/0996/0 submitted 31/07/2017 decision due 21/11/2017). We have provided separate comments in a letter dated 4 th September 2017 on the specifics of this scheme. For the purposes of clarity, comments made as here as part of the reg. 19 Local Plan consultation will refer to the principle of the site allocation only and not to the specifics of an individual scheme. Heritage assets This site is located immediately adjacent to Bunns Bank, a

nationally important scheduled monument. The linear earthwork is an imposing feature within the landscape comprising of a high bank and ditch. Its significance relates to its survival as a well preserved earthwork and archaeological deposits which are of evidential and historic value. It is an important landscape feature and is indicative of further archaeological potential. The site allocation would sit immediately next to the scheduled monument and could therefore impact upon its setting. The area within the site allocation boundary and to the west of Bunns Bank is likely to contain high quality non-designated heritage assets in the form of significant archaeology of national importance as defined by paragraph 139 of the NPPF. The likely presence of the continuation of Bunns Bank to the west is corroborated by the findings of The Historic Characterisation Study (March 2017) which indicates that the bank may extend further westwards into the site allocation boundary. The northern section of the site allocation would be in close proximity to Besthorpe Old Hall and Burgh Farmhouse, both of which are Grade II listed. As farmhouses their rural open surroundings contribute positively to their setting. The historic cores of Attleborough to the north and the village Old Buckenham to the south are both conservation areas.

Impact on Heritage Assets The site allocation involves the construction of a link road to serve the SUE. The indicative link road route, shown on pages 24 and 179 of the Plan would run through the exact area most likely to contain the western continuation of Bunns Bank, which we consider could have major impacts on the scheduled earthwork of Bunns Bank as well as potentially impact on archaeology along the route (including any continuation of the earthwork westwards). The positioning of the road is likely to harm any undesignated remains and would irreversibly alter the integrity of the earthwork by severing how it can be read into the wider landscape. We also have concerns regarding the increased use of the existing road and the atmospheric effects of the proposed road and junction due to the adverse impact increased noise, traffic disturbances, and pollution, etc., would have on Bunns Banks setting. The Capita Symmonds Link Road Concepts Options Report (July 2013) does not appear to contain much assessment of historic environment impacts, with no survey work of potential heritage assets along the different route options. We therefore raise substantial objection to the indicative positioning of the proposed link road. It is not clear how much the historic environment has featured in the identification of the preferred location and how it is justified, effective and consistent with national policy in terms of heritage impacts. In previous responses we have advocated further assessment of the historic landscape to the south of Attleborough to help

with the identification of the preferred location, which would also help with subsequent masterplanning. Since then the Historic Characterisation Study (March 2017) has been produced. The edge of the existing settlement of Attleborough which abuts the proposed site allocation is bordered by the railway line to the north and the southern edge of the settlement has a number of sites in factory and light industrial use. These developments buffer the historic core and conservation area from the proposed site allocation but development of the site will still need to be sensitive in terms of building heights to ensure the setting of the conservation area is preserved. There may be opportunities to improve or enhance the edge of the settlement. The draft policy is silent on these issues. We recognise that the SUE is an important part of the regions housing allocation and so we accept the principle of the SUE and its concept but have serious concerns regarding the justification in terms of the historic environment to support the allocation. Whilst the site allocation may be acceptable in principle the plan is currently unsound to support its inclusion at this time. There is limited evidence, particularly with regards to archaeology, to support the allocation. What evidence there is, namely the 2017 Historic Characterisation Study, identifies the impact of development upon undesignated heritage assets as an issue a development scheme would need to address but this conclusion has not been translated into the policy. The policy makes no reference to the designated heritages adjacent to the site and makes no provision for the potential non-designated heritage assets within the site and so fails to secure the conservation or enhancement of the historic environment. We acknowledge that paragraph 5 of policy GEN 4 requires development to consider the findings of the Historic Characterisation Study and to carry out further assessment work into the historic landscape to the satisfaction of the Council and Historic England. Whilst the submission of individual planning applications presents an opportunity for improved understanding of the historic environment, the Council still has a duty to assess historic environment issues as part of the Local Plan process and there is concern that the policy provision in paragraph 5 will not be effective. The policy provides no meaningful guidance to prospective applicants and decision makers as to what is expected with regards to the historic environment. Careful master planning and the use buffer zones could ensure that open green space and landscaping is incorporated into the sensitive areas to the south of the site near Bunns Bank to protect its setting. The position of the link road will also be integral to the continued protection of the scheduled monument and the junction should be pushed further northwards. Robust archaeological

Local Plan Pre-Submission - Comments and Response Schedule

investigation and preservation in situ or excavation and recording as appropriate could address the impacts upon any archaeological remains but the policy does not include these provisions and there does not appear to be any evidence within the Plans supporting documentation to address archaeology. Careful consideration of densities will be key to the layout of this urban extension. There is concern for example that concentration of densities towards the southern end to the SUE would encourage coalescence with the village of Old Buckenham to the south whilst allowing for the concentration of town centre development near Bunns Bank. Attleborough summary The Historic Characterisation Study for this site concludes that the site could be carried forward as an allocation subject to policy requirements and development consideration which would mitigate the harm to the historic environment but this conclusion has not been followed through into the policy itself. The site allocation is likely result in harm to the historic environment and unsupported by evidence, it is therefore considered to be unsound. Development proposals for the Attleborough SUE should conserve and enhance its historic environment and be underpinned by a robust evidence base. The main issues with the allocation of this site are: - The setting of the Bunns Bank scheduled monument, and the Grade II listed buildings of Besthrope Old Hall and Burgh Famhouse; - The link road position within sensitive areas of the site which are likely to damage undesignated heritage assets to the west of Bunns Bank; - The position of the link road and junction resulting in atmospheric conditions deriving from traffic congestion, noise, pollution etc. which would further impact the setting of Bunns Bank to the detriment of its intangible experiential qualities; - The lack of consideration for development densities which if concentrated around Bunns Bank would compound the harm already identified; - The lack of consideration in the policy and lack of information to demonstrably illustrate how archaeology has been considered in the identification of the site as a Local Plan allocation. We wish to see policy wording to identify these assets and to outline specific mitigation measures such as open green space, landscaping, linear park etc. We also request that the plan includes a strategy diagram.

Breckland Council Response

Officer Response

The Historic Characterisation Study involved baseline survey work to provide an initial consideration of the potential impact on designated and non designated heritage assets, including their setting and the wider landscape. Whilst Policy GEN 4 and the supporting text (para 2.21) do refer to the findings of the Historic Characterisation Study, it is acknowledged that the findings of the study were not effectively incorporated in the proposed policy wording.

Local Plan Pre-Submission - Comments and Response Schedule

With regard to the proposed Attleborough link road, map 2.1 shows the location of the road as indicative. The Council has undertaken preliminary work including feasibility studies and stakeholder consultation as part of the Attleborough Development Partnership board meetings, however the precise location of the link road will be determined through the planning application. In recognition of the requirement for a detailed understanding of the archaeological interest of the site, it is recommended that a further modification may be required however this will be subject to the discussion at the hearing sessions

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1135889	Full Name	Mr Stewart Patience	Organisation Details	Anglian Water Services Ltd
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Development Requirements of Attleborough Strategic Urban Extension (SUE)	Number	GEN 4 - Development Requirem
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Submission Plan includes final wording relating to the above site.		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Anglian Water has no objection to the principle of residential development and associated retail and community uses on this site. We welcome the reference made to the applicant obtaining pre-planning advice from Anglian to identify a feasible foul drainage strategy for this site. Similarly we welcome the reference made to the need for on-going discussion between the Council, the developer and Anglian Water to determine an appropriate deliverable solution for wastewater treatment improvements for the above site. Anglian Water has a statutory obligation to provide sewage treatment for all sites with the benefit of planning permission and any required improvements would be funded through our business plan. We are

Local Plan Pre-Submission - Comments and Response Schedule

currently in the early stages of developing a Long Term Recycling Plan which will be used to inform further investment at existing water recycling centres (formerly wastewater treatment works) and relevant foul sewerage catchments. This will be used to inform the investment identified in our future business plans which are prepared once every 5 years. However the wording of Policy GEN4 could be interpreted as meaning that any sewage treatment improvements would come forward only once the proposed homes have been constructed. The Councils Water Cycle Study Update (March 2017) states that there is capacity for some but not all of the growth proposed in the Dereham catchment. Reference is also made to figure of 1,800 homes but it is unclear how this relates to the phasing outlined in the wording of the first sentence of the policy. It is therefore suggested that Policy GEN4 is amended as follows: Ongoing discussion between the Council, the developer and Anglian Water Services to determine an appropriate, deliverable solution for Wastewater Treatment Work (WwTW) improvements required in time to serve the development of 2,650 homes and the 1,350 homes proposed beyond the plan period .

Breckland Council Response

Officer Response

General support for the policy noted.

The figure of 1,800 homes derives from evidence presented in the Breckland Water Cycle Study Update (March, 2017). The evidence states 'Attleborough WwTW has some available flow headroom in its existing discharge permit and can accept growth of approximately 1,800 dwellings (from the 4,000 allocated), after which the volumetric discharge permit will be exceeded'. Therefore the policy seeks a solution to be identified after the initial level of growth which can be accommodated within the discharge permit.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	502323	Full Name	Attleborough Land Ltd	Organisation Details
Agent ID	1130556	Agent Name	Mr John Long	Agent Organisation

Comment Details

Title	Development Requirements of Attleborough Strategic Urban Extension (SUE)	Number	GEN 4 - Development Requirem
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Attleborough Land Ltd support Policy GEN 4 – Development Requirements of Attleborough Strategic Urban Extension. To inform the Local Plan’s examination the following comments on the policy are relevant:

1. The planning application (ref: 2017/0966/O) forms the majority of the SUE. Some land identified within the SUE is outside of the control of the applications, but they

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted. The policy as worded states that "the applicant will be required to develop design codes to the satisfaction of the Council which will inform the detailed planning application for the SUE".

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 971309 Full Name mr les scott
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Paragraph Number 2.4
 Chapter Number 2

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	I have only recently gained insight into the planning system in action		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The LPA is unable to comply with NPPF which requires the plan to address the affordable housing needs. In practice the commitment by developers is invariably reduced.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The affordable housing policy has been informed by a plan wide viability assessment and seeks to strike a balance between affordable housing and other contributions that would be sought through developer contributions.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	868057	Full Name		Organisation Details	Orbit Homes Limited
Agent ID	868056	Agent Name	Mr Michael Hendry	Agent Organisation	Director PlanSurv Limited

Comment Details

Title	Paragraph	Number	2.16
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The Plan fails to allocate the land at Haverscroft House Farm, London Road Attleborough for approximately 200 dwellings. The site has a committee resolution to grant full planning permission for 200 dwellings under reference 3PL/2016/0325/F with the S106 having been engrossed and as such should be included as an existing commitment and an allocation as part of the Local Plan. As currently drafted the plan is not positively prepared, justified or effective as it ignore an resolution to grant planning permission for 200 dwellings which must be recognised in the Local Plan in order for it to be found sound. The over-reliance on the delivery of one large urban extension of 4,000 dwellings risks delivery of

Local Plan Pre-Submission - Comments and Response Schedule

housing as a delay on that one project will have a significant effect and it is unlikely that developers will rush to deliver the large sites for fear of oversupplying the local market and depressing values; therefore, additional allocations such as the 200 dwellings on the land at Haverscroft House Farm, London Road Attleborough should be included in the Local Plan to help disperse the risk and assist delivery.

Breckland Council Response

Officer Response

The site in question is counted as a commitment in the overall housing figures in Policy HOU 02, which sets the level of allocations required in each settlement and therefore the planning permission is recognised in the Local Plan. The site is not allocated in the plan, as it is not required to meet the identified housing target of 4000 dwellings for Attleborough. Providing the S106 agreement is agreed, the site can be delivered without allocation.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 966641 Full Name MR TIM BORNETT BORNETT
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Development Requirements of Attleborough Strategic Urban Extension (SUE) Number GEN 4 - Development Requirem
 Chapter Number 2

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The policy states that the new road between london Road and Bunns Bank will be completed before the1200 dwellings are built..Thus all but one dwellings completed and then new road could be built befor last one. A let out

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The Infrastructure Delivery Plan states that the threshold for the delivery of the Link Road is upon completion of the 1200th home in the SUE.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 966641 Full Name MR TIM BORNETT BORNETT
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Development Requirements of Attleborough Strategic Urban Extension (SUE) Number GEN 4 - Development Requirem
 Chapter Number 2

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Link Road needs to be in place before dwellings are built..Also the General policy on this is vague and ambiguous.as it says new road will be completed befor 1200 homes are built

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The Infrastructure Delivery Plan states that the threshold for the delivery of the Link Road is upon completion of the 1200th home in the SUE.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 966641 Full Name MR TIM BORNETT BORNETT
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Development Requirements of Attleborough Strategic Urban Extension (SUE) Number GEN 4 - Development Requirem
 Chapter Number 2

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The General policy refers to the new link road being completed when 1200 homes have been built.Link road should precede before any dwellings occur .Also the wording is vague and ambiguous. 1199 home could be built no road.snarl up in Attelborough and heavy traffic on B1077

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The Infrastructure Delivery Plan states that the threshold for the delivery of the Link Road is upon completion of the 1200th home in the SUE.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	2.16
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Neither at previous consultation versions of the Plan, nor in the present version has any reasoned and objective justification been given as to why only 2,650 houses an be delivered in the Attleborough SUE over the Plan period. This was previously noted as being a joint delivery of only 53 houses per year, by three separate developers. There appears to have been no attempt to engage more developers to address the claimed delivery problem. The consequence is that larger housing allocations have been made to other settlements to make up Attleborough's shortfall, which is unacceptable and not in accordance with the Council's principle of directing.development to the most sustainable locations Such seemingly

Local Plan Pre-Submission - Comments and Response Schedule

arbitrary phasing to suit developers would also appear to be contrary to the NPPF. Greater justification for scheduling the development of 1,350 houses in the Attleborough SUE beyond the Plan period is required.

Breckland Council Response

Officer Response

Development has been proportioned to the most sustainable settlements within the district. 50% of the development has been apportioned to the Key settlements and 28% to the remaining Market Towns. One of the key tests in the NPPF is deliverability, therefore by using the most up to date information as to when sites will be expected to come forward will help to ensure that all of the sites allocated within the Local Plan are deliverable. Based on the latest evidence it is expected that 2,650 dwellings will be delivered within the SUE during the lifetime of the plan.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	2.41
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The text concerned is new.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

While recognition of and reference to the Attleborough Neighbourhood Plan is to be welcomed it is not clear why the neighbourhood plans for other settlement are not similarly mentioned in other relevant sections of the Plan and for consistency and awareness this omission should be rectified.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

All adopted neighbourhood plans are given equal weight. Specific reference was made to the Attleborough neighbourhood plan as many of their policies are directly related to the SUE. Comments noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Development Requirements of Attleborough Strategic Urban Extension (SUE)	Number	GEN 4 - Development Requirem
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Identical to comments on paragraph 2.16.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

All adopted neighbourhood plans are given equal weight. Specific reference was made to the Attleborough neighbourhood plan as many of their policies are directly related to the SUE. Comments noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1133651	Full Name	Mr Neil McShane	Organisation Details	Attleborough Academy Norwich
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	2.22
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The Plan recognises the emerging Attleborough Neighbourhood Plan and the support of a new Indoor sports centre, located in the vicinity of Attleborough Academy, Norfolk to provide a joint academic and community facility.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1130821 Full Name Mr Pablo Dimoglou
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Paragraph Number 2.4
 Chapter Number 2

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4 - Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	As District Councillor, I did raise issues at the Local Plan Working Group meetings but was unable to comment for much of the proceedings due to having declared a personal interest		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Much is made in the Local Plan about sustainable development, and the need to promote it. The Parish to which I refer, Yaxham has all the services needed to be deemed a Local Service Centre yet Breckland Council allowed Yaxham Parish Council and The Neighbourhood Plan Group change an earlier resolution of Yaxham Parish Council that Yaxham DID HAVE the services which would deem it a Local Service Centre, and is should be classified so. Once it became apparent that additional landowners wanted to submit land under the call for sites process, the Parish Council were encouraged to call an Extraordinary Meeting and reverse the

Local Plan Pre-Submission - Comments and Response Schedule

decision. Other villages and communities - including the market towns have been encouraged or forced to take significant development. It is only fair an equitable that those will sufficient services take a reasonable share of the burden. We often hear, as in the case of Yaxham - that villages should be allowed to grow slowly - preferably within the settlement boundaries. Most villages have settlement boundaries which are tightly drawn around existing houses and leave virtually no room for growth. In some cases this may be appropriate - but where there are a plethora of local services it is only right that the same test be applied to one Parish as another. The NPPF states that it is important for rural communities not to stagnate but instead meet the needs of all generations of their communities, particularly the needs of younger households and those on lower wages. Letting Yaxham Parish 'opt out' of being a Local Service Centre is contrary to these aims.

Breckland Council Response

Officer Response

Clint Green and Yaxham collectively have the services and facilities to be considered a Local Service Centre and this was originally proposed through the emerging Local Plan. Through Local Plan Working Groups it was argued that the distance between Yaxham and Clint Green is approximately 1km. The school is located in Clint Green and, therefore, the distance between the two settlements was considered to be too great for the settlements to be jointly designated as a Local Service Centre. Yaxham on its own merits would only have 4 of the services and facilities and, would therefore, fall under the policy HOU 04.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	868057	Full Name		Organisation Details	Orbit Homes Limited
Agent ID	868056	Agent Name	Mr Michael Hendry	Agent Organisation	Director PlanSurv Limited

Comment Details

Title	Emerging Attleborough Neighbourhood Plan Policies Map	Number	Map 2.1
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The Plan and Neighbourhood Plan fails to allocate the land at Haverscroft House Farm, London Road Attleborough for approximately 200 dwellings. The site has a resolution to grant full planning permission for 200 dwellings under reference 3PL/2016/0325/F with the S106 having been engrossed with planning permission expected to be granted on or before 6 October 2017 and as such the site should be included as an existing commitment and an allocation as part of the Local Plan. As currently drafted the plan is not positively prepared, justified or effective as it ignores the resolution to grant planning permission for 200 dwellings which must be recognised in the Local Plan in order for it to be found sound.

Local Plan Pre-Submission - Comments and Response Schedule

Breckland Council Response

Officer Response

The site in question is counted as a commitment in the overall housing figures in Policy HOU 02, which sets the level of allocations required in each settlement and therefore the planning permission is recognised in the Local Plan. The site is not allocated in the plan, as it is not required to meet the identified housing target of 4000 dwellings for Attleborough. Providing the S106 agreement is agreed, the site can be delivered without allocation.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	868057	Full Name		Organisation Details	Orbit Homes Limited
Agent ID	868056	Agent Name	Mr Michael Hendry	Agent Organisation	Director PlanSurv Limited

Comment Details

Title	Paragraph	Number	2.17
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The over-reliance on a single large urban extension that requires a link road to be built over the railway line to facilitate its delivery risks housing delivery as a delay to this project will have a significant impact on delivery rates and as such makes the Plan ineffective as it is vulnerable to the timing of a single allocation. Additional residential allocations such as the land at Haverscroft House Farm, Attleborough for 200 dwellings would reduce the risk to delivery as no link road is required in order to deliver the site and a resolution to grant planning permission has been made and the section 106 agreement as been engrossed 3PL/2016/0325/F.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Whilst alternative options could be delivered early in the plan process, when combined with the SUE, this would result in an oversupply of housing provision in Attleborough which would not accord with the overall spatial strategy. The plan for the SUE centres on the delivery of key infrastructure projects to the benefit of the new and existing community including improvements to the existing town centre, of which delivery would be threatened if either the level of housing allocated for the SUE is reduced, or the market is flooded with alternative housing sites. The Council is being proactive in trying to overcome any constraints to delivery and working with the developer to help bring the site forward. The housing trajectory has been revised a number of times to reflect a realistic build out rate and commencement date, informed by evidence.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	868057	Full Name		Organisation Details	Orbit Homes Limited
Agent ID	868056	Agent Name	Mr Michael Hendry	Agent Organisation	Director PlanSurv Limited

Comment Details

Title	Paragraph	Number	2.28
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The Plan fails to allocate the land at Haverscroft House Farm, London Road Attleborough for approximately 200 dwellings. The site has a resolution to grant planning permission for 200 dwellings under reference 3PL/2016/0325/F and as such should be included as an existing commitment and an allocation as part of the Local Plan. As currently drafted the plan is not positively prepared, justified or effective as it ignores a resolution to grant planning permission for 200 dwellings which must be recognised in the Local Plan in order for it to be found sound. The over-reliance on the delivery of one urban extension risks delivery of housing as a delay on one project will have a significant effect and it is unlikely that developers

Local Plan Pre-Submission - Comments and Response Schedule

will rush to deliver the large sites for fear of oversupplying the local market and depressing values; therefore, additional allocations such as the 200 dwellings on the land at Haverscroft House Farm, London Road Attleborough should be included in the Local Plan to help disperse the risk and assist delivery.

Breckland Council Response

Officer Response

The site in question is counted as a commitment in the overall housing figures in Policy HOU 02, which sets the level of allocations required in each settlement and therefore the planning permission is recognised in the Local Plan. The site is not allocated in the plan, as it is not required to meet the identified housing target of 4000 dwellings for Attleborough. Providing the S106 agreement is agreed, the site can be delivered without allocation.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129753	Full Name	Mr Douglas McNab	Organisation Details	Education and Skills Funding Agency
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Development Requirements of Attleborough Strategic Urban Extension (SUE)	Number	GEN 4 - Development Requirem
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Previously team have not looked and responded to Local Plan consultations.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The Education and Skills Funding Agency (ESFA) welcomes the opportunity to contribute to the development of planning policy at the local level. We aim to work closely with local authority education departments and planning authorities to meet the demand for new school places and new schools. In this capacity, we would like to offer the following comments in response to the Local Plan.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	868057	Full Name		Organisation Details	Orbit Homes Limited
Agent ID	868056	Agent Name	Mr Michael Hendry	Agent Organisation	Director PlanSurv Limited

Comment Details

Title	Paragraph	Number	2.41
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The Neighbourhood Plan fails to allocate the land at Haverscroft House Farm, London Road, Attleborough for residential development despite the site having a committee resolution to grant planning permission under reference 3PL/2016/0325/F. The Local Plan needs to specifically allocate the committed development on land at Haverscroft House Farm, London Road, Attleborough in order to give the accurate context of growth within the town and thereby make the plan sound.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Any comment on the Attleborough Neighbourhood Plan must be directed to Attleborough Town Council as they are responsible for its content.

The site in question is counted as a commitment in the overall housing figures in Policy HOU 02, which sets the level of allocations required in each settlement and therefore the planning permission is recognised in the Local Plan. The site is not allocated in the plan, as it is not required to meet the identified housing target of 4000 dwellings for Attleborough. Providing the S106 agreement is agreed, the site can be delivered without allocation.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	868057	Full Name		Organisation Details	Orbit Homes Limited
Agent ID	868056	Agent Name	Mr Michael Hendry	Agent Organisation	Director PlanSurv Limited

Comment Details

Title	Development Requirements of Attleborough Strategic Urban Extension (SUE)	Number	GEN 4 - Development Requirem
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The proposed reliance on the delivery of such a large urban extension within Attleborough risks a shortfall in delivery given the almost inevitable delays that occur with such projects, particularly the required link road. The rate of delivery anticipated seems to take no account of other committed sites within Attleborough and therefore delivery is likely to be slower than anticipated given that developers will not want to flood the market. The Plan is therefore not effective in delivering the identified housing need. Allocations should be made on other sites around Attleborough, such as the 200 dwellings with resolution to grant planning permission on the land at Haverscroft House Farm, Attleborough and across the

Local Plan Pre-Submission - Comments and Response Schedule

district to ensure that delivery is not unreasonably delayed to ensure the effectiveness of the Local Plan.

Breckland Council Response

Officer Response

The Council is being proactive in trying to overcome any constraints to delivery and working with the developer to help bring the site forward. The housing trajectory has been revised a number of times to reflect a realistic build out rate and commencement date, informed by the most up to date evidence and regular meetings with the developer. The site in question is counted as a commitment in the overall housing figures in Policy HOU 02, which sets the level of allocations required in each settlement and therefore the planning permission is recognised in the Local Plan. The site is not allocated in the plan, as it is not required to meet the identified housing target of 4000 dwellings for Attleborough. Providing the S106 agreement is agreed, the site can be delivered without allocation.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 966641 Full Name MR TIM BORNETT BORNETT
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Paragraph Number 2.2
 Chapter Number 2

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Was led to believe that Attleborough SUE would fall within the boundary of the Town Council.Now it appears that a planning application from Attleborough Land Ltd which includes 4000 new. homes, a link road etc etc suggests that part of the development falls within the parish of Old Buckenham. Attleborough SUE should only be within the Town council boundary		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Local Plan Pre-Submission - Comments and Response Schedule

See the above

Breckland Council Response

Officer Response

Comment noted. Parish boundaries are not a planning issue.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	462653	Full Name	Mike Jones RSPB	Organisation Details	Conservation Officer RSPB
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	2	Policy GEN 05 Settlement Boun
Chapter Number	2			

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The issue refers to the specific wording in this draft.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The proposed policy text states that development outside the defined settlement boundaries will only be acceptable where it is compliant with one or more of the following policies (our emphasis). This wording implies that, provided at least one of the policies is met, the remainder of the policies could be ignored. We recommend the wording is changed to the following, to ensure it is clear that all the relevant planning policies should be met “ development outside the defined settlement boundaries will only be acceptable where it is compliant with all relevant policies set out in the Local Plan, including but not necessarily restricted to:.

Local Plan Pre-Submission - Comments and Response Schedule

Breckland Council Response

Officer Response

Comment noted. The amendments proposed is is considered to add clarity to the intentions of the policy and therefore it is considered appropriate to amend the policy.

Potential amendment to the plan

Amend the plan as set out within the representation

Amendment ID

PM/GP/05/A

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1132036	Full Name	De Merke Estates	Organisation Details	De Merke Estates
Agent ID	1132034	Agent Name	Mr Stuart Thomas	Agent Organisation	Berrys

Comment Details

Title		Number	Policy GEN 05 Settlement Boun
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy GEN05 is supported as it provides a presumption in favour of further development within the identified settlement boundary for Swaffham, which appropriately encompasses both residential allocations and sites with planning permission for hosuing.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	609986	Full Name	Mrs Erica Whettingsteel	Organisation Details	Managing Director EJW Planning Ltd
Agent ID	598312	Agent Name	Mrs Erica Whettingsteel	Agent Organisation	Managing Director EJW Planning Ltd

Comment Details

Title	Number	Policy GEN 05 Settlement Boun
Chapter Number	2	

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	It is an issue relevant to the wording of this version of the plan only		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy GEN 05 confirms that proposals for new development within settlement boundaries will be acceptable in principle subject to compliance with National and other Local Plan policies. It is suggested that the word relevant should replace other as the use of the word other could mean that policies that were not relevant to a particular form of development would have to be complied with. It is noted that development outside of settlement boundaries is restricted unless one or more of a list of other policies is complied with. This list makes reference to Policy HOU 13 Agricultural Workers Exceptions. The use of the phrase Agricultural Worker is a term derived from former Planning Policy Guidance (most recently PPS7) the

Local Plan Pre-Submission - Comments and Response Schedule

NPPF recognises the wider definition of Rural Worker to describe the essential needs of rural workers to live permanently at or near their place of work in the countryside (see paragraph first bullet point).

Breckland Council Response

Officer Response

Comment noted. The policy itself makes reference to catering for rural workers in the supporting text and the policy wording itself identifies the ways in which rural workers can support the rural economy. This is in line with paragraph 55 of the NPPF.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1134348	Full Name	Maggie Oechsle	Organisation Details	NP4Yaxham" Yaxham Neighbourhood Plan W
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy GEN 05 Settlement Boun
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

Yaxham welcomes in policy GEN 05 addressing the role of settlement boundaries, which had been missing in earlier versions of the emerging Local Plan.

On this basis it is considered that this element of the Plan as it affects the Parish of Yaxham meets the test of "soundness" in that it is:

13- If you feel the plan is unsound, please tell us why

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1032087	Full Name	Mr Chris Kennard	Organisation Details	Finance Director The Shadwell Estate Compan
Agent ID	1029372	Agent Name	Mr Paul Sutton	Agent Organisation	

Comment Details

Title		Number	Policy GEN 05 Settlement Boun
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy GEN 05 Settlement Boundaries The Plan has failed to include a suitable and deliverable site in one of its key settlements, Thetford. The allocation of our clients land east of Arlington Way has been put forward throughout the process of consultation, at each stage of the draft Plan. The NPPF states that to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until the permission expires, unless there is clear evidence that schemes will not be

Local Plan Pre-Submission - Comments and Response Schedule

implemented within five years, for example because they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans. The outline planning permission for the Thetford Sustainable Urban Extension remains extant, however no reserved matters applications have been submitted and delivery is not expected to commence for a further two years, with just 170 units within the next five years predicated. In contrast, 115 dwellings on our clients site could be built out in the short-term. A revised planning application is currently being considered by the Council for our clients land (LPA Ref: 3PL/2017/058/O). All the main planning issues in respect of the development of the site have been overcome, with the exception of highways which is currently being addressed. While the County Council (as local highway authority) have given an in principle objection to the proposed new access into the site, we note that the design of the access meets all the current technical and safety requirements and would considerably improve the existing dangerous access to the main road. In the past, the Councils main objection to the inclusion of this site for residential development was because of its location within the SPA (stone curlew habitat). Natural England withdrew its objection to the proposals on the 5th June 2017, recommending that planning conditions would address its concerns. Officers have further stated that, subject to addressing highway concerns as far as is practicable, they would support the proposals particularly given the Councils position in respect of their 5 year housing land supply. It is anticipated that, given the housing land supply issues, a positive recommendation may be given by officers to the proposed development. We therefore consider that the site should be allocated for housing and included within the settlement boundary, given the positive feedback in relation to the current planning application, sustainability of the location, and lack of a five-year housing land supply, which is likely to worsen given the Governments consultation on Planning for the right homes in the right places: consultation proposals, see below.

Breckland Council Response

Officer Response

Thetford SUE forms an existing commitment of 5000 homes which is allocated in the Thetford Area Action Plan and which has outline planning permission. The allocation will be saved through the Local Plan which meets the housing target identified for Thetford in policy HOU 02. Whilst alternative options could be delivered early in the plan process, when combined with the SUE, this would result in an oversupply of housing provision in Thetford which would not accord with the overall spatial strategy. The plan for the SUE centres on the delivery of key infrastructure projects to the benefit of the new and existing community including improvements in linkages to the existing town centre, of which delivery would be threatened if either the level of housing allocated for the SUE is reduced, or the market is flooded with alternative housing sites. The Council is being proactive in trying to overcome any constraints to delivery and working with the developer to help bring

Local Plan Pre-Submission - Comments and Response Schedule

the site forward. The housing trajectory has been revised a number of times to reflect a realistic build out rate and commencement date, informed by evidence.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy GEN 05 Settlement Boun
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The text concerned is new.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Amend the first sentence to read as follows: "Within the defined settlement boundaries and the boundary for Attleborough SUE (as shown on the Policies Map) proposals for new development are acceptable in principal , subject to compliance with National and other Local Plan policies , and the relevant policies of made Neighbourhood Plans ." The addition of "in principal" is consistent with paragraph 2.52 and will make clear that development is not acceptable in all circumstances - i.e. it is not equivalent to permitted development. Reference to the policies of made Neighbourhood Plans will make clear that these must also be adhered to when making development proposals within settlement boundaries and given

Local Plan Pre-Submission - Comments and Response Schedule

weight when making planning decisions.

Breckland Council Response

Officer Response

Comments noted. The policy as worded is considered to be in conformity with the NPPF and NPPG.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1131135	Full Name	Mr Ian Martin	Organisation Details	Yaxham Parish Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy GEN 05 Settlement Boun
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Yaxham welcomes in policy GEN 05 addressing the role of settlement boundaries, which had been missing in earlier versions of the emerging Local Plan. On this basis it is considered that this element of the Plan as it affects the Parish of Yaxham meets the test of "soundness" in that it is:

- "positively made" in that it recognises the circumstances of such vulnerable small

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	2.49
Chapter Number	2		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The text concerned is new.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The final statement "Thetford's reputation will be improved" is far too vague and the need for this has not been explained. It needs to be made clear what problems exist regarding Thetford's reputation at present and in what way(s) improvement is desired. Without such context this part of the vision cannot be meaningfully achieved by policy, nor subsequently monitored or measured.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

comments noted

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1124026	Full Name	Mr Nicholas Hartley	Organisation Details	Parish clerk Carbrooke Parish Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Housing	Number	3
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4 - Is the plan positively prepared?	No
5 - Is the plan justified?	Yes	6 - Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10 - Have you raised this at Issues and Options?	No	11 - If you have not raised this issue before please state why			

Dear Sirs, With regard to the Pre Submission Publication of the Local Plan, the Parish Council would like to make the following observations:- Specifically with regard to Watton Housing Allocation 2 (land north of Norwich Road, page 86). This allocation is listed as Watton, but in fact is within the parish of Carbrooke, not Watton. This is not the first time that properties have been recorded as being in Watton when in fact those properties are in Carbrooke. The Parish Council is deeply concerned that the records for housing development from at least the year 2005 show that much/all of the main development that has taken place in Carbrooke has been recorded as being in Watton. The Council is concerned that this gives an inaccurate and unfair impression. Please note that all the development recorded as Blenheim Grange, for instance, is within Carbrooke, not Watton. As further evidence of this inaccurate position, the Council

Local Plan Pre-Submission - Comments and Response Schedule

would like to point out that Barrett Homes, which is currently constructing over 100 new homes at Blenheim Grange, is marketing this development as Knight Park, Watton, even though it is clearly in Carbrooke. A recent Planning Application from Broadland Housing (3PL/2017/1095) is also recorded as being in Watton. In fact it is in Carbrooke and it is the Council's opinion that it should be referred to correctly as Carbrooke, not Watton. The Council would be grateful if this error could be amended for the whole of Carbrooke, both in terms of current and future applications, but also in the records of housing development over at least the last 10 years so that the figures accurately portray the correct position. I would be grateful for your earliest response. Yours faithfully,

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Dear Sirs, With regard to the Pre Submission Publication of the Local Plan, the Parish Council would like to make the following observations:- Specifically with regard to Watton Housing Allocation 2 (land north of Norwich Road, page 86). This allocation is listed as Watton, but in fact is within the parish of Carbrooke, not Watton. This is not the first time that properties have been recorded as being in Watton when in fact those properties are in Carbrooke. The Parish Council is deeply concerned that the records for housing development from at least the year 2005 show that much/all of the main development that has taken place in Carbrooke has been recorded as being in Watton. The Council is concerned that this gives an inaccurate and unfair impression. Please note that all the development recorded as Blenheim Grange, for instance, is within Carbrooke, not Watton. As further evidence of this inaccurate position, the Council would like to point out that Barrett Homes, which is currently constructing over 100 new homes at Blenheim Grange, is marketing this development as Knight Park, Watton, even though it is clearly in Carbrooke. A recent Planning Application from Broadland

Local Plan Pre-Submission - Comments and Response Schedule

Housing (3PL/2017/1095) is also recorded as being in Watton. In fact it is in Carbrooke and it is the Council's opinion that it should be referred to correctly as Carbrooke, not Watton. The Council would be grateful if this error could be amended for the whole of Carbrooke, both in terms of current and future applications, but also in the records of housing development over at least the last 10 years so that the figures accurately portray the correct position. I would be grateful for your earliest response. Yours faithfully,

Breckland Council Response

Officer Response

Although the proposed allocation falls within the Parish of Carbrooke, it falls within the settlement boundary of Watton. At a strategic planning level we are concerned with the selection of the most sustainable sites within the most sustainable settlements. Therefore, for the purpose of the Local Plan, the sites are categorised as being situated within Watton. Parish boundaries are not a planning issue.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1137235	Full Name	Mr Mark Behrendt	Organisation Details	Planning Manager - Local Plans House Builders
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Housing	Number	3
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	5 year land supply can only be considered at the submission of the local plan.		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The plan is unsound as it cannot show a five-year housing land supply upon adoption We would agree with the Council that past delivery indicates that a 20% buffer is required. However, we do not support the Councils proposed use of the Liverpool methodolgy for assessing the five-year housing land supply. This is in addition to the stepped trajectory and would further extend delivery of the housing back log across the plan period. As outlined above this approach does not conform with national policy and the five-year supply should be calculated on the basis of meeting the backlog of housing needs within the first five years of the Plan. Concerns were also raised by the Local Plan Expert Group with regard to what they

Local Plan Pre-Submission - Comments and Response Schedule

saw as double counting when using a stepped trajectory and the Liverpool methodology. In Appendix 13 of their report to Government they state in relation to the use of the Liverpool methodology ' this might also be addressed by in a stepped trajectory so the application of the Liverpool rather than Sedgfield might represent double counting' However, even if the back log is spread across the whole plan period the Council does not have a 5-year housing land supply. Using the Councils Statement of Five Year Housing Land Supply 2017 we calculate that on adoption there would only be a 4.9-year land supply using the Councils proposed approach. Using the stepped trajectory and the Sedgfield methodology results in an even worse position with the Council only having a 4.2-year land supply. If the Council were to follow PPG with no stepped trajectory and backlog being met in the first five years then the position is even worse as they would only have a 4-year housing land supply. Five year supply with stepped trajectory Liverpool with 20% buffer Sedgfield with 20% Basic five year requirement 2017/18 to 2021/22 2920 2920 Backlog 2013/14 to 2016/17 176 669 total 5 year requirement 2017/18 - 2021/22 3096 3589 20% buffer applied 3715 4307 Supply 2017/18 to 2021/22 3605 3605 surplus/shortfall -110 -702 Years supply in first five years 4.9 4.2 Without a five-year land supply on adoption the plan cannot be considered sound and even using a stepped approach and the Liverpool methodology the Council do not have sufficient supply to meet needs. All this indicates that the on the basis of the five-year housing land supply the Plan is not sound. As set out above the Council must allocate more sites that can be delivered in the first five years of the Local Plan in order to secure a more robust housing land supply.

Breckland Council Response

Officer Response

The Council has included the use of both a stepped trajectory and the Liverpool methodology for spreading the shortfall over the remaining plan period. Due to the size of the two sustainable urban extensions proposed within the Local Plan they will take time to reach their full and sustained annual outputs. Using the stepped trajectory and the Liverpool methodology the Council is able to demonstrate a five year housing land supply once the plan is adopted.

Breckland is not unique in adopting both of these approaches, North Tyneside's recently adopted Local Plan also adopts this approach to a stepped trajectory and the use of the Liverpool methodology. The North Tyneside Local Plan's Inspectors Report was issued on 9th May 2017 using this combined approach.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Ashill Housing Allocation 1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

LP(001)009: Land between Church Street and Hale Road There are no known designated heritage assets within the site which could be affected by its development. However, the Grade I listed Church of St Nicholas is located to the southwest of the site. Any development of this site will need to preserve or enhance this designated heritage asset and its setting. This might be achieved through mitigation measures such as appropriate design, location of open space, landscaping/planting and massing of the development. These requirements should be included in the policy and supporting text of the Plan. It is noted that paragraph 3.199 of the supporting text refers to the Grade I listed building and identifies a

Local Plan Pre-Submission - Comments and Response Schedule

nearby C19 school as a non-designated heritage asset of local importance. Whilst this is welcomed there is no mention of these in the policy itself. The supporting text refers to the need to protect views to the Church and whilst this is important it is requested that the text is amended to also refer to the setting of the Grade I listed building as setting is a distinct concept to views. The supporting text also requires a design scheme for development of the site to be informed by a detailed appraisal of the assets significance but again this does not appear as a requirement in the policy itself. It recommended the policy is amended accordingly.

Breckland Council Response

Officer Response

Key development consideration 2 states that "the scheme design, whilst preserving and enhancing, is complementary to the special interest of the existing designated and non-designated heritage assets. The scheme design proposal will be informed via sa detailed appraisal of the assets' significance". This, along side policies ENV 07 and ENV 08 are considered to provide protection of the historic environment.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1135889	Full Name	Mr Stewart Patience	Organisation Details	Anglian Water Services Ltd
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Summary of Ashill Allocations	Number	Map 3.3
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

We welcome the reference made to the applicant obtaining pre-planning advice from Anglian Water to identify a feasible foul drainage strategy for the above sites and obtaining confirmation that there is sufficient wastewater treatment capacity for the sites identified at Dereham and Swaffham.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136116	Full Name	Eastern Attachments Limited	Organisation Details	Eastern Attachments Limited
Agent ID	1136100	Agent Name	Mr Ian Douglass	Agent Organisation	Head of Planning Lanpro Services

Comment Details

Title	Summary of Attleborough Allocation	Number	Picture 6.1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4 - Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	<p>Note for Information: We act on behalf of Eastern Attachments (EA) who are a steel fabrication business currently based at Maurice Gaymer Road, Attleborough. EA are currently preparing a Reserved Matters Planning application in pursuance of planning permission 3PL/2016/0417/O, Land to the east of London Road, Attleborough. Consent was granted by Breckland Council on 8 th July 2016 for 13,710 sq m of B1, B2 and B8 uses at the site. The subject site sits within the General Employment Area off London Road, Attleborough as identified in the Pre-Submission local plan.</p>		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Local Plan Pre-Submission - Comments and Response Schedule

Our client is supportive of the identification of the site subject of planning permission 3PL/2016/0417/O, Land to the east of London Road, Attleborough as a General employment area in the emerging local plan.

Eastern Attachments produces material handling attachments for telehandlers and forklifts within the agricultural and construction industries. They are the foremost

Breckland Council Response

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1126434	Full Name		Organisation Details	Breckland Bridge Ltd and G F Cole & Sons Ltd
Agent ID	1126421	Agent Name	Mrs Sarah Hornbrook	Agent Organisation	Associate Planner Ingleton Wood

Comment Details

Title	Paragraph	Number	3.208
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4 - Is the plan positively prepared?	Yes
5 - Is the plan justified?	Yes	6 - Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10 - Have you raised this at Issues and Options?	No	11 - If you have not raised this issue before please state why	This is the first time that this paragraph has appeared in the draft document.		
Do you wish to appear at the Examination in Public?				Yes			

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Paragraph 3.208 states that the land to the south of Greyhound Lane is unsuitable for residential development because of constraints in terms of access, fluvial flood risk and surface water flood risk, as well as being adjacent to the Conservation Area. Whilst it is correct that development of this whole parcel of land for approximately 15 dwellings has been ruled out on this basis, it may be possible to secure a small amount of development in this location, away from the part of the site in Flood Zone 3, and at a quantum which would have no adverse highway safety impacts. Norfolk County Councils comments on the proposed allocation (Comment ID 88) indicate that development in this location could be acceptable,

Local Plan Pre-Submission - Comments and Response Schedule

subject to highways improvements to Greyhound Lane. Furthermore, access to Church Hill to the north may be possible, as the landowner has retained a right of access in this location. The wording of this paragraph should be revised, to avoid ruling out development of any scale in this location, as to do so would be unjustified.

Breckland Council Response

Officer Response

Norfolk County Council Highways commented on site LP[003]003 that "Developer funded works have recently been carried out to improve visibility at the junction of Greyhound Lane and Crown Street. The Highway Authority have historically raised concerns regarding intensification of vehicle movements at this junction. We remain concerned about further development being accessed from this junction. In absence of any evidence demonstrating how further improvements could be demonstrated. The Highway Authority would object to this site in being in the local plan". The constraints to development on this site and the need to replace the open space lost at Lp[003]009 mean that this site is not suitable for residential development.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1126434	Full Name		Organisation Details	Breckland Bridge Ltd and G F Cole & Sons Ltd
Agent ID	1126421	Agent Name	Mrs Sarah Hornbrook	Agent Organisation	Associate Planner Ingleton Wood

Comment Details

Title		Number	Banham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	This is the first time that this specific policy wording has been proposed		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Whilst Breckland Bridge Ltd and G F Cole & Sons Ltd strongly support the proposed allocation, as detailed in our response to Map 3.4, in order to ensure that the proposed allocation is sound, in terms of whether it is effective, justified and positively prepared, it is requested that alterations are made to the wording of the proposed Policy, as detailed below. Point 1 of the Policy requires access to be taken from Wayland Way; whilst we are in agreement that the principal means of access should be from Wayland Way, we request that the word principal is inserted into the Policy wording, to facilitate, where feasible, a secondary means of access to the site. It may be that in order to achieve the optimum development of the site, a

number of units could also be accessed via Gaymer Close, or directly from Greyhound Lane. The inclusion of the word principal would provide flexibility for the developer to consider a variety of options, including potential secondary points of access, subject to demonstrating that there would be no adverse impacts on highway safety, and no other adverse effects. We also seek clarification on the quantum of Public Open Space to be provided, as there is currently some ambiguity; the first paragraph of the Policy requires a minimum of 1ha of open space, whereas point 7 refers to 0.75ha. The area of land currently designated as Open Space, immediately adjacent to Wayland Way and Gaymer Close, is approximately 0.75ha, and it is this space that is to be re-provided on the land to the south of Greyhound Lane. We would therefore request that the first paragraph of the Policy is corrected to read a minimum of 0.75ha of open space including a childrens play facility; and point 7 remains unaltered. The significant qualitative improvements that are to be provided, including the provision of a Local Area of Play (LAP), mean that like-for-like replacement (in terms of the area of open space) will be more than sufficient to meet the needs of the new residents. The existing open space performs no real function and is of little amenity value; as detailed in our previous Representations, the site is laid to grass, and whilst members of the public are able to walk freely within the site, this is the only opportunity it affords for recreation. It does not provide any social function, and is not actively managed for recreation purposes; there is no seating provided, no litter bins, and no links in to any of the Public Rights of Way in the vicinity of the site. The proposals contained within the draft Policy will result in a significant enhancement to the open space provision, to the benefit of the whole village, and to require an increase in the area of the space, as well as the qualitative improvements, is not justified. We would question whether the wording of point 3 of the proposed Policy is entirely appropriate; the site is not a gateway site in that it is not directly situated on a key approach into the village. Whilst there is a possibility that some development will front onto Greyhound Lane, the majority of the land lies to the north of Greyhound Lane, and will not be read as part of Greyhound Lane. Consequently, it is suggested that the wording of point 3 is revised to read appropriate use of height and scale to reflect the sites edge of settlement location. For clarity, the proposed Policy is repeated below, with wording that we suggest is omitted crossed through, and new wording underlined. Land adjacent to Gaymer Close and to the south of Greyhound Lane (LP[003]003, LP[003]009 & LP[003]012) Land amounting to 3.2 ha is allocated for a residential development of at least 42

Local Plan Pre-Submission - Comments and Response Schedule

dwellings. A minimum of 1 ha 0.75 ha of open space including a children's play facility will be provided on land to the south of Greyhound Lane (LP[003]003). Development will be subject to compliance with the following criteria: 1. Principal access to residential development to be provided from Wayland Way including associated improvements to the local highway and footway provision to the satisfaction of Norfolk County Council as Highway Authority, including a footpath link from the housing development to Greyhound Lane; 2. Appropriate density to reflect and respect existing development; 3. Appropriate use of height and scale to ensure the site's position as a gateway to the settlement reflect the sites location at the edge of the village ; 4. Retention of native hedgerow and trees on the site boundary, where appropriate, with further natural screening to be provided on the north west boundary of the residential site; 5. Development proposals should seek to protect and enhance the setting of Banham Conservation Area; 6. Appropriate sustainable surface water attenuation measures are provided, and where possible included as part of landscaping schemes; 7. Subject to provision of equivalent replacement new open space of a minimum of 0.75ha including a Local Area for Play (LAP) on land south of Greyhound Lane (LP[003]003). The risk of surface water flood and fluvial flood risk is required to be addressed in the planning application, and appropriate solutions implemented to improve drainage and ground conditions to enable the open space and LAP to be in use throughout the year; and 8. A pre-application enquiry with Anglian Water Services is required for this site in accordance with the Water Cycle Study to demonstrate that sufficient capacity is available to transfer wastewater for treatment. Where insufficient capacity within the wastewater network is identified, financial contributions may be sought.

Breckland Council Response

Officer Response

The Council consulted Norfolk County Council as Highways Authority on proposed allocations. This information was used to determine proposed access to sites. The policy wording does not preclude the developer from identifying secondary access points in consultation with Norfolk County Council as part of any planning application. There is an error in the policy regarding the quantity of open space sought as it should be 0.75ha. The Council will recommend a minor modification to address the identified issue. On approaching the village from the west along Greyhound Lane the site is visible and represents a gateway to Banham.

Potential amendment to the plan

Amend the first para of policy Banham Housing Allocation 1 to specify 0.75 ha of open space and delete 1 ha.

Amendment ID

PM/H/B1/A

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1132853	Full Name	Martin Goymour	Organisation Details	Goymour Properties
Agent ID	1132852	Agent Name	Mr Jon Jennings	Agent Organisation	Cheffins Planning

Comment Details

Title		Number	Banham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	My clients land holding was presented to a meeting with the Local Plan teams on the 6th February 2017. As requested the site was formally submitted to the Council for consideration in this local plan. In addition, the representations also included a specific wording for the safeguarding of Banham Zoo and its specific development aspirations.		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Local Plan Pre-Submission - Comments and Response Schedule

The comment that the site is within 800m of key services is incorrect with the supermarket and public house located on Kenninghall Road being approximately 1300m from the site. The facilities within 800m of this site are the school, post office and Church. The main areas of employment associated with Banham are located to the western end of the village which is in excess of 1300m from the proposed allocation. As detailed at criterion 7 of Banham Housing Allocation 1 parts of this site fall within Flood Zone and the question has to be raised as to whether this is the most appropriate site for housing when there are other sites within Banham which are within Flood Zone 1 i.e. at the lowest risk of flooding. It is advised that the site should be allocated for at least 42 dwellings whereas Policy HOU 2 is clear that the housing target for Banham is 111 of which 42 are housing allocations within the Local Plan. The policy needs to be clear as to the amount of development which is being proposed for this site. The density of development is also very low raising the question as to the extent of housing which will be affordable and of a size to meet local housing needs. It is clear that the quantum of housing being proposed fails to recognise the range of existing employment and other facilities in Banham and understand how additional housing will not only provide accommodation for employees but also aid the vitality and viability of local services.

Breckland Council Response

Officer Response

The site is within close proximity to the shop/post office, school and bus stop. These are considered to be key facilities. Part of the allocation which is at risk of flooding (LP[003]003) is allocated for open space only. The housing target in para 3.200 for Banham clarifies that of the 111 houses sought during the plan period, 60 houses are committed and 16 have been completed therefore leaving a remaining target of 42 which can be accommodated on the proposed allocated sites.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Banham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

LP(003)003, LP(003)009 and LP(003)012: Land adjacent to Gaymer Close and to the south of Greyhound Lane There are no known designated heritage assets within this collection of sites which could be affected their development. The sites however, partially fall within the Banham Conservation Area and are located to the north of a cluster of Grade II listed buildings and structures. Any development of this site will need to preserve or enhance these designated heritage assets and their settings. This might be achieved through mitigation measures such as appropriate design, location of open space, landscaping/planting and massing of the development. These requirements should be included in the policy and

Local Plan Pre-Submission - Comments and Response Schedule

supporting text of the Plan. Point 5 of the policy requires development to protect or enhance the setting of the Banham Conservation Area and this is welcomed. As an edge of settlement this collection of the cumulative impact of all three sites must be considered, the policy requirements referring to height, scale, and density are therefore welcomed but justification for their inclusion would be strengthened if linked back to the role these requirements have to play in maintaining the character of the settlement.

Breckland Council Response

Officer Response

Comments noted. Clause 5 of the policy states "development proposals should seek to protect and enhance the setting of the conservation area". This, along side policies ENV 07 and ENV 08 are considered to provide protection of the historic environment.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1128246	Full Name	Hannah Grimes	Organisation Details	Norfolk County Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Banham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	No, because the allocations in the preferred options consultation and proposed policy were different from those in this Reg. 19 publication version of the plan.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The policy text for Banham is unclear in its description of the development that is allowed on site 003 003. The supporting text suggests that this site is unsuitable for residential development but the wording of the policy is not explicit on this point. To make the plan sound the wording of Policy Banham Housing Allocation 1 should be changed to either: Be explicit that the land South of Greyhound Lane is not acceptable for residential development and ensure that appropriate footway provision is made to the village. OR If the site is to be available for residential development then the requirements for local highway improvements as set out in the last regulation consultation to Ensure that safe access can be achieved onto

Local Plan Pre-Submission - Comments and Response Schedule

Greyhound Lane with appropriate highways improvements be included in Policy Banham Housing Allocation 1.

Breckland Council Response

Officer Response

Modifications to the policy are recommended to clarify that residential development is not acceptable on part of the site at risk of flooding (LP[003]003).

Potential amendment to the plan

Change the wording of the first para of the policy to state: "land amounting to 2ha (sites LP(003)009 and (LP[003]012) is allocated for residential development of at least 42 dwellings. A minimum of 0.75 ha of open space including a childrens play facility will be provided on land to the south of Greyhound Lane (LP(003)003).

Amendment ID

PM/H/B1/A

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1135889	Full Name	Mr Stewart Patience	Organisation Details	Anglian Water Services Ltd
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Summary of Banham Allocations.	Number	Map 3.4
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

We welcome the reference made to the applicant obtaining pre-planning advice from Anglian Water to identify a feasible foul drainage strategy for the above sites and obtaining confirmation that there is sufficient wastewater treatment capacity for the sites identified at Dereham and Swaffham.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1132853	Full Name	Martin Goymour	Organisation Details	Goymour Properties
Agent ID	1132852	Agent Name	Mr Jon Jennings	Agent Organisation	Cheffins Planning

Comment Details

Title	Paragraph	Number	3.205
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	My clients land holding was presented to a meeting with the Local Plans team on the 6th February 2017. As requested the site was formally submitted to the Council for consideration in this local plan. In addition, the representations also included a specific wording for the safeguarding of Banham Zoo and its specific development aspirations.		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Local Plan Pre-Submission - Comments and Response Schedule

Whilst the Council acknowledges at paragraph 3.205 that Banham Zoo is both a significant tourist attraction and local employer. The location and level of growth within Banham does not reflect the importance of the zoo with a limited allocation for only 42 houses being proposed at the northern edge of Banham remote from the zoo. The zoo attracts in excess of 200,000 visitors per annum and an additional 100,000 visit the car boot sale and caravan site associated with this facility. As can be seen from the documentation appended to this representation a proposed allocation for residential development was submitted to the Council for consideration which is located adjacent to the main retail area within the village and public house and is immediately to the north of the zoo (Appendix 1) It is also the landowners intention to seek to expand the shop and provide other retail facilities within the existing retail and community area, potentially including small scale craft businesses and a coffee shop. My clients land holding was presented to a meeting with the Local Plans team on the 6th February 2017. As requested the site was formally submitted to the Council for consideration in this local plan. In addition, the representations also included a specific wording for the safeguarding of Banham Zoo and its specific development aspirations 6. If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound. (Please attach extra sheets if necessary) Whilst the Council acknowledges at paragraph 3.205 that Banham Zoo is both a significant tourist attraction and local employer. The location and level of growth within Banham does not reflect the importance of the zoo with a limited allocation for only 42 houses being proposed at the northern edge of Banham remote from the zoo. The zoo attracts in excess of 200,000 visitors per annum and an additional 100,000 visit the car boot sale and caravan site associated with this facility. As can be seen from the documentation appended to this representation a proposed allocation for residential development was submitted to the Council for consideration which is located adjacent to the main retail area within the village and public house and is immediately to the north of the zoo (Appendix 1) It is also the landowners intention to seek to expand the shop and provide other retail facilities within the existing retail and community area, potentially including small scale craft businesses and a coffee shop. It is also contended that the zoo is very important at a local, regional and international scale. The comment at paragraph 3.205 that Applications for non-operational enabling development which supports the retention enhancement or expansion of these facilities will be considered in line with the relevant strategic policies in the

Local Plan Pre-Submission - Comments and Response Schedule

plan fails to give adequate support to the retention and expansion of this facility. It is contended that a specific policy should be formulated for the zoo. The suggested wording for this policy is that Breckland Council recognises the importance of Banham Zoo as a major visitor attraction and will support the growth of sustainable tourism at Banham Zoo in line with Policy EC07 of the Breckland Local Plan and where this does not conflict with other Local Plan policies. The District Council will work with the trustees and operators of Banham Zoo to formulate a comprehensive masterplan and development brief which seeks to enhance and expand the existing zoo in a sensitive manner, to include: Ć A new zoo entrance feature Ć Incubation business units to complement the A11 Innovation Corridor and reinforce links between the zoo and the wider region Ć Expansion of the holiday village using eco-lodges - with the emphasis on ecology and sustainability Ć Germinal Habitat Dome “ a spectacular tourist attraction with a unique combination of tropical environments and animal habitats Ć Provision of retail improvements to provide viable long term local facilities for both residents, employees and visitors Ć Provision of proportionate enabling development to assist in the funding of improvements to the zoo Ć Key worker housing to address the needs of employees at the zoo and related businesses Ć Formulation of a detailed access strategy, including measures to reduce reliance on the private car. The objective of this policy is to not only to make Banham Zoo a regional/national tourist attraction, particularly as a result of its links to London and other national zoos but also an important educational and business facility focused on the innovation associated with the Zoos research and conservation operations. The extent of the area to be covered by this policy is attached as Appendix 2 to this representation.

Breckland Council Response

Officer Response

The wording as set out in paragraph 3.205 is further supported by other policies within the plan: Policy EC 04 Employment Development Outside General Employment Area; Policy EC 07 Tourism Related Development; and Policy COM 04 Community Facilities. It is considered that the plan allows for a flexible approach towards the rural economy and would allow business to thrive within the District.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1126434	Full Name		Organisation Details	Breckland Bridge Ltd and G F Cole & Sons Ltd
Agent ID	1126421	Agent Name	Mrs Sarah Hornbrook	Agent Organisation	Associate Planner Ingleton Wood

Comment Details

Title	Summary of Banham Allocations.	Number	Map 3.4
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The proposed site is considered to be entirely deliverable and capable of making an important contribution towards satisfying the Councils housing needs during the period up to 2036. The site, in accordance with the National Planning Policy Framework (NPPF), represents a suitable location for development, is available immediately and is viable, as demonstrated in our Representation at the Preferred Site Options and Settlement Boundaries Stage, which is appended to this form. However, the Settlement Boundary has not been extended around site LP[003]003. As set out in our comments in relation to paragraph 3.208, the potential for some residential development on this part of the wider site should not be ruled out, as

Local Plan Pre-Submission - Comments and Response Schedule

there is no justification to do so. It is therefore proposed that the Settlement Boundary is extended to include site LP[003]003.

Breckland Council Response

Officer Response

Support noted. The boundary has not been drawn around site LP[003]003 because it is proposed that this site would provide open space that is to be lost through LP[003]009.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.202
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

The reference to Banhams rich historic environment and description of designated heritage assets in paragraph 3.202 of the opening text is helpful in outlining the defining aspects of Banham.

13- If you feel the plan is unsound, please tell us why

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 868883 Full Name Mr David Cockburn
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Bawdeswell Housing Allocation
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Issues were raised in relation to the planning applications for the land off Hall Road.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Insufficient consideration has been given to the effect on vehicular traffic at the junction of Hall Road with Norwich Road and the junction of Norwich Road with the A1067. There are already significant delays at the latter junction and the parking of HGV's on Norwich Road for deliveries to the Garden Centre creates a road safety hazard.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Norfolk County Council Highways Authority provided comments on the planning application (3PL/2015/1424/F) that would equate to the overall growth that Bawdeswell would see over the plan period. NCC raised a number of conditions through the outline application that would make the development acceptable in highways terms. NCC Highways have raised no objection to the site being allocated through the Local Plan.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1135889	Full Name	Mr Stewart Patience	Organisation Details	Anglian Water Services Ltd
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Bawdeswell Housing Allocation
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4 - Is the plan positively prepared?	No
5 - Is the plan justified?	Yes	6 - Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10 - Have you raised this at Issues and Options?	No	11 - If you have not raised this issue before please state why	Submission Plan includes final wording relating to this site.		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13 - If you feel the plan is unsound, please tell us why

Anglian Water has no objection to the principle of residential development on this site. The above policy does not include reference to the need for improvements to be made to the foul sewerage network to enable the development of this allocation site as outlined in the Councils Water Cycle Study Update (March 2017) and comments previously made by Anglian Water. It is therefore proposed that the following wording to be added to this policy (to follow point 3): 4. a pre-application enquiry with Anglian Water Services is required for this site in accordance with the Water Cycle Study to demonstrate that sufficient capacity is available to transfer wastewater for treatment. Where insufficient capacity within the wastewater

Local Plan Pre-Submission - Comments and Response Schedule

network is identified, financial contributions may be sought.

Breckland Council Response

Officer Response

The suggested wording is already contained in the supporting text, however it may be necessary to include this within the a modification to the document, subject to discussion at the hearing sessions.

Potential amendment to the plan

No amendment proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Bawdeswell Housing Allocation
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

LP(004)008: Land off Hall Road There are no known designated heritage assets within the site which could be affected its development. The Bawdeswell Conservation Area and a cluster of Grade II listed buildings and structures are however situated to the north of the site. Any development of this site will need to preserve or enhance these designated heritage assets and their settings. This might be achieved through mitigation measures such as appropriate design, location of open space, landscaping/planting and massing of the development. These requirements should be included in the policy and supporting text of the Plan. At present neither the supporting text nor the policy mention the presence of nearby

Local Plan Pre-Submission - Comments and Response Schedule

heritage assets and contains no provision for their protection or enhancement. It is recommended that the policy is amended accordingly.

Breckland Council Response

Officer Response

The site benefits from planning permission 3PL/2015/1424/F, subject to S106 agreement. In consideration of the implications on the historic environment it was determined the site is approx. 200m from the nearest listed buildings and is well screened from heritage assets by the intervening built form of the village and residential area to the north. A condition for a written scheme of archaeological evaluation was imposed. Should the permission lapse, any proposal would be assessed against policies ENV 07 and ENV 08 which would ensure the impact on designated and non designated heritage assets would be considered.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1132458	Full Name	Roland Bohn	Organisation Details	Albanwise Limited
Agent ID	1132456	Agent Name	Anna Bend	Agent Organisation	Amec Foster Wheeler

Comment Details

Title		Number	Bawdeswell Housing Allocation
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

In relation to growth at Bawdeswell, paragraph 3.211 states that the village will see a 10% growth by 2036. This is in conflict with Policy HOU2 which states that the Local Service Centres, including Bawdeswell, will see a 15% increase. It is not understood why this level of growth is not reflected in the remainder of the Local Plan. As such the Council is not planning for a sufficient level of growth at Bawdeswell, and it is recommended that the housing target is increased in line with Policy HOU2, and the revised distribution for the District. Despite this error, it is considered that Bawdeswell is a sustainable location which can sufficiently accommodate a higher level of growth. Albanwise Limiteds site LP[004]005 was

included in the previous Local Plan consultation as a proposed alternative allocation. However, this has been removed from the Pre-submission draft, and the housing allocation for the village has not increased. Restricting development at Local Service Centres where the allocated number of dwellings has been met is not an appropriate way to meet longer-term needs to 2036. As the Council has increased its housing requirements to 2036 in line with the latest SHMA update, and as it does not have a five year supply of housing, it is suggested that for the plan to be sound the Council needs to allocate additional sites to ensure that the Districts housing requirements are fully delivered. If the Council cannot demonstrate a favourable five year supply position, it will render the Plan immediately out-of-date. There is no technical justification for not allocating the site and no overriding constraints to development have been identified through the Plan preparation, as demonstrated by the inclusion of site LP[004]005 as an alternative housing site in previous stages of the Plan. The Highways Authority has not objected to the sites inclusion in the Local Plan. On the basis of initial desktop analysis undertaken for site LP[004]005, which has included a review of highway access opportunities, it is not considered that there are likely to be any significant adverse impacts through development sufficient to outweigh the presumption in favour of sustainable development. The site is in a sustainable location adjacent to the village settlement and the recreation ground, and well related to facilities within the village, to support a residential development. The site is not covered by any environmental designations, and is not at risk of flooding with the area proposed for development is entirely within Flood Zone 1. It is considered that a residential development on the site would be visually acceptable being partially screened from the planting along Reepham Road and the sub-station. There is also an opportunity to improve the sites northern edge and provide an attractive approach into the village from the north which is sympathetic to the adjacent Conservation Area. Amec Foster Wheeler has undertaken a review of access options and it is proposed that development of site LP[004]005 could facilitate significant improvements to the existing highway situation, including the provision of enhanced pedestrian linkages from the northern part of the village into the village centre for the benefit of existing and new residents. In addition, there is the opportunity to provide additional traffic calming measures along this section of Reepham Road improving road safety on the approach into the village. Therefore, it is considered that this site is highly suitable and sustainable for residential development, with no constraints to delivery within the early part of the Plan

Local Plan Pre-Submission - Comments and Response Schedule

period, to assist the Council in boosting its supply of housing in accordance with the NPPF. Requested Change That the Council includes site LP[004]005 as a housing allocation to contribute towards the Districts housing needs.

Breckland Council Response

Officer Response

The table in HOU 02 outlines the percentage of growth according to the different categories in the settlement hierarchy. All allocations in the Local Service Centres collectively will deliver 15% of the overall housing target. Individually, each Local Service Centre settlement will see 10% growth through the plan period. The allocation in Bawdeswell fulfils the housing target for the settlement and is considered to be the most sustainable site for development, comparative to alternative options.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 868883 Full Name Mr David Cockburn
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Paragraph Number 3.212
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The X29 bus service has only one service each hour in each direction and there are no early morning or evening services. There is no bus service to our nearest Market Town Reepham, other than the school bus, and there is only a bus service to Dereham one day a week. There is no public transport to the Doctors surgeries in North Elmham or Swanton Morely. Nearly ALL the businesses in Bawdeswell are sole traders with no opportunity for employment. The larger employers will only employ staff if someone leaves so there is no additional employment potential whatsoever within the village. Bawdeswell School is only coping with the use of temporary classrooms.

Local Plan Pre-Submission - Comments and Response Schedule

Breckland Council Response

Officer Response

A range of options were set out in the Issues and Options Consultation (November 2014) : Retain definition of Local Service Centres used within the adopted Core Strategy; Define Local Service Centres around facilities regardless of population; and define Local Service Centres based around schooling and health provision. The majority of the responses to this consultation were in favour of defining Local Service Centres around facilities regardless of population. The Local Service Centre Topic Paper set out a methodology for assessing the suitability of Local Service Centres. This criteria is as follows: Public Transport - An assessment of the level of public transport access within the village. This has included looking at the frequency of services and whether you can reach a higher order settlement for normal working hours. Community Facility - This can include a number of different facilities such as a village hall, public house, restaurant or café. Employment - The assessment has looked at the level of employment available within the village. This has included whether there is a business park and also the size of the businesses within the settlement. Shop/Post Office School The X29 bus has an hourly service to Norwich, which is a higher order settlement. The first bus departs at 6:57am with the last bus returning at 17:55pm. It is considered that Bawdeswell therefore meets the criteria for public transport. In regards to public transport to a doctor surgery, this was not considered part of the criteria for the selection of Local Service Centres in line with responses to the Issues and Options consultation. The 2016 Inter-departmental Business Register states that there are 23 businesses within the parish with 5 employing 10 or more people. The Local Service Centre topic paper makes clear that the criteria is as follows: The parish must have approximately 20 businesses within the villages, with at least two of these businesses employing 10 or more people. During the Preferred Site Options and Settlement Boundaries Consultation NCC education commented that the additional housing could be accommodated with capital investment in the development of the existing school buildings. Through the outline planning application that has approval, NCC education sought contributions for education that would alleviate the increase in pupil numbers. Bawdeswell therefore meets the criteria for being designated a Local Service Centre.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1132458	Full Name	Roland Bohn	Organisation Details	Albanwise Limited
Agent ID	1132456	Agent Name	Anna Bend	Agent Organisation	Amec Foster Wheeler

Comment Details

Title	Summary of Bawdeswell Allocations.	Number	Map 3.5
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

In relation to growth at Bawdeswell, paragraph 3.211 states that the village will see a 10% growth by 2036. This is in conflict with Policy HOU2 which states that the Local Service Centres, including Bawdeswell, will see a 15% increase. It is not understood why this level of growth is not reflected in the remainder of the Local Plan. As such the Council is not planning for a sufficient level of growth at Bawdeswell, and it is recommended that the housing target is increased in line with Policy HOU2, and the revised distribution for the District. Despite this error, it is considered that Bawdeswell is a sustainable location which can sufficiently accommodate a higher level of growth. Albanwise Limiteds site LP[004]005 was

included in the previous Local Plan consultation as a proposed alternative allocation. However, this has been removed from the Pre-submission draft, and the housing allocation for the village has not increased. Restricting development at Local Service Centres where the allocated number of dwellings has been met is not an appropriate way to meet longer-term needs to 2036. As the Council has increased its housing requirements to 2036 in line with the latest SHMA update, and as it does not have a five year supply of housing, it is suggested that for the plan to be sound the Council needs to allocate additional sites to ensure that the Districts housing requirements are fully delivered. If the Council cannot demonstrate a favourable five year supply position, it will render the Plan immediately out-of-date. There is no technical justification for not allocating the site and no overriding constraints to development have been identified through the Plan preparation, as demonstrated by the inclusion of site LP[004]005 as an alternative housing site in previous stages of the Plan. The Highways Authority has not objected to the sites inclusion in the Local Plan. On the basis of initial desktop analysis undertaken for site LP[004]005, which has included a review of highway access opportunities, it is not considered that there are likely to be any significant adverse impacts through development sufficient to outweigh the presumption in favour of sustainable development. The site is in a sustainable location adjacent to the village settlement and the recreation ground, and well related to facilities within the village, to support a residential development. The site is not covered by any environmental designations, and is not at risk of flooding with the area proposed for development is entirely within Flood Zone 1. It is considered that a residential development on the site would be visually acceptable being partially screened from the planting along Reepham Road and the sub-station. There is also an opportunity to improve the sites northern edge and provide an attractive approach into the village from the north which is sympathetic to the adjacent Conservation Area. Amec Foster Wheeler has undertaken a review of access options and it is proposed that development of site LP[004]005 could facilitate significant improvements to the existing highway situation, including the provision of enhanced pedestrian linkages from the northern part of the village into the village centre for the benefit of existing and new residents. In addition, there is the opportunity to provide additional traffic calming measures along this section of Reepham Road improving road safety on the approach into the village. Therefore, it is considered that this site is highly suitable and sustainable for residential development, with no constraints to delivery within the early part of the Plan

Local Plan Pre-Submission - Comments and Response Schedule

period, to assist the Council in boosting its supply of housing in accordance with the NPPF. Requested Change That the Council includes site LP[004]005 as a housing allocation to contribute towards the Districts housing needs.

Breckland Council Response

Officer Response

The table in HOU 02 outlines the percentage of growth according to the different categories in the settlement hierarchy. All allocations in the Local Service Centres collectively will deliver 15% of the overall housing target. Individually, each Local Service Centre settlement will see 10% growth through the plan period. The allocation in Bawdeswell fulfils the housing target for the settlement and is considered to be the most sustainable site for development, comparative to alternative options.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.213
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The reference to Bawdeswells rich historic environment and description of designated heritage assets in paragraph 3.213 of the opening text is helpful in outlining the defining aspects of Bawdeswell.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130247	Full Name	Gordon Kay	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	I had understood that Breckland Capita would be taking account of both the unprecedented number of written objections already made (400+) for a current proposal on this site and the numerous technical challenges presented by this site- It is clear that in recommending it they have done neither.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Land to the west of EtlingView (LPj025]007 The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock/grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate. Many of the 400+ local objectors to the current scheme

proposed for the land have outlined the visual, landscape and amenity importance of the land together with numerous issues around flooding, degradation of hedgerows loss of wildlife area and concerns from the Police regarding crime. The area is a cherished local asset due to its openness -the small field in particular due to its visual exposure from two popular footpaths including the medieval lane " Shillings Lane. The openness of the land is important in separating the built environment from the wildlife corridor and County Wildlife Site, such areas forming a physical breathing space away from the hustle and bustle of both the existing and proposed residential areas nearby. Moreover, the indicative layout illustrates a relatively high density, physically distinct development, wholly incongruous with the single existing dwelling adjoining the paddock field Rose Farm a comparatively low level dwelling with single storey appendages. The dwellings are likely to result in an unduly urbanised built form, introducing harmful change which would be incompatible with the quality of the landscape and setting of the settlement. The 2 fields are located in a highly sensitive, historic and valued landscape; bordered by common land and historic rights of way. The level and density of development proposed (60 dwellings) is not reflective of its context and would not enhance the character and appearance of the area, but would have a significant and harmful impact on the setting. A development of 60 dwellings cannot be accommodated successfully on the site without harming the landscape character and appearance of the area- The application is contrary to the NPPF and Core Strategy Policy CP11/DC16. See also paragraphs 17 & 58 of the NPPF Proposed dwellings on the southern boundary of the site would cause an unacceptable level of overlooking and harm to the amenities of Rose Farm on Field 2 and neighbouring dwellings on Field 1 as well as to users of the surrounding common land and public rights of way. Contrary to Core Strategy Policy DCO1. The fields traditionally flood- it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that because the adjoining Shillings Lane is lower that flooding of the lane once a rare occurrence now occurs frequently. Development as proposed will further increase this flooding. The likely impact on the risk of flooding elsewhere as a result of an increase in the volume of run off post development. Contrary to NPPF paragraphs 103 and 109 The NPPF makes it clear in Paragraph 8 that the three roles the planning system is required to perform in respect of sustainable development should not be taken in isolation because they are mutually dependant. For the above reasons the benefits of the housing provision proposed, taking into account the development plan and the policies of

Local Plan Pre-Submission - Comments and Response Schedule

the NPPF as a whole, are clearly outweighed by the significant harmful impacts of the development. This proposal does not meet the criteria to be regarded as sustainable development and should be refused. The NPPF identifies (in paras 6 and 17) sustainable development as the purpose of the planning system and conserving and enhancing the natural environment as a core planning principle. While specific policies on conserving and enhancing the natural environment are addressed in Section 11 of the NPPF, these should not be considered in isolation, as other natural environment related policies, and their consideration in plan- and decision-making, can be found throughout the document. The NPPF states (in para. 114) that local planning authorities should plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. The NPPF makes it clear (in para. 110) that Plans should allocate land with the least environmental or amenity value. Planning policies and decision-making should seek to protect and enhance natural and heritage assets appropriate to their significance. Policies and decisions should also encourage multiple benefits from development.

Breckland Council Response

Officer Response

History of the site in the Local Plan The site, LP[025]007, known as Land to the west of Etling View, was identified as a reasonable alternative during the Emerging Site Options consultation. The site was then considered to be a proposed allocation through the Preferred Sites and Settlement Boundaries consultation. During these consultations no significant objections were raised by any of the statutory consultees. The sites inclusion within the Local Plan is supported and underpinned by a range of evidence including, but not exclusive to: the Historic Characterisation Study, the Sequential Test, the Water Cycle Study and the Infrastructure Delivery Plan. The site is now subject to a planning application (3PL/2015/1045/O), which is still under consideration. However, through this further detailed comments have been provided.

Landscape & Natural Environment The site adjoins Neatherd Moor Common to the west, which is designated both as a County Wildlife Site and as Natural/Semi “natural green space. The Breckland District Settlement Fringe Landscape Assessment defines the character area as the Northall Green Open Arable Plateau, which is of Moderate-High sensitivity. The Assessment states that, as part of the general landscape management plan, Neatherd Moor must be conserved and enhanced through appropriate landscape management including grazing. The proposed allocation would extend the built up area of the town north and the appearance of the site would change from open farmland to a built up housing area. However, the scheme would largely be contained visually by the adjacent built environment to the south and east and the existing boundary hedging/trees and woodland to the north and west. From the County Wildlife Site, the Neatherd and Shillings Lane to the east, the proposal would be screened during part of the year by existing mature landscaping along Shillings Lane and the northern boundary of the site. When seen within the autumn, winter and early spring months the proposed buildings would be seen adjacent to the existing buildings to the east and would bring the built form closer to Shillings Lane and the Neatherd. The proposal would transform and erode the open aspect of the neighbouring dwellings immediately to the south of the site. However, this would be localised and could be mitigated through landscaping and additional planting. The policy wording of the allocation seeks the Retention and enhancement of native hedgerows and trees on the outer edge of the site boundary. This would seek to mitigate the impact. The proposal seeks at least 60 dwellings

Local Plan Pre-Submission - Comments and Response Schedule

on a 2.3 hectare site, which would provide a density of approximately 26 dwellings per hectare; this would be in keeping with the neighbouring dwellings. Natural England have commented on the Pre-submission Publication and raised no objections. It is therefore considered that the impact upon the landscape and natural environment would not be significant. Through the application, the Public Rights of Way officer raised no objection as long as long as there is no adverse impact on either the registered common land to the west or Restricted Byway (RB32) along the northern boundary of the site. The allocation itself seeks to respect the northern boundary of the site by being set back from Shillings Lane. Historic Character During the Preferred sites and Settlement Boundaries consultation, Historic England commented that further work should be carried out to assess the impact of preferred and alternative sites upon the Historic Environment. The Historic Characterisation Study was carried out in early 2017 and in relation to site LP[025]007, concluded that: Development proposals must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken so as to inform an appropriate design response. In this case the established pattern of adjacent mixed development will be an additional factor in the formation of the proposal. On the planning application itself NCC Historic Environment Service commented that the proposal does not have any implications for the historic environment and that no recommendations for archaeological work would be made. Flood Risk The SA highlighted that the site is situated within an area of flood risk. However, this is only a very small extant to the north and north east. Through the Preferred Sites and Settlement Boundaries consultation the Lead Local Flood Authority recommended that conditions are attached to any planning permission granted under the current planning application. At this stage the Lead Local Flood Authority commented on the site specifically stating: We welcome that the site has been reduced in its extent from the original allocation and now does not include areas at risk of flooding from surface water. An assessment of the actual risk of flooding should be undertaken by any development on this site. Following the Preferred Sites and Settlement Boundaries Consultation the Sequential Test looked at all defined as preferred or alternative. As part of this the extent of surface water flooding on the site was not considered to be substantial, with only approximately 2% of the site subject to surface water flooding. Through the planning application the Environment Agency and the Lead Local Flood Authority have raised no objections to the proposed development subject to conditions. Wastewater treatment As part of the evidence base underpinning the Local Plan a Water Cycle Study was carried out. As part of this study it was highlighted that improvements may be required to the treatment capacity. The study recommends that all applications for development proposals in Dereham are accompanied by a pre-development enquiry with Anglian Water Services to demonstrate that sufficient capacity is available to treat wastewater from the proposals. This wording has been added to the key development considerations within the allocation wording. Conclusion In conclusion it is considered that the site represents a sustainable site on the edge of one of five Market Towns within the district. There are no constraints that would be considered severe enough to affect the designation of the site.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130294	Full Name	Chris Chitty	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	I had understood that Breckland Capita would be taking account of both the unprecedented number of written objections already made (400+) for a current proposal on this site and the numerous technical challenges presented by this site- It is clear that in recommending it they have done neither!!!!!!		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Land to the west of EtlingView (LP[025]007 The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock/grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate. Many of the 400+ local objectors to the current scheme

proposed for the land have outlined the visual, landscape and amenity importance of the land together with numerous issues around flooding, degradation of hedgerows loss of wildlife area and concerns from the Police regarding crime. The area is a cherished local asset due to its openness -the small field in particular due to its visual exposure from two popular footpaths including the medieval lane " Shillings Lane. The openness of the land is important in separating the built environment from the wildlife corridor and County Wildlife Site, such areas forming a physical breathing space away from the hustle and bustle of both the existing and proposed residential areas nearby. Moreover, the indicative layout illustrates a relatively high density, physically distinct development, wholly incongruous with the single existing dwelling adjoining the paddock field Rose Farm a comparatively low level dwelling with single storey appendages. The dwellings are likely to result in an unduly urbanised built form, introducing harmful change which would be incompatible with the quality of the landscape and setting of the settlement. The 2 fields are located in a highly sensitive, historic and valued landscape; bordered by common land and historic rights of way. The level and density of development proposed (60 dwellings) is not reflective of its context and would not enhance the character and appearance of the area, but would have a significant and harmful impact on the setting. A development of 60 dwellings cannot be accommodated successfully on the site without harming the landscape character and appearance of the area- The application is contrary to the NPPF and Core Strategy Policy CP11/DC16. See also paragraphs 17 & 58 of the NPPF Proposed dwellings on the southern boundary of the site would cause an unacceptable level of overlooking and harm to the amenities of Rose Farm on Field 2 and neighbouring dwellings on Field 1 as well as to users of the surrounding common land and public rights of way. Contrary to Core Strategy Policy DCO1. The fields traditionally flood- it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that because the adjoining Shillings Lane is lower that flooding of the lane once a rare occurrence now occurs frequently. Development as proposed will further increase this flooding. The likely impact on the risk of flooding elsewhere as a result of an increase in the volume of run off post development. Contrary to NPPF paragraphs 103 and 109 The NPPF makes it clear in Paragraph 8 that the three roles the planning system is required to perform in respect of sustainable development should not be taken in isolation because they are mutually dependant. For the above reasons the benefits of the housing provision proposed, taking into account the development plan and the policies of

Local Plan Pre-Submission - Comments and Response Schedule

the NPPF as a whole, are clearly outweighed by the significant harmful impacts of the development. This proposal does not meet the criteria to be regarded as sustainable development and should be refused. The NPPF identifies (in paras 6 and 17) sustainable development as the purpose of the planning system and conserving and enhancing the natural environment as a core planning principle. While specific policies on conserving and enhancing the natural environment are addressed in Section 11 of the NPPF, these should not be considered in isolation, as other natural environment related policies, and their consideration in plan- and decision-making, can be found throughout the document. The NPPF states (in para. 114) that local planning authorities should plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. The NPPF makes it clear (in para. 110) that Plans should allocate land with the least environmental or amenity value. Planning policies and decision-making should seek to protect and enhance natural and heritage assets appropriate to their significance. Policies and decisions should also encourage multiple benefits from development.

Breckland Council Response

Officer Response

History of the site in the Local Plan The site, LP[025]007, known as Land to the west of Etling View, was identified as a reasonable alternative during the Emerging Site Options consultation. The site was then considered to be a proposed allocation through the Preferred Sites and Settlement Boundaries consultation. During these consultations no significant objections were raised by any of the statutory consultees. The sites inclusion within the Local Plan is supported and underpinned by a range of evidence including, but not exclusive to: the Historic Characterisation Study, the Sequential Test, the Water Cycle Study and the Infrastructure Delivery Plan. The site is now subject to a planning application (3PL/2015/1045/O), which is still under consideration. However, through this further detailed comments have been provided.

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130263	Full Name	J Moore	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4 - Is the plan positively prepared?	Yes
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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130260	Full Name	Mr M Wilkins	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

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Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130255	Full Name	Tom Brady	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
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Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

on a 2.3 hectare site, which would provide a density of approximately 26 dwellings per hectare; this would be in keeping with the neighbouring dwellings. Natural England have commented on the Pre-submission Publication and raised no objections. It is therefore considered that the impact upon the landscape and natural environment would not be significant. Through the application, the Public Rights of Way officer raised no objection as long as long as there is no adverse impact on either the registered common land to the west or Restricted Byway (RB32) along the northern boundary of the site. The allocation itself seeks to respect the northern boundary of the site by being set back from Shillings Lane. Historic Character During the Preferred sites and Settlement Boundaries consultation, Historic England commented that further work should be carried out to assess the impact of preferred and alternative sites upon the Historic Environment. The Historic Characterisation Study was carried out in early 2017 and in relation to site LP[025]007, concluded that: Development proposals must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken so as to inform an appropriate design response. In this case the established pattern of adjacent mixed development will be an additional factor in the formation of the proposal. On the planning application itself NCC Historic Environment Service commented that the proposal does not have any implications for the historic environment and that no recommendations for archaeological work would be made. Flood Risk The SA highlighted that the site is situated within an area of flood risk. However, this is only a very small extant to the north and north east. Through the Preferred Sites and Settlement Boundaries consultation the Lead Local Flood Authority recommended that conditions are attached to any planning permission granted under the current planning application. At this stage the Lead Local Flood Authority commented on the site specifically stating: We welcome that the site has been reduced in its extent from the original allocation and now does not include areas at risk of flooding from surface water. An assessment of the actual risk of flooding should be undertaken by any development on this site. Following the Preferred Sites and Settlement Boundaries Consultation the Sequential Test looked at all defined as preferred or alternative. As part of this the extent of surface water flooding on the site was not considered to be substantial, with only approximately 2% of the site subject to surface water flooding. Through the planning application the Environment Agency and the Lead Local Flood Authority have raised no objections to the proposed development subject to conditions. Wastewater treatment As part of the evidence base underpinning the Local Plan a Water Cycle Study was carried out. As part of this study it was highlighted that improvements may be required to the treatment capacity. The study recommends that all applications for development proposals in Dereham are accompanied by a pre-development enquiry with Anglian Water Services to demonstrate that sufficient capacity is available to treat wastewater from the proposals. This wording has been added to the key development considerations within the allocation wording. Conclusion In conclusion it is considered that the site represents a sustainable site on the edge of one of five Market Towns within the district. There are no constraints that would be considered severe enough to affect the designation of the site.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130252	Full Name	Jemma Shepherd	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	I had understood that Breckland Capita would be taking account of both the unprecedented number of written objections already made (400+) for a current proposal on this site and the numerous technical challenges presented by this site- It is clear that in recommending it they have done neither.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Land to the west of EtlingView (LPj025]007 The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock/grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate. Many of the 400+ local objectors to the current scheme

proposed for the land have outlined the visual, landscape and amenity importance of the land together with numerous issues around flooding, degradation of hedgerows loss of wildlife area and concerns from the Police regarding crime. The area is a cherished local asset due to its openness -the small field in particular due to its visual exposure from two popular footpaths including the medieval lane " Shillings Lane. The openness of the land is important in separating the built environment from the wildlife corridor and County Wildlife Site, such areas forming a physical breathing space away from the hustle and bustle of both the existing and proposed residential areas nearby. Moreover, the indicative layout illustrates a relatively high density, physically distinct development, wholly incongruous with the single existing dwelling adjoining the paddock field Rose Farm a comparatively low level dwelling with single storey appendages. The dwellings are likely to result in an unduly urbanised built form, introducing harmful change which would be incompatible with the quality of the landscape and setting of the settlement. The 2 fields are located in a highly sensitive, historic and valued landscape; bordered by common land and historic rights of way. The level and density of development proposed (60 dwellings) is not reflective of its context and would not enhance the character and appearance of the area, but would have a significant and harmful impact on the setting. A development of 60 dwellings cannot be accommodated successfully on the site without harming the landscape character and appearance of the area- The application is contrary to the NPPF and Core Strategy Policy CP11/DC16. See also paragraphs 17 & 58 of the NPPF Proposed dwellings on the southern boundary of the site would cause an unacceptable level of overlooking and harm to the amenities of Rose Farm on Field 2 and neighbouring dwellings on Field 1 as well as to users of the surrounding common land and public rights of way. Contrary to Core Strategy Policy DCO1. The fields traditionally flood- it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that because the adjoining Shillings Lane is lower that flooding of the lane once a rare occurrence now occurs frequently. Development as proposed will further increase this flooding. The likely impact on the risk of flooding elsewhere as a result of an increase in the volume of run off post development. Contrary to NPPF paragraphs 103 and 109 The NPPF makes it clear in Paragraph 8 that the three roles the planning system is required to perform in respect of sustainable development should not be taken in isolation because they are mutually dependant. For the above reasons the benefits of the housing provision proposed, taking into account the development plan and the policies of

Local Plan Pre-Submission - Comments and Response Schedule

the NPPF as a whole, are clearly outweighed by the significant harmful impacts of the development. This proposal does not meet the criteria to be regarded as sustainable development and should be refused. The NPPF identifies (in paras 6 and 17) sustainable development as the purpose of the planning system and conserving and enhancing the natural environment as a core planning principle. While specific policies on conserving and enhancing the natural environment are addressed in Section 11 of the NPPF, these should not be considered in isolation, as other natural environment related policies, and their consideration in plan- and decision-making, can be found throughout the document. The NPPF states (in para. 114) that local planning authorities should plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. The NPPF makes it clear (in para. 110) that Plans should allocate land with the least environmental or amenity value. Planning policies and decision-making should seek to protect and enhance natural and heritage assets appropriate to their significance. Policies and decisions should also encourage multiple benefits from development.

Breckland Council Response

Officer Response

History of the site in the Local Plan The site, LP[025]007, known as Land to the west of Etling View, was identified as a reasonable alternative during the Emerging Site Options consultation. The site was then considered to be a proposed allocation through the Preferred Sites and Settlement Boundaries consultation. During these consultations no significant objections were raised by any of the statutory consultees. The sites inclusion within the Local Plan is supported and underpinned by a range of evidence including, but not exclusive to: the Historic Characterisation Study, the Sequential Test, the Water Cycle Study and the Infrastructure Delivery Plan. The site is now subject to a planning application (3PL/2015/1045/O), which is still under consideration. However, through this further detailed comments have been provided.

Landscape & Natural Environment The site adjoins Neatherd Moor Common to the west, which is designated both as a County Wildlife Site and as Natural/Semi “natural green space. The Breckland District Settlement Fringe Landscape Assessment defines the character area as the Northall Green Open Arable Plateau, which is of Moderate-High sensitivity. The Assessment states that, as part of the general landscape management plan, Neatherd Moor must be conserved and enhanced through appropriate landscape management including grazing. The proposed allocation would extend the built up area of the town north and the appearance of the site would change from open farmland to a built up housing area. However, the scheme would largely be contained visually by the adjacent built environment to the south and east and the existing boundary hedging/trees and woodland to the north and west. From the County Wildlife Site, the Neatherd and Shillings Lane to the east, the proposal would be screened during part of the year by existing mature landscaping along Shillings Lane and the northern boundary of the site. When seen within the autumn, winter and early spring months the proposed buildings would be seen adjacent to the existing buildings to the east and would bring the built form closer to Shillings Lane and the Neatherd. The proposal would transform and erode the open aspect of the neighbouring dwellings immediately to the south of the site. However, this would be localised and could be mitigated through landscaping and additional planting. The policy wording of the allocation seeks the Retention and enhancement of native hedgerows and trees on the outer edge of the site boundary. This would seek to mitigate the impact. The proposal seeks at least 60 dwellings

Local Plan Pre-Submission - Comments and Response Schedule

on a 2.3 hectare site, which would provide a density of approximately 26 dwellings per hectare; this would be in keeping with the neighbouring dwellings. Natural England have commented on the Pre-submission Publication and raised no objections. It is therefore considered that the impact upon the landscape and natural environment would not be significant. Through the application, the Public Rights of Way officer raised no objection as long as long as there is no adverse impact on either the registered common land to the west or Restricted Byway (RB32) along the northern boundary of the site. The allocation itself seeks to respect the northern boundary of the site by being set back from Shillings Lane. Historic Character During the Preferred sites and Settlement Boundaries consultation, Historic England commented that further work should be carried out to assess the impact of preferred and alternative sites upon the Historic Environment. The Historic Characterisation Study was carried out in early 2017 and in relation to site LP[025]007, concluded that: Development proposals must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken so as to inform an appropriate design response. In this case the established pattern of adjacent mixed development will be an additional factor in the formation of the proposal. On the planning application itself NCC Historic Environment Service commented that the proposal does not have any implications for the historic environment and that no recommendations for archaeological work would be made. Flood Risk The SA highlighted that the site is situated within an area of flood risk. However, this is only a very small extant to the north and north east. Through the Preferred Sites and Settlement Boundaries consultation the Lead Local Flood Authority recommended that conditions are attached to any planning permission granted under the current planning application. At this stage the Lead Local Flood Authority commented on the site specifically stating: We welcome that the site has been reduced in its extent from the original allocation and now does not include areas at risk of flooding from surface water. An assessment of the actual risk of flooding should be undertaken by any development on this site. Following the Preferred Sites and Settlement Boundaries Consultation the Sequential Test looked at all defined as preferred or alternative. As part of this the extent of surface water flooding on the site was not considered to be substantial, with only approximately 2% of the site subject to surface water flooding. Through the planning application the Environment Agency and the Lead Local Flood Authority have raised no objections to the proposed development subject to conditions. Wastewater treatment As part of the evidence base underpinning the Local Plan a Water Cycle Study was carried out. As part of this study it was highlighted that improvements may be required to the treatment capacity. The study recommends that all applications for development proposals in Dereham are accompanied by a pre-development enquiry with Anglian Water Services to demonstrate that sufficient capacity is available to treat wastewater from the proposals. This wording has been added to the key development considerations within the allocation wording. Conclusion In conclusion it is considered that the site represents a sustainable site on the edge of one of five Market Towns within the district. There are no constraints that would be considered severe enough to affect the designation of the site.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1130940 Full Name Mr Paul Walmsley
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

LP 025 007 The proposed site is 2 separate fields. The smaller field is bordered by both the Little Neatherd, The Neatherd and the medieval Shillings Lane. Any development on this small field would both be clearly visible to those areas and spoil their amenity and character -the small gain in housing would be wholly disproportionate to this loss of amenity. Furthermore 50% of this field regularly floods (I leased this field for 20 years and am prepared to state this on oath) any development on this field would further increase flooding to adjoining areas- in particular the already flood prone Shillings Lane. There are numerous other issues which have come to light through the current and ongoing (25 months)Taylor

Local Plan Pre-Submission - Comments and Response Schedule

Wimpey application on this land- issues include' sewage,flooding,loss of hedges, loss of trees, loss of amenity, crime prevention, loss of habitat, incongruity with surroundings, effect on the adjoin County Wildlife site etc The changes suggested are NO building whatsoever on the smaller field, it should remain as a buffer both for humans and wildlife and low density low rise (Bungalows) on the larger field

Breckland Council Response

Officer Response

History of the site in the Local Plan The site, LP[025]007, known as Land to the west of Etling View, was identified as a reasonable alternative during the Emerging Site Options consultation. The site was then considered to be a proposed allocation through the Preferred Sites and Settlement Boundaries consultation. During these consultations no significant objections were raised by any of the statutory consultees. The sites inclusion within the Local Plan is supported and underpinned by a range of evidence including, but not exclusive to: the Historic Characterisation Study, the Sequential Test, the Water Cycle Study and the Infrastructure Delivery Plan. The site is now subject to a planning application (3PL/2015/1045/O), which is still under consideration. However, through this further detailed comments have been provided.

Landscape & Natural Environment The site adjoins Neatherd Moor Common to the west, which is designated both as a County Wildlife Site and as Natural/Semi "natural green space. The Breckland District Settlement Fringe Landscape Assessment defines the character area as the Northall Green Open Arable Plateau, which is of Moderate-High sensitivity. The Assessment states that, as part of the general landscape management plan, Neatherd Moor must be conserved and enhanced through appropriate landscape management including grazing. The proposed allocation would extend the built up area of the town north and the appearance of the site would change from open farmland to a built up housing area. However, the scheme would largely be contained visually by the adjacent built environment to the south and east and the existing boundary hedging/trees and woodland to the north and west. From the County Wildlife Site, the Neatherd and Shillings Lane to the east, the proposal would be screened during part of the year by existing mature landscaping along Shillings Lane and the northern boundary of the site. When seen within the autumn, winter and early spring months the proposed buildings would be seen adjacent to the existing buildings to the east and would bring the built form closer to Shillings Lane and the Neatherd. The proposal would transform and erode the open aspect of the neighbouring dwellings immediately to the south of the site. However, this would be localised and could be mitigated through landscaping and additional planting. The policy wording of the allocation seeks the Retention and enhancement of native hedgerows and trees on the outer edge of the site boundary. This would seek to mitigate the impact. The proposal seeks at least 60 dwellings on a 2.3 hectare site, which would provide a density of approximately 26 dwellings per hectare; this would be in keeping with the neighbouring dwellings. Natural England have commented on the Pre-submission Publication and raised no objections. It is therefore considered that the impact upon the landscape and natural environment would not be significant. Through the application, the Public Rights of Way officer raised no objection as long as long as there is no adverse impact on either the registered common land to the west or Restricted Byway (RB32) along the northern boundary of the site. The allocation itself seeks to respect the northern boundary of the site by being set back from Shillings Lane.

Historic Character During the Preferred sites and Settlement Boundaries consultation, Historic England commented that further work should be carried out to assess the impact of preferred and alternative sites upon the Historic Environment. The Historic Characterisation Study was carried out in early 2017 and in relation to site LP[025]007, concluded that: Development proposals must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken so as to inform an appropriate design response. In this case the established pattern of adjacent mixed development will be an additional factor in the formation of the proposal. On the planning application itself NCC Historic Environment Service commented that the proposal does not have any implications for the

Local Plan Pre-Submission - Comments and Response Schedule

historic environment and that no recommendations for archaeological work would be made. Flood Risk The SA highlighted that the site is situated within an area of flood risk. However, this is only a very small extent to the north and north east. Through the Preferred Sites and Settlement Boundaries consultation the Lead Local Flood Authority recommended that conditions are attached to any planning permission granted under the current planning application. At this stage the Lead Local Flood Authority commented on the site specifically stating: We welcome that the site has been reduced in its extent from the original allocation and now does not include areas at risk of flooding from surface water. An assessment of the actual risk of flooding should be undertaken by any development on this site. Following the Preferred Sites and Settlement Boundaries Consultation the Sequential Test looked at all defined as preferred or alternative. As part of this the extent of surface water flooding on the site was not considered to be substantial, with only approximately 2% of the site subject to surface water flooding. Through the planning application the Environment Agency and the Lead Local Flood Authority have raised no objections to the proposed development subject to conditions. Wastewater treatment As part of the evidence base underpinning the Local Plan a Water Cycle Study was carried out. As part of this study it was highlighted that improvements may be required to the treatment capacity. The study recommends that all applications for development proposals in Dereham are accompanied by a pre-development enquiry with Anglian Water Services to demonstrate that sufficient capacity is available to treat wastewater from the proposals. This wording has been added to the key development considerations within the allocation wording. Conclusion In conclusion it is considered that the site represents a sustainable site on the edge of one of five Market Towns within the district. There are no constraints that would be considered severe enough to affect the designation of the site.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1132181	Full Name	Mr Daniel Hewett	Organisation Details	Taylor Wimpey UK Ltd
Agent ID	1132169	Agent Name	Mr Graeme Free	Agent Organisation	DLP Planning Ltd

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why	A site plan was previously submitted at both the Issues and Options stage and the Preferred Options stage that clearly included entire site extending to 3.78has. This has not been picked up at the pre-submission (regulation 19 stage).		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The allocation site boundary excludes the northern part of the site that is within our client's ownership. This area is proposed to be used as public open space and surface water drainage attenuation as part of the planning application that is currently under considerations (LPA Ref: 3PL/2015/1045/O). In order to be found sound the allocation boundary should be increased to mirror the application site boundary. This area of land is required to deliver the housing, public open space and drainage attenuation associated with development on this site. Dereham

Housing Allocation 1 “ Land to the west of Etling View (LP[025]007) 2.8 We support the proposed allocation of land to the west of Etling View for residential development of approximately 60 dwellings as set out in Dereham Housing Allocation 1. 2.9 However, and notwithstanding our clients general support for Dereham Housing Allocation 1, as currently proposed the allocation site boundary excludes the northern part of the site. This area is proposed to be used as public open space and surface water drainage attenuation as part of the planning application that is currently under consideration (LPA Ref: 3PL/2015/1045/O). Therefore, as currently drafted this policy is considered to be unsound as it is not positively prepared or justified. 2.10 We would therefore request that the allocation boundary is increased to mirror the application site boundary. This area of land is required to deliver the housing required by the draft allocation policy and also that proposed by the pending application. Therefore, it should be included within the allocation boundary in order for this policy to be considered sound . 2.11 Land to the west of Etling View is a sustainable growth option that will deliver new housing on a site adjacent to an existing committed development site that is currently under construction, and with good access to the existing road network and key services and facilities. It is therefore considered to be justified as an allocation. 2.12 The site is located on the north-eastern edge of Dereham and is located to the west of a committed development area known as Etling View and which is now under construction. The site has mature hedges and tree belts to the northern and western boundaries and to the south are the gardens of existing residential properties located on Briar Close. As such, the site is very well contained. 2.13 The site is not subject to any significant constraints that would prevent development coming forward, and thus its allocation for residential development is fully supported. 2.14 Where possible existing native hedgerows and trees on the outer edge of the site boundary would be retained by any development proposal. 2.15 All the main utilities are available in the surrounding residential streets and can be connected to the development on the site. 2.16 The size of the site would allow for a range of house types to be delivered, including affordable homes, in accordance with prevailing policy. 2.17 The principal access to the site could be achieved through Etling View as required by the emerging policy. A pedestrian and cycle route could also be provided through the landscaped areas of the site away from the main vehicle routes. 2.18 It is anticipated that our client would make provision on site for open space requirements and local areas of play in any redevelopment scheme in line with the requirements of this policy. 2.19 The

Local Plan Pre-Submission - Comments and Response Schedule

site is available now, suitable for development and is also deliverable. It would also make a material contribution to the Councils housing land supply. An application (Ref: 3PL/2015/1045/O) is currently under consideration by Breckland DC, having been submitted in August 2015. All technical matters in respect of this application have been resolved and it is likely to be reported to the Councils Planning Committee, well before the outcome of the Local Plan examination process, with an officer recommendation for approval.

2.20 The proposed allocation of our clients land would enable the delivery of a deliverable and developable site in Dereham, which would enable a greater choice of housing in a sustainable location, which would help to boost housing delivery, particularly in the early years of the plan.

2.21 Based on the policy as worded, the Dereham Housing Allocation 1 is considered to be unsound. In order to be found sound the allocation boundary should be increased to mirror the application site boundary. The site could be delivered promptly by our client in compliance with the aspirations expressed in this policy.

2.22 My client is a nationally recognised housebuilder, who following the allocation of the land and grant of planning permission, will be seeking to build out the site without delay. In this regard, the policy and allocation of land for development is highly deliverable and therefore effective for the purposes of paragraph 182.

2.20 The proposed allocation of our clients land would enable the delivery of a deliverable and developable site in Dereham, which would enable a greater choice of housing in a sustainable location, which would help to boost housing delivery, particularly in the early years of the plan.

2.21 Based on the policy as worded, the Dereham Housing Allocation 1 is considered to be unsound. In order to be found sound the allocation boundary should be increased to mirror the application site boundary. The site could be delivered promptly by our client in compliance with the aspirations expressed in this policy.

2.22 My client is a nationally recognised house builder, who following the allocation of the land and grant of planning permission, will be seeking to build out the site without delay. In this regard, the policy and allocation of land for development is highly deliverable and therefore effective for the purposes of paragraph 182.

Breckland Council Response

Officer Response

Support from the developer for the allocation of the site is noted. The allocation has been deliberately drawn away from Shillings Lane. As noted within the reasoned justification this is a historic lane connecting the Neatherd and Shillings Lane. This is also an important green infrastructure route as reflected within the Dereham Green Infrastructure Study and the allocation seeks to prevent encroachment on this route. The allocation follows the northerly extent of the eastern site which was allocated through the Site Specific Policies and Proposals DPD, which was also developed by Taylor Wimpey.

Local Plan Pre-Submission - Comments and Response Schedule

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1131017	Full Name	M Neave	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
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9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	I had understood that Breckland Capita would be taking account of both the unprecedented number of written objections already made (400+) for a current proposal on this site and the numerous technical challenges presented by this site- It is clear that in recommending it they have done neither.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Land to the west of EtlingView (LP[025]007 The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock/grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate. Many of the 400+ local objectors to the current scheme

proposed for the land have outlined the visual, landscape and amenity importance of the land together with numerous issues around flooding, degradation of hedgerows loss of wildlife area and concerns from the Police regarding crime. The area is a cherished local asset due to its openness -the small field in particular due to its visual exposure from two popular footpaths including the medieval lane " Shillings Lane. The openness of the land is important in separating the built environment from the wildlife corridor and County Wildlife Site, such areas forming a physical breathing space away from the hustle and bustle of both the existing and proposed residential areas nearby. Moreover, the indicative layout illustrates a relatively high density, physically distinct development, wholly incongruous with the single existing dwelling adjoining the paddock field Rose Farm a comparatively low level dwelling with single storey appendages. The dwellings are likely to result in an unduly urbanised built form, introducing harmful change which would be incompatible with the quality of the landscape and setting of the settlement. The 2 fields are located in a highly sensitive, historic and valued landscape; bordered by common land and historic rights of way. The level and density of development proposed (60 dwellings) is not reflective of its context and would not enhance the character and appearance of the area, but would have a significant and harmful impact on the setting. A development of 60 dwellings cannot be accommodated successfully on the site without harming the landscape character and appearance of the area- The application is contrary to the NPPF and Core Strategy Policy CP11/DC16. See also paragraphs 17 & 58 of the NPPF Proposed dwellings on the southern boundary of the site would cause an unacceptable level of overlooking and harm to the amenities of Rose Farm on Field 2 and neighbouring dwellings on Field 1 as well as to users of the surrounding common land and public rights of way. Contrary to Core Strategy Policy DCO1. The fields traditionally flood- it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that because the adjoining Shillings Lane is lower that flooding of the lane once a rare occurrence now occurs frequently. Development as proposed will further increase this flooding. The likely impact on the risk of flooding elsewhere as a result of an increase in the volume of run off post development. Contrary to NPPF paragraphs 103 and 109 The NPPF makes it clear in Paragraph 8 that the three roles the planning system is required to perform in respect of sustainable development should not be taken in isolation because they are mutually dependant. For the above reasons the benefits of the housing provision proposed, taking into account the development plan and the policies of

Local Plan Pre-Submission - Comments and Response Schedule

the NPPF as a whole, are clearly outweighed by the significant harmful impacts of the development. This proposal does not meet the criteria to be regarded as sustainable development and should be refused. The NPPF identifies (in paras 6 and 17) sustainable development as the purpose of the planning system and conserving and enhancing the natural environment as a core planning principle. While specific policies on conserving and enhancing the natural environment are addressed in Section 11 of the NPPF, these should not be considered in isolation, as other natural environment related policies, and their consideration in plan- and decision-making, can be found throughout the document. The NPPF states (in para. 114) that local planning authorities should plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. The NPPF makes it clear (in para. 110) that Plans should allocate land with the least environmental or amenity value. Planning policies and decision-making should seek to protect and enhance natural and heritage assets appropriate to their significance. Policies and decisions should also encourage multiple benefits from development.

Breckland Council Response

Officer Response

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Local Plan Pre-Submission - Comments and Response Schedule

on a 2.3 hectare site, which would provide a density of approximately 26 dwellings per hectare; this would be in keeping with the neighbouring dwellings. Natural England have commented on the Pre-submission Publication and raised no objections. It is therefore considered that the impact upon the landscape and natural environment would not be significant. Through the application, the Public Rights of Way officer raised no objection as long as long as there is no adverse impact on either the registered common land to the west or Restricted Byway (RB32) along the northern boundary of the site. The allocation itself seeks to respect the northern boundary of the site by being set back from Shillings Lane.

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Conclusion In conclusion it is considered that the site represents a sustainable site on the edge of one of five Market Towns within the district. There are no constraints that would be considered severe enough to affect the designation of the site.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129327	Full Name	Jarl Barnes	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1131040	Full Name	Lisa Boyle	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

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Potential amendment to the plan

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Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1131046 Full Name Mrs Jen Gatton
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

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Flood Risk The SA highlighted that the site is situated within an area of flood risk. However, this is only a very small extent to the north and north east. Through the Preferred Sites and Settlement Boundaries consultation the Lead Local Flood Authority recommended that conditions are attached to any planning permission granted under the current planning application. At this stage the Lead Local Flood Authority commented on the site specifically stating: We welcome that the site has been reduced in its extent from the original allocation and now does not include areas at risk of flooding from surface water. An assessment of the actual risk of flooding should be undertaken by any development on this site.

Following the Preferred Sites and Settlement Boundaries Consultation the Sequential Test looked at all defined as preferred or alternative. As part of this the extent of surface water flooding on the site was not considered to be substantial, with only approximately 2% of the site subject to surface water flooding. Through the planning application the Environment Agency and the Lead Local Flood Authority have raised no objections to the proposed development subject to conditions.

Wastewater treatment As part of the evidence base underpinning the Local Plan a Water Cycle Study was carried out. As part of this study it was highlighted that improvements may be required to the treatment capacity. The study recommends that all applications for development proposals in Dereham are accompanied by a pre-development enquiry with Anglian Water Services to demonstrate that sufficient capacity is available to treat wastewater from the proposals. This wording has been added to the key development considerations within the allocation wording.

Conclusion In conclusion it is considered that the site represents a sustainable site on the edge of one of five Market Towns within the district. There are no constraints that would be considered severe enough to affect the designation of the site.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1131059 Full Name Mr S Yarham
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	I had understood that Breckland Capita would be taking account of both the unprecedented number of written objections already made (400+) for a current proposal on this site and the numerous technical challenges presented by this site- It is clear that in recommending it they have done neither.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

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Land to the west of EtlingView (LP[025]007 The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock/grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate. Many of the 400+ local objectors to the current scheme

proposed for the land have outlined the visual, landscape and amenity importance of the land together with numerous issues around flooding, degradation of hedgerows loss of wildlife area and concerns from the Police regarding crime. The area is a cherished local asset due to its openness -the small field in particular due to its visual exposure from two popular footpaths including the medieval lane " Shillings Lane. The openness of the land is important in separating the built environment from the wildlife corridor and County Wildlife Site, such areas forming a physical breathing space away from the hustle and bustle of both the existing and proposed residential areas nearby. Moreover, the indicative layout illustrates a relatively high density, physically distinct development, wholly incongruous with the single existing dwelling adjoining the paddock field Rose Farm a comparatively low level dwelling with single storey appendages. The dwellings are likely to result in an unduly urbanised built form, introducing harmful change which would be incompatible with the quality of the landscape and setting of the settlement. The 2 fields are located in a highly sensitive, historic and valued landscape; bordered by common land and historic rights of way. The level and density of development proposed (60 dwellings) is not reflective of its context and would not enhance the character and appearance of the area, but would have a significant and harmful impact on the setting. A development of 60 dwellings cannot be accommodated successfully on the site without harming the landscape character and appearance of the area- The application is contrary to the NPPF and Core Strategy Policy CP11/DC16. See also paragraphs 17 & 58 of the NPPF Proposed dwellings on the southern boundary of the site would cause an unacceptable level of overlooking and harm to the amenities of Rose Farm on Field 2 and neighbouring dwellings on Field 1 as well as to users of the surrounding common land and public rights of way. Contrary to Core Strategy Policy DCO1. The fields traditionally flood- it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that because the adjoining Shillings Lane is lower that flooding of the lane once a rare occurrence now occurs frequently. Development as proposed will further increase this flooding. The likely impact on the risk of flooding elsewhere as a result of an increase in the volume of run off post development. Contrary to NPPF paragraphs 103 and 109 The NPPF makes it clear in Paragraph 8 that the three roles the planning system is required to perform in respect of sustainable development should not be taken in isolation because they are mutually dependant. For the above reasons the benefits of the housing provision proposed, taking into account the development plan and the policies of

Local Plan Pre-Submission - Comments and Response Schedule

the NPPF as a whole, are clearly outweighed by the significant harmful impacts of the development. This proposal does not meet the criteria to be regarded as sustainable development and should be refused. The NPPF identifies (in paras 6 and 17) sustainable development as the purpose of the planning system and conserving and enhancing the natural environment as a core planning principle. While specific policies on conserving and enhancing the natural environment are addressed in Section 11 of the NPPF, these should not be considered in isolation, as other natural environment related policies, and their consideration in plan- and decision-making, can be found throughout the document. The NPPF states (in para. 114) that local planning authorities should plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. The NPPF makes it clear (in para. 110) that Plans should allocate land with the least environmental or amenity value. Planning policies and decision-making should seek to protect and enhance natural and heritage assets appropriate to their significance. Policies and decisions should also encourage multiple benefits from development.

Breckland Council Response

Officer Response

History of the site in the Local Plan The site, LP[025]007, known as Land to the west of Etling View, was identified as a reasonable alternative during the Emerging Site Options consultation. The site was then considered to be a proposed allocation through the Preferred Sites and Settlement Boundaries consultation. During these consultations no significant objections were raised by any of the statutory consultees. The sites inclusion within the Local Plan is supported and underpinned by a range of evidence including, but not exclusive to: the Historic Characterisation Study, the Sequential Test, the Water Cycle Study and the Infrastructure Delivery Plan. The site is now subject to a planning application (3PL/2015/1045/O), which is still under consideration. However, through this further detailed comments have been provided.

Landscape & Natural Environment The site adjoins Neatherd Moor Common to the west, which is designated both as a County Wildlife Site and as Natural/Semi “natural green space. The Breckland District Settlement Fringe Landscape Assessment defines the character area as the Northall Green Open Arable Plateau, which is of Moderate-High sensitivity. The Assessment states that, as part of the general landscape management plan, Neatherd Moor must be conserved and enhanced through appropriate landscape management including grazing. The proposed allocation would extend the built up area of the town north and the appearance of the site would change from open farmland to a built up housing area. However, the scheme would largely be contained visually by the adjacent built environment to the south and east and the existing boundary hedging/trees and woodland to the north and west. From the County Wildlife Site, the Neatherd and Shillings Lane to the east, the proposal would be screened during part of the year by existing mature landscaping along Shillings Lane and the northern boundary of the site. When seen within the autumn, winter and early spring months the proposed buildings would be seen adjacent to the existing buildings to the east and would bring the built form closer to Shillings Lane and the Neatherd. The proposal would transform and erode the open aspect of the neighbouring dwellings immediately to the south of the site. However, this would be localised and could be mitigated through landscaping and additional planting. The policy wording of the allocation seeks the Retention and enhancement of native hedgerows and trees on the outer edge of the site boundary. This would seek to mitigate the impact. The proposal seeks at least 60 dwellings

Local Plan Pre-Submission - Comments and Response Schedule

on a 2.3 hectare site, which would provide a density of approximately 26 dwellings per hectare; this would be in keeping with the neighbouring dwellings. Natural England have commented on the Pre-submission Publication and raised no objections. It is therefore considered that the impact upon the landscape and natural environment would not be significant. Through the application, the Public Rights of Way officer raised no objection as long as long as there is no adverse impact on either the registered common land to the west or Restricted Byway (RB32) along the northern boundary of the site. The allocation itself seeks to respect the northern boundary of the site by being set back from Shillings Lane. Historic Character During the Preferred sites and Settlement Boundaries consultation, Historic England commented that further work should be carried out to assess the impact of preferred and alternative sites upon the Historic Environment. The Historic Characterisation Study was carried out in early 2017 and in relation to site LP[025]007, concluded that: Development proposals must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken so as to inform an appropriate design response. In this case the established pattern of adjacent mixed development will be an additional factor in the formation of the proposal. On the planning application itself NCC Historic Environment Service commented that the proposal does not have any implications for the historic environment and that no recommendations for archaeological work would be made. Flood Risk The SA highlighted that the site is situated within an area of flood risk. However, this is only a very small extant to the north and north east. Through the Preferred Sites and Settlement Boundaries consultation the Lead Local Flood Authority recommended that conditions are attached to any planning permission granted under the current planning application. At this stage the Lead Local Flood Authority commented on the site specifically stating: We welcome that the site has been reduced in its extent from the original allocation and now does not include areas at risk of flooding from surface water. An assessment of the actual risk of flooding should be undertaken by any development on this site. Following the Preferred Sites and Settlement Boundaries Consultation the Sequential Test looked at all defined as preferred or alternative. As part of this the extent of surface water flooding on the site was not considered to be substantial, with only approximately 2% of the site subject to surface water flooding. Through the planning application the Environment Agency and the Lead Local Flood Authority have raised no objections to the proposed development subject to conditions. Wastewater treatment As part of the evidence base underpinning the Local Plan a Water Cycle Study was carried out. As part of this study it was highlighted that improvements may be required to the treatment capacity. The study recommends that all applications for development proposals in Dereham are accompanied by a pre-development enquiry with Anglian Water Services to demonstrate that sufficient capacity is available to treat wastewater from the proposals. This wording has been added to the key development considerations within the allocation wording. Conclusion In conclusion it is considered that the site represents a sustainable site on the edge of one of five Market Towns within the district. There are no constraints that would be considered severe enough to affect the designation of the site.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130058	Full Name	Ian Hollings	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	I had understood that Breckland Capita would be taking account of both the unprecedented number of written objections already made (400+) for a current proposal on this site and the numerous technical challenges presented by this site- It is clear that in recommending it they have done neither!!!!!!		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock/grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate. Many of the 400+ local objectors to the current scheme proposed for the land have outlined the visual,

Local Plan Pre-Submission - Comments and Response Schedule

landscape and amenity importance of the land together with numerous issues around flooding, degradation of hedgerows loss of wildlife area and concerns from the Police regarding crime.

The area is a cherished local asset due to its openness -the small field in particular due to its visual exposure from two popular footpaths including the medieval lane — Shillings Lane. The openness of the land is important in separating the built environment from the wildlife corridor and County Wildlife Site, such areas forming a “physical breathing” space away from the hustle and bustle of both the existing and proposed residential areas nearby.

Moreover, the indicative layout illustrates a relatively high density, physically distinct development, wholly incongruous with the single existing dwelling adjoining the paddock field Rose Farm a comparatively low level dwelling with single storey appendages.

The dwellings are likely to result in an unduly urbanised built form, introducing harmful change which would be incompatible with the quality of the landscape and setting of the settlement.

The 2 fields are located in a highly sensitive, historic and valued landscape; bordered by common land and historic rights of way. The level and density of development proposed (60 dwellings) is not reflective of its context and would not enhance the character and appearance of the area, but would have a significant and harmful impact on the setting. A development of 60 dwellings cannot be accommodated successfully on the site without harming the landscape character and appearance of the area- The application is contrary to the NPPF and Core Strategy Policy CP11/DC16. See also paragraphs 17 & 58 of the NPPF

Proposed dwellings on the southern boundary of the site would cause an unacceptable level of overlooking and harm to the amenities of Rose Farm on Field 2 and neighbouring dwellings on Field 1 as well as to users of the surrounding common land and public rights of way. Contrary to Core Strategy Policy DCO1.

The fields traditionally flood- it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that

Local Plan Pre-Submission - Comments and Response Schedule

because the adjoining Shillings Lane is lower than flooding of the lane once a rare occurrence now occurs frequently. Development as proposed will further increase this flooding. The likely impact on the risk of flooding elsewhere as a result of an increase in the volume of run off post development. Contrary to NPPF paragraphs 103 and 109

The NPPF makes it clear in Paragraph 8 that the three roles the planning system is required to perform in respect of sustainable development should not be taken in isolation because they are mutually dependant. For the above reasons the benefits of the housing provision proposed, taking into account the development plan and the policies of the NPPF as a whole, are clearly outweighed by the significant harmful impacts of the development. This proposal does not meet the criteria to be regarded as sustainable development and should be refused.

The NPPF identifies (in paras 6 and 17) sustainable development as the purpose of the planning system and conserving and enhancing the natural environment as a 'core planning principle'. While specific policies on conserving and enhancing the natural environment are addressed in Section 11 of the NPPF, these should not be considered in isolation, as other natural environment related policies, and their consideration in plan- and decision-making, can be found throughout the document.

The NPPF states (in para. 114) that local planning authorities should 'plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure'.

The NPPF makes it clear (in para. 110) that 'Plans should allocate land with the least environmental or amenity value'.

Planning policies and decision-making should seek to protect and enhance natural and heritage assets appropriate to their significance. Policies and decisions should also encourage multiple benefits from development.

Breckland Council Response

Officer Response

History of the site in the Local Plan The site, LP[025]007, known as Land to the west of Etling View, was identified as a reasonable alternative during the Emerging Site Options consultation. The site was then considered to be a proposed allocation through the Preferred Sites and Settlement Boundaries consultation. During these consultations no significant objections were raised by any of the statutory consultees. The sites inclusion within the Local Plan is supported and underpinned by a range of evidence including, but not exclusive to: the Historic

Local Plan Pre-Submission - Comments and Response Schedule

Characterisation Study, the Sequential Test, the Water Cycle Study and the Infrastructure Delivery Plan. The site is now subject to a planning application (3PL/2015/1045/O), which is still under consideration. However, through this further detailed comments have been provided.

Landscape & Natural Environment The site adjoins Neatherd Moor Common to the west, which is designated both as a County Wildlife Site and as Natural/Semi "natural green space. The Breckland District Settlement Fringe Landscape Assessment defines the character area as the Northall Green Open Arable Plateau, which is of Moderate-High sensitivity. The Assessment states that, as part of the general landscape management plan, Neatherd Moor must be conserved and enhanced through appropriate landscape management including grazing. The proposed allocation would extend the built up area of the town north and the appearance of the site would change from open farmland to a built up housing area. However, the scheme would largely be contained visually by the adjacent built environment to the south and east and the existing boundary hedging/trees and woodland to the north and west. From the County Wildlife Site, the Neatherd and Shillings Lane to the east, the proposal would be screened during part of the year by existing mature landscaping along Shillings Lane and the northern boundary of the site. When seen within the autumn, winter and early spring months the proposed buildings would be seen adjacent to the existing buildings to the east and would bring the built form closer to Shillings Lane and the Neatherd. The proposal would transform and erode the open aspect of the neighbouring dwellings immediately to the south of the site. However, this would be localised and could be mitigated through landscaping and additional planting. The policy wording of the allocation seeks the Retention and enhancement of native hedgerows and trees on the outer edge of the site boundary. This would seek to mitigate the impact. The proposal seeks at least 60 dwellings on a 2.3 hectare site, which would provide a density of approximately 26 dwellings per hectare; this would be in keeping with the neighbouring dwellings. Natural England have commented on the Pre-submission Publication and raised no objections. It is therefore considered that the impact upon the landscape and natural environment would not be significant. Through the application, the Public Rights of Way officer raised no objection as long as long as there is no adverse impact on either the registered common land to the west or Restricted Byway (RB32) along the northern boundary of the site. The allocation itself seeks to respect the northern boundary of the site by being set back from Shillings Lane.

Historic Character During the Preferred sites and Settlement Boundaries consultation, Historic England commented that further work should be carried out to assess the impact of preferred and alternative sites upon the Historic Environment. The Historic Characterisation Study was carried out in early 2017 and in relation to site LP[025]007, concluded that: Development proposals must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken so as to inform an appropriate design response. In this case the established pattern of adjacent mixed development will be an additional factor in the formation of the proposal. On the planning application itself NCC Historic Environment Service commented that the proposal does not have any implications for the historic environment and that no recommendations for archaeological work would be made.

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Wastewater treatment As part of the evidence base underpinning the Local Plan a Water Cycle

Local Plan Pre-Submission - Comments and Response Schedule

Study was carried out. As part of this study it was highlighted that improvements may be required to the treatment capacity. The study recommends that all applications for development proposals in Dereham are accompanied by a pre-development enquiry with Anglian Water Services to demonstrate that sufficient capacity is available to treat wastewater from the proposals. This wording has been added to the key development considerations within the allocation wording. Conclusion In conclusion it is considered that the site represents a sustainable site on the edge of one of five Market Towns within the district. There are no constraints that would be considered severe enough to affect the designation of the site.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130335	Full Name	Ian Dent	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
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Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130020	Full Name	Matthew Pendercrest	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
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Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130035	Full Name	Demi Fossitt	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1130041 Full Name Mrs Lesley Manns
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

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Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1130046 Full Name Caroline Green
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130049	Full Name	Leslie Alan Thompson	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129725	Full Name	Kelly Wing	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129738	Full Name	Albert Harris	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

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History of the site in the Local Plan The site, LP[025]007, known as Land to the west of Etling View, was identified as a reasonable alternative during the Emerging Site Options consultation. The site was then considered to be a proposed allocation through the Preferred Sites and Settlement Boundaries consultation. During these consultations no significant objections were raised by any of the statutory consultees. The sites inclusion within the Local Plan is supported and underpinned by a range of evidence including, but not exclusive to: the Historic Characterisation Study, the Sequential Test, the Water Cycle Study and the Infrastructure Delivery Plan. The site is now subject to a planning application (3PL/2015/1045/O), which is still under consideration. However, through this further detailed comments have been provided.

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Local Plan Pre-Submission - Comments and Response Schedule

on a 2.3 hectare site, which would provide a density of approximately 26 dwellings per hectare; this would be in keeping with the neighbouring dwellings. Natural England have commented on the Pre-submission Publication and raised no objections. It is therefore considered that the impact upon the landscape and natural environment would not be significant. Through the application, the Public Rights of Way officer raised no objection as long as long as there is no adverse impact on either the registered common land to the west or Restricted Byway (RB32) along the northern boundary of the site. The allocation itself seeks to respect the northern boundary of the site by being set back from Shillings Lane. Historic Character During the Preferred sites and Settlement Boundaries consultation, Historic England commented that further work should be carried out to assess the impact of preferred and alternative sites upon the Historic Environment. The Historic Characterisation Study was carried out in early 2017 and in relation to site LP[025]007, concluded that: Development proposals must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken so as to inform an appropriate design response. In this case the established pattern of adjacent mixed development will be an additional factor in the formation of the proposal. On the planning application itself NCC Historic Environment Service commented that the proposal does not have any implications for the historic environment and that no recommendations for archaeological work would be made. Flood Risk The SA highlighted that the site is situated within an area of flood risk. However, this is only a very small extant to the north and north east. Through the Preferred Sites and Settlement Boundaries consultation the Lead Local Flood Authority recommended that conditions are attached to any planning permission granted under the current planning application. At this stage the Lead Local Flood Authority commented on the site specifically stating: We welcome that the site has been reduced in its extent from the original allocation and now does not include areas at risk of flooding from surface water. An assessment of the actual risk of flooding should be undertaken by any development on this site. Following the Preferred Sites and Settlement Boundaries Consultation the Sequential Test looked at all defined as preferred or alternative. As part of this the extent of surface water flooding on the site was not considered to be substantial, with only approximately 2% of the site subject to surface water flooding. Through the planning application the Environment Agency and the Lead Local Flood Authority have raised no objections to the proposed development subject to conditions. Wastewater treatment As part of the evidence base underpinning the Local Plan a Water Cycle Study was carried out. As part of this study it was highlighted that improvements may be required to the treatment capacity. The study recommends that all applications for development proposals in Dereham are accompanied by a pre-development enquiry with Anglian Water Services to demonstrate that sufficient capacity is available to treat wastewater from the proposals. This wording has been added to the key development considerations within the allocation wording. Conclusion In conclusion it is considered that the site represents a sustainable site on the edge of one of five Market Towns within the district. There are no constraints that would be considered severe enough to affect the designation of the site.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130248	Full Name	T Webster	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1129734 Full Name Mr R Kingdom
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

Reasons for Objection

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Potential amendment to the plan

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Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130300	Full Name	Kenneth Powles	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

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Flood Risk The SA highlighted that the site is situated within an area of flood risk. However, this is only a very small extent to the north and north east. Through the Preferred Sites and Settlement Boundaries consultation the Lead Local Flood Authority recommended that conditions are attached to any planning permission granted under the current planning application. At this stage the Lead Local Flood Authority commented on the site specifically stating: We welcome that the site has been reduced in its extent from the original allocation and now does not include areas at risk of flooding from surface water. An assessment of the actual risk of flooding should be undertaken by any development on this site.

Following the Preferred Sites and Settlement Boundaries Consultation the Sequential Test looked at all defined as preferred or alternative. As part of this the extent of surface water flooding on the site was not considered to be substantial, with only approximately 2% of the site subject to surface water flooding. Through the planning application the Environment Agency and the Lead Local Flood Authority have raised no objections to the proposed development subject to conditions.

Wastewater treatment As part of the evidence base underpinning the Local Plan a Water Cycle Study was carried out. As part of this study it was highlighted that improvements may be required to the treatment capacity. The study recommends that all applications for development proposals in Dereham are accompanied by a pre-development enquiry with Anglian Water Services to demonstrate that sufficient capacity is available to treat wastewater from the proposals. This wording has been added to the key development considerations within the allocation wording.

Conclusion In conclusion it is considered that the site represents a sustainable site on the edge of one of five Market Towns within the district. There are no constraints that would be considered severe enough to affect the designation of the site.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1130065 Full Name Craig La Mont
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
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Representation

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proposed for the land have outlined the visual, landscape and amenity importance of the land together with numerous issues around flooding, degradation of hedgerows loss of wildlife area and concerns from the Police regarding crime. The area is a cherished local asset due to its openness -the small field in particular due to its visual exposure from two popular footpaths including the medieval lane " Shillings Lane. The openness of the land is important in separating the built environment from the wildlife corridor and County Wildlife Site, such areas forming a physical breathing space away from the hustle and bustle of both the existing and proposed residential areas nearby. Moreover, the indicative layout illustrates a relatively high density, physically distinct development, wholly incongruous with the single existing dwelling adjoining the paddock field Rose Farm a comparatively low level dwelling with single storey appendages. The dwellings are likely to result in an unduly urbanised built form, introducing harmful change which would be incompatible with the quality of the landscape and setting of the settlement. The 2 fields are located in a highly sensitive, historic and valued landscape; bordered by common land and historic rights of way. The level and density of development proposed (60 dwellings) is not reflective of its context and would not enhance the character and appearance of the area, but would have a significant and harmful impact on the setting. A development of 60 dwellings cannot be accommodated successfully on the site without harming the landscape character and appearance of the area- The application is contrary to the NPPF and Core Strategy Policy CP11/DC16. See also paragraphs 17 & 58 of the NPPF Proposed dwellings on the southern boundary of the site would cause an unacceptable level of overlooking and harm to the amenities of Rose Farm on Field 2 and neighbouring dwellings on Field 1 as well as to users of the surrounding common land and public rights of way. Contrary to Core Strategy Policy DCO1. The fields traditionally flood- it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that because the adjoining Shillings Lane is lower that flooding of the lane once a rare occurrence now occurs frequently. Development as proposed will further increase this flooding. The likely impact on the risk of flooding elsewhere as a result of an increase in the volume of run off post development. Contrary to NPPF paragraphs 103 and 109 The NPPF makes it clear in Paragraph 8 that the three roles the planning system is required to perform in respect of sustainable development should not be taken in isolation because they are mutually dependant. For the above reasons the benefits of the housing provision proposed, taking into account the development plan and the policies of

Local Plan Pre-Submission - Comments and Response Schedule

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Breckland Council Response

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130069	Full Name	Alison Baker	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

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Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130241	Full Name	Brian Ottis	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
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Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130028	Full Name	Danielle O'Connell	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1130056 Full Name Susan Hollings
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

Reasons for Objection

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130398	Full Name	Dawn Mastin	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

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Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1130636 Full Name Vincent Potter
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

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Breckland Council Response

Officer Response

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Landscape & Natural Environment The site adjoins Neatherd Moor Common to the west, which is designated both as a County Wildlife Site and as Natural/Semi “natural green space. The Breckland District Settlement Fringe Landscape Assessment defines the character area as the Northall Green Open Arable Plateau, which is of Moderate-High sensitivity. The Assessment states that, as part of the general landscape management plan, Neatherd Moor must be conserved and enhanced through appropriate landscape management including grazing. The proposed allocation would extend the built up area of the town north and the appearance of the site would change from open farmland to a built up housing area. However, the scheme would largely be contained visually by the adjacent built environment to the south and east and the existing boundary hedging/trees and woodland to the north and west. From the County Wildlife Site, the Neatherd and Shillings Lane to the east, the proposal would be screened during part of the year by existing mature landscaping along Shillings Lane and the northern boundary of the site. When seen within the autumn, winter and early spring months the proposed buildings would be seen adjacent to the existing buildings to the east and would bring the built form closer to Shillings Lane and the Neatherd. The proposal would transform and erode the open aspect of the neighbouring dwellings immediately to the south of the site. However, this would be localised and could be mitigated through landscaping and additional planting. The policy wording of the allocation seeks the Retention and enhancement of native hedgerows and trees on the outer edge of the site boundary. This would seek to mitigate the impact. The proposal seeks at least 60 dwellings

Local Plan Pre-Submission - Comments and Response Schedule

on a 2.3 hectare site, which would provide a density of approximately 26 dwellings per hectare; this would be in keeping with the neighbouring dwellings. Natural England have commented on the Pre-submission Publication and raised no objections. It is therefore considered that the impact upon the landscape and natural environment would not be significant. Through the application, the Public Rights of Way officer raised no objection as long as there is no adverse impact on either the registered common land to the west or Restricted Byway (RB32) along the northern boundary of the site. The allocation itself seeks to respect the northern boundary of the site by being set back from Shillings Lane.

Historic Character During the Preferred sites and Settlement Boundaries consultation, Historic England commented that further work should be carried out to assess the impact of preferred and alternative sites upon the Historic Environment. The Historic Characterisation Study was carried out in early 2017 and in relation to site LP[025]007, concluded that: Development proposals must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken so as to inform an appropriate design response. In this case the established pattern of adjacent mixed development will be an additional factor in the formation of the proposal.

On the planning application itself NCC Historic Environment Service commented that the proposal does not have any implications for the historic environment and that no recommendations for archaeological work would be made.

Flood Risk The SA highlighted that the site is situated within an area of flood risk. However, this is only a very small extent to the north and north east. Through the Preferred Sites and Settlement Boundaries consultation the Lead Local Flood Authority recommended that conditions are attached to any planning permission granted under the current planning application. At this stage the Lead Local Flood Authority commented on the site specifically stating: We welcome that the site has been reduced in its extent from the original allocation and now does not include areas at risk of flooding from surface water. An assessment of the actual risk of flooding should be undertaken by any development on this site.

Following the Preferred Sites and Settlement Boundaries Consultation the Sequential Test looked at all defined as preferred or alternative. As part of this the extent of surface water flooding on the site was not considered to be substantial, with only approximately 2% of the site subject to surface water flooding. Through the planning application the Environment Agency and the Lead Local Flood Authority have raised no objections to the proposed development subject to conditions.

Wastewater treatment As part of the evidence base underpinning the Local Plan a Water Cycle Study was carried out. As part of this study it was highlighted that improvements may be required to the treatment capacity. The study recommends that all applications for development proposals in Dereham are accompanied by a pre-development enquiry with Anglian Water Services to demonstrate that sufficient capacity is available to treat wastewater from the proposals. This wording has been added to the key development considerations within the allocation wording.

Conclusion In conclusion it is considered that the site represents a sustainable site on the edge of one of five Market Towns within the district. There are no constraints that would be considered severe enough to affect the designation of the site.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130605	Full Name	Gillian Wingrove	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4 - Is the plan positively prepared?	Yes
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Land to the west of EtlingView (LP[025]007 The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock/grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate. Many of the 400+ local objectors to the current scheme

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Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1130432 Full Name Mr Stephen Gibson
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4 - Is the plan positively prepared?	Yes
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Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1130426 Full Name Morgan Da Silva
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

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Local Plan Pre-Submission - Comments and Response Schedule

on a 2.3 hectare site, which would provide a density of approximately 26 dwellings per hectare; this would be in keeping with the neighbouring dwellings. Natural England have commented on the Pre-submission Publication and raised no objections. It is therefore considered that the impact upon the landscape and natural environment would not be significant. Through the application, the Public Rights of Way officer raised no objection as long as there is no adverse impact on either the registered common land to the west or Restricted Byway (RB32) along the northern boundary of the site. The allocation itself seeks to respect the northern boundary of the site by being set back from Shillings Lane.

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Following the Preferred Sites and Settlement Boundaries Consultation the Sequential Test looked at all defined as preferred or alternative. As part of this the extent of surface water flooding on the site was not considered to be substantial, with only approximately 2% of the site subject to surface water flooding. Through the planning application the Environment Agency and the Lead Local Flood Authority have raised no objections to the proposed development subject to conditions.

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Conclusion In conclusion it is considered that the site represents a sustainable site on the edge of one of five Market Towns within the district. There are no constraints that would be considered severe enough to affect the designation of the site.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130417	Full Name	Rod James Ranger	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
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proposed for the land have outlined the visual, landscape and amenity importance of the land together with numerous issues around flooding, degradation of hedgerows loss of wildlife area and concerns from the Police regarding crime. The area is a cherished local asset due to its openness -the small field in particular due to its visual exposure from two popular footpaths including the medieval lane " Shillings Lane. The openness of the land is important in separating the built environment from the wildlife corridor and County Wildlife Site, such areas forming a physical breathing space away from the hustle and bustle of both the existing and proposed residential areas nearby. Moreover, the indicative layout illustrates a relatively high density, physically distinct development, wholly incongruous with the single existing dwelling adjoining the paddock field Rose Farm a comparatively low level dwelling with single storey appendages. The dwellings are likely to result in an unduly urbanised built form, introducing harmful change which would be incompatible with the quality of the landscape and setting of the settlement. The 2 fields are located in a highly sensitive, historic and valued landscape; bordered by common land and historic rights of way. The level and density of development proposed (60 dwellings) is not reflective of its context and would not enhance the character and appearance of the area, but would have a significant and harmful impact on the setting. A development of 60 dwellings cannot be accommodated successfully on the site without harming the landscape character and appearance of the area- The application is contrary to the NPPF and Core Strategy Policy CP11/DC16. See also paragraphs 17 & 58 of the NPPF Proposed dwellings on the southern boundary of the site would cause an unacceptable level of overlooking and harm to the amenities of Rose Farm on Field 2 and neighbouring dwellings on Field 1 as well as to users of the surrounding common land and public rights of way. Contrary to Core Strategy Policy DCO1. The fields traditionally flood- it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that because the adjoining Shillings Lane is lower that flooding of the lane once a rare occurrence now occurs frequently. Development as proposed will further increase this flooding. The likely impact on the risk of flooding elsewhere as a result of an increase in the volume of run off post development. Contrary to NPPF paragraphs 103 and 109 The NPPF makes it clear in Paragraph 8 that the three roles the planning system is required to perform in respect of sustainable development should not be taken in isolation because they are mutually dependant. For the above reasons the benefits of the housing provision proposed, taking into account the development plan and the policies of

Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130412	Full Name	Ronald Hart	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

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Potential amendment to the plan

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Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1130408 Full Name Michael Meers
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

Reasons for Objection

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Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

on a 2.3 hectare site, which would provide a density of approximately 26 dwellings per hectare; this would be in keeping with the neighbouring dwellings. Natural England have commented on the Pre-submission Publication and raised no objections. It is therefore considered that the impact upon the landscape and natural environment would not be significant. Through the application, the Public Rights of Way officer raised no objection as long as long as there is no adverse impact on either the registered common land to the west or Restricted Byway (RB32) along the northern boundary of the site. The allocation itself seeks to respect the northern boundary of the site by being set back from Shillings Lane. Historic Character During the Preferred sites and Settlement Boundaries consultation, Historic England commented that further work should be carried out to assess the impact of preferred and alternative sites upon the Historic Environment. The Historic Characterisation Study was carried out in early 2017 and in relation to site LP[025]007, concluded that: Development proposals must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken so as to inform an appropriate design response. In this case the established pattern of adjacent mixed development will be an additional factor in the formation of the proposal. On the planning application itself NCC Historic Environment Service commented that the proposal does not have any implications for the historic environment and that no recommendations for archaeological work would be made. Flood Risk The SA highlighted that the site is situated within an area of flood risk. However, this is only a very small extant to the north and north east. Through the Preferred Sites and Settlement Boundaries consultation the Lead Local Flood Authority recommended that conditions are attached to any planning permission granted under the current planning application. At this stage the Lead Local Flood Authority commented on the site specifically stating: We welcome that the site has been reduced in its extent from the original allocation and now does not include areas at risk of flooding from surface water. An assessment of the actual risk of flooding should be undertaken by any development on this site. Following the Preferred Sites and Settlement Boundaries Consultation the Sequential Test looked at all defined as preferred or alternative. As part of this the extent of surface water flooding on the site was not considered to be substantial, with only approximately 2% of the site subject to surface water flooding. Through the planning application the Environment Agency and the Lead Local Flood Authority have raised no objections to the proposed development subject to conditions. Wastewater treatment As part of the evidence base underpinning the Local Plan a Water Cycle Study was carried out. As part of this study it was highlighted that improvements may be required to the treatment capacity. The study recommends that all applications for development proposals in Dereham are accompanied by a pre-development enquiry with Anglian Water Services to demonstrate that sufficient capacity is available to treat wastewater from the proposals. This wording has been added to the key development considerations within the allocation wording. Conclusion In conclusion it is considered that the site represents a sustainable site on the edge of one of five Market Towns within the district. There are no constraints that would be considered severe enough to affect the designation of the site.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1130309 Full Name Derek Brown
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
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Do you wish to appear at the Examination in Public? No

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I had understood that Breckland Capita would be taking account of both the unprecedented number of written objections already made (400+) for a current proposal on this site and the numerous technical challenges presented by this site- It is clear that in recommending it they have done neither!!!!!!

Land to the west of EtlingView (LP[025]007

The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed

paddock/grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate. Many of the 400+ local objectors to the current scheme proposed for the land have outlined the visual, landscape and amenity importance of the land together with numerous issues around flooding, degradation of hedgerows loss of wildlife area and concerns from the Police regarding crime.

The area is a cherished local asset due to its openness -the small field in particular due to its visual exposure from two popular footpaths including the medieval lane — Shillings Lane. The openness of the land is important in separating the built environment from the wildlife corridor and County Wildlife Site, such areas forming a “physical breathing” space away from the hustle and bustle of both the existing and proposed residential areas nearby.

Moreover, the indicative layout illustrates a relatively high density, physically distinct development, wholly incongruous with the single existing dwelling adjoining the paddock field Rose Farm a comparatively low level dwelling with single storey appendages.

The dwellings are likely to result in an unduly urbanised built form, introducing harmful change which would be incompatible with the quality of the landscape and setting of the settlement.

The 2 fields are located in a highly sensitive, historic and valued landscape; bordered by common land and historic rights of way. The level and density of development proposed (60 dwellings) is not reflective of its context and would not enhance the character and appearance of the area, but would have a significant and harmful impact on the setting. A development of 60 dwellings cannot be accommodated successfully on the site without harming the landscape character and appearance of the area- The application is contrary to the NPPF and Core Strategy Policy CP11/DC16. See also paragraphs 17 & 58 of the NPPF

Proposed dwellings on the southern boundary of the site would cause an unacceptable level of overlooking and harm to the amenities of Rose Farm on Field 2 and neighbouring dwellings on Field 1 as well as to users of the surrounding

Local Plan Pre-Submission - Comments and Response Schedule

common land and public rights of way. Contrary to Core Strategy Policy DCO1.

The fields traditionally flood- it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that because the adjoining Shillings Lane is lower that flooding of the lane once a rare occurrence now occurs frequently. Development as proposed will further increase this flooding. The likely impact on the risk of flooding elsewhere as a result of an increase in the volume of run off post development. Contrary to NPPF paragraphs 103 and 109

The NPPF makes it clear in Paragraph 8 that the three roles the planning system is required to perform in respect of sustainable development should not be taken in isolation because they are mutually dependant. For the above reasons the benefits of the housing provision proposed, taking into account the development plan and the policies of the NPPF as a whole, are clearly outweighed by the significant harmful impacts of the development. This proposal does not meet the criteria to be regarded as sustainable development and should be refused.

The NPPF identifies (in paras 6 and 17) sustainable development as the purpose of the planning system and conserving and enhancing the natural environment as a 'core planning principle'. While specific policies on conserving and enhancing the natural environment are addressed in Section 11 of the NPPF, these should not be considered in isolation, as other natural environment related policies, and their consideration in plan- and decision-making, can be found throughout the document.

The NPPF states (in para. 114) that local planning authorities should 'plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure'.

The NPPF makes it clear (in para. 110) that 'Plans should allocate land with the least environmental or amenity value'.

Planning policies and decision-making should seek to protect and enhance natural and heritage assets appropriate to their significance. Policies and decisions should also encourage multiple benefits from development.

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

History of the site in the Local Plan The site, LP[025]007, known as Land to the west of Etling View, was identified as a reasonable alternative during the Emerging Site Options consultation. The site was then considered to be a proposed allocation through the Preferred Sites and Settlement Boundaries consultation. During these consultations no significant objections were raised by any of the statutory consultees. The sites inclusion within the Local Plan is supported and underpinned by a range of evidence including, but not exclusive to: the Historic Characterisation Study, the Sequential Test, the Water Cycle Study and the Infrastructure Delivery Plan. The site is now subject to a planning application (3PL/2015/1045/O), which is still under consideration. However, through this further detailed comments have been provided.

Landscape & Natural Environment The site adjoins Neatherd Moor Common to the west, which is designated both as a County Wildlife Site and as Natural/Semi “natural green space. The Breckland District Settlement Fringe Landscape Assessment defines the character area as the Northall Green Open Arable Plateau, which is of Moderate-High sensitivity. The Assessment states that, as part of the general landscape management plan, Neatherd Moor must be conserved and enhanced through appropriate landscape management including grazing. The proposed allocation would extend the built up area of the town north and the appearance of the site would change from open farmland to a built up housing area. However, the scheme would largely be contained visually by the adjacent built environment to the south and east and the existing boundary hedging/trees and woodland to the north and west. From the County Wildlife Site, the Neatherd and Shillings Lane to the east, the proposal would be screened during part of the year by existing mature landscaping along Shillings Lane and the northern boundary of the site. When seen within the autumn, winter and early spring months the proposed buildings would be seen adjacent to the existing buildings to the east and would bring the built form closer to Shillings Lane and the Neatherd. The proposal would transform and erode the open aspect of the neighbouring dwellings immediately to the south of the site. However, this would be localised and could be mitigated through landscaping and additional planting. The policy wording of the allocation seeks the Retention and enhancement of native hedgerows and trees on the outer edge of the site boundary. This would seek to mitigate the impact. The proposal seeks at least 60 dwellings on a 2.3 hectare site, which would provide a density of approximately 26 dwellings per hectare; this would be in keeping with the neighbouring dwellings. Natural England have commented on the Pre-submission Publication and raised no objections. It is therefore considered that the impact upon the landscape and natural environment would not be significant. Through the application, the Public Rights of Way officer raised no objection as long as long as there is no adverse impact on either the registered common land to the west or Restricted Byway (RB32) along the northern boundary of the site. The allocation itself seeks to respect the northern boundary of the site by being set back from Shillings Lane.

Historic Character During the Preferred sites and Settlement Boundaries consultation, Historic England commented that further work should be carried out to assess the impact of preferred and alternative sites upon the Historic Environment. The Historic Characterisation Study was carried out in early 2017 and in relation to site LP[025]007, concluded that: Development proposals must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken so as to inform an appropriate design response. In this case the established pattern of adjacent mixed development will be an additional factor in the formation of the proposal. On the planning application itself NCC Historic Environment Service commented that the proposal does not have any implications for the historic environment and that no recommendations for archaeological work would be made.

Flood Risk The SA highlighted that the site is situated within an area of flood risk. However, this is only a very small extent to the north and north east. Through the Preferred Sites and Settlement Boundaries consultation the Lead Local Flood Authority recommended that conditions are attached to any planning permission granted under the current planning application. At this stage the Lead Local Flood Authority commented on the site specifically stating: We welcome that the site has been reduced in its extent from the original allocation and now does not include areas at risk of flooding from surface water. An assessment of the actual risk of flooding should be undertaken by any development on this site. Following the Preferred

Local Plan Pre-Submission - Comments and Response Schedule

Sites and Settlement Boundaries Consultation the Sequential Test looked at all defined as preferred or alternative. As part of this the extent of surface water flooding on the site was not considered to be substantial, with only approximately 2% of the site subject to surface water flooding. Through the planning application the Environment Agency and the Lead Local Flood Authority have raised no objections to the proposed development subject to conditions. Wastewater treatment As part of the evidence base underpinning the Local Plan a Water Cycle Study was carried out. As part of this study it was highlighted that improvements may be required to the treatment capacity. The study recommends that all applications for development proposals in Dereham are accompanied by a pre-development enquiry with Anglian Water Services to demonstrate that sufficient capacity is available to treat wastewater from the proposals. This wording has been added to the key development considerations within the allocation wording. Conclusion In conclusion it is considered that the site represents a sustainable site on the edge of one of five Market Towns within the district. There are no constraints that would be considered severe enough to affect the designation of the site.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1130400 Full Name Mrs Tina Wilkins
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

Reasons for Objection

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Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1130657 Full Name Dean Goldspink
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

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Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

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Following the Preferred Sites and Settlement Boundaries Consultation the Sequential Test looked at all defined as preferred or alternative. As part of this the extent of surface water flooding on the site was not considered to be substantial, with only approximately 2% of the site subject to surface water flooding. Through the planning application the Environment Agency and the Lead Local Flood Authority have raised no objections to the proposed development subject to conditions.

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1130393 Full Name Marie Da Silva
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
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Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID: 1130376 Full Name: Mr King Organisation Details
 Agent ID: Agent Name Agent Organisation

Comment Details

Title: Dereham Housing Allocation 1 Number: 3
 Chapter Number: 3

Reasons for Objection

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Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1130367 Full Name Debbie Dungan
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

Reasons for Objection

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1130359 Full Name Bethany Hollings
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

Reasons for Objection

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Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

on a 2.3 hectare site, which would provide a density of approximately 26 dwellings per hectare; this would be in keeping with the neighbouring dwellings. Natural England have commented on the Pre-submission Publication and raised no objections. It is therefore considered that the impact upon the landscape and natural environment would not be significant. Through the application, the Public Rights of Way officer raised no objection as long as long as there is no adverse impact on either the registered common land to the west or Restricted Byway (RB32) along the northern boundary of the site. The allocation itself seeks to respect the northern boundary of the site by being set back from Shillings Lane.

Historic Character During the Preferred sites and Settlement Boundaries consultation, Historic England commented that further work should be carried out to assess the impact of preferred and alternative sites upon the Historic Environment. The Historic Characterisation Study was carried out in early 2017 and in relation to site LP[025]007, concluded that: Development proposals must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken so as to inform an appropriate design response. In this case the established pattern of adjacent mixed development will be an additional factor in the formation of the proposal.

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Following the Preferred Sites and Settlement Boundaries Consultation the Sequential Test looked at all defined as preferred or alternative. As part of this the extent of surface water flooding on the site was not considered to be substantial, with only approximately 2% of the site subject to surface water flooding. Through the planning application the Environment Agency and the Lead Local Flood Authority have raised no objections to the proposed development subject to conditions.

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1130357 Full Name Jamie Beeby
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

Reasons for Objection

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1130350 Full Name Luke Carrol
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1130345 Full Name Jennifer Manns
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

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Local Plan Pre-Submission - Comments and Response Schedule

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Following the Preferred Sites and Settlement Boundaries Consultation the Sequential Test looked at all defined as preferred or alternative. As part of this the extent of surface water flooding on the site was not considered to be substantial, with only approximately 2% of the site subject to surface water flooding. Through the planning application the Environment Agency and the Lead Local Flood Authority have raised no objections to the proposed development subject to conditions.

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1130402 Full Name Elaine Wintebone
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

Reasons for Objection

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Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1130692 Full Name Annette Barkowski
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130319	Full Name	Diane Ogilvy	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
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Breckland Council Response

Officer Response

History of the site in the Local Plan The site, LP[025]007, known as Land to the west of Etling View, was identified as a reasonable alternative during the Emerging Site Options consultation. The site was then considered to be a proposed allocation through the Preferred Sites and Settlement Boundaries consultation. During these consultations no significant objections were raised by any of the statutory consultees. The sites inclusion within the Local Plan is supported and underpinned by a range of evidence including, but not exclusive to: the Historic Characterisation Study, the Sequential Test, the Water Cycle Study and the Infrastructure Delivery Plan. The site is now subject to a planning application (3PL/2015/1045/O), which is still under consideration. However, through this further detailed comments have been provided.

Landscape & Natural Environment The site adjoins Neatherd Moor Common to the west, which is designated both as a County Wildlife Site and as Natural/Semi “natural green space. The Breckland District Settlement Fringe Landscape Assessment defines the character area as the Northall Green Open Arable Plateau, which is of Moderate-High sensitivity. The Assessment states that, as part of the general landscape management plan, Neatherd Moor must be conserved and enhanced through appropriate landscape management including grazing. The proposed allocation would extend the built up area of the town north and the appearance of the site would change from open farmland to a built up housing area. However, the scheme would largely be contained visually by the adjacent built environment to the south and east and the existing boundary hedging/trees and woodland to the north and west. From the County Wildlife Site, the Neatherd and Shillings Lane to the east, the proposal would be screened during part of the year by existing mature landscaping along Shillings Lane and the northern boundary of the site. When seen within the autumn, winter and early spring months the proposed buildings would be seen adjacent to the existing buildings to the east and would bring the built form closer to Shillings Lane and the Neatherd. The proposal would transform and erode the open aspect of the neighbouring dwellings immediately to the south of the site. However, this would be localised and could be mitigated through landscaping and additional planting. The policy wording of the allocation seeks the Retention and enhancement of native hedgerows and trees on the outer edge of the site boundary. This would seek to mitigate the impact. The proposal seeks at least 60 dwellings

Local Plan Pre-Submission - Comments and Response Schedule

on a 2.3 hectare site, which would provide a density of approximately 26 dwellings per hectare; this would be in keeping with the neighbouring dwellings. Natural England have commented on the Pre-submission Publication and raised no objections. It is therefore considered that the impact upon the landscape and natural environment would not be significant. Through the application, the Public Rights of Way officer raised no objection as long as there is no adverse impact on either the registered common land to the west or Restricted Byway (RB32) along the northern boundary of the site. The allocation itself seeks to respect the northern boundary of the site by being set back from Shillings Lane. Historic Character During the Preferred sites and Settlement Boundaries consultation, Historic England commented that further work should be carried out to assess the impact of preferred and alternative sites upon the Historic Environment. The Historic Characterisation Study was carried out in early 2017 and in relation to site LP[025]007, concluded that: Development proposals must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken so as to inform an appropriate design response. In this case the established pattern of adjacent mixed development will be an additional factor in the formation of the proposal. On the planning application itself NCC Historic Environment Service commented that the proposal does not have any implications for the historic environment and that no recommendations for archaeological work would be made. Flood Risk The SA highlighted that the site is situated within an area of flood risk. However, this is only a very small extent to the north and north east. Through the Preferred Sites and Settlement Boundaries consultation the Lead Local Flood Authority recommended that conditions are attached to any planning permission granted under the current planning application. At this stage the Lead Local Flood Authority commented on the site specifically stating: We welcome that the site has been reduced in its extent from the original allocation and now does not include areas at risk of flooding from surface water. An assessment of the actual risk of flooding should be undertaken by any development on this site. Following the Preferred Sites and Settlement Boundaries Consultation the Sequential Test looked at all defined as preferred or alternative. As part of this the extent of surface water flooding on the site was not considered to be substantial, with only approximately 2% of the site subject to surface water flooding. Through the planning application the Environment Agency and the Lead Local Flood Authority have raised no objections to the proposed development subject to conditions. Wastewater treatment As part of the evidence base underpinning the Local Plan a Water Cycle Study was carried out. As part of this study it was highlighted that improvements may be required to the treatment capacity. The study recommends that all applications for development proposals in Dereham are accompanied by a pre-development enquiry with Anglian Water Services to demonstrate that sufficient capacity is available to treat wastewater from the proposals. This wording has been added to the key development considerations within the allocation wording. Conclusion In conclusion it is considered that the site represents a sustainable site on the edge of one of five Market Towns within the district. There are no constraints that would be considered severe enough to affect the designation of the site.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129721	Full Name	Stuart Wing	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	I had understood that Breckland Capita would be taking account of both the unprecedented number of written objections already made (400+) for a current proposal on this site and the numerous technical challenges presented by this site- It is clear that in recommending it they have done neither!!!!!!		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Land to the west of EtlingView (LPj025]007 The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock/grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate. Many of the 400+ local objectors to the current scheme

proposed for the land have outlined the visual, landscape and amenity importance of the land together with numerous issues around flooding, degradation of hedgerows loss of wildlife area and concerns from the Police regarding crime. The area is a cherished local asset due to its openness -the small field in particular due to its visual exposure from two popular footpaths including the medieval lane " Shillings Lane. The openness of the land is important in separating the built environment from the wildlife corridor and County Wildlife Site, such areas forming a physical breathing space away from the hustle and bustle of both the existing and proposed residential areas nearby. Moreover, the indicative layout illustrates a relatively high density, physically distinct development, wholly incongruous with the single existing dwelling adjoining the paddock field Rose Farm a comparatively low level dwelling with single storey appendages. The dwellings are likely to result in an unduly urbanised built form, introducing harmful change which would be incompatible with the quality of the landscape and setting of the settlement. The 2 fields are located in a highly sensitive, historic and valued landscape; bordered by common land and historic rights of way. The level and density of development proposed (60 dwellings) is not reflective of its context and would not enhance the character and appearance of the area, but would have a significant and harmful impact on the setting. A development of 60 dwellings cannot be accommodated successfully on the site without harming the landscape character and appearance of the area- The application is contrary to the NPPF and Core Strategy Policy CP11/DC16. See also paragraphs 17 & 58 of the NPPF Proposed dwellings on the southern boundary of the site would cause an unacceptable level of overlooking and harm to the amenities of Rose Farm on Field 2 and neighbouring dwellings on Field 1 as well as to users of the surrounding common land and public rights of way. Contrary to Core Strategy Policy DCO1. The fields traditionally flood- it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that because the adjoining Shillings Lane is lower that flooding of the lane once a rare occurrence now occurs frequently. Development as proposed will further increase this flooding. The likely impact on the risk of flooding elsewhere as a result of an increase in the volume of run off post development. Contrary to NPPF paragraphs 103 and 109 The NPPF makes it clear in Paragraph 8 that the three roles the planning system is required to perform in respect of sustainable development should not be taken in isolation because they are mutually dependant. For the above reasons the benefits of the housing provision proposed, taking into account the development plan and the policies of

Local Plan Pre-Submission - Comments and Response Schedule

the NPPF as a whole, are clearly outweighed by the significant harmful impacts of the development. This proposal does not meet the criteria to be regarded as sustainable development and should be refused. The NPPF identifies (in paras 6 and 17) sustainable development as the purpose of the planning system and conserving and enhancing the natural environment as a core planning principle. While specific policies on conserving and enhancing the natural environment are addressed in Section 11 of the NPPF, these should not be considered in isolation, as other natural environment related policies, and their consideration in plan- and decision-making, can be found throughout the document. The NPPF states (in para. 114) that local planning authorities should plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. The NPPF makes it clear (in para. 110) that Plans should allocate land with the least environmental or amenity value. Planning policies and decision-making should seek to protect and enhance natural and heritage assets appropriate to their significance. Policies and decisions should also encourage multiple benefits from development.

Breckland Council Response

Officer Response

History of the site in the Local Plan The site, LP[025]007, known as Land to the west of Etling View, was identified as a reasonable alternative during the Emerging Site Options consultation. The site was then considered to be a proposed allocation through the Preferred Sites and Settlement Boundaries consultation. During these consultations no significant objections were raised by any of the statutory consultees. The sites inclusion within the Local Plan is supported and underpinned by a range of evidence including, but not exclusive to: the Historic Characterisation Study, the Sequential Test, the Water Cycle Study and the Infrastructure Delivery Plan. The site is now subject to a planning application (3PL/2015/1045/O), which is still under consideration. However, through this further detailed comments have been provided.

Landscape & Natural Environment The site adjoins Neatherd Moor Common to the west, which is designated both as a County Wildlife Site and as Natural/Semi “natural green space. The Breckland District Settlement Fringe Landscape Assessment defines the character area as the Northall Green Open Arable Plateau, which is of Moderate-High sensitivity. The Assessment states that, as part of the general landscape management plan, Neatherd Moor must be conserved and enhanced through appropriate landscape management including grazing. The proposed allocation would extend the built up area of the town north and the appearance of the site would change from open farmland to a built up housing area. However, the scheme would largely be contained visually by the adjacent built environment to the south and east and the existing boundary hedging/trees and woodland to the north and west. From the County Wildlife Site, the Neatherd and Shillings Lane to the east, the proposal would be screened during part of the year by existing mature landscaping along Shillings Lane and the northern boundary of the site. When seen within the autumn, winter and early spring months the proposed buildings would be seen adjacent to the existing buildings to the east and would bring the built form closer to Shillings Lane and the Neatherd. The proposal would transform and erode the open aspect of the neighbouring dwellings immediately to the south of the site. However, this would be localised and could be mitigated through landscaping and additional planting. The policy wording of the allocation seeks the Retention and enhancement of native hedgerows and trees on the outer edge of the site boundary. This would seek to mitigate the impact. The proposal seeks at least 60 dwellings

Local Plan Pre-Submission - Comments and Response Schedule

on a 2.3 hectare site, which would provide a density of approximately 26 dwellings per hectare; this would be in keeping with the neighbouring dwellings. Natural England have commented on the Pre-submission Publication and raised no objections. It is therefore considered that the impact upon the landscape and natural environment would not be significant. Through the application, the Public Rights of Way officer raised no objection as long as there is no adverse impact on either the registered common land to the west or Restricted Byway (RB32) along the northern boundary of the site. The allocation itself seeks to respect the northern boundary of the site by being set back from Shillings Lane.

Historic Character During the Preferred sites and Settlement Boundaries consultation, Historic England commented that further work should be carried out to assess the impact of preferred and alternative sites upon the Historic Environment. The Historic Characterisation Study was carried out in early 2017 and in relation to site LP[025]007, concluded that: Development proposals must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken so as to inform an appropriate design response. In this case the established pattern of adjacent mixed development will be an additional factor in the formation of the proposal.

On the planning application itself NCC Historic Environment Service commented that the proposal does not have any implications for the historic environment and that no recommendations for archaeological work would be made.

Flood Risk The SA highlighted that the site is situated within an area of flood risk. However, this is only a very small extent to the north and north east. Through the Preferred Sites and Settlement Boundaries consultation the Lead Local Flood Authority recommended that conditions are attached to any planning permission granted under the current planning application. At this stage the Lead Local Flood Authority commented on the site specifically stating: We welcome that the site has been reduced in its extent from the original allocation and now does not include areas at risk of flooding from surface water. An assessment of the actual risk of flooding should be undertaken by any development on this site.

Following the Preferred Sites and Settlement Boundaries Consultation the Sequential Test looked at all defined as preferred or alternative. As part of this the extent of surface water flooding on the site was not considered to be substantial, with only approximately 2% of the site subject to surface water flooding. Through the planning application the Environment Agency and the Lead Local Flood Authority have raised no objections to the proposed development subject to conditions.

Wastewater treatment As part of the evidence base underpinning the Local Plan a Water Cycle Study was carried out. As part of this study it was highlighted that improvements may be required to the treatment capacity. The study recommends that all applications for development proposals in Dereham are accompanied by a pre-development enquiry with Anglian Water Services to demonstrate that sufficient capacity is available to treat wastewater from the proposals. This wording has been added to the key development considerations within the allocation wording.

Conclusion In conclusion it is considered that the site represents a sustainable site on the edge of one of five Market Towns within the district. There are no constraints that would be considered severe enough to affect the designation of the site.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1123472 Full Name Julie Walmsley
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4 - Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	I had understood that Breckland Capita would be taking account of both the unprecedented number of objections they already have (400+) for a current proposal on this site and the numerous technical challenges presented by this site. They have not hence this representation		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Land to the west of EtlingView (LP[025]007 I feel the plan is unsound for the following reasons: 1) The 2 fields are located in a highly sensitive, historic and valued landscape; bordered by common land and historic rights of way. The level and density of development proposed (60 dwellings) is not reflective of its context and would not enhance the character and appearance of the area, but would have a significant and harmful impact on the setting. A development of 60 dwellings

cannot be accommodated successfully on the site without harming the landscape character and appearance of the area- The application is contrary to the NPPF and Core Strategy Policy CP11/DC16. See also paragraphs 17 & 58 of the NPPF- 2) Proposed dwellings on the southern boundary of the site would cause an unacceptable level of overlooking and harm to the amenities of Rose Farm on Field 2 and neighbouring dwellings on Field 1 as well as to users of the surrounding common land and public rights of way . Contrary to Core Strategy Policy DC01. 3) The likely impact on the risk of flooding elsewhere as a result of an increase in the volume of run off post development. Contrary to NPPF paragraphs 103 and 109 The NPPF makes it clear in Paragraph 8 that the three roles the planning system is required to perform in respect of sustainable development should not be taken in isolation because they are mutually dependant. For the above reasons the benefits of the housing provision proposed, taking into account the development plan and the policies of the NPPF as a whole, are clearly outweighed by the significant harmful impacts of the development. This proposal does not meet the criteria to be regarded as sustainable development and should be refused. The NPPF identifies (in paras 6 and 17) sustainable development as the purpose of the planning system and conserving and enhancing the natural environment as a core planning principle. While specific policies on conserving and enhancing the natural environment are addressed in Section 11 of the NPPF, these should not be considered in isolation, as other natural environment related policies, and their consideration in plan- and decision-making, can be found throughout the document. The objectives for the natural environment within the planning system are set out in the NPPF (in para. 109) and state that the planning system should contribute to and enhance the natural and local environment by: —~~2~~—~~2~~ protecting and enhancing valued landscapes; —~~2~~—~~2~~recognising the wider benefits of ecosystem services; —~~2~~—~~2~~minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Governments commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; The NPPF stresses a proactive and strategic approach to planning for the natural environment. The ambition of the NPPF is not just to retain protection for existing designations, but to plan ahead for re-creation of habitat where possible. The NPPF states (in para. 114) that local planning authorities should plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure . The NPPF makes it clear (in para. 110) that

Local Plan Pre-Submission - Comments and Response Schedule

Plans should allocate land with the least environmental or amenity value . Planning policies and decision-making should seek to protect and enhance natural and heritage assets appropriate to their significance. Policies and decisions should also encourage multiple benefits from development. The proposed Site which consists of one Arable field and one enclosed paddock /grazing land on the edge of a settlement contributes to a rural setting and compliments the adjoining County Wildlife site and surrounding lightly wooded amenity land. Many of the 400+ local objectors have outlined the visual and landscape importance of the land together with numerous issues around flooding, degradation of hedgerows loss of wildlife area and concerns from the Police regarding crime. The area is a cherished local asset due to its openness -the paddock field in particular due to its visual exposure from two popular footpaths including the medieval lane “ Shillings Lane. The openness of the land is important in separating the built environment from the wildlife corridor and County Wildlife Site, such areas forming a "physical breathing" space away from the hustle and bustle of the residential areas nearby. Moreover, the indicative layout illustrates a relatively high density, physically distinct development. wholly incongruous with the single existing dwelling adjoining the paddock field Rose Farm a comparatively low level dwelling with single storey appendages. The dwellings are likely to result in an unduly urbanised built form, introducing harmful change which would be incompatible with the quality of the landscape and setting of the settlement.

Breckland Council Response

Officer Response

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Local Plan Pre-Submission - Comments and Response Schedule

boundary of the site. When seen within the autumn, winter and early spring months the proposed buildings would be seen adjacent to the existing buildings to the east and would bring the built form closer to Shillings Lane and the Neatherd. The proposal would transform and erode the open aspect of the neighbouring dwellings immediately to the south of the site. However, this would be localised and could be mitigated through landscaping and additional planting. The policy wording of the allocation seeks the Retention and enhancement of native hedgerows and trees on the outer edge of the site boundary. This would seek to mitigate the impact. The proposal seeks at least 60 dwellings on a 2.3 hectare site, which would provide a density of approximately 26 dwellings per hectare; this would be in keeping with the neighbouring dwellings. Natural England have commented on the Pre-submission Publication and raised no objections. It is therefore considered that the impact upon the landscape and natural environment would not be significant. Through the application, the Public Rights of Way officer raised no objection as long as there is no adverse impact on either the registered common land to the west or Restricted Byway (RB32) along the northern boundary of the site. The allocation itself seeks to respect the northern boundary of the site by being set back from Shillings Lane.

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Wastewater treatment As part of the evidence base underpinning the Local Plan a Water Cycle Study was carried out. As part of this study it was highlighted that improvements may be required to the treatment capacity. The study recommends that all applications for development proposals in Dereham are accompanied by a pre-development enquiry with Anglian Water Services to demonstrate that sufficient capacity is available to treat wastewater from the proposals. This wording has been added to the key development considerations within the allocation wording.

Conclusion In conclusion it is considered that the site represents a sustainable site on the edge of one of five Market Towns within the district. There are no constraints that would be considered severe enough to affect the designation of the site.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1123468 Full Name Jane Woollestone
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Impact to the local environment, flora and fauna. There is already increased flooding in that area due to other houses being built. Dereham can not cope as it is - the drain by the fire station regularly floods now and we end up with sewage all over the path and road. The road system cant cope as it is Basically Derehams current infrastructure cant cope

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The key development considerations includes the requirement to maximise opportunities to enhance biodiversity, whilst also seeking to retain the existing native hedgerows and trees. Furthermore the policy also includes the requirements for any application to include a pre-application enquiry with Anglian Water to ensure there sufficient capacity within the waste water system.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1123033 Full Name Mrs Lesley Cauillault
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
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Reasons for Objection

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9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Development of these 2 fields has been a matter of public debate for over 2 years. There has been considerable press coverage, 00's of written objections I had not expected Breckland ever to consider putting the site forward and requiring FURTHER comment.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Land to the west of Etling View (LP[025]007 1) This 2 fields are located in a highly sensitive, historic and valued landscape; bordered by common land and historic rights of way. The level and density of development proposed (60 dwellings) is not reflective of its context and would not enhance the character and appearance of the area, but would have a significant and harmful impact on the setting. A development of 60 dwellings cannot be accommodated successfully on the site

without harming the landscape character and appearance of the area - The application is contrary to the NPPF and Core Strategy Policy CP11/DC16. See also paragraphs 17 & 58 of the NPPF - NOT SUSTAINABLE DEVELOPMENT 2) Proposed dwellings on the southern boundary of the site would cause an unacceptable level of overlooking and harm to the amenities of Rose Farm on Field 2 and neighbouring dwellings on Field 1 as well as to users of the surrounding common land and public rights of way. Contrary to Core Strategy Policy DC01. - NOT SUSTAINABLE DEVELOPMENT 3) The likely impact on the risk of flooding elsewhere as a result of an increase in the volume of run off post development. Contrary to NPPF paragraphs 103 and 109 - NOT SUSTAINABLE The NPPF makes it clear in Paragraph 8 that the three roles the planning system is required to perform in respect of sustainable development should not be taken in isolation because they are mutually dependency. For the above reasons the benefits of the housing provision proposed, taking into account of the development plan and the policies of the NPPF as a whole, are clearly outweighed by the significant harmful impacts of the development. This proposal does not meet the criteria to be regarded as sustainable development and should be refused. Natural environment objectives in the NPPF The NPPF identifies (in paras 6 and 17) sustainable development as the purpose of the planning system and conserving and enhancing the natural environment as a 'core planning principle.' While Specific policies on conserving and enhancing the natural environment are addressed in Section 11 of the NPPF, these should not be considered in isolation, s other natural environment related policies, and their consideration in plan- and decision-making, can be found throughout the document. The objectives for the natural environment within the planning system are set out in the NPPF (in para. 109) and state that the 'planning system should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes; recognising the wider benefits of ecosystem services; minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; The NPPF stresses a proactive and strategic approach to planning for the natural environment. The ambition of the NPPF is not just to retain protection for existing designations, but to plan ahead for re-creation of habitat where possible. The NPPF states (in para. 114) that local planning authorities should 'plan positively for the creation, protection, enhancement and management of networks of biodiversity and green

Local Plan Pre-Submission - Comments and Response Schedule

infrastructure.' The NPPF makes it clear (in para. 110) that 'Plans should allocate land with the least environmental or amenity value'. Planning policies and decision-making should seek to protect and enhance natural and heritage assets appropriate to their significance. Policies and decisions should also encourage multiple benefits from development Immediate concerns with Land to the west of Etling View (LP[025]007): FLOODING OF ADJOINING AREAS especially SHILLINGS LANE LOSS OF A PROTECTED OAK TREE WITH "TPO" ORDER ON IT LOSS OF AMENITY LACK OF SEWAGE PROVISION INTRUSION INTO A COUNTYR WILDLIFE SITE DESTRUCTION OF HISTORIC HEDGEROWS DENISTY OF PROPSOED DEVELOPMENT

Breckland Council Response

Officer Response

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Historic Character During the Preferred sites and Settlement Boundaries consultation, Historic England commented that further work should be carried out to assess the impact of preferred and alternative sites upon the Historic Environment. The

Local Plan Pre-Submission - Comments and Response Schedule

Historic Characterisation Study was carried out in early 2017 and in relation to site LP[025]007, concluded that: Development proposals must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken so as to inform an appropriate design response. In this case the established pattern of adjacent mixed development will be an additional factor in the formation of the proposal. On the planning application itself NCC Historic Environment Service commented that the proposal does not have any implications for the historic environment and that no recommendations for archaeological work would be made. Flood Risk The SA highlighted that the site is situated within an area of flood risk. However, this is only a very small extent to the north and north east. Through the Preferred Sites and Settlement Boundaries consultation the Lead Local Flood Authority recommended that conditions are attached to any planning permission granted under the current planning application. At this stage the Lead Local Flood Authority commented on the site specifically stating: We welcome that the site has been reduced in its extent from the original allocation and now does not include areas at risk of flooding from surface water. An assessment of the actual risk of flooding should be undertaken by any development on this site. Following the Preferred Sites and Settlement Boundaries Consultation the Sequential Test looked at all defined as preferred or alternative. As part of this the extent of surface water flooding on the site was not considered to be substantial, with only approximately 2% of the site subject to surface water flooding. Through the planning application the Environment Agency and the Lead Local Flood Authority have raised no objections to the proposed development subject to conditions. Wastewater treatment As part of the evidence base underpinning the Local Plan a Water Cycle Study was carried out. As part of this study it was highlighted that improvements may be required to the treatment capacity. The study recommends that all applications for development proposals in Dereham are accompanied by a pre-development enquiry with Anglian Water Services to demonstrate that sufficient capacity is available to treat wastewater from the proposals. This wording has been added to the key development considerations within the allocation wording. Conclusion In conclusion it is considered that the site represents a sustainable site on the edge of one of five Market Towns within the district. There are no constraints that would be considered severe enough to affect the designation of the site.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1121366 Full Name Lynn Fletcher
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	I have raised the issue before, but I cannot remember exactly at which stage. Since the issue of this development has been a matter of public debate for over two years, has had hundreds of written objections and has been highlighted in the local press, I honestly thought that common sense would prevail in the Breckland Council Planning Dept, and that I wouldnt be needing to comment on this again so didnt bother to note down the date that I submitted my written objection.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Land to the west of EtlingView (LP[025]007 1) These two fields are located in a highly sensitive, historic and valued landscape; bordered by common land and historic rights of way. The level and density of the development proposed (60 dwellings) is not reflective of its context and would not enhance the character and appearance of the area, but would have a significant and harmful impact on the setting. A development of 60 dwellings cannot be accommodated successfully on the site without harming the landscape character and appearance of the area - The application is contrary to the NPPF and Core Strategy Policy CP11/DC16. See also paragraphs 17 & 58 of the NPPF- NOT SUSTAINABLE DEVELOPMENT 2) Proposed dwellings on the southern boundary of the site would cause an unacceptable level of overlooking and harm to the amenities of Rose Farm on Field 2 and neighbouring dwellings on Field 1 as well as to users of the surrounding common land and public rights of way. Contrary to Core Strategy Policy DC01. - NOT SUSTAINABLE DEVELOPMENT 3) The likely impact on the risk of flooding elsewhere as a result of an increase in the volume of run off post development. Contrary to NPPF paragraphs 103 and 109 - NOT SUSTAINABLE DEVELOPMENT The NPPF makes it clear in Paragraph 8 that the three roles the planning system is required to perform in respect of sustainable development should not be taken in isolation because they are mutually dependant. For the above reasons the benefits of the housing provision proposed, taking into account the development plan and the policies of the NPPF as a whole, are clearly outweighed by the significant harmful impacts of the development. This proposal does not meet the criteria to be regarded as sustainable development and should be refused. Natural environment objectives in the NPPF The NPPF identifies (in paras 6 and 17) sustainable development as the purpose of the planning system and conserving and enhancing the natural environment as a core planning principle. While specific policies on conserving and enhancing the natural environment are addressed in Section 11 of the NPPF, these should not be considered in isolation, as other natural environment related policies, and their consideration in plan- and decision-making, can be found throughout the document. The objectives for the natural environment within the planning system are set out in the NPPF (in para. 109) and state that the planning system should contribute to and enhance the natural and local environment by: —protecting and enhancing valued landscapes; —recognising the wider benefits of ecosystem services; —minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Governments commitment to

halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; The NPPF stresses a proactive and strategic approach to planning for the natural environment. The ambition of the NPPF is not just to retain protection for existing designations, but to plan ahead for re-creation of habitat where possible. The NPPF states (in para.114) that local planning authorities should plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. The NPPF makes it clear (in para. 110) that Plans should allocate land with the least environmental or amenity value. Planning policies and decision-making should seek to protect and enhance natural and heritage assets appropriate to their significance. Policies and decisions should also encourage multiple benefits from development. Immediate concerns with Land to the west of EtlingView (LP[025]007: FLOODING OF ADJOINING AREAS ESPECIALLY SHILLINGS LANE LOSS OF A PROTECTED OAK TREE WITH A TPO ORDER ON IT LOSS OF AMENITY LACK OF SEWAGE PROVISION INTRUSION INTO A COUNTY WILDLIFE SITE DESTRUCTION OF HISTORIC HEDGEROWS DENSITY OF PROPOSED DEVELOPMENT etc etc To put it into laymans terms: We dont want any more monstrosities like the ones at Etling View (quite possibly the ugliest dwellings its ever been my misfortune to encounter). Were sick of Shillings Lane turning into something akin to the Florida Everglades every time we get the slightest bit of precipitation, which, although it used to get a little muddy, it didnt do before Etling View was forced upon us and we certainly dont want it to get any worse which it is guaranteed to do if Taylor Wimpey get their money-grabbing way. We dont want protected trees and ancient hedgerows uprooted to make way for more of the aforementioned monstrosities. We dont want to lose any more of our wildlife which has already been adversely affected by the existing development. We dont want any more problems with sewage as already experienced by Norwich Road residents and the area surrounding Etling View and we dont want the jewel in Derehams crown ruined any further by Taylor Wimpey or anyone else. Our enjoyment of the area has already been severely impacted by the existing development. What we do want is for the Planning Department of Breckland Council to do their job according to the guidelines and to protect this valuable and irreplaceable area of historical and natural importance and to guarantee its preservation for future generations of both residents and wildlife to enjoy. I am frankly appalled that the proposed development has been recommended to go ahead. It is an outrageous disregard for the NPPF, the hundreds of valid objections

Local Plan Pre-Submission - Comments and Response Schedule

from tax paying, long term residents of the area who know and love Neatherd Moor for the wonderful area that it is and for the hundreds of wildlife species, NINE of which are on the RSPB Red List, and SEVEN of which are on the RSPB Amber List (I have just checked the current list against species that I know to be resident or seasonal visitors), that inhabit the area (I know because I have personally spent literally hours upon hours watching them), not to mention the other endangered non-avian species that live in the area including hedgehogs and the Brown Hare which currently has a Species Action Plan under the UK Biodiversity Action Plan. How can Breckland Planning Department possibly justify such a blatant and wanton disregard and disrespect on each of the aforementioned issues? One has to wonder exactly what the incentives are for these individuals to be so flagrantly in breach of the guidelines? I urge everyone involved in the planning process to reconsider and to protect this beautiful, irreplaceable corner of our wonderful county, before its too late.

Breckland Council Response

Officer Response

History of the site in the Local Plan The site, LP[025]007, known as Land to the west of Etling View, was identified as a reasonable alternative during the Emerging Site Options consultation. The site was then considered to be a proposed allocation through the Preferred Sites and Settlement Boundaries consultation. During these consultations no significant objections were raised by any of the statutory consultees. The sites inclusion within the Local Plan is supported and underpinned by a range of evidence including, but not exclusive to: the Historic Characterisation Study, the Sequential Test, the Water Cycle Study and the Infrastructure Delivery Plan. The site is now subject to a planning application (3PL/2015/1045/O), which is still under consideration. However, through this further detailed comments have been provided.

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Local Plan Pre-Submission - Comments and Response Schedule

considered that the impact upon the landscape and natural environment would not be significant. Through the application, the Public Rights of Way officer raised no objection as long as there is no adverse impact on either the registered common land to the west or Restricted Byway (RB32) along the northern boundary of the site. The allocation itself seeks to respect the northern boundary of the site by being set back from Shillings Lane. Historic Character During the Preferred sites and Settlement Boundaries consultation, Historic England commented that further work should be carried out to assess the impact of preferred and alternative sites upon the Historic Environment. The Historic Characterisation Study was carried out in early 2017 and in relation to site LP[025]007, concluded that: Development proposals must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken so as to inform an appropriate design response. In this case the established pattern of adjacent mixed development will be an additional factor in the formation of the proposal. On the planning application itself NCC Historic Environment Service commented that the proposal does not have any implications for the historic environment and that no recommendations for archaeological work would be made. Flood Risk The SA highlighted that the site is situated within an area of flood risk. However, this is only a very small extent to the north and north east. Through the Preferred Sites and Settlement Boundaries consultation the Lead Local Flood Authority recommended that conditions are attached to any planning permission granted under the current planning application. At this stage the Lead Local Flood Authority commented on the site specifically stating: We welcome that the site has been reduced in its extent from the original allocation and now does not include areas at risk of flooding from surface water. An assessment of the actual risk of flooding should be undertaken by any development on this site. Following the Preferred Sites and Settlement Boundaries Consultation the Sequential Test looked at all defined as preferred or alternative. As part of this the extent of surface water flooding on the site was not considered to be substantial, with only approximately 2% of the site subject to surface water flooding. Through the planning application the Environment Agency and the Lead Local Flood Authority have raised no objections to the proposed development subject to conditions. Wastewater treatment As part of the evidence base underpinning the Local Plan a Water Cycle Study was carried out. As part of this study it was highlighted that improvements may be required to the treatment capacity. The study recommends that all applications for development proposals in Dereham are accompanied by a pre-development enquiry with Anglian Water Services to demonstrate that sufficient capacity is available to treat wastewater from the proposals. This wording has been added to the key development considerations within the allocation wording. Conclusion In conclusion it is considered that the site represents a sustainable site on the edge of one of five Market Towns within the district. There are no constraints that would be considered severe enough to affect the designation of the site.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130708	Full Name	Sarah Godsoe	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

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proposed for the land have outlined the visual, landscape and amenity importance of the land together with numerous issues around flooding, degradation of hedgerows loss of wildlife area and concerns from the Police regarding crime. The area is a cherished local asset due to its openness -the small field in particular due to its visual exposure from two popular footpaths including the medieval lane " Shillings Lane. The openness of the land is important in separating the built environment from the wildlife corridor and County Wildlife Site, such areas forming a physical breathing space away from the hustle and bustle of both the existing and proposed residential areas nearby. Moreover, the indicative layout illustrates a relatively high density, physically distinct development, wholly incongruous with the single existing dwelling adjoining the paddock field Rose Farm a comparatively low level dwelling with single storey appendages. The dwellings are likely to result in an unduly urbanised built form, introducing harmful change which would be incompatible with the quality of the landscape and setting of the settlement. The 2 fields are located in a highly sensitive, historic and valued landscape; bordered by common land and historic rights of way. The level and density of development proposed (60 dwellings) is not reflective of its context and would not enhance the character and appearance of the area, but would have a significant and harmful impact on the setting. A development of 60 dwellings cannot be accommodated successfully on the site without harming the landscape character and appearance of the area- The application is contrary to the NPPF and Core Strategy Policy CP11/DC16. See also paragraphs 17 & 58 of the NPPF Proposed dwellings on the southern boundary of the site would cause an unacceptable level of overlooking and harm to the amenities of Rose Farm on Field 2 and neighbouring dwellings on Field 1 as well as to users of the surrounding common land and public rights of way. Contrary to Core Strategy Policy DCO1. The fields traditionally flood- it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that because the adjoining Shillings Lane is lower that flooding of the lane once a rare occurrence now occurs frequently. Development as proposed will further increase this flooding. The likely impact on the risk of flooding elsewhere as a result of an increase in the volume of run off post development. Contrary to NPPF paragraphs 103 and 109 The NPPF makes it clear in Paragraph 8 that the three roles the planning system is required to perform in respect of sustainable development should not be taken in isolation because they are mutually dependant. For the above reasons the benefits of the housing provision proposed, taking into account the development plan and the policies of

Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130644	Full Name	Claire Gooch	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

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Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130696	Full Name	Blundell	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4 - Is the plan positively prepared?	Yes
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proposed for the land have outlined the visual, landscape and amenity importance of the land together with numerous issues around flooding, degradation of hedgerows loss of wildlife area and concerns from the Police regarding crime. The area is a cherished local asset due to its openness -the small field in particular due to its visual exposure from two popular footpaths including the medieval lane " Shillings Lane. The openness of the land is important in separating the built environment from the wildlife corridor and County Wildlife Site, such areas forming a physical breathing space away from the hustle and bustle of both the existing and proposed residential areas nearby. Moreover, the indicative layout illustrates a relatively high density, physically distinct development, wholly incongruous with the single existing dwelling adjoining the paddock field Rose Farm a comparatively low level dwelling with single storey appendages. The dwellings are likely to result in an unduly urbanised built form, introducing harmful change which would be incompatible with the quality of the landscape and setting of the settlement. The 2 fields are located in a highly sensitive, historic and valued landscape; bordered by common land and historic rights of way. The level and density of development proposed (60 dwellings) is not reflective of its context and would not enhance the character and appearance of the area, but would have a significant and harmful impact on the setting. A development of 60 dwellings cannot be accommodated successfully on the site without harming the landscape character and appearance of the area- The application is contrary to the NPPF and Core Strategy Policy CP11/DC16. See also paragraphs 17 & 58 of the NPPF Proposed dwellings on the southern boundary of the site would cause an unacceptable level of overlooking and harm to the amenities of Rose Farm on Field 2 and neighbouring dwellings on Field 1 as well as to users of the surrounding common land and public rights of way. Contrary to Core Strategy Policy DCO1. The fields traditionally flood- it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that because the adjoining Shillings Lane is lower that flooding of the lane once a rare occurrence now occurs frequently. Development as proposed will further increase this flooding. The likely impact on the risk of flooding elsewhere as a result of an increase in the volume of run off post development. Contrary to NPPF paragraphs 103 and 109 The NPPF makes it clear in Paragraph 8 that the three roles the planning system is required to perform in respect of sustainable development should not be taken in isolation because they are mutually dependant. For the above reasons the benefits of the housing provision proposed, taking into account the development plan and the policies of

Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1130647 Full Name Mrs J. R. Howard
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

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Amendment ID

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Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130686	Full Name	Angela Daley	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130683	Full Name	P Doughty	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130681	Full Name	Jan Hawkins	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

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Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1130677 Full Name Morgana Hale
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1130673 Full Name Danielle Buttes
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

Reasons for Objection

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1130665 Full Name Marcus Admes
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

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Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1130661 Full Name Jess Bannerman
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

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Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129717	Full Name	Teresa Small	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130704	Full Name	Mrs JJ Tinney	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

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Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1129420 Full Name A Pendergrest
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
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Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

on a 2.3 hectare site, which would provide a density of approximately 26 dwellings per hectare; this would be in keeping with the neighbouring dwellings. Natural England have commented on the Pre-submission Publication and raised no objections. It is therefore considered that the impact upon the landscape and natural environment would not be significant. Through the application, the Public Rights of Way officer raised no objection as long as long as there is no adverse impact on either the registered common land to the west or Restricted Byway (RB32) along the northern boundary of the site. The allocation itself seeks to respect the northern boundary of the site by being set back from Shillings Lane. Historic Character During the Preferred sites and Settlement Boundaries consultation, Historic England commented that further work should be carried out to assess the impact of preferred and alternative sites upon the Historic Environment. The Historic Characterisation Study was carried out in early 2017 and in relation to site LP[025]007, concluded that: Development proposals must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken so as to inform an appropriate design response. In this case the established pattern of adjacent mixed development will be an additional factor in the formation of the proposal. On the planning application itself NCC Historic Environment Service commented that the proposal does not have any implications for the historic environment and that no recommendations for archaeological work would be made. Flood Risk The SA highlighted that the site is situated within an area of flood risk. However, this is only a very small extant to the north and north east. Through the Preferred Sites and Settlement Boundaries consultation the Lead Local Flood Authority recommended that conditions are attached to any planning permission granted under the current planning application. At this stage the Lead Local Flood Authority commented on the site specifically stating: We welcome that the site has been reduced in its extent from the original allocation and now does not include areas at risk of flooding from surface water. An assessment of the actual risk of flooding should be undertaken by any development on this site. Following the Preferred Sites and Settlement Boundaries Consultation the Sequential Test looked at all defined as preferred or alternative. As part of this the extent of surface water flooding on the site was not considered to be substantial, with only approximately 2% of the site subject to surface water flooding. Through the planning application the Environment Agency and the Lead Local Flood Authority have raised no objections to the proposed development subject to conditions. Wastewater treatment As part of the evidence base underpinning the Local Plan a Water Cycle Study was carried out. As part of this study it was highlighted that improvements may be required to the treatment capacity. The study recommends that all applications for development proposals in Dereham are accompanied by a pre-development enquiry with Anglian Water Services to demonstrate that sufficient capacity is available to treat wastewater from the proposals. This wording has been added to the key development considerations within the allocation wording. Conclusion In conclusion it is considered that the site represents a sustainable site on the edge of one of five Market Towns within the district. There are no constraints that would be considered severe enough to affect the designation of the site.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

LP(025)007: Land to west of Etling View There are no known designated heritage assets within the site or nearby which could be affected development of this site. However, Dereham is associated with significant prehistoric activity as such the site may have archaeological potential which should be considered and it is recommended that the policy and supporting text is amended to require an archaeological assessment for development proposals within the site. The proposed site is located on the edge of the existing settlement looking over open land, the relationship between any new development and the surrounding landscape should then be carefully considered. Paragraph 3.125 of the supporting

Local Plan Pre-Submission - Comments and Response Schedule

text states that a historic characterisation study carried out in support of the allocation concluded that development proposals must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken so as to inform appropriate design, this is welcomed but it does appear as a criterion in the policy itself. It is requested that policy is amended accordingly. The proposed allocation is located immediately next to a site which already has permission for housing development. It is important that the cumulative impacts are therefore considered.

Breckland Council Response

Officer Response

Development of this site would need to be in conformity with all policies within the Local Plan and also the NPPF. The Local Plan includes policy ENV07 in relation to Designated Heritage Assets and also design policies COM01 and GEN2. The reference to the historic characterisation study is included within the reasoned justification, this is combined with the requirements to consider the design policies within the DPD. Any application for this site would need to consider this and it is considered that it is not necessary to specifically include these within the key development considerations.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130073	Full Name	Richard Biggs	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

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Representation

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Land to the west of EtlingView (LPj025]007 The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock/grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate. Many of the 400+ local objectors to the current scheme

proposed for the land have outlined the visual, landscape and amenity importance of the land together with numerous issues around flooding, degradation of hedgerows loss of wildlife area and concerns from the Police regarding crime. The area is a cherished local asset due to its openness -the small field in particular due to its visual exposure from two popular footpaths including the medieval lane " Shillings Lane. The openness of the land is important in separating the built environment from the wildlife corridor and County Wildlife Site, such areas forming a physical breathing space away from the hustle and bustle of both the existing and proposed residential areas nearby. Moreover, the indicative layout illustrates a relatively high density, physically distinct development, wholly incongruous with the single existing dwelling adjoining the paddock field Rose Farm a comparatively low level dwelling with single storey appendages. The dwellings are likely to result in an unduly urbanised built form, introducing harmful change which would be incompatible with the quality of the landscape and setting of the settlement. The 2 fields are located in a highly sensitive, historic and valued landscape; bordered by common land and historic rights of way. The level and density of development proposed (60 dwellings) is not reflective of its context and would not enhance the character and appearance of the area, but would have a significant and harmful impact on the setting. A development of 60 dwellings cannot be accommodated successfully on the site without harming the landscape character and appearance of the area- The application is contrary to the NPPF and Core Strategy Policy CP11/DC16. See also paragraphs 17 & 58 of the NPPF Proposed dwellings on the southern boundary of the site would cause an unacceptable level of overlooking and harm to the amenities of Rose Farm on Field 2 and neighbouring dwellings on Field 1 as well as to users of the surrounding common land and public rights of way. Contrary to Core Strategy Policy DCO1. The fields traditionally flood- it can be seen from the development on adjoining fields that the propensity of the area to flood has increased dramatically and that because the adjoining Shillings Lane is lower that flooding of the lane once a rare occurrence now occurs frequently. Development as proposed will further increase this flooding. The likely impact on the risk of flooding elsewhere as a result of an increase in the volume of run off post development. Contrary to NPPF paragraphs 103 and 109 The NPPF makes it clear in Paragraph 8 that the three roles the planning system is required to perform in respect of sustainable development should not be taken in isolation because they are mutually dependant. For the above reasons the benefits of the housing provision proposed, taking into account the development plan and the policies of

Local Plan Pre-Submission - Comments and Response Schedule

the NPPF as a whole, are clearly outweighed by the significant harmful impacts of the development. This proposal does not meet the criteria to be regarded as sustainable development and should be refused. The NPPF identifies (in paras 6 and 17) sustainable development as the purpose of the planning system and conserving and enhancing the natural environment as a core planning principle. While specific policies on conserving and enhancing the natural environment are addressed in Section 11 of the NPPF, these should not be considered in isolation, as other natural environment related policies, and their consideration in plan- and decision-making, can be found throughout the document. The NPPF states (in para. 114) that local planning authorities should plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. The NPPF makes it clear (in para. 110) that Plans should allocate land with the least environmental or amenity value. Planning policies and decision-making should seek to protect and enhance natural and heritage assets appropriate to their significance. Policies and decisions should also encourage multiple benefits from development.

Breckland Council Response

Officer Response

History of the site in the Local Plan The site, LP[025]007, known as Land to the west of Etling View, was identified as a reasonable alternative during the Emerging Site Options consultation. The site was then considered to be a proposed allocation through the Preferred Sites and Settlement Boundaries consultation. During these consultations no significant objections were raised by any of the statutory consultees. The sites inclusion within the Local Plan is supported and underpinned by a range of evidence including, but not exclusive to: the Historic Characterisation Study, the Sequential Test, the Water Cycle Study and the Infrastructure Delivery Plan. The site is now subject to a planning application (3PL/2015/1045/O), which is still under consideration. However, through this further detailed comments have been provided.

Landscape & Natural Environment The site adjoins Neatherd Moor Common to the west, which is designated both as a County Wildlife Site and as Natural/Semi “natural green space. The Breckland District Settlement Fringe Landscape Assessment defines the character area as the Northall Green Open Arable Plateau, which is of Moderate-High sensitivity. The Assessment states that, as part of the general landscape management plan, Neatherd Moor must be conserved and enhanced through appropriate landscape management including grazing. The proposed allocation would extend the built up area of the town north and the appearance of the site would change from open farmland to a built up housing area. However, the scheme would largely be contained visually by the adjacent built environment to the south and east and the existing boundary hedging/trees and woodland to the north and west. From the County Wildlife Site, the Neatherd and Shillings Lane to the east, the proposal would be screened during part of the year by existing mature landscaping along Shillings Lane and the northern boundary of the site. When seen within the autumn, winter and early spring months the proposed buildings would be seen adjacent to the existing buildings to the east and would bring the built form closer to Shillings Lane and the Neatherd. The proposal would transform and erode the open aspect of the neighbouring dwellings immediately to the south of the site. However, this would be localised and could be mitigated through landscaping and additional planting. The policy wording of the allocation seeks the Retention and enhancement of native hedgerows and trees on the outer edge of the site boundary. This would seek to mitigate the impact. The proposal seeks at least 60 dwellings

Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129728	Full Name	Kirsty-R Hann	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

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Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129715	Full Name	Stephen Dean	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

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Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1129430 Full Name Mr Trevor Ward
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

Reasons for Objection

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Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1129426 Full Name Edwin Atkinson
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

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Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

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Amendment ID

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Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129623	Full Name	Danny Rae	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129664	Full Name	Beverley Hatherall	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1129423 Full Name Mr Hollett
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

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Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129674	Full Name	Shaun Small	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
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Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1129464 Full Name Emily Makcrow
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

Reasons for Objection

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129449	Full Name	D. M. Ward	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

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Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129414	Full Name	Mr H Wilcox	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129409	Full Name	Jackie Francis	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130339	Full Name	D Chambers	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129403	Full Name	Keith Francis	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
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Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129398	Full Name	Michelle Hoskins	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
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Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Land to the west of EtlingView (LPj025]007 The proposed site consists of 2 separate hedged fields - one which has been used as an Arable field and a much smaller field which has for 50 years been an enclosed paddock/grazing land. On the edge of a settlement these fields contribute to the rural setting and compliment the adjoining County Wildlife site and surrounding lightly wooded amenity land into which they penetrate. Many of the 400+ local objectors to the current scheme

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Local Plan Pre-Submission - Comments and Response Schedule

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Breckland Council Response

Officer Response

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1134647 Full Name Mr Tony Needham
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
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Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Not Justified. The evidence in the Dereham Green Infrastructure Strategy has not been used when developing this policy. Point 3. The policy only stipulates that native hedging and trees on the outer edge of the site boundary should be retained. Given the high ecological value of this location, all hedging and trees should be retained. Given the importance of this location adjacent to a county wildlife site and at a junction between the Eastern and Northern green corridors more emphasis should be placed on enhancing the wildlife value of the site making connections between wildlife corridors. The wording of this policy should be amended so that there is the option to provide a single large LAP rather than two

Local Plan Pre-Submission - Comments and Response Schedule

small LAPs - this would then be in accordance with ENV 04. The emerging Dereham Neighbourhood Plan has identified that enhancing valued green corridors where developers need to identify additional environmental enhancements is a high priority for residents. The Dereham Transport Study does not provide sound evidence to support allocation.

Breckland Council Response

Officer Response

The representation states that the Dereham Transport Study does not provide sound evidence to support the allocation. It is difficult to respond further on this issue without explanation from Dereham Town Council as to the elements of the transport study which they specifically object to. Through the Local Plan consultations, Norfolk County Council highways have not objected to the development of the site. Green infrastructure is included under Policy ENV01. This applies to all allocations and planning applications within the District, including this allocation.

The representation makes reference to the Dereham neighbourhood plan. This is at a very early stage of preparation and has not been subject to either its regulation 14 or 16 consultations yet. In this regard it is not considered appropriate to apply weight to the proposals within it. The allocation does not restrict the neighbourhood plan bringing forward policies in relation to green infrastructure.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129622	Full Name	John Dawson	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

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Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1129340 Full Name Andy Carr
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

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Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1129331 Full Name Debbie Dingor
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

Reasons for Objection

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129710	Full Name	Stephen Gilding	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

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Amendment ID

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Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1129707 Full Name Louise DGLISH
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

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Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129705	Full Name	Susan Gilding	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129702	Full Name	Naomi Daghish-Gage	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

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Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

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Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1129699 Full Name Mr Colin Reeve
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1129696 Full Name Mrs Emma Reeve
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
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Do you wish to appear at the Examination in Public? No

Representation

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Local Plan Pre-Submission - Comments and Response Schedule

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Breckland Council Response

Officer Response

History of the site in the Local Plan The site, LP[025]007, known as Land to the west of Etling View, was identified as a reasonable alternative during the Emerging Site Options consultation. The site was then considered to be a proposed allocation through the Preferred Sites and Settlement Boundaries consultation. During these consultations no significant objections were raised by any of the statutory consultees. The sites inclusion within the Local Plan is supported and underpinned by a range of evidence including, but not exclusive to: the Historic Characterisation Study, the Sequential Test, the Water Cycle Study and the Infrastructure Delivery Plan. The site is now subject to a planning application (3PL/2015/1045/O), which is still under consideration. However, through this further detailed comments have been provided.

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	875126	Full Name	Spaceward	Organisation Details	
Agent ID	1130567	Agent Name	Mr Geoff Armstrong	Agent Organisation	Armstrong Rigg Planning

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
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Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

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Land at Etling Green, Dereham In respect of the above identified need to allocate additional sites for residential development during the next five years, we are pleased to confirm that our clients land at Etling Green , Dereham is considered to be a sustainable option for the delivery of 122 dwellings and is deliverable during the next five years. We submitted previous representations to the Local Plan Issues and Options Consultation Document and Call for Sites (January 2015), to the Local Plan Preferred Directions Consultation (February 2016) and to the Local Plan Preferred Site Options and Settlement Boundaries Consultation (October 2016) in support of further housing growth in Dereham and specifically to promote land at

Etling Green (as shown on the enclosed location plan for allocation) for up to 122 dwellings. We were disappointed to note in the Preferred Site Options and Settlement Boundaries Consultation (October 2016) that the site (reference LP[025]025) had been categorised as an Unreasonable Option by reason that: "The site is visually detached from the Dereham settlement and comprises land associated with Etling Green. The site is remote from services and facilities within the town. The development of the site would lead to the coalescence of the settlements of Dereham and Etling Green which would be unfavourable in landscape terms." In June 2016, a pre-application request was submitted to Breckland District Council (copy attached) in respect of a proposed residential development with possible commercial use on the site. A positive response to the pre-application request was received from James Tipping, Principal Development Management Planner on 27th July 2016 (copy attached). Fundamentally, this confirmed (my emphasis): Development of the site for residential use would be supported by the Council should a formal application be submitted; It is evident that the proposed development would be well related to any existing built form, albeit separated from the Norwich Road to the west of the site, on the Dereham side. However, the development would form the smaller cluster of existing residential buildings at Etling Green; The land is considered a greenfield site, though is bound by residential development to the east and west, with the A47 directly to the south and the B1147 to the north. The site would not therefore be considered development within the open countryside; and The site would have access to local services within Dereham, and could utilise the newly constructed footpath to the north of the B1147 to access such services by foot. In addition, there are other forms of sustainable modes of transport available (e.g. bus service) within Dereham that address certain sustainability matters. In these broad terms the proposal would represent a sustainable development as defined in the NPPF. Other general advice was received in terms of the suggested density, design and mix for the housing and the need to provide noise mitigation. It was advised that there was no current need/demand for additional commercial floor space in this locality. In light of the positive response by Officers in respect of the suitable and sustainable nature of the site outlined above, we consider Land at Etling Green to be particularly well-placed to help meet the currently unmet need for an additional several hundred new homes identified above. The attached pre-application submission demonstrates that there are no access, sewerage, landscape or flooding constraints to development coming forward on the site in the short term. Any noise

Local Plan Pre-Submission - Comments and Response Schedule

impact from the adjacent A47 could be adequately mitigated by a landscape buffer and plot positioning. Furthermore, we are pleased to confirm that our client is committed to bringing forwards a planning application in the short-term and to deliver the full 122 homes on the site within 5 years.

Breckland Council Response

Officer Response

Comment noted. All sites have been assessed through the sustainability appraisal and also through the criteria set out within the site selection topic paper. This states that It is remote from services and facilities increasing the number of private vehicles on the road. The development of the site would lead to the coalescence of the settlements of Dereham and Etling Green which would be unfavourable in landscape terms. The site is situated within the Northall Green Open Arable Plateau character area, as defined in the Breckland Settlement Fringe Landscape Assessment, which is of moderate to high sensitivity to change. Norfolk County Council Highways object to this site on the bases that it is in an unsustainable location. There are no links to pedestrian facilities and fronts onto the A47 slip road. For these reasons this site is not considered to be a reasonable option for allocation

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129689	Full Name	J Bird	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

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Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129659	Full Name	Kevin Green	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

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Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1129345 Full Name Sonia Meacher
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

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Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1129348 Full Name Jane Whitehead
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

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Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

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Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1129352 Full Name Chloe Green
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

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History of the site in the Local Plan The site, LP[025]007, known as Land to the west of Etling View, was identified as a reasonable alternative during the Emerging Site Options consultation. The site was then considered to be a proposed allocation through the Preferred Sites and Settlement Boundaries consultation. During these consultations no significant objections were raised by any of the statutory consultees. The sites inclusion within the Local Plan is supported and underpinned by a range of evidence including, but not exclusive to: the Historic Characterisation Study, the Sequential Test, the Water Cycle Study and the Infrastructure Delivery Plan. The site is now subject to a planning application (3PL/2015/1045/O), which is still under consideration. However, through this further detailed comments have been provided.

Landscape & Natural Environment The site adjoins Neatherd Moor Common to the west, which is designated both as a County Wildlife Site and as Natural/Semi “natural green space. The Breckland District Settlement Fringe Landscape Assessment defines the character area as the Northall Green Open Arable Plateau, which is of Moderate-High sensitivity. The Assessment states that, as part of the general landscape management plan, Neatherd Moor must be conserved and enhanced through appropriate landscape management including grazing. The proposed allocation would extend the built up area of the town north and the appearance of the site would change from open farmland to a built up housing area. However, the scheme would largely be contained visually by the adjacent built environment to the south and east and the existing boundary hedging/trees and woodland to the north and west. From the County Wildlife Site, the Neatherd and Shillings Lane to the east, the proposal would be screened during part of the year by existing mature landscaping along Shillings Lane and the northern boundary of the site. When seen within the autumn, winter and early spring months the proposed buildings would be seen adjacent to the existing buildings to the east and would bring the built form closer to Shillings Lane and the Neatherd. The proposal would transform and erode the open aspect of the neighbouring dwellings immediately to the south of the site. However, this would be localised and could be mitigated through landscaping and additional planting. The policy wording of the allocation seeks the Retention and enhancement of native hedgerows and trees on the outer edge of the site boundary. This would seek to mitigate the impact. The proposal seeks at least 60 dwellings

Local Plan Pre-Submission - Comments and Response Schedule

on a 2.3 hectare site, which would provide a density of approximately 26 dwellings per hectare; this would be in keeping with the neighbouring dwellings. Natural England have commented on the Pre-submission Publication and raised no objections. It is therefore considered that the impact upon the landscape and natural environment would not be significant. Through the application, the Public Rights of Way officer raised no objection as long as there is no adverse impact on either the registered common land to the west or Restricted Byway (RB32) along the northern boundary of the site. The allocation itself seeks to respect the northern boundary of the site by being set back from Shillings Lane.

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Following the Preferred Sites and Settlement Boundaries Consultation the Sequential Test looked at all defined as preferred or alternative. As part of this the extent of surface water flooding on the site was not considered to be substantial, with only approximately 2% of the site subject to surface water flooding. Through the planning application the Environment Agency and the Lead Local Flood Authority have raised no objections to the proposed development subject to conditions.

Wastewater treatment As part of the evidence base underpinning the Local Plan a Water Cycle Study was carried out. As part of this study it was highlighted that improvements may be required to the treatment capacity. The study recommends that all applications for development proposals in Dereham are accompanied by a pre-development enquiry with Anglian Water Services to demonstrate that sufficient capacity is available to treat wastewater from the proposals. This wording has been added to the key development considerations within the allocation wording.

Conclusion In conclusion it is considered that the site represents a sustainable site on the edge of one of five Market Towns within the district. There are no constraints that would be considered severe enough to affect the designation of the site.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1129365 Full Name Maeve McBride
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129385	Full Name	K Powles	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

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Amendment ID

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Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129669	Full Name	Paul Sandford	Organisation Details	Railway Tavern
Agent ID		Agent Name		Agent Organisation	

Comment Details

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Following the Preferred Sites and Settlement Boundaries Consultation the Sequential Test looked at all defined as preferred or alternative. As part of this the extent of surface water flooding on the site was not considered to be substantial, with only approximately 2% of the site subject to surface water flooding. Through the planning application the Environment Agency and the Lead Local Flood Authority have raised no objections to the proposed development subject to conditions.

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129687	Full Name	B Bird	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
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Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1129685 Full Name Huw David
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

Reasons for Objection

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Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1129694 Full Name Gemma Gilding
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 1
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
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Local Plan Pre-Submission - Comments and Response Schedule

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Local Plan Pre-Submission - Comments and Response Schedule

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Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Dereham Housing Allocation 2
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
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14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

LP(025)011: Land west of Shipdham Road There are no known designated heritage assets within the site or nearby which could be affected development of this site. However, Dereham is associated with significant prehistoric activity as such the site may have archaeological potential which should be considered and it is recommended that the policy and supporting text is amended to require an archaeological assessment for development proposals within the site. The proposed site is located on the edge of the existing settlement looking over open land, the relationship between any new development and the surrounding landscape should then be carefully considered. In addition the site is also described

Local Plan Pre-Submission - Comments and Response Schedule

as a gateway location and in a landscape sensitive to change. Paragraph 3.128 of the supporting text states that a historic characterisation study carried out in support of the allocation concluded that development proposals must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken so as to inform appropriate design, this is welcomed but it does appear as a criterion in the policy itself. It is requested that policy is amended accordingly.

Breckland Council Response

Officer Response

Development of this site would need to be in conformity with all policies within the Local Plan and also the NPPF. The Local Plan includes policy ENV07 in relation to Designated Heritage Assets and also design policies COM01 and GEN2. The reference to the historic characterisation study is included within the reasoned justification, this is combined with the requirements to consider the design policies within the DPD. Any application for this site would need to consider this and it is considered that it is not necessary to specifically include these within the key development considerations.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1134647 Full Name Mr Tony Needham
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 2
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Most of these issues were raised as part of the Site Options consultation in October 2016.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Not Justified. The LPA has not demonstrated that the chosen approach is the most appropriate given the alternatives. The site's connectivity with the town centre in terms of sustainable transport has not been fully considered. Congestion issues have not been adequately dealt with because of the limitations of the Dereham Transport Study. The site is poorly connected to the town centre being 2km away. The development will therefore be highly reliant on private cars for short journeys. The Dereham Transport study does not address the whole network and only deals with a few individual junctions rather than a model for the whole town. Part of this site is currently an employment site its loss to housing would have a negative

Local Plan Pre-Submission - Comments and Response Schedule

impact due to loss of employment on the town this has not been factored into the decision to allocate this site. To be acceptable, allocation should be delayed until a greater understanding of the road network is established to identify the best location for new developments in terms of congestion. Alternative employment allocation should be identified to compensate for the loss on this site because it is close to the Southern Green corridor greater emphasis is placed on enhancements to biodiversity. The emerging Dereham Neighbourhood Plan has identified that enhancing valued green corridors where developers need to identify additional environmental enhancements is a high priority for residents. And identified that locating development where it will either reduce or not contribute to congestion is high priority for residents.

Breckland Council Response

Officer Response

All sites have been subject to sustainability appraisal, which has allowed for the appraisal of reasonable alternative options. The site is not a designated general employment area, and contains a range of uses within the site, this includes greenfield agricultural land. The representation states that the Dereham Transport Study does not provide sound evidence to support the allocation. It is difficult to respond further on this issue without explanation from Dereham Town Council as to the elements of the transport study which they specifically object to. Through the Local Plan consultations, Norfolk County Council highways have not objected to the development of the site.

The representation makes reference to the Dereham neighbourhood plan. Green infrastructure is included under Policy ENV01. This applies to all allocations and planning applications within the District, including this allocation. The neighbourhood plan is at a very early stage of preparation and has not been subject to either its regulation 14 or 16 consultations yet. In this regard it is not considered appropriate to apply weight to the proposals within it.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1132253	Full Name	Glavenhill Strategic Land	Organisation Details	Glavenhill Strategic Land
Agent ID	1132430	Agent Name	Philip Atkinson	Agent Organisation	Lanpro

Comment Details

Title		Number	Dereham Housing Allocation 2
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The same points were raised during the previous consultation and no changes were then made to DHA2. Failure to make the changes sought will block an important opportunity to deliver linked sustainable development and improve peoples lives within Dereham. Similar representations have been made to the emerging Norfolk Strategic Framework document that seeks to guide planned development within the District to 2036.		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Glavenhill Strategic Land (GSL) supports the location of emerging Dereham Housing Allocation 2 (DHA2) to the west of Shipdham Road as indicated in the Pre-Submission version of the emerging Local Plan. My client does however object to the wording of Policy DHA2 as currently drafted on the basis it would make the emerging allocation unsound. This is on the basis that land on the opposite site of Shipdham Road referred to as Dereham Housing Allocation 5 (DHA5) contains a planned section of new primary distributor road between Yaxham Road (B1135) and Shipdham Road (A1075). DHA2 makes no provision to extend this new route through the land to the west of Shipdham Road through to The Broadway. The new distributor road through the DHA2 and DHA5 sites could eventually facilitate a dedicated east-to-west vehicular route around Dereham to take the pressure off the Tavern Lane/Yaxham Road junctions that are nearing capacity. GSL is currently in discussions with the land owners to the west of the DHA2 site back to the A47 trunk road to facilitate delivery of this southern route. The land being assembled is to the south of Hillcrest Avenue, north and east of Broadway Farm; and south, east and west of Brookfield to the west of Dereham. If the Council sees the merits in devising a long-term growth strategy for Dereham to link Yaxham Road through to the A47 at Draytonhall Lane, it is important that this route is not sterilised by poorly planned development within the DHA2. To be very clear this infrastructure-led strategic development opportunity will be lost if Policy DHA2 as drafted is not amended. As such DHA2 as currently drafted is not positively prepared and/or effective in the widest sense and this is the reason for my clients current objection. Although this longer-term spatial development strategy would need to be debated through future Local Plans it is important to recognise that this opportunity exists, especially given the early stage nature of the emerging Norfolk Strategic Framework. Therefore, to protect the opportunity going forwards we contend that the wording of the first criteria in Allocation DHA2 should be changed to Provision of safe highways access from Shipdham Road should be provided. This access should link to an internal roadway through the site connecting to farmland south of Heidi Close to the west of the site. This internal roadway should be of sufficient width to accommodate a primary distributor road. In the short term, secondary access should be provided to Colleen Close. GSLs view is that this would make allocation DHA2 sound. To better explain the opportunity, a plan showing the route of the new southern primary distributor road that could be delivered between the Yaxham Road (B1135) and the A47 at Draytonhall Lane is attached to this representation.

Local Plan Pre-Submission - Comments and Response Schedule

Breckland Council Response

Officer Response

The development of the a western distributor road is not included within the Local Plan. Development of this scale would require revisions to the settlement hierarchy and spatial distribution within the Local Plan. It is noted that the representation makes reference to future Local Plans. Land to the west of the town was also assessed as part of this Local Plan and the majority of the sites were considered to be unreasonable on the basis of impact upon protected sites (County Wildlife Sites, SSSI's and SAC), flood risk and also the ability to achieve access. The representations goes beyond the current requirements and it is not considered necessary to make the dvelopment acceptable in planning terms as would be required under regulation 122 of the Community Infrastructure Levy Regulations 2010. It is therefore not proposed to amend the plan.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 972215 Full Name MRS KIRSTY HEATH
Agent ID Agent Name

Organisation Details
Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 2
Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound No

2 - Do you consider the Pre-Submission Publication to be unound Yes

3 - Is the plan legally compliant? No

4- Is the plan positively prepared? No

5- Is the plan justified? No

6- Is the plan effective? No

7 - Is the plan consistent with national policy? No

8 - Have you raised this at Preferred Site Options consultation? No

9 - Have you raised this at Preferred Directions ? No

10- Have you raised this at Issues and Options? No

11- If you have not raised this issue before please state why

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

This development is too close to the River Tud which is prone to flooding. Also exiting onto the main trunk road through Dereham where over 1000 cars use everyday.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted. The site assessment has considered both flood risk and highways.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1134647 Full Name Mr Tony Needham
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 3
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Not Justified. The evidence in the Dereham Green Infrastructure Strategy has not been used while developing this policy. This site is close to the ton centre it therefore has significant potential to be highly sustainable. The developer should show clear linkages for walkers and cyclists to access the town centre. The site is adjacent to the central and Northern Green corridors as identified in the Dereham GI strategy, greater emphasis should be placed on improvements to biodiversity. The emerging Dereham Neighbourhood Plan has identified that enhancing valued green corridors where developers need to identify additional environmental enhancements is a high priority for residents as is improvements to walking and

Local Plan Pre-Submission - Comments and Response Schedule

cycling. The Dereham Transport Study does not provide sound evidence to support this allocation.

Breckland Council Response

Officer Response

The representation states that the Dereham Transport Study does not provide sound evidence to support the allocation. It is difficult to respond further on this issue without explanation from Dereham Town Council as to the elements of the transport study which they specifically object to. Through the Local Plan consultations, Norfolk County Council highways have not objected to the development of the site. Further to the above the site has been the subject of a planning application, through which the issues relating to highways have been further assessed. The site is currently the subject of a call in from the Secretary of State, however it has been recommended for approval by the Councils planning committee.

The representation makes reference to the Dereham neighbourhood plan. This is at a very early stage of preparation and has not been subject to either its regulation 14 or 16 consultations yet. In this regard it is not considered appropriate to apply weight to the proposals within it. However the allocation of the site does not preclude the neighbourhood plan from including policies around green infrastructure.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Dereham Housing Allocation 3
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

LP(025)023: Land off Swanton Road There are no known designated heritage assets within the site or nearby which could be affected development of this site. However, Dereham is associated with significant prehistoric activity as such the site may have archaeological potential which should be considered and it is recommended that the policy and supporting text is amended to require an archaeological assessment for development proposals within the site. The proposed site is located on the edge of the existing settlement looking over open land, the relationship between any new development and the surrounding landscape should then be carefully considered. Development of this site should not

Local Plan Pre-Submission - Comments and Response Schedule

encourage coalescence with the neighbouring hamlet of Northall Green. Paragraph 3.135 of the supporting text states that a historic characterisation study carried out in support of the allocation concluded that development proposals must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken so as to inform appropriate design, this is welcomed but it does appear as a criterion in the policy itself. It is requested that the policy is amended accordingly.

Breckland Council Response

Officer Response

Development of this site would need to be in conformity with all policies within the Local Plan and also the NPPF. The Local Plan includes policy ENV07 in relation to Designated Heritage Assets and also design policies COM01 and GEN2. The reference to the historic characterisation study is included within the reasoned justification, this is combined with the requirements to consider the design policies within the DPD. Any application for this site would need to consider this and it is considered that it is not necessary to specifically include these within the key development considerations.

Further to this the site now has the decision to grant planning permission subject to the completion of the section 106 agreement.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1131634	Full Name	Mountleigh Development Holdings	Organisation Details	Mountleigh Development Holdings
Agent ID	1130567	Agent Name	Mr Geoff Armstrong	Agent Organisation	Armstrong Rigg Planning

Comment Details

Title		Number	Dereham Housing Allocation 3
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Dereham Housing Allocation 3 - Land off Swanton Road (LP[025]023) As outlined above, we support the allocation of our clients land for residential development, but have a couple of concerns regarding the soundness of the Dereham Housing Allocation 3 policy that allocates the site for development. The site has a resolution to grant outline planning permission for up to 216 dwellings (Ref: 3PL2015/1487/O). The committee report for this application clearly demonstrates that this level of development can be sustainably accommodated on the site. It is therefore unclear why the policy proposes only 210 dwellings. In this respect the policy is not considered to represent the most appropriate strategy for the site and

Local Plan Pre-Submission - Comments and Response Schedule

must be considered unsound. Recommendation: Amend policy wording to refer to approximately 216 dwellings. In addition to the above we wish to raise concern regarding the policy criteria that " Development should provide a minimum of 2 Locally Equipped Areas for Play and an Outdoor Sport Area ". This requirement is not worded as flexibly as emerging Policy ENV 04 " Open Space, Sport and Recreation, which recognises that " there may be cases where the direct provision of open space on-site is not the preferred option. It may be that open space does not represent an efficient use of land in the context of the site location or that there is a deliverable opportunity to secure a more meaningful area of open space that better serves the whole community in close proximity to the application site" .

Recommendation: The policy wording should be amended to allow more flexibility in the provision open space in accordance with Policy ENV 04. Conclusion We wish to support the allocation of our clients land at Swanton Road, Dereham by policy Dereham Housing Allocation 3 and consider the policy wording to be largely sound, subject to the minor amendments suggested regarding the level of proposed development and requirements for open space. In addition to these recommendations, we have concerns regarding the burden placed on developers by the proposed policies on technical design standards, healthy lifestyles and open space provision. In each case we have made recommendations to either delete or amend the relevant policies in order to make the Local Plan sound.

Breckland Council Response

Officer Response

The policy sets the requirement as approximately 210 dwellings. The target is not intended to be an upper limit, hence the use of the word approximately, and where an appropriately designed scheme comes forward which meets upther policies within the Local Plan this would be deemed to be acceptable. In this regard it is not considered that any amendments are needed to the policy.

In terms of open space, any application in relation to this site will need to have regard to all the policies within the Local Plan including ENV04. It is considered that policy ENV04 includes enough flexibility withough having to vary the key development considerations.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Dereham Housing Allocation 4
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

LP(25)029: Land to the rear of Dereham Hospital There are no known heritage assets within the site boundary but a Grade II listed water tower and the Dereham Conservation Area are located to the south west of the site. The watertower is an interesting piece of Victorian industrial heritage and is one of only two surviving town watertowers of its style and date (1881) in Norfolk. Any development of the site therefore has the potential to impact upon these heritage assets. It is important that any development of this site will need to preserve these heritage assets and their settings. These requirements should be included in the policy and supporting text of the Plan. Dereham is associated with significant prehistoric

Local Plan Pre-Submission - Comments and Response Schedule

activity as such the site may have archaeological potential which should be considered and it is recommended that the policy and supporting text is amended to require an archaeological assessment for development proposals within the site. The policy and supporting text both acknowledge the local interest of the hospital as a non-designated heritage asset and the provision at point 3 of the policy which requires development to have regard for the hospital building is welcomed. Paragraph 3.141 of the supporting text states that a historic characterisation study carried out in support of the allocation concluded that development proposals must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken so as to inform appropriate design, this is welcomed but it does appear as a criterion in the policy itself. It is requested that policy is amended accordingly.

Breckland Council Response

Officer Response

Development of this site would need to be in conformity with all policies within the Local Plan and also the NPPF. The Local Plan includes policy ENV07 in relation to Designated Heritage Assets and also design policies COM01 and GEN2. The reference to the historic characterisation study is included within the reasoned justification, this is combined with the requirements to consider the design policies within the DPD. Any application for this site would need to consider this and it is considered that it is not necessary to specifically include these within the key development considerations.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1134647 Full Name Mr Tony Needham
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 4
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Not Justified. The evidence in the Dereham Green Infrastructure Strategy has not been used to develop this policy. This site is adjacent to the central Green Corridor and close to the Northern Green corridor as identified in the Dereham GI strategy, to be acceptable greater emphasis should be placed on improvements to biodiversity, walking and cycling. The wording of the policy should be amended so that there is the option to provide a single large LAP rather than two small LAPs - this would then be in accordance with ENV 04. The Dereham Transport Study does not provide sound evidence to support this allocation. The emerging Dereham Neighbourhood Plan has identified that enhancing valued green corridors where

Local Plan Pre-Submission - Comments and Response Schedule

developers need to identify additional environmental enhancements is a high priority for residents. It has also identified that locating development where it will either reduce or not contribute to congestions and walking and cycling improvements are a high priority for residents.

Breckland Council Response

Officer Response

Comment noted. Any applications would need to meet all the policy requirements set out within the Local Plan and not just those key development considerations outlined within the policy. In relation to the provision of 2 LAPS rather than a single larger site, Policy ENV04 notes that 'where on-site provision is provided, the space should be of an appropriate type to serve the needs of the development.' However it should be noted that the intention of a LAP is that it should be located within 100m of houses.

The allocation does not exclude the possibility of a neighbourhood plan adding further detail around green infrastructure.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	972215	Full Name	MRS KIRSTY HEATH	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Dereham Housing Allocation 5
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

This development should not be considered due to the distance from the towns. Also near to the River Tud, prone to flooding and proximity to nearby SSSI's. Traffic is also a major negative against this development, the proximity to the old railway bridge, the narrow lanes of Westfield and the boundary of Westfield itself should be considered. The roads surrounding this land are gridlocked everyday at school times making residents life difficult. Dereham doesn't have the doctors, dentists and school places for these extra houses, the 2 high schools are based in the north of the town making commuting from the south at peak times troublesome.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

A full assessment of the site has been under taken, having regard to issues including highways. Further information on infrastructure is included through the infrastructure delivery plan. NCC highways have confirmed that subject to wording within the key development considerations and conditions included within the decision they would not object to the scheme. Due to the comments received from the statutory infrastructure providers, no further amendments to the allocation are proposed.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1132253	Full Name	Glavenhill Strategic Land	Organisation Details	Glavenhill Strategic Land
Agent ID	1132250	Agent Name	Jane Crichton	Agent Organisation	Lanpro Services

Comment Details

Title		Number	Dereham Housing Allocation 5
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

My client is supportive that Breckland Council have proposed this site as one of the residential allocations for Dereham to deliver the required 750 dwellings up to 2036.

A planning application (3PL/2015/1490/O) is pending determination for development on site LP[025]030. The proposed development of the approximately

13- If you feel the plan is unsound, please tell us why

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Dereham Housing Allocation 5
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

LP(025)030: Land to east of Shipdham Road There are no known designated heritage assets within the site or nearby which could be affected development of this site. However, Dereham is associated with significant prehistoric activity as such the site may have archaeological potential which should be considered and it is recommended that the policy and supporting text is amended to require an archaeological assessment for development proposals within the site. The proposed site is located on the edge of the existing settlement looking over open land, the relationship between any new development and the surrounding landscape should then be carefully considered. The site allocation would form a

Local Plan Pre-Submission - Comments and Response Schedule

substantial urban extension to Dereham and it is important that the edge condition of the town is appreciated within the wider context of the landscape, as such the relationship of the new development with the surrounding landscape should be considered. Part 5 of the policy states that development should avoid coalescence with Westfield which is welcomed but it is recommended to that this amended to also refer to Yaxham which also has site allocations proposed. Paragraph 3.146 of the supporting text states that a historic characterisation study carried out in support of the allocation concluded that development proposals must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken so as to inform appropriate design, this is welcomed but it does appear as a criterion in the policy itself. It is requested that policy is amended accordingly. The cumulative impact of the site allocations should also be considered and this is recognised in paragraph 3.145 which states that development should have regard to neighbouring allocation LP(25)011 but this is only in terms of access arrangement rather than in terms of landscape or townscape.

Breckland Council Response

Officer Response

Development of this site would need to be in conformity with all policies within the Local Plan and also the NPPF. The Local Plan includes policy ENV07 in relation to Designated Heritage Assets and also design policies COM01 and GEN2. The reference to the historic characterisation study is included within the reasoned justification, this is combined with the requirements to consider the design policies within the DPD. Any application for this site would need to consider this and it is considered that it is not necessary to specifically include these within the key development considerations.

The representation also makes reference to avoiding coalescence with Yaxham. Through the made Yaxham neighbourhood plan a strategic gap is included between Dereham and Yaxham. Therefore it is not considered necessary to update the wording, as the neighbourhood plan forms part of the development plan and already covers this aspect.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 972215 Full Name MRS KIRSTY HEATH
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Paragraph Number 3.144
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Just because it is close to an employment area this does not mean there are actually any job vacancies. This goes for the schools too, which are at capacity, with several classes in each year having over 30 pupils per class, which in this day and age is not acceptable.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

NCC have been consulted on this site in their role as the education authority, subject to securing funds through section 106, they have not raised any concerns with the development of the site for residential use. Further to this, the site is well related to Rashes Green and also has good public transport facilities.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	972215	Full Name	MRS KIRSTY HEATH	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title	Paragraph	Number	3.145
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

This may relieve the Tavern junction initially, but inevitably this traffic will adjoin the tavern junction if they require a trip into the town or to get north. This would also seriously impact the 'Tesco' roundabout which at peak times is gridlocked, not only at weekends now, due to the nature of the new business parks popularity. There are serious causes for concern having a junction onto Shipdham Road from such a large housing estate, on the brow of a hill with well over 1000 cars/hgvs using this road daily, making turning right extremely dangerous.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The key development considerations include the requirement for the scheme to contribute towards highways improvements in Dereham having regard to the Dereham Transport Study. Further to this NCC highways have not raised concerns regard the access to the site from Shipdham Road.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 972215 Full Name MRS KIRSTY HEATH
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Paragraph Number 3.147
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

When this site was looked at in the 70's/80's there were concerns for the water treatment even back then, with talk of a multi million pound sewerage plant, hence why it didn't go ahead and things have got significantly worse since then around Dereham with the growth of the town therefore making it impossible to consider without a considerable upgrade to the Dereham water treatment works.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The water cycle study has considered development within Dereham with regard to capacity with the sewerage treatment system. This has shown that subject to including a pre-application enquiry with Anglian Water there is capacity within the system.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1134647 Full Name Mr Tony Needham
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Dereham Housing Allocation 5
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Not Justified. The LPA has not demonstrated that the chosen approach is the most appropriate given the alternatives. The sites connectivity with the town centre in terms of sustainable transport has not been fully considered. Impact of development in this location is not adequately understood. A proper link road should be provided between Shipdham Road and Yaxham Road incorporating a twin carriageway road bridge over the railway. NCC own land on the eastern side of the existing bridge on the Southside of Westfield Lane which would accommodate a wider bridge and approach. This site is adjacent to the Southern and central green corridors as identified in the Dereham Green infrastructure strategy, greater

Local Plan Pre-Submission - Comments and Response Schedule

emphasis therefore should be placed on providing net gains in biodiversity. To make the policy acceptable no development should be permitted unless a proper link road is created between Shipdham Road and Yaxham Road, the policy does not require a proper link road, the absence of a link road would have a detrimental impact on the road network. Insufficient consideration has been given to the alternative site to the east of Yaxham Road, this site has potential to deliver housing earlier in the plan period because there is an existing detailed application pending and the developer would be willing to make land available for a future link road. The emerging Dereham Neighbourhood Plan has identified that enhancing valued green corridors where developers need to identify additional environmental enhancements is a high priority for residents. An identified that locating development where it will either reduce or not contribute to congestion is high priority for residents. And identified that locating development where it will either reduce or not contribute to congestion is a high priority for residents. Transport studies commissioned to support the NP may identify the need for a link for the site.

Breckland Council Response

Officer Response

Alternative options for Dereham have all been assessed through the sustainability appraisal. Norfolk County Council have been consulted on this as part of the preparation of the Local Plan and also through the planning application. No objections have been received from Norfolk County Council highways, and furthermore they have not requested that a full link road between Shipdham Road and Yaxham Road. Regulation 122 of the Community Infrastructure Levy regulations require planning obligations to only be sought where they are necessary to make the development acceptable in planning terms. Following the advice of Norfolk County Council, a link road is not considered to be necessary to make the development acceptable in planning terms. The representation makes reference to the Dereham neighbourhood plan. This is at a very early stage of preparation and has not been subject to either its regulation 14 or 16 consultations yet. In this regard it is not considered appropriate to apply weight to the proposals within it.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 969337 Full Name mr chris Manning
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Breckland Local Plan Pre-Submission Publication
 Chapter Number 3

Number

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound Yes

2 - Do you consider the Pre-Submission Publication to be unound No

3 - Is the plan legally compliant? No

4- Is the plan positively prepared? No

5- Is the plan justified? No

6- Is the plan effective? No

7 - Is the plan consistent with national policy? No

8 - Have you raised this at Preferred Site Options consultation? Yes

9 - Have you raised this at Preferred Directions ? No

10- Have you raised this at Issues and Options? Yes

11- If you have not raised this issue before please state why

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

I think that this is the only way to meet the shortfall in housing and also to tackle the big problem of traffic congestion in the town which has mainly been caused by traffic coming towards the A47 from the north.

The Town proposal has the idiotic idea that by building lots of housing to the south will ease this problem which is cetrtainly will not . This view is also backed by the

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The Local Plan is supported by a Dereham specific transport study which highlighted a range of options to support the levels of growth proposed through the Local Plan and an Infrastructure Delivery Plan. Furthermore each of the sites has been subject to highways comments from Norfolk County Council Highways.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130929	Full Name	Mr Dick Barwick	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title	Breckland Local Plan Pre-Submission Publication	Number
Chapter Number	3	

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Only just heard about it from work colleague.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

No publicity given from council about this consultation. Something this important should have had a flyer to every house.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The consultation has been carried out in accordance with the adopted Breckland Statement of Community Involvement and regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The consultation statement details the way in which the consultation was carried out, however this included advertisements and press releases within local newspapers, letters to specific and general consultees and use of social media platforms.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1128366	Full Name	Mr Richard Smith	Organisation Details	on behalf of Norfolk County Council NPS Prop
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Summary of the Dereham Allocations.	Number	Map 3.1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

We would also like to take this opportunity to highlight again our concerns regarding the relationship between the existing development boundaries of towns and villages on the proposal maps and school sites. At present there appears to be some inconsistencies regarding whether school sites (buildings/playing fields) are located within the development boundaries or not. We are seeking a more consistent approach to the designation of development boundaries in relation to school buildings and playing fields across Norfolk to allow the opportunity for schools to expand when necessary. We would request the school buildings and hardstanding at St Nicholas Junior School and Neatherd High School, Dereham be

Local Plan Pre-Submission - Comments and Response Schedule

included within the development boundary for Dereham. The plan and proposals maps are inconsistent regarding whether school sites are located within development boundaries. This would make it more difficult for some schools to expand than others and would not result in an effective or sound local plan.

Breckland Council Response

Officer Response

The approach to schools and settlement boundaries is considered to be consistent across the District. Where a school sits on the edge of a settlement it is proposed to not include these within development boundaries to limit development pressure on schools. This would not have an impact upon the future expansion of schools.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	498955	Full Name	Mrs J M Raynsford	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Gross over-development of this very sensitive site Flooding of adjoining areas especially Shillings Lane Loss of amenity Lack of sewage provision Intrusion into a County Wildlife Site Destruction of ancient hedgerows and loss of oak tree with a TPO Density of development You have received over 400 objections to this application which must be taken into consideration for not to do so, is a gross indictment of your duty to the Breckland residents which you are duty bound to serve. Please reject this application.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

History of the site in the Local Plan The site, LP[025]007, known as Land to the west of Etling View, was identified as a reasonable alternative during the Emerging Site Options consultation. The site was then considered to be a proposed allocation through the Preferred Sites and Settlement Boundaries consultation. During these consultations no significant objections were raised by any of the statutory consultees. The sites inclusion within the Local Plan is supported and underpinned by a range of evidence including, but not exclusive to: the Historic Characterisation Study, the Sequential Test, the Water Cycle Study and the Infrastructure Delivery Plan. The site is now subject to a planning application (3PL/2015/1045/O), which is still under consideration. However, through this further detailed comments have been provided.

Landscape & Natural Environment The site adjoins Neatherd Moor Common to the west, which is designated both as a County Wildlife Site and as Natural/Semi “natural green space. The Breckland District Settlement Fringe Landscape Assessment defines the character area as the Northall Green Open Arable Plateau, which is of Moderate-High sensitivity. The Assessment states that, as part of the general landscape management plan, Neatherd Moor must be conserved and enhanced through appropriate landscape management including grazing. The proposed allocation would extend the built up area of the town north and the appearance of the site would change from open farmland to a built up housing area. However, the scheme would largely be contained visually by the adjacent built environment to the south and east and the existing boundary hedging/trees and woodland to the north and west. From the County Wildlife Site, the Neatherd and Shillings Lane to the east, the proposal would be screened during part of the year by existing mature landscaping along Shillings Lane and the northern boundary of the site. When seen within the autumn, winter and early spring months the proposed buildings would be seen adjacent to the existing buildings to the east and would bring the built form closer to Shillings Lane and the Neatherd. The proposal would transform and erode the open aspect of the neighbouring dwellings immediately to the south of the site. However, this would be localised and could be mitigated through landscaping and additional planting. The policy wording of the allocation seeks the Retention and enhancement of native hedgerows and trees on the outer edge of the site boundary. This would seek to mitigate the impact. The proposal seeks at least 60 dwellings on a 2.3 hectare site, which would provide a density of approximately 26 dwellings per hectare; this would be in keeping with the neighbouring dwellings. Natural England have commented on the Pre-submission Publication and raised no objections. It is therefore considered that the impact upon the landscape and natural environment would not be significant. Through the application, the Public Rights of Way officer raised no objection as long as there is no adverse impact on either the registered common land to the west or Restricted Byway (RB32) along the northern boundary of the site. The allocation itself seeks to respect the northern boundary of the site by being set back from Shillings Lane.

Historic Character During the Preferred sites and Settlement Boundaries consultation, Historic England commented that further work should be carried out to assess the impact of preferred and alternative sites upon the Historic Environment. The Historic Characterisation Study was carried out in early 2017 and in relation to site LP[025]007, concluded that: Development proposals must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken so as to inform an appropriate design response. In this case the established pattern of adjacent mixed development will be an additional factor in the formation of the proposal. On the planning application itself NCC Historic Environment Service commented that the proposal does not have any implications for the historic environment and that no recommendations for archaeological work would be made.

Flood Risk The SA highlighted that the site is situated within an area of flood risk. However, this is only a very small extent to the north and north east. Through the Preferred Sites and Settlement Boundaries consultation the Lead Local Flood Authority recommended that conditions are attached to any planning permission granted under the current planning application. At this stage the Lead Local Flood Authority commented on the site specifically stating: We welcome that the site has been reduced in its extent from the original allocation and now does not include areas at risk of flooding from surface water. An assessment of the actual risk of flooding should be undertaken by any development on this site. Following the Preferred

Local Plan Pre-Submission - Comments and Response Schedule

Sites and Settlement Boundaries Consultation the Sequential Test looked at all defined as preferred or alternative. As part of this the extent of surface water flooding on the site was not considered to be substantial, with only approximately 2% of the site subject to surface water flooding. Through the planning application the Environment Agency and the Lead Local Flood Authority have raised no objections to the proposed development subject to conditions. Wastewater treatment As part of the evidence base underpinning the Local Plan a Water Cycle Study was carried out. As part of this study it was highlighted that improvements may be required to the treatment capacity. The study recommends that all applications for development proposals in Dereham are accompanied by a pre-development enquiry with Anglian Water Services to demonstrate that sufficient capacity is available to treat wastewater from the proposals. This wording has been added to the key development considerations within the allocation wording. Conclusion In conclusion it is considered that the site represents a sustainable site on the edge of one of five Market Towns within the district. There are no constraints that would be considered severe enough to affect the designation of the site.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1135889	Full Name	Mr Stewart Patience	Organisation Details	Anglian Water Services Ltd
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Summary of the Dereham Allocations.	Number	Map 3.1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

We welcome the reference made to the applicant obtaining pre-planning advice from Anglian Water to identify a feasible foul drainage strategy for the above sites and obtaining confirmation that there is sufficient wastewater treatment capacity for the sites identified at Dereham and Swaffham.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1131065 Full Name Mr John Pitt
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Summary of the Dereham Allocations. Number Map 3.1
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

It looked a responsible plan for all areas within your mandate from government. Also you have avoided a massive housing estate 'on top of' grade II listed Green Farm Dumpling Green. Also you realised the amount of traffic from this build would be unsustainable for B1135, even if '4' cars were allowed access proposed site only one access as Dumpling Green Lane still only B1135 access.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.116
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			
Do you wish to appear at the Examination in Public?		No					

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Dereham Reference to Derehams rich historic environment in paragraph 3.116 of the supporting text is welcomed.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	973437	Full Name	Mr Peter Bush	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title	Breckland Local Plan Pre-Submission Publication	Number
Chapter Number	3	

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The consultation is extremely complicated to comment on, you need a degree in planning! Also no publicity to the public this consultation is being held, how are the public supposed to know. Something this important should have leaflet distribution to every household, local shops even do this to advertise their special offers! THIS CONSULTATION IS ALL GEARED TO RECEIVE AS FEW COMMENTS FROM THE PUBLIC AS POSSIBLE! NO WONDER THERE ARE SO FEW COMMENTS!! The Toftwood site LP[025]030 received the most negative comments out of all the Dereham sites in previous consulation, will these comments be ignored!?

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The consultation has been carried out in accordance with the adopted Breckland Statement of Community Involvement and regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The consultation statement details the way in which the consultation was carried out, however this included advertisements and press releases within local newspapers, letters to specific and general consultees and use of social media platforms.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 972215 Full Name MRS KIRSTY HEATH
Agent ID Agent Name

Organisation Details
Agent Organisation

Comment Details

Title Paragraph Number 3.115
Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The figure for the Dereham population needs to be updated this is several thousand out.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The figure reflects the 2011 census, which is the most recent information on population by parish.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1127986 Full Name Mrs Val Pitt
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Summary of the Dereham Allocations. Number Map 3.1
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

I believe the most sustainable area for ease of access to A47 and Dereham would be N and E of Dereham down A47, nearer Norwich at Mattishall. Of course this would be the case if all this housing is needed. It is not. It is a political exercise to receive money from govt. for every house built. Not Breckland councils idea, as I realize, but lets be honest Dereham locals would not need all this housing. Also with another banking crash, and Brexit, doubt it these vast housing projects will be

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support & comments noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 976454 Full Name Mark Mendham
Agent ID Agent Name

Organisation Details
Agent Organisation

Comment Details

Title Breckland Local Plan Pre-Submission Publication
Chapter Number 3

Number

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound No

2 - Do you consider the Pre-Submission Publication to be unound Yes

3 - Is the plan legally compliant? Yes

4- Is the plan positively prepared? Yes

5- Is the plan justified? No

6- Is the plan effective? Yes

7 - Is the plan consistent with national policy? No

8 - Have you raised this at Preferred Site Options consultation? Yes

9 - Have you raised this at Preferred Directions ? Yes

10- Have you raised this at Issues and Options? Yes

11- If you have not raised this issue before please state why

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

There has been no advertising by Breckland Council that this consultation exists, how are the public supposed to know? Dereham simply cannot cope with further large scale housing. Traffic at saturation point, sewerage system already at over capacity. Toftwood site LP[025]030 should not be considered as suitable as adjacent to river Tud with Badley Moor SAC only short distance downstream.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The consultation has been carried out in accordance with the adopted Breckland Statement of Community Involvement and regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The consultation statement details the way in which the consultation was carried out, however this included advertisements and press releases within local newspapers, letters to specific and general consultees and use of social media platforms.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 255168 Full Name Mr Chris Smith
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Summary of the Dereham Allocations. Number Map 3.1
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Hopkins Homes would continue to suggest that the land south of Dumpling Green, East of Yaxham Road (identified in orange as a Reasonable Alternative under Reference LP(025) 003 on Map 5.1 within the previous Dereham Preferred and Alternative Sites Consultation) provides the most suitable and sustainable location to accommodate the future strategic growth of Dereham. As is clear from Map 5.1, this site provides the most sustainable location, closest to the town centre and strategic road network, whilst is of sufficient size and scale to enable phased growth to occur throughout the proposed Plan period. As was identified by the cross-hatching over the orange shading on Map 5.1, the site is the subject of a long-

standing Planning Application (3PL/2010/1361/F) for the erection of 255 dwellings, together with new associated public open space. This application was recommended by Officers for Approval to the Councils Planning Committee in September 2014, with formal determination subsequently deferred by the Planning Committee pending receipt of further updated technical information upon highway impacts, landscape & ecology impacts, an updated affordable housing mix and overall development viability. These additional elements of information are currently being compiled, in order to enable further consideration by the Councils Planning Committee in the Autumn of 2017, with a likelihood that construction could then commence by Spring 2018. The remaining eastern-most portions of the site, up to the existing access tracks serving Salt Lake Farm to the east and south, are also available to accommodate further phase(s) of residential development in the medium to longer-term, alongside and further open space and/or additional community infrastructure that may subsequently be required. Within Table 5.2 Dereham Alternative Sites, despite an acknowledgement that the site lies adjacent to the settlement boundary and has good access to the services and facilities within the town, including retail and employment areas the justification for not favouring the allocation of Site LP(025)003 was stated to be that Highway concerns in relation to Yaxham Road have previously been raised and it is for this reason that the site is not considered a preferred option. In reviewing matters, it is strongly contended that there is no logical explanation as to how such a conclusion has been arrived at, on the basis of the available evidence. The text accompanying Table 3.2 Sustainability Appraisal of Sites in Dereham at the previous Preferred Options stage indicated that the majority of sites score well against the sustainability objectives. There is limited differences between the sites. Furthermore, the largest of the Preferred Sites (LP(025)030) did not appear to have been assessed at all, with no reference made to this site within Table 3.2. In comparing the sites which were previously Preferred for allocation and continue to remain so at this subsequent Pre-Submission Stage, Site LP(025)030 as indicated above and Site LP(025)023 remain favoured for allocation ahead of Site LP(025)003, despite more obvious deficiencies in accessibility and highway concerns. Site LP(025)030 lies further to the south-west of Site LP(025)003, to the west of the railway line and south of the existing extent of the town, comprising of three linked field parcels. Whilst the primary access to the site would be from the A1075 Shipdham Road to the west of the western-most of the three parcels, the resulting elongated nature of the site would require the construction of a new link-road

through to the B1135 Yaxham Road to the east. The eastern extent of the three field parcels proposed for allocation falls someway short of the B1135 Yaxham Road, concluding at the western side of the railway line, with no obvious link available to the Yaxham Road, despite the wording of the Policy confirming that An access link should be provided from Shipdham Road to Yaxham Road. Below Site LP(025)030, the next largest allocation is proposed to the North-East of the town, upon two triangular-shaped parcels of land to either side of the relatively narrow, unclassified Swanton Road, together identified as Site LP(025)023 . An existing railway line lies immediately adjacent to the west, physically dividing the site(s) from the existing built form of the town, with a Gated Level Crossing then lying between the sites and the existing extent of the town. The wording of the Policy and the subsequent text within Paragraph 3.134 highlights the inadequacies of the Swanton Road in this location, noting a requirement that highway improvements are made to Swanton Road to achieve safe access to and from the site. Given such obvious deficiencies in accessibility, it is incomprehensible how Site LP(025)003 , which has direct access onto the B1135 Yaxham Road, which itself is one of the main routes into Dereham from the south and south-east, cannot be Preferred for allocation in this respect. In reviewing matters in more detail, there are no principle access or highway-based objections from Officers of either the Local Planning Authority or the Highway Authority to current pending proposals for the erection of 255 dwellings upon Site LP(025)003 . The September 2014 Planning Committee Report highlighted that the Highway Authority had No objection, subject to conditions and the provision of off-site highway works whilst the LPA Case Officer concluded that The applicants have submitted a comprehensive Traffic Assessment (TA) with the application, which has been reviewed by Norfolk County Council and the Highways Agency. No objection to the development has been raised. Whilst the September 2014 Planning Committee nevertheless resolved to defer the current planning application on Site LP(025)003 for further information, including those in relation to highway impacts, the resulting further works, including the Local Planning Authorities own recent town-wide Dereham Transport Study have not raised any additional concerns which are specifically applicable to Site LP(025)003. Instead, the Dereham Transport Study indicates a package of additional measures required to improve highway infrastructure around the town, for which contributions will be required from all major developments, and which are equally applicable upon whichever site residential development occurs. In summary, therefore, there is no justification for proposing the allocation of Sites LP(025)023

Local Plan Pre-Submission - Comments and Response Schedule

or LP(025)030 ahead of Site LP(025)003 . To this end, Hopkins Homes would strongly contend that Site LP(025)003 should now be identified as a Proposed Allocation for the residential development of approximately 450 dwellings and associated open space, with Sites LP(025)023 and LP(025)030 significantly reduced in scale to deliver the remaining balance of dwellings required.

Breckland Council Response

Officer Response

The Council has assessed site LP[025]003 through the sustainability appraisal and it has also been appraised using the methodology set out within the site selection topic paper. The same methodology has been used to assess all sites within Dereham. As noted within the representation, the site scores well against a number of the objectives within the sustainability appraisal. As noted within the representation the site has been the subject of a planning application since 2010. There remain outstanding issues with the application which have prevented it being determined. The issues include those relating to transport and access onto Yaxham Road. It is for this reason that the site is not proposed for allocation. The representation also makes reference to sites LP[025]023 and LP[025]030 both of which have been proposed for allocation through the Local plan. Subsequent to the agreement to publish the plan site LP[025]023 has received the decision to grant planning permission subject to the completion of the s106. It can therefore be considered to be committed development. Site LP[025]030 is also the subject of a planning application which is currently being determined. Whilst the site scores similarly to LP[025]003 for some of the objectives within the sustainability appraisal, the site is not subject to concerns from Norfolk County Council highways in relation to access.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1127986 Full Name Mrs Val Pitt
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Paragraph Number 3.121
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

Yes it is sound, because West Toftwood - Shipdham Road is preferred site NOT Dumlping Green. But, a small point in part 3.121 noticed area claimed as 'moderate' impact. As long as this does not mean Hopkins build, with planning committee consent there/some houses. I thought it odd this area mentioned on 3.121 when no others specific. Also Bradley Moor EPS, thus any housing as Hopkins suggest could expand to/near this area is NOT sustainable and probably illegal.

13- If you feel the plan is unsound, please tell us why

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	975674	Full Name	Gina Lopes	Organisation Details	Attleborough Town Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Breckland Local Plan Pre-Submission Publication	Number	
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			
Do you wish to appear at the Examination in Public?		No					

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Members have considered the Breckland Local Plan Pre-submission publication and wish to make the following comments:- The proportion of growth to be delivered in Attleborough is stated as 2,650 dwellings within the Plan period and this is noted as reduced from the original target of 4,000 There is concern that the link road will be triggered on completion of 1,200 dwellings; members feel it is vital that the road is delivered prior to the housing and understand a loan is being facilitated between Norfolk County Council and the developer to ensure this is possible The link road must be built to accommodate two HGVs to pass easily (4.8m minimum) Concerns were raised at the proposed two way traffic flows on Connaught Road and the

Local Plan Pre-Submission - Comments and Response Schedule

possible closure of Church Street The plan states a strategic employment site of 10 hectares and members request this is amended to a minimum of 10 hectares
Members stress that the Breckland Local Plan must reflect the vision and policies clearly laid out in the Attleborough Neighbourhood Plan

Breckland Council Response

Officer Response

The Infrastructure Delivery Plan states that the threshold for the delivery of the Link Road is upon completion of the 1200th home in the SUE. The policy GEN 04 also sets out that a travel plan is required to make additional transport improvements to the town centre in order to mitigate the impact of additional development".

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Garboldisham Housing Allocatio
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

LP(031)004 and LP(031)005: Land to the west of Hopton Road There are no known designated heritage assets within the site which could be affected its development. However, the Grade II listed Compton Pear Tree Cottage is located to the north east of the site and the Gorboldisham Conservation Area lies to the north. The site occupies currently open land and has a relationship to the The Brecks which lie to the northeast. Development at this site could erode the historic relationship with the fen edge. There are a number of scheduled monuments and a Roman Road to the east of the site; these include Devils Ditch and Garboldisham Heath Round Barrow. It is therefore likely that this site will have archaeological potential.

Local Plan Pre-Submission - Comments and Response Schedule

Development of this site should not encourage or result in coalescence with the nearby settlement of Smallworth which although in close proximity to Garboldisham retains a discernible separation. At present neither the policy or the supporting text mentions these issues. Any development of this site will need to preserve or enhance these designated heritage assets and their settings. This might be achieved through mitigation measures such as appropriate design, location of open space, landscaping/planting and massing of the development. The text and the policy should also refer to potential archaeological remains and require an archaeological assessment to be submitted upon application. These requirements should be included in the policy and supporting text of the Plan. At present neither the supporting text nor the policy mention the presence of nearby heritage assets and contains no provision for their protection or enhancement. It is recommended that the policy is amended accordingly.

Breckland Council Response

Officer Response

The reasoned justification sets out the use of the historic characterisation study. Further to this development of this site would need to be in conformity with all policies within the Local Plan and also the NPPF. The Local Plan includes policy ENV07 in relation to Designated Heritage Assets and also design policies COM01 and GEN2. Any application for this site would need to consider this and it is considered that it is not necessary to specifically include these within the key development considerations.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129859	Full Name		Organisation Details	Breckland Bridge Ltd
Agent ID	1126421	Agent Name	Mrs Sarah Hornbrook	Agent Organisation	Associate Planner Ingleton Wood

Comment Details

Title	Summary of Garboldisham Allocations	Number	Map 3.6
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

On behalf of Breckland Bridge Ltd, we support the identification of Garboldisham as a Local Service Centre that will accommodate 35 residential units. It is evident from the text relating to Garboldisham at Paragraph 3.219 that the village provides a range of services which justifies its designation as a Local Service Centre. The village is therefore a sustainable location for modest growth. Accordingly, this aspect of the Local Plan is considered sound as it has been positively prepared. However, we believe that there is doubt that the proposed allocation of land to west of Hopton Road is deliverable, as defined in the National Planning Policy Framework (NPPF). The two sites which make up the proposed allocation include land within Flood

Zones 2 and 3, and it is evident from the Environment Agency's maps that the risk of flooding from surface water is significant. The Lead Local Flood Authority raised concerns about the heavy constraints posed by the risk of fluvial flooding from the ordinary watercourse during the previous round of Public Consultation, on the Preferred Sites and Settlement Boundaries document published in Autumn 2016. These concerns were also borne out by comments from local residents, who referred to the sites being low lying, and prone to flooding/waterlogging. Indeed, Breckland Council's Report on Site Selection (August 2017) identifies that 30% of site LP[031]004 is subject to surface water flooding, and 25% of site LP[031]005. There is no evidence to suggest that this issue has been satisfactorily addressed, which calls into question the ability of the site to deliver the quantum of development proposed. There is a requirement within the proposed allocation for highways improvements to visibility and the provision of a footway into the village. Whilst the Local Highway Authority have no objection to the development of the sites provided that these measures are implemented, there is no certainty that the necessary improvements can be either viably or practically be achieved. In addition, Historic England raised concerns during the Preferred Sites and Settlement Boundaries consultation about the potential for development of these sites to erode the fen edge, which is highly sensitive in both heritage and landscape terms. Furthermore, the sites are located close to two County Wildlife Sites. The supporting text to the proposed allocation refers to shared complexities relating to site levels and landscape impact, and requires a Masterplan approach to ensure that both sites are delivered in tandem. This raises further concerns about the suitability and deliverability of the sites. In light of the above, it is considered that the proposed allocation of land on Hopton Road to meet the full allocation is not justified, nor effective in terms of delivering the required level of growth in the village, and consequently unsound. In order to make the proposed Plan sound, we suggest that land at Back Street, previously given the reference number LP[031]010, is allocated in preference to the sites on Hopton Road. In earlier Representations at both the Preferred Directions and Preferred Sites and Settlement Boundaries Stages (Representations appended for clarity) we have demonstrated that the site is suitable, available and viable, and therefore deliverable. The site was discounted at a previous stage of Plan preparation, due to alleged highways constraints; however, work undertaken by Richard Jackson, which has been submitted during previous rounds of consultation (and appended to this form for clarity), demonstrates that the reasons given for the site being identified

Local Plan Pre-Submission - Comments and Response Schedule

as an Unreasonable Site are not substantiated or justified.

Breckland Council Response

Officer Response

The support for the identification of Garboldisham as a local service centre is noted.

The proposed allocation has been assessed through the sequential test in relation to flood risk and the policy requirements include the need for sustainable surface water attenuation measures to be incorporated into the planning application and design of the site. The Lead Local Flood Authority have not made representations on the allocation of this site in this regard. Furthermore, in relation to comments made from historic England at the regulation 18 stage, the policy has responded to this by providing a single site masterplan approach to the site ensuring that it is a cohesive development, with particular regard to respecting site levels and landscape.

The Council have worked with Norfolk County Council highways authority in relation to all sites within Garboldisham. They have maintained an objection to the development of Back Street due to its restricted width.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129859	Full Name		Organisation Details	Breckland Bridge Ltd
Agent ID	1126421	Agent Name	Mrs Sarah Hornbrook	Agent Organisation	Associate Planner Ingleton Wood

Comment Details

Title	Paragraph	Number	3.218
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

On behalf of Breckland Bridge Ltd, we support the identification of Garboldisham as a Local Service Centre that will accommodate 35 residential units. It is evident from the text relating to Garboldisham at Paragraph 3.219 that the village provides a range of services which justifies its designation as a Local Service Centre. The village is therefore a sustainable location for modest growth. Accordingly, this aspect of the Local Plan is considered sound as it has been positively prepared.

13- If you feel the plan is unsound, please tell us why

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1135889	Full Name	Mr Stewart Patience	Organisation Details	Anglian Water Services Ltd
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Summary of Garboldisham Allocations	Number	Map 3.6
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

We welcome the reference made to the applicant obtaining pre-planning advice from Anglian Water to identify a feasible foul drainage strategy for the above sites and obtaining confirmation that there is sufficient wastewater treatment capacity for the sites identified at Dereham and Swaffham.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1133000	Full Name	The Diocese of Norwich	Organisation Details	The Diocese of Norwich
Agent ID	512998	Agent Name	Mr William Lusty	Agent Organisation	Associate Savills

Comment Details

Title	Great Ellingham Settlement Boundary	Number	Map 3.7
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

We consider that the Local Plan is unsound in that its fails to allocate land for housing development at Glebe Meadow, Great Ellingham, the boundary of which is edged red on the attached plan. We can confirm that the site, which lies within the freehold ownership of our client, The Diocese of Norwich, is available now for housing development. In view of this single freehold ownership, we also consider that development of the site is achievable. In terms of suitability, we note the Councils assessment of the site, as set out within the Breckland Local Plan Pre-Submission Sustainability Appraisal (Site LP[037]015). The summary of this assessment states that the site scores negatively against criteria 2 and 3 due to the

Local Plan Pre-Submission - Comments and Response Schedule

site being situated within a zone 3 groundwater source protection zone. We have reviewed The Environment Agency's Approach to Groundwater Protection guidance and document and this does not preclude housing development within Zone 3 Groundwater Protection Zones. Furthermore, we also note that housing development has recently taken place elsewhere in the village. Further information could be presented at the time of a planning application under the Environment Agency's risk based approach to demonstrate how any impacts of groundwater would be mitigated. We also note that the Council is not proposing to allocate any land for housing development at Great Ellingham and has already exceeded the numbers required over the plan period. As we go on to note below, Great Ellingham is a sustainable location for development, as is recognised by the status of the village as a Local Service Centre. Under the National Planning Policy Framework, housing requirements should not be treated as a maximum requirements. Within this context and where suitable and sustainable opportunities for housing development are presented, these should be taken. The site is well related to the village's excellent range of local services and facilities, which include a primary school, local shop/post office, village hall and public house. The village is well serviced by public transport including regular buses to Norwich, Attleborough and Watton. Attleborough's train station is located within 4.5km of the village. The settlement's proximity to Attleborough ensures access to higher level services and facilities including secondary schools, shops and tertiary services. We therefore consider that the site is suitable for development, and with the site also being available for development, and in view that this would be achievable within 5 years, we consider that housing development is deliverable. Against the above background, there is the opportunity to allocate the site for deliverable and sustainable housing development. Without doing so, we consider that the plan is not positively prepared and therefore contrary to paragraph 182 of the National Planning Policy Framework. We therefore propose that the site is shown on the Great Ellingham Policies Map as a housing allocation and that an according Policy is added to the written part of the document, as follows: Great Ellingham - Allocation 1 Land at Glebe Meadow, Great Ellingham (Site LP[037]015) Land amounting to 0.46 hectares is allocated for residential development of up to 10 dwellings. Development will be permitted subject to compliance with adopted policies in the Local Plan.

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Policy HOU 02 sets out that between 2011-March 2017 Great Ellingham has a total of 184 completions and commitments. This is in excess of the 10% growth the Local Plan seeks to apportion to the Local Service Centres. As a result it is not proposed to allocate further sites through the Local Plan.

Potential amendment to the plan

No amendments required.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	975598	Full Name	Alan Presslee	Organisation Details	Cornerstone Planning Ltd
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Great Ellingham Settlement Boundary	Number	Map 3.7
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The errors do not arise in previous iterations		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Paragraph 3.228 - The reference to "including 75 with decision to grant subject to a Section 106 legal agreement" should be deleted. The Planning permission (ref. 3PL/2016/0648/O) has been issued . Map 3.7 (Great Ellingham) - There is a drafting error in the settlement boundary. Assuming it is intended to include sites with planning permission within the boundary, then there is an error in excluding part of the Mellor Metals site, for which outline planning permission has been granted (ref. 3PL/2016/0648/O). A copy of Map 3.7 altered to show the correct boundary line is attached, together with the approved site location plan for reference.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comments noted. At the time of making the maps only sites were included where the permission had been granted at that point in time.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1132400	Full Name	Mr Matt Bartram	Organisation Details	Heritage Developments
Agent ID	1132250	Agent Name	Jane Crichton	Agent Organisation	Lanpro Services

Comment Details

Title		Number	Harling Housing Allocation 1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

My client is supportive that Breckland Council have proposed this site as the residential allocation for Harling to deliver the required 85 dwellings up to 2036. The landowner is a developer and is the same developer who built out the housing development

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1128246	Full Name	Hannah Grimes	Organisation Details	Norfolk County Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Harling Housing Allocation 1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Since the site was included in the Local Plan the County has seen informal proposals on this site and has developed more comprehensive Highways views.		
Do you wish to appear at the Examination in Public?				No			

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy Harling Housing Allocation 1 provides insufficient criteria regarding access to the site and offsite highway safety matters. For these reasons the policy is ineffective and unsound. In order to make the plan sound the following criteria need to be addressed in the above Policy: Under point 1 in the policy - make the point clear that the site requires two points of access one through the existing development (Mount Pleasant Drive) and a second new point of access onto Kenninghall Road. New criterion - The development will need to address through an appropriate legal agreement the widening of Kenninghall Road and provision of a footway along the frontage of the site and west all the way to Mount Pleasant

Local Plan Pre-Submission - Comments and Response Schedule

Drive. New Criterion - Agreement will need to be sought for the extension of the 30mph speed limit on Kenninghall Road the entire site frontage. New criterion “ to address the need for the retention of the public right of way (Harling FP2).

Breckland Council Response

Officer Response

Comment noted - these more detailed matters in relation to Highway safety have arisen following enquiries from the developer. The proposed additions to the policy are considered to be appropriate to enable the satisfactory development of the site, and it may be necessary to amend the policy in this regard. This will be subject to discussion at the hearing sessions

Potential amendment to the plan

No amendment proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Harling Housing Allocation 1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

LP(042)001: Land off Kenninghall Road There are no known designated heritage assets within the site which could be affected its development. A Grade II listed windmill is located to the south of the site and the East Harling Conservation Area is located to the east. Any development of this site will need to preserve or enhance these designated heritage assets and their settings. This might be achieved through mitigation measures such as appropriate design, location of open space, landscaping/planting and massing of the development. The text and the policy should also refer to potential archaeological remains and require an archaeological assessment to be submitted upon application. These requirements should be

Local Plan Pre-Submission - Comments and Response Schedule

included in the policy and supporting text of the Plan.

Breckland Council Response

Officer Response

Development of this site would need to be in conformity with all policies within the Local Plan and also the NPPF. The Local Plan includes policy ENV07 in relation to Designated Heritage Assets and also design policies COM01 and GEN2. Any application for this site would need to consider this and it is considered that it is not necessary to specifically include these within the key development considerations

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1135889	Full Name	Mr Stewart Patience	Organisation Details	Anglian Water Services Ltd
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Harling Housing Allocation 1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Submission Plan includes final wording relating to this policy.		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Anglian Water has no objection to the principle of residential development and associated retail and community uses on this site. We welcome the reference made to the applicant obtaining pre-planning advice from Anglian to identify a feasible foul drainage strategy for this site. The above policy does not include reference to the need for improvements to be made to the need to consider the existing pumping station in the ownership of Anglian Water. As stated in our earlier representations there is a need to consider the potential for nuisance by ensuring that development is located a minimum of 15m from the pumping station. It is therefore proposed that the following wording should be added to this policy (to

Local Plan Pre-Submission - Comments and Response Schedule

follow point 3): 4. Consider the proximity of the foul pumping station in the design and layout of the scheme, and allow for a distance of 15 metres from the boundary of the curtilage of the dwellings to reduce the risk of nuisance/loss of amenity associated with the operation of the pumping station.

Breckland Council Response

Officer Response

All policies within the Local Plan will be relevant to the determination of any planning application. Issues relating to amenity are considered under policy COM03 whilst it is also addressed through COM01.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	970265	Full Name	Mrs Kate Filby	Organisation Details	Clerk Harling Parish Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Breckland Local Plan Pre-Submission Publication	Number	
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

We feel that comments made by the Parish Council at previous consultations have been listened to and we are happy with those listed in the pre-submission publication.

We would add that although the Parish Council do not wish to make a representation against the preferred site at this stage, we cannot guarantee that

13- If you feel the plan is unsound, please tell us why

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Hockering Residential Allocation
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

LP(044)005: Land to east of Heath Road There are no known designated heritage assets within the site which could be affected by its development. Paragraph 3.243 of the supporting text states that planning approvals have recently been granted for sites on land to the west of Heath Road, it is therefore important for development of the proposed site allocation to have consideration for the cumulative impacts of development in this area. Reference in the policy to the need for development to reflect existing development in terms of density, height and scale is welcomed.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1135889	Full Name	Mr Stewart Patience	Organisation Details	Anglian Water Services Ltd
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Summary of the Hockering Allocations.	Number	Map 3.8
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

We welcome the reference made to the applicant obtaining pre-planning advice from Anglian Water to identify a feasible foul drainage strategy for the above sites and obtaining confirmation that there is sufficient wastewater treatment capacity for the sites identified at Dereham and Swaffham.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1131328	Full Name	Mr Robert Crone	Organisation Details	Crone's Cider
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Kenninghall Housing Allocation
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	I have not previously been made aware that such a foolish scheme could be seriously considered by any planning authority		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Any additional dwellings at the chosen site will mean an increase in traffic at the time and at the very place where children access the Kenninghall primary school. In my view there are countless other and better places where Kenninghall could gain an extra 15 houses. For me the Fersfield Road out of Kenninghall would be an ideal place to build extra houses. I would consider it recklessness on the part of Breckland District Council if it allows what will amount to a dramatic increase in traffic at this already congested point and so expose children to increased risk and the council would be failing in its duty of care.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Norfolk County Council stated that "Subject to a safe access and adequate visibility the Highway Authority would not object to a smaller allocation of less than eight, in the local plan". It is considered that the site is the most sustainable location among the sites that have been submitted through the Local Plan process.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Kenninghall Housing Allocation
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

LP(051)003: Land off Powell Close There are no known designated heritage assets within the site which could be affected by its development. However, the site is located immediately adjacent to the Kenninghall Conservation which lies to the east of the site and which contains a number listed buildings and structures. This relatively small site is proposed for allocation to provide 15 dwellings. The site is set away from the listed buildings and it is unlikely that they would be affected. Point 1 of the policy requires development to have regard to these heritage assets but the wording does refers only to the special interest of the designated heritage assets. We would recommend that the wording is amended to require development to

Local Plan Pre-Submission - Comments and Response Schedule

preserve or enhance these heritage assets and their settings. It is also recommended that the supporting text is expanded to refer to the conservation area and to define some of its characteristics so that the policy is more locally specific.

Breckland Council Response

Officer Response

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

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129859	Full Name		Organisation Details	Breckland Bridge Ltd
Agent ID	1126421	Agent Name	Mrs Sarah Hornbrook	Agent Organisation	Associate Planner Ingleton Wood

Comment Details

Title		Number	Kenninghall Housing Allocation
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The proposed policy wording was not included in the previous version of the Local Plan		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

The site is considered to be entirely deliverable and capable of making an important contribution towards satisfying the Council's housing needs during the period up to 2036. The site, in accordance with the National Planning Policy Framework (NPPF), represents a suitable location for development, is available immediately and is viable, as demonstrated in our Representations at the Preferred Site Options and Settlement Boundaries Stage (Comment ID: 1106) and Preferred

13- If you feel the plan is unsound, please tell us why

To ensure soundness, we request that the wording of the proposed Policy (or the supporting text) is expanded to clarify which designated heritage assets are referred to in point 1, in addition to the Conservation Area, as this is not currently clear.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The Historic Characterisation Study highlights the listed buildings that are situated within a 500m buffer of the site.

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.249
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			
Do you wish to appear at the Examination in Public?		No					

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The reference to Kenninghalls rich historic environment and description of designated heritage assets in paragraph 3.249 of the opening text is helpful in outlining the defining aspects of Kenninghall.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129859	Full Name		Organisation Details	Breckland Bridge Ltd
Agent ID	1126421	Agent Name	Mrs Sarah Hornbrook	Agent Organisation	Associate Planner Ingleton Wood

Comment Details

Title	Paragraph	Number	3.247
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

On behalf of Breckland Bridge Ltd, we support the identification of Kenninghall as a Local Service Centre that will accommodate 36 residential units. It is evident from the text relating to Kenninghall at Paragraph 3.248 that the village provides a range of services which justifies its designation as a Local Service Centre. The village is therefore a sustainable location for modest growth. Accordingly, this aspect of the Local Plan is considered sound as it has been positively prepared.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1135889	Full Name	Mr Stewart Patience	Organisation Details	Anglian Water Services Ltd
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Summary of the Kenninghall Allocations.	Number	Map 3.9
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

We welcome the reference made to the applicant obtaining pre-planning advice from Anglian Water to identify a feasible foul drainage strategy for the above sites and obtaining confirmation that there is sufficient wastewater treatment capacity for the sites identified at Dereham and Swaffham.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129859	Full Name		Organisation Details	Breckland Bridge Ltd
Agent ID	1126421	Agent Name	Mrs Sarah Hornbrook	Agent Organisation	Associate Planner Ingleton Wood

Comment Details

Title	Summary of the Kenninghall Allocations.	Number	Map 3.9
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The site is considered to be entirely deliverable and capable of making an important contribution towards satisfying the Council's housing needs during the period up to 2036. The site, in accordance with the National Planning Policy Framework (NPPF), represents a suitable location for development, is available immediately and is viable, as demonstrated in our Representations at the Preferred Site Options and Settlement Boundaries Stage (Comment ID: 1106) and Preferred

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130112	Full Name	Mr Iain Hill	Organisation Details	Breckland Bridge
Agent ID	1032077	Agent Name	Mr Iain Hill	Agent Organisation	

Comment Details

Title	Paragraph	Number	3.255
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

On behalf of Breckland Bridge Limited, we support the identification of Litcham as a Local Service Centre that will accommodate 22 residential units. It is evident from the text relating to Litcham at Paragraph 3.256 that the village provides a range of services which justifies its designation as a Local Service Centre. The village is therefore a sustainable location for modest growth. Accordingly, this aspect of the Local Plan is considered sound as it has been positively prepared

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	873985	Full Name	Leigh	Organisation Details	Clerk Litcham Parish Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Breckland Local Plan Pre-Submission Publication	Number	
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The Parish Council accepts the document and the provision of 22 houses over the period of the plan.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Narborough Housing Allocation
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

LP(065)008: Land to south of Chalk Lane It is noted that this inset map within the plan is not orientated to north; it is recommended that this is amended for clarity. There are no known designated heritage assets within the site which could be affected its development. The Campbell scheduled monument is located to the north of the site on the far side of the existing settlement which itself has Saxon origins. Therefore the proposed site allocation may have archaeological potential and so it is recommended that the policy is amended to require an archaeological assessment to be submitted upon application. This requirement should be included in the policy and supporting text of the Plan.

Local Plan Pre-Submission - Comments and Response Schedule

Breckland Council Response

Officer Response

Camphill Scheduled Monument is located 800m to the north east of the site. Policy ENV 07 of the Local Plan, which would be read alongside the policies for the allocation, states that "Where It is considered appropriate in cases where development coincides with the location of a known or suspected archeological interest, an archaeological field evaluation will be required".

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1135889	Full Name	Mr Stewart Patience	Organisation Details	Anglian Water Services Ltd
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Summary of the Narborough Allocations.	Number	Map 3.12
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

We welcome the reference made to the applicant obtaining pre-planning advice from Anglian Water to identify a feasible foul drainage strategy for the above sites and obtaining confirmation that there is sufficient wastewater treatment capacity for the sites identified at Dereham and Swaffham.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	973867	Full Name		Organisation Details	Heritage Developments Ltd
Agent ID	973445	Agent Name	Mr Ian Reilly	Agent Organisation	Lanpro Services

Comment Details

Title		Number	Necton Housing Allocation 2
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

With regards to proposed policy Necton Housing Allocation 2 Land off North Pickenham Road (LP[067]010) I consider the plan to be sound.

13- If you feel the plan is unsound, please tell us why

With regards to proposed policy Necton Housing Allocation 2 Land off North Pickenham Road (LP[067]010) I consider the plan to be sound.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Necton Housing Allocation 2
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

LP(067)010: Land off North Pickenham Road Whilst there are no designated heritage assets within the proposed site allocation boundary the site contains Erne Farm and its associated barn which date from 1817 and are considered to be of local importance. The policy and supporting text both outline the non-designated heritage assets within the site stating that they are worthy of retention and requiring development to preserve or enhance these non-designated assets which is welcomed.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Necton Housing Allocation 3
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

LP(067)011: Land between North Pickenham Road and Masons Drive There are no known designated heritage ssets within or near to the site which could be affected by its development. Point 3 of the policy refers to the need to protect and enhance existing non-designated assets but the supporting text provides no information to outline what these non-designated assets are or where they are located. Development of this site could impact upon the setting of the non-designated Erne Farm and barn discussed in the site allocation above but so point 3 may be intended to reflect that but clarity is required if this policy inclusion is to be fully comprehended and justified.

Local Plan Pre-Submission - Comments and Response Schedule

Breckland Council Response

Officer Response

The supporting text of the policy makes reference to the Historic Characterisation Study. The study highlights all of the designated and non-designated assets within a 500m buffer of the site. This policy is also intended to be read alongside all other policies within the local plan, including policies ENV 07 and ENV 08 on the historic environment.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	609986	Full Name	Mrs Erica Whettingsteel	Organisation Details	Managing Director EJW Planning Ltd
Agent ID	598312	Agent Name	Mrs Erica Whettingsteel	Agent Organisation	Managing Director EJW Planning Ltd

Comment Details

Title		Number	Necton Housing Allocation 3
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The site LP(067)011 as identified in emerging Local Plan is accessed from Pickenham Road and extends to the rear of existing residential development of Masons Drive. A parcel of land at the front of the site currently owned and operated by Necton Management Limited as a builders yard and offices is excluded. The allocation should be extended to include this land as Necton Management Limited has the potential to relocate their business to an alternative location to the

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1133000	Full Name	The Diocese of Norwich	Organisation Details	The Diocese of Norwich
Agent ID	512998	Agent Name	Mr William Lusty	Agent Organisation	Associate Savills

Comment Details

Title	Summary of the Necton Allocations.	Number	Map 3.13
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			
Do you wish to appear at the Examination in Public?		No					

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

We consider that the Local Plan is unsound in that its fails to allocate land for housing development at School Road, Necton, the boundary of which is edged red on the attached plan. We can confirm that the site, which lies within the freehold ownership of our client, The Diocese of Norwich, is available now for housing development. In view of this single freehold ownership, we also consider that development of the site is achievable. In terms of suitability, we note the Councils assessment of the site, as set out within the Breckland Local Plan Pre-Submission Sustainability Appraisal (Site LP[067]004). The summary of this assessment states that the site scores negatively against criteria 6 due to flood risk. We note from the

Local Plan Pre-Submission - Comments and Response Schedule

Councils Policies Map that the eastern part of the site is shown to lie within an area identified as Flood Zone 3b. However, we have also viewed the Environment Agency's Flood Map for Planning which is available on-line, and this shows the site to wholly lie within Flood Zone 1, within which housing development is acceptable. Owing to its national status, we consider it is upon the basis of flood map information made available by the Environment Agency that the site should be assessed in terms of flood risk. Housing development of the site would continue the linear pattern of development fronting School Road and would not result in undue encroachment into the open countryside. Adjacent to the south of the site is existing residential development and thus residential development of this site would not be out of context. The site is well related to the village's excellent range of local services and facilities, which include a primary school, satellite surgery, local shop, post office, village hall and a public house. We therefore consider that the site is suitable for development, and with the site also being available for development, and in view that this would be achievable within 5 years, we consider that housing development is deliverable. Against the above background, there is the opportunity to allocate the site for deliverable and sustainable housing development. Without doing so, we consider that the plan is not positively prepared and therefore contrary to paragraph 182 of the National Planning Policy Framework. We therefore propose that the site is shown on the Necton Policies Map as a housing allocation and that an according Policy is added to the written part of the document, as follows: Necton Housing Allocation 1 Land at School Road, Necton (Site LP[067]004) Land amounting to 0.4 hectares is allocated for residential development of 5 dwellings. Development will be permitted subject to compliance with adopted policies in the Local Plan.

Breckland Council Response

Officer Response

Site LP[067]004 was assessed through the sequential test 2017, highlighted that part of the site is situated within flood zone 3b. However, the study also showed that 95% of the site is subject to surface water flooding. The Lead Local Flood Authority have also assessed the constraints on the site as "Significant migration required for severe constraints" and recommended a review of the site and potential removal from the Local Plan. On this basis the site was not considered to be a proposed allocation within the Pre-submission Publication.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1135889	Full Name	Mr Stewart Patience	Organisation Details	Anglian Water Services Ltd
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Summary of the Necton Allocations.	Number	Map 3.13
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

We welcome the reference made to the applicant obtaining pre-planning advice from Anglian Water to identify a feasible foul drainage strategy for the above sites and obtaining confirmation that there is sufficient wastewater treatment capacity for the sites identified at Dereham and Swaffham.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	North Elmham Housing Allocati
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

LP(070)001: Land at Holt Road Whilst there are no known designated assets within the site boundary of the proposed allocation the site is surrounded by a number of highly significant heritage assets. These include the Grade I listed Church of St Mary which lies to the north of the site along with an Episcopal chapel and fortified manor house and site of Angle-Saxon cathedral scheduled monument along with the North Elmham Conservation Area. The Elmham Park Registered Park and Garden is located to the west of the site on the far side of Holt Road along with a number of Grade II listed structures within the settlement centre also to the west of the site. Any development of this site will need to preserve or enhance these

Local Plan Pre-Submission - Comments and Response Schedule

designated heritage assets and their settings. It is noted that point for of the policy requires development to have regard for nearby heritage assets. The text and the policy should also refer to potential archaeological remains and require an archaeological assessment to be submitted upon application. These requirements should be included in the policy and supporting text of the Plan.

Breckland Council Response

Officer Response

Development of this site would need to be in conformity with all policies within the Local Plan and also the NPPF. The reasoned justification makes reference to the historic characterisation study, and the need for an application to demonstrate an analysis of the immediate and wider context to ensure any design response is appropriate to the setting. The Local Plan includes policy ENV07 in relation to Designated Heritage Assets and also design policies COM01 and GEN2. Any application for this site would need to consider this and it is considered that it is not necessary to specifically include these within the key development considerations.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	North Elmham Housing Allocati
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

LP(070)007: Land to north of Eastgate Street The site is located within the North Elmham Conservation Area and sits opposite the Old Hall Farm Barn and Farmhouse, both of which are Grade II listed. To the north of the site lies the Episcopal chapel and fortified manor house and site of Angle-Saxon cathedral scheduled monument. Points 1, 2 and 3 of the policy require development to have regard to these heritage assets but the wording could be improved. With regards to the conservation area development should preserve or enhance its character or appearance. The policy regarding conservation areas at present only refers to views and landscape character and whilst this is important it does not adhere to the

Local Plan Pre-Submission - Comments and Response Schedule

statutory obligations required for the management of conservation areas under the 1990 Act. Point 3 which relates to the setting of listed building is welcomed but it would be better is simply used the term heritage assets rather than listed buildings, this term would cover impacts upon the setting of the scheduled monument and conservation area as well as the listed buildings. The need for an archaeological assessment is welcomed.

Breckland Council Response

Officer Response

Criteria 2 of the policy requires new development to respect the setting of the conservation area. As this is set out within criteria 2 it is therefore not considered necessary to update the wording of criteria 3 as this is considered to be adequately covered.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1135889	Full Name	Mr Stewart Patience	Organisation Details	Anglian Water Services Ltd
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Summary of the North Elmham Allocations.	Number	Map 3.14
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

We welcome the reference made to the applicant obtaining pre-planning advice from Anglian Water to identify a feasible foul drainage strategy for the above sites and obtaining confirmation that there is sufficient wastewater treatment capacity for the sites identified at Dereham and Swaffham.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.287
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The reference to North Elmhams rich historic environment and description of designated heritage assets in paragraph 3.287 of the opening text is helpful in outlining the defining aspects of North Elmham.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Old Buckenham Residential Allo
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

LP(074)014: Land off St. Andrews Close It is noted that this inset map within the plan is not orientated to north; it is recommended that this is amended for clarity. The site lies to the south of the Old Buckenham Conservation Are and the Grade II listed Manor House. Any development of this site will need to preserve or enhance these designated heritage assets and their settings. Whilst the policy and supporting text refer to the need for development to use appropriate heights, scale and densities neither the policy nor the text refer to the heritage assets identified. These requirements should be included in the policy and supporting text of the Plan. Paragraph 3.303 states that development should demonstrate that full

Local Plan Pre-Submission - Comments and Response Schedule

analysis of the immediate and wider context has been undertaken to inform a design response but this not appear as a requirement within the policy itself.

Breckland Council Response

Officer Response

Development of this site would need to be in conformity with all policies within the Local Plan and also the NPPF. The Local Plan includes policy ENV07 in relation to Designated Heritage Assets and also design policies COM01 and GEN2. Any application for this site would need to consider this and it is considered that it is not necessary to specifically include these within the key development considerations.

The north arrow is included on the map, which is orientated northerly, the map is displayed on a landscape page in order to enable it to fit within the document.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130852	Full Name	Mrs Hilary Clutten. Clerk to Old Bucken Council	Organisation Details	Clerk Old Buckenham Parish Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Old Buckenham Residential Allo
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Not raised before because this wording has not appeared in previous versions of the draft Local Plan		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

OBPC supports the allocation of Land at St Andrews Close for approximately 20 dwellings. This is a sustainable location for housing growth, and represents a logical extension to the village. However, minor alterations to the proposed wording of the policy are requested. Specifically, criterion 2 of the draft policy refers to the Appropriate use of height and scale to ensure the site's position as a key gateway to the settlement. The site does not occupy a gateway position, and is accessible only via St Andrews Close, a cul-de-sac. The wording should therefore be revised to The height and scale of development should reflect the sites location at the edge of the settlement, and respect the character of adjacent

Local Plan Pre-Submission - Comments and Response Schedule

development²

Breckland Council Response

Officer Response

Support for the allocation is noted. Due to the access to the site being from St Andrews Close and the requirement to retain the trees, it may be appropriate to amend the Local Plan however this will be subject to further discussion at the hearing sessions

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1135889	Full Name	Mr Stewart Patience	Organisation Details	Anglian Water Services Ltd
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Summary of the Old Buckenham Allocations.	Number	Map 3.15
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

We welcome the reference made to the applicant obtaining pre-planning advice from Anglian Water to identify a feasible foul drainage strategy for the above sites and obtaining confirmation that there is sufficient wastewater treatment capacity for the sites identified at Dereham and Swaffham.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130852	Full Name	Mrs Hilary Clutten. Clerk to Old Bucken Council	Organisation Details	Clerk Old Buckenham Parish Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.295
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Not raised before because these figures have not appeared in previous versions of the draft Local Plan		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

OBPC believes that the figures quoted do not equate to 10% growth; Based on a population of 1270, and a household multiplier of 2.3 people per dwelling, a 10% increase in dwelling numbers would equate to 55 additional dwellings, and not the 69 proposed, which represents a 12.5% increase. If the villages allocation were reduced to 10% i.e. 55, then taking into account completions and commitments, coupled with the proposed allocation of 20 dwellings at St Andrews Close, the shortfall to be made up under policy HOU03 would only be 3 dwellings.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Paragraph 3.9 sets out that each of the Local Service Centres receives an allocation equivalent to 10% growth. This is a new target and does not include the committed growth up to March 2017. The allocation is for 37 dwellings which is under the 10% growth target.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Shipdham Residential Allocation
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

LP(085)002: Old Nursery, land behind Old Post Office Street There are no known designated heritage assets within the site boundary which could be affected by development of this site. The Shipdham Conservation Area is located east of the site but on the far side of Watton Road. Development of this site should still have regard for the setting of the conservation area and its setting will be vulnerable to building heights within the site allocation. The site is currently open land and so development should also have considered.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted. The Historic Characterisation Study concludes development of the site would have a limited impact on the historic environment. However the study does set out recommended policy requirements which have not been noted as a consideration in the Local Plan. Recommend amending the supporting text to include the policy requirements set out in the Historic Characterisation Study.

Potential amendment to the plan

Add wording to para 3.309 of the supporting text for policy Shipdham Residential Allocation 1: Development proposals must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken so as to inform an appropriate design response. Respecting views of the wider landscape will be an additional factor in the formation of proposals.

Amendment ID

PM/H/Sh1/C

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1130870 Full Name Mr Geoff Hinchliffe
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Shipdham Residential Allocation
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Not aware of the detail.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

(1) The addition of another 55 houses , adjacent to the Old Coalyard site (already approved for approx 90 houses) exceeds the previously specified development total for the village, bearing in mind other ongoing developments. (2) The Old Coalyard development , with proposed access onto the A1075 , opposite the Old School Playing Field site (Scheduled for development by Breckland's own agents) is going to create a major road and traffic bottleneck already. To add another 55 houses-worth of vehicles to that scenario is a contradiction of all the idealistic principles claimed for the Plan.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The housing requirement for Shipdham takes into account the planning commitments and completions since the beginning of the plan period 2011. The remaining total (80) is sought on the proposed allocated sites to fulfil the housing requirement up to year 2036. Norfolk County Council as Highways Authority were consulted on the proposed allocation stating that access to the site should be extended through the existing Coal Yard application. Developer contributions will be sought in line with Policy INF O2.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	609986	Full Name	Mrs Erica Whettingsteel	Organisation Details	Managing Director EJW Planning Ltd
Agent ID	598312	Agent Name	Mrs Erica Whettingsteel	Agent Organisation	Managing Director EJW Planning Ltd

Comment Details

Title		Number	Shipdham Residential Allocation
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

The land west of Brick Kiln Lane (LP (085)006) lies to the east of and wraps around land north of Chapel Street that benefits from planning permission for 90 dwellings. The site would act as a logical extension to that development. The site is located at the centre of the village close to existing and proposed shops and services and is accessible to the local school, doctors' surgery and local bus services. The site is therefore in a very sustainable, location in term of its location within Shipdham.

13- If you feel the plan is unsound, please tell us why

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Shipdham Residential Allocation
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

LP(085)006: Land west of Brick Kiln Lane There are no known designated heritage assets within the site boundary which could be affected by development of this site. The Shipdham Conservation Area is however located to the immediate southwest of the site. Any development of this site will need to preserve or enhance this designated heritage asset and its setting. Whilst the policy and supporting text refer to the need for development to use appropriate of appropriate design and densities neither the policy nor the text refer to the conservation area. These requirements should be included in the policy and supporting text of the Plan.

Local Plan Pre-Submission - Comments and Response Schedule

Breckland Council Response

Officer Response

Comment noted. The Historic Characterisation Study concludes development of the site would have a limited impact on the historic environment. However the study does set out recommended policy requirements which have not been noted as a consideration in the Local Plan. Recommend amending the supporting text to include the policy requirements set out in the Historic Characterisation Study.

Potential amendment to the plan

Add wording to para 3.314 of the supporting text for policy Shipdham Residential Allocation 2: Development proposals must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken so as to inform an appropriate design response. In this particular instance, respecting views of the wider landscape will be an additional factor in the formation of proposals.

Amendment ID

PM/H/Sh2/C

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1135889	Full Name	Mr Stewart Patience	Organisation Details	Anglian Water Services Ltd
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Summary of the Shipdham Allocations.	Number	Map 3.16
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

We welcome the reference made to the applicant obtaining pre-planning advice from Anglian Water to identify a feasible foul drainage strategy for the above sites and obtaining confirmation that there is sufficient wastewater treatment capacity for the sites identified at Dereham and Swaffham.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 512902 Full Name Mr Paul Hewett
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Summary of the Shipdham Allocations. Number Map 3.16
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

I have been asked to comment by residents within Shipdham in my capacity as District Councillor on the following grounds: 1 “ Preparation, effectiveness and compliance of the plan as presented: despite the time taken to reach this stage there are a number of errors, omissions, typos and inconsistencies that do not befit a plan of this significance, and suggest additional, more significant errors might be present. For example, The Millwright Arms is not in Shipdham “ it is in a town a number of miles away. This has been pointed out in the past. 2 “ Compliance and effectiveness of the plan as submitted: there are significant questions as to the current capacity of infrastructure (roads, power, water, sewerage) within Shipdham

Local Plan Pre-Submission - Comments and Response Schedule

to cope with even current occupancy let alone additional building within the village. Lack of adequate drainage and sewerage in particular have been raised on all recent building projects in the village with current utility businesses failing to address, or (in some instances) even recognise existing shortcomings. 3 “ Compliance and effectiveness with the plans as submitted: both with the current village road network and, more significantly, on the network either side of the village, there are significant concerns over road safety, traffic volumes and speed. Shipdham is a ribbon-development village on a major A road (the A1075) which is the only major route north/south through the district and is an emergency diversion should the A47 be closed. Current traffic levels on the A1075 struggle with village traffic, and will be negatively impacted in the centre of the village with a further 80 “ 120 properties being built (preferred sites) before windfall sites in the current pipeline. Moreover, there are significant, major developments planned in Watton (5 miles south on the A1075) and Dereham (4 miles north) all of which will use the A1075 to access north or south of the District. The focus of much of these major developments is on traffic flow caused by the developments themselves (which constitute major challenge) but have not yet addressed the critical impact these will have on the major transport route that goes through Shipdham. Until there is a genuine attempt to address these critical strategic priorities the plan as it stands cannot be legally compliant, positively prepared, or

Breckland Council Response

Officer Response

Shipdham is identified as a Local Service Centre on the basis that the village meets the 5 required services and facilities. The Local Service Centre Topic paper states that the village has the one pub, the Golden Dog. As a result of the services and facilities it is considered that the village is a sustainable location for growth. Moreover a certain proportion of growth is required to ensure that the services and facilities within the vilage are supported over the plan period.

The Local Plan is supported by an infrastructure delivery plan, which sets out the requirements for the plan period to meet the proposed growth.

In terms of Highways, Norfolk County Council have provided high level, strategic comments on the site and the plan itself throughout the process.

Potential amendment to the plan

Update pub information in the Local Service Centre Topic Paper and Shipdham summary

Amendment ID

PM/H/Sh/A

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1131212	Full Name	Mrs Patty Harris	Organisation Details	Clerk Shipdham Parish Council
Agent ID	1131206	Agent Name	Mrs Patty Harris	Agent Organisation	

Comment Details

Title	Breckland Local Plan Pre-Submission Publication	Number	
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Following an Open Forum for the residents of Shipdham, the following comments have been agreed by the Parish Council: 1 " Preparation, effectiveness and compliance of the plan as presented: despite the time taken to reach this stage there are a number of errors, omissions, typos and inconsistencies that do not befit a plan of this significance, and suggest additional, more significant errors might be present. For example, The Millwright Arms is not in Shipdham " it is in a town a number of miles away. This has been pointed out in the past. 2 " Compliance and effectiveness of the plan as submitted: there are significant questions as to the current capacity of infrastructure (roads, power, water, sewerage) within Shipdham

Local Plan Pre-Submission - Comments and Response Schedule

to cope with even current occupancy let alone additional building within the village. Lack of adequate drainage and sewerage in particular have been raised on all recent building projects in the village with current utility businesses failing to address, or (in some instances) even recognise existing shortcomings. 3 “ Compliance and effectiveness with the plans as submitted: both with the current village road network and, more significantly, on the network either side of the village, there are significant concerns over road safety, traffic volumes and speed. Shipdham is a ribbon-development village on a major A road (the A1075) which is the only major route north/south through the district and is an emergency diversion should the A47 be closed. Current traffic levels on the A1075 struggle with village traffic, and will be negatively impacted in the centre of the village with a further 80 “ 120 properties being built (preferred sites) before windfall sites in the current pipeline. Moreover, there are significant, major developments planned in Watton (5 miles south on the A1075) and Dereham (4 miles north) all of which will use the A1075 to access north or south of the District. The focus of much of these major developments is on traffic flow caused by the developments themselves (which constitute major challenge) but have not yet addressed the critical impact these will have on the major transport route that goes through Shipdham. Until there is a genuine attempt to address these critical strategic priorities the plan as it stands cannot be legally compliant, positively prepared, or

Breckland Council Response

Officer Response

Shipdham is identified as a Local Service Centre on the basis that the village meets the 5 required services and facilities. The Local Service Centre Topic paper states that the village has the one pub, the Golden Dog. As a result of the services and facilities it is considered that the village is a sustainable location for growth. Moreover a certain proportion of growth is required to ensure that the services and facilities within the vilage are supported over the plan period.

The Local Plan is supported by an infrastructure delivery plan, which sets out the requirements for the plan period to meet the proposed growth.

In terms of Highways, Norfolk County Council have provided high level, strategic comments on the site and the plan itself throughout the process.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.306
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The reference to Shipdhams rich historic environment and description of designated heritage assets in paragraph 3.306 of the opening text is helpful in outlining the defining aspects of Shipdham.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Sporle Residential Allocation 1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

LP(092)005: Land to the north of Essex Farm There are no known designated heritage assets within the site boundary which could be affected by development of this site. A Roman Road lies to the west of the site which increases the likelihood of archaeological potential, as such we request that the policy is amended to require development proposals on this site to accompanied by a an archaeological assessment. Wolferton Hall, a Grade II listed building sites to the southeast of the site. We welcome the inclusion of point 5 in the policy which requires development to preserve and enhance the special interest of this heritage asset. We do however request that the policy is amended so that it also makes specific reference to its

Local Plan Pre-Submission - Comments and Response Schedule

setting.

Breckland Council Response

Officer Response

Criteria 5 of the key development considerations states that "The scheme design, whilst preserving and enhancing, is complementary to the special interest of the designated heritage assets. The scheme design proposal will be informed via a detailed appraisal of the assets' significance". The policy should also be read alongside all other policies within the Local Plan, including policies ENV 07 and ENV 08 on the historic environment.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1135889	Full Name	Mr Stewart Patience	Organisation Details	Anglian Water Services Ltd
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Summary of the Sporle Allocations.	Number	Map 3.17
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

We welcome the reference made to the applicant obtaining pre-planning advice from Anglian Water to identify a feasible foul drainage strategy for the above sites and obtaining confirmation that there is sufficient wastewater treatment capacity for the sites identified at Dereham and Swaffham.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Swaffham Allocation 3
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

Can be dealt with by written representations unless the examining inspector feels otherwise.

13- If you feel the plan is unsound, please tell us why

LP(097)009: Land to the east of Brandon Road There are no known designated heritage assets within the site or nearby which could be affected development of this site. The proposed site allocation is located immediately adjacent to a larger site which already has planning permission to be developed. Together the sites would constitute a substantial urban extension to the Swaffham. As an edge of settlement site, its development should be informed by an assessment of relationship between Swaffham and the surrounding landscape. Point 4 of the policy does make a provision for layout and design but only in respect to existing built development and not with the open landscape to the south. It is noted that

Local Plan Pre-Submission - Comments and Response Schedule

point 4 makes reference to Norwich Road which lies much further north of the site; this is highlighted as a potential error in the plan.

Breckland Council Response

Officer Response

The supporting text sets out that development proposals "must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken so as to inform an appropriate design response. In this particular instance, respecting the site's location on the edge of the settlement, the site being a prominent gateway into the village and respecting the landscape character sensitivity will be additional factors in the formation of proposals".

Comment noted.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Swaffham Allocation 4
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

LP(097)010: Land to the south of Norwich Road To the north west of the site is the Church of St Peter & St Paul, which is Grade I listed and dates from the 14th century and the Grade II* listed Manor House dating from c1740. The site is outside the conservation area which lies to the west and is separated from the site by existing 20th century residential development. There are also several Grade II listed buildings which surround the site, including Crown Cottage and Wood Farmhouse. Any development of the site therefore has the potential to impact upon these heritage assets. It is important that any development of this site will need to preserve the listed buildings, and conserve or enhance the conservation

Local Plan Pre-Submission - Comments and Response Schedule

area and its setting. These requirements should be included in the policy and supporting text of the Plan. It is acknowledged that both the supporting text and policy make reference to the presence and proximity of designated heritage assets which is welcomed. However there should also be consideration for potential unknown or non-designated heritage assets. This could be achieved by amending point 4 to use the historic environment rather than designated heritage assets and conservation area. It is also recommended that the policy require a Heritage Statement rather than an appraisal of significance which is required in any case by paragraph 129 of the NPPF.

Breckland Council Response

Officer Response

The Historic Characterisation Study (2017) states that development proposals "must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken so as to inform an appropriate design response. In this particular instance, respecting the site's location on the edge of the settlement and the site being a prominent gateway into the village and respecting the setting of the nearby listed buildings, in particular Wood Farm, will be additional factors in the formation of proposals". This wording is included within the reasoned justification of the policy.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Swaffham Allocation 5
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

LP(097)013: Land off Sporle Road There are no known designated heritage assets within the site which could be affected its development. The Swaffham Conservation Area is located to the southwest of the site and covers the town centre of the settlement. Development of this site should seek to conserve or enhance the setting of the conservation area as the height of new development could impact upon the conservation area. Reference to the anticipated building height of two storeys in point 2 of the policy is therefore welcomed but its justification could be strengthened by referring back to the need to conserve the setting of the conservation area. Additionally, as an edge of settlement site, its

Local Plan Pre-Submission - Comments and Response Schedule

development should be informed by an assessment of relationship between Swaffham and the surrounding landscape. These requirements should be included in the policy and supporting text of the Plan.

Breckland Council Response

Officer Response

The Historic Characterisation Study (2017) states that "Development proposals must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken so as to inform an appropriate design response. In this particular instance, respecting the site's location on the edge of the settlement and the site being a prominent gateway into the village and preserving native trees where possible, will be additional factors in the formation of proposals". This text is included in the supporting text of the policy wording. It is considered that the key development constraints in conjunction with policies 'ENV 05 Protection and Enhancement of the Landscape' and policies 'ENV 07 Designated Heritage Assets' and 'ENV 08 Non Designated Heritage Assets' provide protection of the wider historic environment.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1132036	Full Name	De Merke Estates	Organisation Details	De Merke Estates
Agent ID	1132034	Agent Name	Mr Stuart Thomas	Agent Organisation	Berrys

Comment Details

Title		Number	Swaffham Allocation 5
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The issue was not apparent prior to the publication of the policies and proposals contained within the Pre-Submission Breckland Local Plan.		
Do you wish to appear at the Examination in Public?				Yes			

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

It is noted that policy "Swaffham Allocation 5 - Land off Sporle Road (LP[097]013)" refers to a site capacity of "at ;east 78 dwellings". It is unclear how the figure of 78 dwellings was derived as the site benefits from Outline consent for 130 dwellings (recognised on Table 3.3 Swaffham Proposed Site Allocations). Therefore, whilst the identification of a minimum site capacity does not restrict its subsequent development for 30 dwellings the statement is considered to be superfluous and does not assist in providing a level of consistency and clarity over how the Plan will deliver its housing requirement and meet housing needs during the Plan period.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted.

Potential amendment to the plan

Key development consideration proposed to change from 78 dwellings to 130 dwellings to reflect table 3.3

Amendment ID

PM/H/S5/A

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Swaffham Allocation 6
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

LP(097)018: Land to the north of Norwich Road This site allocation would see the development of 165 new dwellings on an area of open land to the east of the grade II* listed Swaffham Manor House. The Grade II listed Gradys Hotle and the Swaffham Conservation Area are also located to the west of the site. The currently open site forms part of the setting of this Grade II* listed building. The Manor House dates from around 1740 and presents a formal facade to the west, towards Swaffham town centre. The rear of the House features a series of 19th century service ranges and beyond this outbuildings set in a linear arrangement. On its north side this range faces an access trackway which continues past the buildings

Local Plan Pre-Submission - Comments and Response Schedule

towards the field beyond. The Manor House is set in agricultural land on the outskirts of Swaffham, but having the outbuildings in this arrangement gives the Manor House an additional link to the landscape. The field at the end of the outbuilding range is a relatively small one and borders the application site to the east of the Manor. Although there is planting on the field edge the application site plays a role in the rural setting of the Manor House an building a housing development on the site could diminishes the contribution it makes to the significance of the listed building. Any development of this site would therefore have the potential to impact upon the setting of the conservation area. Any development of this site will need to preserve or enhance these heritage assets and their settings. This might be achieved through mitigation measures such as appropriate design, location of open space, landscaping/planting and massing of the development. Additionally, as an edge of settlement site, its development should be informed by an assessment of relationship between Swaffham and the surrounding landscape. It is noted that part 3 of the policy refers to need to preserve or enhance special interest of designated and non-designated heritage assets but makes no reference to setting. We request the policy is amended accordingly. The policy is written as if a scheme has already been submitted and whilst that may be the case the policy should work as separate entity and should be written in isolation to any prospective scheme. The need to provide a statement of significance is welcomed but is slightly superfluous as this is required by the NPPF in any case. It is noted that the supporting text erroneously refers to the Manor House as being Grade II listed when it is in fact Grade II* listed, as such any future decision should be made in consultation with Historic England.

Breckland Council Response

Officer Response

Criteria 3 of the key development considerations states that "the scheme design, whilst preserving and enhancing, is complementary to the special interest of the existing designated and non-designated heritage assets and conservation area. The scheme design proposal will be informed via a detailed appraisal of the assets' significance". It is considered that the key development constraints in conjunction with policies 'ENV 05 Protection and Enhancement of the Landscape' and policies 'ENV 07 Designated Heritage Assets' and 'ENV 08 Non Designated Heritage Assets' provide protection of the wider historic environment.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 971309 Full Name mr les scott
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Paragraph Number 3.151
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound No

2 - Do you consider the Pre-Submission Publication to be unound Yes

3 - Is the plan legally compliant? No

4- Is the plan positively prepared? No

5- Is the plan justified? No

6- Is the plan effective? No

7 - Is the plan consistent with national policy? Yes

8 - Have you raised this at Preferred Site Options consultation? No

9 - Have you raised this at Preferred Directions ? No

10- Have you raised this at Issues and Options? No

11- If you have not raised this issue before please state why I have only become aware after working on preparations for swaffham NP

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

NNPF states that LPA's should have an up to date conservation area appraisal. Not only has Swaffham's conservation area not been updated but there is no information held on record. A new appraisal should be carried out immediately in order that 3.151 can be used.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The NPPF does not state that Local Planning Authorities should have an up to date conservation area. The 1990 Planning (Listed Buildings and Conservation Areas) Act 1990 states that: (1) Every local planning authority" (a) shall from time to time determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance, and (b) shall designate those areas as conservation areas. (2) It shall be the duty of a local planning authority from time to time to review the past exercise of functions under this section and to determine whether any parts or any further parts of their area should be designated as conservation areas; and, if they so determine, they shall designate those parts accordingly. (3) The Secretary of State may from time to time determine that any part of a local planning authoritys area which is not for the time being designated as a conservation area is an area of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance; and, if he so determines, he may designate that part as a conservation area. (4) The designation of any area as a conservation area shall be a local land charge.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1132036	Full Name	De Merke Estates	Organisation Details	De Merke Estates
Agent ID	1132034	Agent Name	Mr Stuart Thomas	Agent Organisation	Berrys

Comment Details

Title	Breckland Local Plan Pre-Submission Publication	Number	
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	This issue was not apparent prior to the publication of the policies and proposals contained within the Pre-Submission Breckland Local Plan.		
Do you wish to appear at the Examination in Public?				Yes			

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The Plan is unclear, imprecise and inconsistent in respect to 'sites with planning permission for housing' identified on the 'Swaffham Policies Map - Pre-submission Publication Summer 2017'. 'Sites with planning permission for housing' contribute towards meeting Swaffham's housing growth requirement over the Plan period, as identified in policy HOU 02. However, these 'sites with planning permission for housing' lie both within, and outside of, the development boundary of Swaffham (where there is a presumption in favour of development). In addition, Table 3.3 Swaffham Proposed Site Allocations identifies that some of the proposed site 'allocations' identified benefit from planning permission and count as part of the

Local Plan Pre-Submission - Comments and Response Schedule

completions and commitments. These site 'Allocations' are in effect also 'sites with planning permission for housing'. There is, therefore, no consistency in how the Plan defines and deals with sites that benefit from planning permission and considerable uncertainty remains as to how new planning applications will be dealt with on such sites if the extant consent lapses. Nonetheless, it is assumed that as Policy GEN 05 provides a general presumption in favour of development within settlement development boundaries, there is a presumption in favour of planning applications for housing on 'sites with planning permission for housing' identified within the settlement boundary. Whilst there is a presumption against future planning applications for housing on those 'sites with planning permission for housing' identified outside of the settlement boundary. It is therefore contended that those 'sites with planning permission for housing' included within the settlement boundary on the 'Swaffham Policies Map - Pre-submission Publication Summer 2017' are also identified as housing 'Allocations' on the Map and within 'Table 3.3 Swaffham Proposed Site Allocations'. This will provide a level of consistency and clarity, that is currently lacking in the Plan as drafted, on how the Council will view future applications on 'sites with planning permission for housing' and therefore how the Plan will deliver its housing land requirement and meet housing needs during the Plan period.

Breckland Council Response

Officer Response

The plan is consistent in that a target was set for each of the settlements, commitments and completions were analysed at this stage. The site allocation process and the planning application process are separate processes and it is the case that some of the proposed allocations received planning permission prior to being allocated through the Local Plan. This is reflected in the completions and commitments. Therefore the completions and commitments are all currently identified within the settlement boundary or through proposed allocations. This is a consistent approach throughout all of the settlements and meets the identified need for Swaffham.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1135889	Full Name	Mr Stewart Patience	Organisation Details	Anglian Water Services Ltd
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Summary of the Swaffham Allocations.	Number	Map 3.2
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

We welcome the reference made to the applicant obtaining pre-planning advice from Anglian Water to identify a feasible foul drainage strategy for the above sites and obtaining confirmation that there is sufficient wastewater treatment capacity for the sites identified at Dereham and Swaffham.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1132036	Full Name	De Merke Estates	Organisation Details	De Merke Estates
Agent ID	1132034	Agent Name	Mr Stuart Thomas	Agent Organisation	Berrys

Comment Details

Title	Swaffham Saved Employment Allocations	Number	Map 6.3
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The Swaffham saved Employment Allocations as identified on map 6.3 are supported. Nonetheless, for clarity and consistency the map should identify the proposed settlement boundary as used on the Swaffham Policies Map.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1132036	Full Name	De Merke Estates	Organisation Details	De Merke Estates
Agent ID	1132034	Agent Name	Mr Stuart Thomas	Agent Organisation	Berrys

Comment Details

Title	Summary of the Swaffham Allocations.	Number	Map 3.2
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The identified 'settlement boundary' as identified on the Pre-Submission Policies Map for Swaffham is supported as it enables an appropriate level of housing and employment development growth in the settlement for the remainder of the Plan period.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1132036	Full Name	De Merke Estates	Organisation Details	De Merke Estates
Agent ID	1132034	Agent Name	Mr Stuart Thomas	Agent Organisation	Berrys

Comment Details

Title	Swaffham Proposed Site Allocations	Number	Table 3.3
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	This issues was not apparent prior to the publication of the policies and proposals contained within the Pre-Submission Breckland Local Plan.		
Do you wish to appear at the Examination in Public?				Yes			

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Table 3.3 Swaffham Proposed Site Allocations is supported in as much as it identifies site LP[097]013 as a site that will provide 130 dwellings in the plan period. However, Table 3.3 identifies that some of the proposed site allocations benefit from planning permission and count as part of the completions and commitments. These site 'Allocations' are therefore also effectively 'sites with planning permission for housing'. In addition, whilst 'sites with planning permission for hosuing' contribute towards meeting Swaffham's housing growth requirement over the Plan period (as identified in policy HOU 02), a number of these sites are not included within the development boundary of Swaffham (where there is a

Local Plan Pre-Submission - Comments and Response Schedule

presumption in favour of development). The Plan is therefore unclear, imprecise and inconsistent in respect to site 'allocations' identified in Table 303 and 'sites with planning permission for housing' identified on the 'Swaffham Policies Map - Pre-submission Publication Summer 2017'. Considerable uncertainty also remains as to how new planning applications will be dealt with on 'sites with planning permission for housing' if an extant consent lapses. In this regards, it is assumed that, as Policy GEN 05 provides a general presumption in favour of development within settlement development boundaries, there is a presumption in favour of planning applications for housing on 'sites with planning permission for housing' identified within the settlement boundary. Whilst there is a presumption against future planning applications for housing on those 'sites with planning permission for housing' identified outside of the settlement boundary. It is therefore contended that those 'site with planning permission for housing' included within the settlement boundary on the 'Swaffham Policies Map - Pre-submission Publication Summer 2017' are also identified as proposed housing allocations on the policies maps and within 'Table 3.3 Swaffham Proposed Site Allocations'. This will provide a level of consistency and clarity, that is currently lacking in the Plan as drafted, on how the Council will view future applications on 'sites with planning permission for housing' and therefore how the Plan will deliver its housing land requirement and meet housing need during the Plan period.

Breckland Council Response

Officer Response

Sites that were subject to planning permission subject to a section 106 agreement at the time of the plan preparation were allocated to provide more certainty. This has been consistently carried out through the entire plan in regard to all sites. Sites that have planning permission have been included within the settlement boundary for consistency.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Swanton Morley Residential All
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

LP(098)013: Land off Rectory Road The proposed site allocation consists of currently open land to the north of Swanton Morley. To the east of the site sits the grade I listed parish church of All Saints. The church remains decisively separated from the settlement and the open fields to the north and west of the village make a particular contribution to the churchs significance. The character of its immediate surroundings serves to symbolise the historic status and authority of the church in the community, reflects its historical place in an agricultural community and economy and gives it greater presence in the landscape. It is also a suitable setting for such an ancient and spiritual place which contributes to its significance and to

Local Plan Pre-Submission - Comments and Response Schedule

an understanding of its importance. Alarminglly the draft policy makes no reference to the presence of this Grade I listed building and as such contains no provision to ensure that its special historic or architectural significance and its setting are protected. We request that the policy amended to reflect this. Paragraph 3.328 of the supporting text states that the proposed site allocation would be an extension of an existing site which is under construction to provide 52 dwellings. The site layout shows that open space has been designed to site towards the end of the north site nearest the Church. We would expect then that the policy would refer to the cumulative impacts of any future development and the impacts that it would have upon the setting of the church and upon the relationship of the existing settlement and the adjoining open landscape. Open space should be orientated toward the northern end of the proposed site allocation to preserve the setting of the church similar to that negotiated at the adjoining site. We would also question the wording of point 4 of the policy which requires new development to reflect existing densities. As the site is currently open land surrounded by sparse development any proposed site allocation for 85 dwellings could not realistically achieve a density level comparable with what exists, if this is intended to mean that the site should only accommodate low densities then the wording of the policy should be changed to say that.

Breckland Council Response

Officer Response

Development of this site would need to be in conformity with all policies within the Local Plan and also the NPPF. The Local Plan includes policy ENV07 in relation to Designated Heritage Assets and also design policies COM01 and GEN2. Any application for this site would need to consider this and it is considered that it is not necessary to specifically include these within the key development considerations.

Further to the above, whilst not shown on map 3.18 land to the east of the site is underconstruction for residential development.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.326
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			
Do you wish to appear at the Examination in Public?		No					

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

We welcome the supporting text at paragraph 3.326 which states the need to avoid coalescence of Swanton Morley and the hamlet of Woodgate to the southeast.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1135889	Full Name	Mr Stewart Patience	Organisation Details	Anglian Water Services Ltd
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Summary of the Swanton Morley Allocations.	Number	Map 3.18
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

We welcome the reference made to the applicant obtaining pre-planning advice from Anglian Water to identify a feasible foul drainage strategy for the above sites and obtaining confirmation that there is sufficient wastewater treatment capacity for the sites identified at Dereham and Swaffham.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	609986	Full Name	Mrs Erica Whettingsteel	Organisation Details	Managing Director EJW Planning Ltd
Agent ID	598312	Agent Name	Mrs Erica Whettingsteel	Agent Organisation	Managing Director EJW Planning Ltd

Comment Details

Title		Number	Watton Housing Allocation 1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The site is located to the east of Saham Road immediately north of the built up area of Watton. There is existing residential development to the south. Land to the north and east in agricultural use. An existing footway extends from the town centre as far as Richmond Golf Club on the western side of Saham Road. The site is within walking and cycling distance of the town centre where there is a comprehensive range of services and facilities, and is well located for bus stops

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Watton Housing Allocation 1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

LP(104)008 and LP(104)019: Land off Saham Road There are no known designated heritage assets within the site which could be affected its development. The Watton Conservation Area is however located to the south of the site. Any development of this site will need to preserve or enhance this designated heritage asset and its setting. This might be achieved through mitigation measures such as appropriate design, location of open space, landscaping/planting and massing of the development. Additionally, as an edge of settlement site, its development should be informed by an assessment of relationship between Watton and the surrounding landscape. We note that point 3 outlines appropriate densities to

Local Plan Pre-Submission - Comments and Response Schedule

reflect his which is welcomed. These requirements should be included in the policy and supporting text of the Plan. Paragraph 3.186 of the supporting text makes reference to the conservation and other nearby non-designated heritage assets but this is not referred to in the policy itself. This paragraph also states that development proposals at this site must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken in order to inform an appropriate design response but again this requirement does not transfer through into the policy itself. It is recommended that the policy is amended accordingly to include these requirements.

Breckland Council Response

Officer Response

Criteria 10 of the policy does require protection and enhancement of the wider setting of the conservation area, listed buildings and other nearby non-designated heritage assets. This is reflected in the supporting text at para 3.186. There is no justification for amending the policy.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	11968	Full Name	Mr Garth Hanlon	Organisation Details	Abel Developments
Agent ID	11888	Agent Name	Mr Garth Hanlon	Agent Organisation	Director Savills

Comment Details

Title		Number	Watton Housing Allocation 2
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4 - Is the plan positively prepared?	Yes
5 - Is the plan justified?	No	6 - Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10 - Have you raised this at Issues and Options?	No	11 - If you have not raised this issue before please state why	<p>Representations have been submitted on behalf of Abel Homes Limited to the Preferred Directions and the Preferred Site Options and Settlement Boundaries stages of the emerging Local Plan. In addition, submissions have been made in response to the Call for Sites. Within all submissions a case has been made for the allocation of Land North of Norwich Road, Watton. This Pre-Submission Draft of the plan is the first to have identified Land North of Norwich Road, Watton for allocation under draft Policy Watton Housing Allocation 2. As such, details comments about the wording of the policy have not been submitted previously.</p>		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13 - If you feel the plan is unsound, please tell us why

Local Plan Pre-Submission - Comments and Response Schedule

Strong support is given to the proposed allocation of Land north of Norwich Road, Watton for at least 45 dwellings and at least 60 bed care home at Watton Housing Allocation 2. It is however suggested that there are a number of minor amendments to the wording of this policy and therefore this representation is considered as an objection. It is acknowledged that draft policy wording requires any applications for development at the allocated site to meet the necessary technical standards. The Council proposes to reinforce this with a series of 10 criteria. Criterion 1 seeks the provision of vehicular access via Norwich Road. It is acknowledged by Abel Homes that there will be a need for a new vehicular access at this site which will involve the stopping up of the existing lay-by. In addition Criterion 2 seeks the implementation of transport mitigation measures to the satisfaction of Norfolk County Council Highways Authority. The site is in a sustainable location and it is confirmed at paragraph 3.189 of the Pre-Submission Draft Local Plan that the Council considers development in this location to represent infill development. The supporting Approach to the Selection of Sites states that Norfolk County Council Highways have raised no concerns with the site. The Interim Infrastructure Delivery Plan (August 2017) states at paragraph 2.87 that opportunities to provide safe pedestrian crossing points across Norwich Road alongside wider transport and access improvements will require consideration as part of a transport assessment to support any planning application. In order to be justified, the highways mitigation referenced at Criterion 2 should only be sought where it meets the following tests: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. Suggested solution: Criterion 2 Implementation of necessary transport mitigation measures to the satisfaction of Norfolk County Council Highways Authority. Criterion 5 currently states that A further landscaping buffer is required on the eastern boundary of the site to provide screening from the adjacent business park. Additional mitigation measures may be required to ensure the protection of residential amenity from the adjacent business park, in line with Policy COM 03; Supporting paragraph 3.190 reiterates that consideration of the existing uses adjacent the site to ensure there is no adverse impact on the amenity of new residents. There is an existing row of mature trees along the eastern boundary of the site, it is questioned what justification there is for a further landscaping buffer? In the detail review of the site and its surrounding context, an alternative approach to amenity mitigation maybe preferential. Suggested solution: Necessary mitigation measures shall be

incorporated into the development to ensure the protection of residential amenity from the adjacent business park, in line with Policy COM 03. Criterion 8 currently states A pre-application enquiry with Anglian Water Services is required for this site in accordance with the Water Cycle Study to demonstrate that sufficient capacity is available to transfer wastewater for treatment. Where insufficient capacity within the wastewater network is identified, financial contributions may be sought ; Whilst it is considered good practice to identify capacity within the waste water network in the event of speculative application, it is however noted that this development is proposed to be allocated and therefore represents planned development. Paragraph 3.11 of the Pre-Submission Draft Breckland Local Plan specifically states that The Local Plan, through providing individual settlement targets, gives providers and other infrastructure providers greater certainty in the areas for investment. It is also acknowledged at the same paragraph that these figures are to be treated a minimum housing requirements Sewerage Undertakers, in this case Anglian Water, have statutory duties requiring them to ensure that its public sewerage and sewage disposal system continues to have the ability to receive and treat the foul flows from planned development. It is considered that Anglian Water should be a statutory consultee in the determination of planning applications for planned development such as this. There should not be the obligation on the Applicant to pay for a pre-application enquiry to accompany an application for planned development in this location. Notwithstanding the above, Anglian Water will respond to this consultation and specify whether any improvements to the network or capacity is required. Anglian Water is obliged to provide this infrastructure in a planned manner. Suggested solution: remove proposed criteria 8 Criterion 10 currently states: Submission of a project level Habitats Regulation Assessment to determine the impact of proposed development on Breckland SPA/SAC and to assess habitat suitability, the need for additional survey work and mitigation strategies where required . The Pre-Submission Draft Local Plan is accompanied by the Breckland Local Plan Habitats Regulations Assessment at Publication Stage which has been prepared by Footprint Ecology. It is stated at page 80 of this document in respect of the proposed allocations at Watton that Both allocations north of Norwich Road and therefore outside the 1500m buffer but within 1500m and 3km from the SPA where survey data is lacking . It is explained that there is potential for likely significant effects due to a lack of data and therefore a project level Habitat Regulations Assessment is requested. Abel Homes is happy to commission and submit to the Council the

Local Plan Pre-Submission - Comments and Response Schedule

necessary ecological survey data at the appropriate time.. It is however the requirement of the Council, as the Competent Authority, to complete the Habitats Regulation Assessment as necessary. Overall we support the policy but with the above comments

Breckland Council Response

Officer Response

Support for the proposed allocation is noted. Transport mitigation measures for a major linked development site are likely to be required to satisfy Norfolk County Council as Highways Authority. The policy wording does not mean that more mitigation will be sought than is required. A landscape buffer is the preferred method of screening from the business park to reduce noise and visual pollution and as there is already a number of mature trees present on the eastern border this is not considered to be onerous to the developer. The clause regarding Anglian Water is supported by evidence in the Breckland Water Cycle Study, without satisfying this requirement; the allocation would not be made. Criteria 10 flags the need for a project level HRA. This will be sought in accordance with the requirements set in policy ENV 02.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Watton Housing Allocation 2
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

LP(104)015: Land north of Norwich Road, Watton There are no known designated heritage assets within the site which could be affected its development. However, the Grade II listed Rokeles Hall is located to the immediate northeast of the site. The open setting of the surrounding landscape contributes positively to the setting of this designated heritage asset. We note that point 9 of the policy refers to the need for development to protect or enhance the setting of Rokeles Hall and requires a design scheme to be informed by a detailed appraisal of the assets significance which is welcomed. The policy would be strengthened if the supporting text outlines more precisely the nature of the Rokeles Hall to the surrounding

Local Plan Pre-Submission - Comments and Response Schedule

landscape.

Breckland Council Response

Officer Response

The Historic Characterisation Study provides a more in depth overview of heritage issues relating to the site. It is also referred to in para 3.191.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1128366	Full Name	Mr Richard Smith	Organisation Details	on behalf of Norfolk County Council NPS Prop
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Summary of Watton Allocations	Number	Picture 3.1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

We would also like to take this opportunity to highlight again our concerns regarding the relationship between the existing development boundaries of towns and villages on the proposal maps and school sites. At present there appears to be some inconsistencies regarding whether school sites (buildings/playing fields) are located within the development boundaries or not. We are seeking a more consistent approach to the designation of development boundaries in relation to school buildings and playing fields across Norfolk to allow the opportunity for schools to expand when necessary. We would request the school buildings and hardstanding at Westfields Infant School, Watton be included within the

Local Plan Pre-Submission - Comments and Response Schedule

development boundary. The plan and proposals maps are inconsistent regarding whether school sites are located within development boundaries. This would make it more difficult for some schools to expand than others and would not result in an effective or sound local plan.

Breckland Council Response

Officer Response

The approach to schools and settlement boundaries is considered to be consistent across the District. Where a school sits on the edge of a settlement it is proposed to not include these within development boundaries to limit development pressure on schools. This would not have an impact upon the future expansion of schools.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1135889	Full Name	Mr Stewart Patience	Organisation Details	Anglian Water Services Ltd
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Summary of Watton Allocations	Number	Picture 3.1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			
Do you wish to appear at the Examination in Public?		No					

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

We welcome the reference made to the applicant obtaining pre-planning advice from Anglian Water to identify a feasible foul drainage strategy for the above sites and obtaining confirmation that there is sufficient wastewater treatment capacity for the sites identified at Dereham and Swaffham.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.112
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Site Allocations We would make the following general comments on the site allocation process and also drafting of site specific policies before making a number of site specific comments In assessing sites, we would advise that you refer to the advice in our Advice Note 3 - site allocations in local plans: <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/> . This provides a helpful methodology for site selection. In essence, it is important that you a) Identify any heritage assets that may be affected by the potential site allocation. b) Understand what contribution the site makes to the significance of the asset c) Identify what impact the

Local Plan Pre-Submission - Comments and Response Schedule

allocation might have on that significance d) Consider maximising enhancements and avoiding harm e) Determine whether the proposed allocation is appropriate in light of the NPPFs tests of soundness In assessing sites it is important to identify those sites which are inappropriate for development and also to assess the potential capacity of the site in the light of any historic environment (and other) factors. If a site is allocated, we would expect to see reference in the policy and supporting text to the need to protect and enhance the on-site or nearby heritage assets and their setting, the need for high quality design and any other factors relevant to the historic environment and the site in question. Many of the sites will abut to join together with other proposed allocations, some of which already benefit from an extant permission. Therefore the cumulative impacts of the site allocations upon the historic environment must be considered. It is recommended that a plan is provided which shows site allocations which are clustered together along with any designated assets so the overall scope of development can be readily appreciated. Paragraph 157 of the National Planning Policy Framework requires Local Plans to provide detail with site allocations where appropriate (fifth bullet point), with the Planning Practice Guidance stating where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the what, where, when and how questions) [PPG Reference ID: 12-010-20140306 (last revised 06/03/2014)]. Paragraph 154 of the NPPF also states that only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan. Conservation of the historic environment is a core planning principle (Paragraph 17) and Local Plans should set out a positive strategy in this respect (Paragraph 126).

Breckland Council Response

Officer Response

The Historic Characterisation Study was carried out in 2017 and the methodology was agreed by Historic England.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	875126	Full Name	Spaceward	Organisation Details	
Agent ID	1130567	Agent Name	Mr Geoff Armstrong	Agent Organisation	Armstrong Rigg Planning

Comment Details

Title		Number	Policy HOU 01- Development Re
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy HOU 01- Development Requirements (Minimum) The policy is unsound as the housing requirement is neither positively prepared, justified nor is it consistent with national policy. Policy HOU 01 states that the Local Plan will provide for no less than 15,298 new homes between 2011 and 2036, an average of 612 dwellings per annum and that the annualised level of new housing provision will increase during the plan period, from 584 per year for the first 5 years (2017/18 to 2021/22) to 622 per year from 2021/22. The supporting text to this policy explains at Paragraph 3.3 that the reason for this stepped housing trajectory is to reflect the delivery timelines of the two Sustainable Urban Extensions in Thetford and Attleborough.

We consider that the housing need identified in this policy is unsound on the basis that: 1. It fails to adequately consider market signals for the affordability of housing in calculating an appropriate uplift on household projections; and 2. It fails to justify the use of a stepped trajectory Market Signals The Local Plan Expert Groups recommendations to central government published in March 2016 1 , recommend at Appendix 6 that where the ratio of median quartile house prices to median earnings is above 7 and less than 8.7, a 20% uplift should be applied. The Central Norfolk Strategic Housing Market Assessments (SH MA) only includes an uplift of 10% for Breckland based on market signals, despite the fact that the Office for National Statistics (ONS) latest data on the ratio of house price to work-place based earnings (which is the governments recommended source for affordability data in the current consultation on housing needs methodology 3) shows that median house prices in Breckland are 8.19 times higher than median earnings for jobs in the district. It is clear from this that there is a requirement for a further uplift of 10% against household projections which would result in a need for several hundred more homes to be allocated in the Local Plan. A total uplift of 20% against household projections would also mean that the Councils housing requirement is more in line with the figure contained in the governments current consultation on the new housing needs methodology which would see the annual requirement rise by 11% to 680 dwellings per annum. In respect of the above, the Local Plan Pre-Submission Publication cannot be considered sound in its current form as it is not based on a strategy that seeks to meet the true objectively assessed need for new homes in the district and it cannot therefore be considered to be positively prepared. Recommendation: In order to make the plan sound we consider that the Council should increase its housing requirement by a further 10% against household projections. Stepped Housing Trajectory The Council propose within Policy HOU 01 to use a stepped trajectory in relation to housing delivery in order to extend the period over which the back log in housing will be met. National Planning Practice Guidance (PPG) states that Local Planning Authorities should aim to deal with any undersupply within the first 5 year of the plan period where possible (ID: 3-035-20140306) . The Local Plan Pre-Submission Publication indicates that the Council consider a stepped trajectory to be necessary to reflect the delivery times of the Sustainable Urban Extensions in Thetford and Attleborough. This approach is not considered to be justified, nor is it in line with national policy in the PPG as there is nothing to suggest that it wouldnt be possible for the Council to meet its backlog in the first 5 years of the plan. The policy cannot therefore be considered

Local Plan Pre-Submission - Comments and Response Schedule

sound. Recommendation: Additional sites should be allocated for delivery in the first five years of the plan to meet the Councils undersupply between 2011 and 2016 of 669 dwellings and any additional undersupply following the application of the additional 10% uplift recommended above.

Breckland Council Response

Officer Response

Comment noted. Whilst the Central Norfolk SHMA has not been subject to examination, it has been considered as part of a section 78 appeal reference APP/Y2620/W/16/3150860 where it was considered to represent a pragmatic and robust approach to the calculation of OAN.

The PPG sets out that the household projections should form the starting point for OAN. However paragraph 17 of the PPG allows for a more nuanced approach, encouraging the use of sensitivity testing specific to local circumstances based on alternative assumptions in relation to the underlying demographic projections, including migration levels. The representation questions the use of the 10 year migration trend, however paragraph 159 of the NPPF is clear that in identifying the scale and mix of housing the SHMA should take into account migration and demographic change.

The representation makes reference to the Local Plan Experts Group which the recent Government consultation on a standardised approach to housing numbers has moved away from. The Government has not provided a formal response yet to its consultation, therefore it is not possible to provide weight to its findings around numbers. However it is worth noting that the consultation does include a transitional period which would include the continuation of existing approach for plans which would be submitted prior to 31st March.

The stepped trajectory has been developed to reflect the use of sustainable urban extensions and the initial slower delivery rates due to infrastructure provision. The NPPF at paragraph 52 notes that the supply of housing can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130821	Full Name	Mr Pablo Dimoglou	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	3	Policy HOU 01- Development Re
Chapter Number				

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4 - Is the plan positively prepared?	Yes
5 - Is the plan justified?	Yes	6 - Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10 - Have you raised this at Issues and Options?	No	11 - If you have not raised this issue before please state why	As District Councillor, I did raise issues at the Local Plan Working Group meetings but was unable to comment for much of the proceedings due to having declared a personal interest		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13 - If you feel the plan is unsound, please tell us why

I feel that Breckland Council has determined the minimum housing allocation it can provide instead of building in some comfort to our residents that their housing needs will be met. All too often the people engaged with Local Government and Neighbourhood Planning - the decision makers - have no real commitment to significantly increase housing supply as they have their houses, and their kids have moved away. Shortly after I was elected as a District Councillor in 2015 I was walking through my village and a young man stopped me. He put his hand on my arm and said "We elected you. Well done, now what are you going to do so that

Local Plan Pre-Submission - Comments and Response Schedule

me and my friends don't have to move out of the village to buy a house?" The only way we can meet the often unheard voices - as above - is to deliver more houses where they are sustainable and where the infrastructure can cope or be improved. We should be aiming high. This plan should be about providing the homes needed in our district - not just the minimum number the council thinks will suffice.

Breckland Council Response

Officer Response

The housing figure has been informed by Central Norfolk Strategic Housing Market Assessment which has assessed the housing needs across Breckland. The intention of the policy is that the requirement set from the SHMA is the minimum level of growth required within the District, rather than it being a maximum figure.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1126434	Full Name		Organisation Details	Breckland Bridge Ltd and G F Cole & Sons Ltd
Agent ID	1126421	Agent Name	Mrs Sarah Hornbrook	Agent Organisation	Associate Planner Ingleton Wood

Comment Details

Title	Paragraph	Number	3.2
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

On behalf of Breckland Bridge Ltd and G F Cole & Sons Ltd, we support the identification of Banham as a Local Service Centre that will accommodate at least 42 residential units. It is evident from the text relating to Banham at Paragraph 3.201 that the village provides a range of services which justifies its designation as a Local Service Centre. The village is therefore a sustainable location for modest growth. Accordingly, this aspect of the Local Plan is considered sound as it has been

13- If you feel the plan is unsound, please tell us why

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The text in question is new.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

No evidence or justification has been presented for the statement "A 7% allowance for rural areas is identified as being consistent with the approach within Policy HOU 04...". It appears to be an arbitrary figure, applied to "make up the numbers - in part due to the unjustified delay in development of the two SUE's. This is a change from the approach in the previous two consultation versions of the Plan, but is not justified by any representations on the matter (at least not those included in the Statement of Consultation). This paragraph does mention representations from landowners and developers as evidence that sites are available and develop-able. Such evidence must be made available for scrutiny before the 7% figure can be

Local Plan Pre-Submission - Comments and Response Schedule

accepted as sound. Additionally if evidence exists of such sites in the rural settlements that is then inconsistent with the Council's failure to identify housing allocations by individual settlement in Policy HOU 02.

Breckland Council Response

Officer Response

The 7% figure is taken from and informed by Policy HOU 04, where each settlement with a settlement boundary will be expected to increase by 5% from the date of adoption of the plan. This figure is considered to be proportionate to the levels of services and facilities within these settlements. The table in policy HOU 02 shows that between 2011-2017 902 dwellings have been completed or have planning permission. The increased figure of 150 over the remainder of the plan period is therefore not considered to be unjustified. Furthermore, policy HOU 02 exceeds the figure required in the OAN by 652 dwellings.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	3	Policy HOU 01- Development Re
Chapter Number				

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4 - Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Note: This issue was also raised via a Freedom of Information request which Breckland Council failed to address adequately. Neither the Plan nor the Central Norfolk Strategic Housing Market Assessment from which figures are taken provide a clear and justified calculation to explain how a population increase of 23,656 over the period 2011-2036 results in a housing need of 15,298 over the same period, given that the average household size in Breckland is assumed to be 2.3 (as used to establish number of households in settlements in paragraph 3.9). While it is understood there are other factors to consider when calculating housing need, that does not explain why that assessed need equates to an average household size of

Local Plan Pre-Submission - Comments and Response Schedule

approximately 1.5. This results in uncertainty about all of the housing allocations which could be rectified by giving a clear and concise calculation as part of the justification for total housing allocation to justify the figure of 15,298 new houses.

Breckland Council Response

Officer Response

The Central Norfolk Strategic Housing Market Assessment not only looks at the population increase but also makes uplifts for homelessness, concealed households, affordable housing, migration, housing for older persons, market signals, employment trends, etc. The calculation for the number of homes in the district is much more complex than looking at only population projection data. At a recent planning inquiry in North Norfolk, where the CNSHMA is also used, the inspector considered that the Council has taken a "pragmatic, robust and convincing approach to the assessment of its OAN". It is therefore considered that the housing numbers for Breckland are equally pragmatic, robust and convincing.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.3
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Note: This issue was also raised via a Freedom of Information request which Breckland Council failed to address adequately. Neither the Plan nor the Central Norfolk Strategic Housing Market Assessment from which figures are taken provide a clear and justified calculation to explain how a population increase of 23,656 over the period 2011-2036 results in a housing need of 15,298 over the same period, given that the average household size in Breckland is assumed to be 2.3 (as used to establish number of households in settlements in paragraph 3.9). While it is understood there are other factors to consider when calculating housing need, that does not explain why that assessed need equates to an average household size of

Local Plan Pre-Submission - Comments and Response Schedule

approximately 1.5. This results in uncertainty about all of the housing allocations which could be rectified by giving a clear and concise calculation as part of the justification for total housing allocation to justify the figure of 15,298 new houses. This also follows through into paragraph 3.6.

Breckland Council Response

Officer Response

The Central Norfolk Strategic Housing Market Assessment not only looks at the population increase but also makes uplifts for homelessness, concealed households, affordable housing, migration, housing for older persons, market signals, employment trends, etc. The calculation for the number of homes in the district is much more complex than looking at only population projection data. At a recent planning inquiry in North Norfolk, where the CNSHMA is also used, the inspector considered that the Council has taken a "pragmatic, robust and convincing approach to the assessment of its OAN". It is therefore considered that the housing numbers for Breckland are equally pragmatic, robust and convincing.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1132853	Full Name	Martin Goymour	Organisation Details	Goymour Properties
Agent ID	1132852	Agent Name	Mr Jon Jennings	Agent Organisation	Cheffins Planning

Comment Details

Title		Number	Policy HOU 01- Development Re
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	My clients land holding was presented to a meeting with the Local Plan teams on the 6th February 2017. As requested the site was formally submitted to the Council for consideration in this local plan. In addition, the representations also included a specific wording for the safeguarding of Banham Zoo and its specific development aspirations.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Local Plan Pre-Submission - Comments and Response Schedule

The Council needs to have due regard to the current consultation Planning for the right homes in the right places: consultation proposals in particular the standard methodology for calculating housing need. If this methodology is introduced in its current form it could increase the housing requirement by 11.1% from the 612 dwellings per annum currently proposed to 680 dwellings per annum.

Breckland Council Response

Officer Response

The Local Plan has sought to respond to changes within national policy. The Planning for the right homes in the right places remains a consultation at this stage and the Government has not provided its response yet. The consultation does however provide for transitional arrangements for Local Plans dependent upon their stage of production. Breckland's Local Plan would be covered by these arrangements which would support the continuation of data from the Central Norfolk Strategic Housing Market Assessment.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1132458	Full Name	Roland Bohn	Organisation Details	Albanwise Limited
Agent ID	1132456	Agent Name	Anna Bend	Agent Organisation	Amec Foster Wheeler

Comment Details

Title	Number	Policy HOU 01- Development Re
Chapter Number	3	

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The consultation document indicates that the Council will provide for no less than 15,298 new homes between 2011 and 2036, an average of 612 dwellings per annum. This increase from the 14,925 dwellings in the Preferred Site and Settlement Boundaries document is in line with the SHMA 2017 update, and is supported. It is, however, considered that the Council is not effectively planning for a sufficient number of new homes to meet their housing requirements for the Plan period, as well as make up the shortfall for past under delivery. As of April 2017 the Council had less than four years housing supply. The Councils housing supply has not been analysed. Therefore, it is unclear whether this position has changed, and

Local Plan Pre-Submission - Comments and Response Schedule

whether the supply has further decreased due to the proposed increase in housing requirements for the Plan period. However, it is understood that the Council still does not have a five year supply of housing, as recognised in the Planning Officers report to the 25 September 2017 Planning Committee. Policy HOU1 states that the annualised level of new housing provision will increase during the plan period, from 584 per year from 2017/18 - 2021/22 to 622 per year from 2021/22. The Councils preference in using the Liverpool method is not considered to be suitable when there is a historic undersupply of housing. The housing trajectory at Appendix 1 indicates that the Council has not met its five year requirement, having a shortfall of 403 dwellings within the last five years against the average annual requirement of 612 dwellings. Even when comparing past delivery to the lower annual requirement of 585 dwellings, the Council has under delivered by 263 dwellings in the past five years. Whilst the Council is proposing to deliver a higher number housing in later years to make up for lower housing delivery in the early part of the Plan, as the Council does not have a five year supply of housing, it should be planning for a higher proportion of housing delivery within the short-term to meet existing housing needs, and make up the historic shortfall. If the Council cannot demonstrate a deliverable five year supply of housing, it will render the Local Plan immediately out-of-date. It should also be noted that the Governments current consultation on calculating housing supply predicts an increase to Brecklands housing requirements to 680 dwellings per annum. It is, therefore, possible that the Districts requirements may increase beyond what is currently being planned for, and as such will further decrease the Councils five year supply position. Requested Change For the Plan to be sound, the Council should be planning for a higher proportion of housing 4 delivery within the short-term to meet existing housing needs, and make up the historic shortfall. As such, the Council should allocate further sites, such as Albanwise Limiteds site at Reephams Road (LP[004]005) to ensure that this housing shortfall and the annual housing requirements are sufficiently met within the next five years.

Breckland Council Response

Officer Response

The support for the use of the SHMA figure is noted. As note through recent appeal APP/Y2620/W/16/3150860 the Central Norfolk SHMA is considered to be a pragmatic and robust approach to calculating OAN.

The representation makes reference to Breckland not currently being able to demonstrate a five year housing land supply of deliverable housing land. The most recent five year housing land supply completed in March 2017 showed that the Council was able to demonstrate a 4.6 year supply including a 20% buffer. The housing trajectory within the Local Plan includes a stepped approach to reflect the longer term

Local Plan Pre-Submission - Comments and Response Schedule

delivery expectations of the two sustainable urban extensions. This stepped target has not been included within the current (March 2017) land supply statement as at the time it is not adopted policy. Further to this the housing land supply will be boosted through the new allocations which have also not currently been included. The PPG notes that deliverable sites for housing could include those that are allocated in in the development plan... unless there is clear evidence that schemes will not be implemented within 5 years. Paragraph: 031 Reference ID: 3-031-20140306.

The Government's consultation planning for the right homes in the right places remains at consultation at this stage. The Government has not provided a formal response to this consultation and has not released the timescales within which it intends to do so. The Council would however be included within the transitional arrangements as set out within the consultation.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1032087	Full Name	Mr Chris Kennard	Organisation Details	Finance Director The Shadwell Estate Compan
Agent ID	1029372	Agent Name	Mr Paul Sutton	Agent Organisation	

Comment Details

Title		Number	Policy HOU 01- Development Re
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy HOU 01 " Development Requirements (Minimum) This policy has been updated to reflect the Councils most recent Statement of Five Year Housing Land Supply. This sets out a need for 15,300 dwellings, averaging 612 per year. In the recent publication by the Department of Communities and Local Government of Planning for the right homes in the right places: consultation proposals it is noted that an indicative assessment, using the proposed standard approach, would lead to a requirement of 680 dwellings per annum to be delivered. Over the plan period this equates to 17000 dwellings, an additional 1700. The document states at paragraph 6 that: Subject to the outcome of this consultation, and the responses

Local Plan Pre-Submission - Comments and Response Schedule

received to the housing White Paper, the Government intends to publish a draft revised National Planning Policy Framework early in 2018. We intend to allow a short period of time for further consultation on the text of the Framework to make sure the wording is clear, consistent and well-understood. Our ambition is to publish a revised, updated Framework in Spring 2018. It is likely, therefore, that this revised approach will be adopted in advance of the Local Plan and should be considered by the Council, which needs to build flexibility into its housing figures. Paragraph 47 of the NPPF challenges local planning authorities to boost significantly the supply of housing and ensure that their local plan meets the full objectively assessed needs for market and affordable housing in the market area. It also requires local authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing, including the identification of key sites which are critical to the delivery of the housing strategy over the plan period. The objectively assessed development needs (OAN) of the local plan period, between 2011 and 2036, includes 15,300 new homes (both market and affordable). However, it is important that this figure should not be seen as a target, rather the minimum base line number of homes which the local plan will deliver over the plan period, with sufficient flexibility to adapt to rapid changes and ensure that the plan significantly boosts the supply of housing. Therefore, the Plans ambition should be to deliver significantly more than 15,298 homes, to ensure that any allocations which stall or are delayed do not adversely affect the Districts rate of delivery.

Breckland Council Response

Officer Response

The Local Plan has sought to respond to changes within national policy. The Planning for the right homes in the right places remains a consultation at this stage and the Government has not provided its response yet. The consultation does however provide for transitional arrangements for Local Plans dependent upon their stage of production. Breckland's Local Plan would be covered by these arrangements which would support the continuation of data from the Central Norfolk Strategic Housing Market Assessment.

The target within the Local Plan is set out as a minimum in order to not constrain housing growth within the District.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.2
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The text in question is new.		
Do you wish to appear at the Examination in Public?		No					

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Delete "expected to" from the first sentence since it implies it is optional to submit a supporting statement but does not define the consequence if one is not submitted. The statement is to address important issues that must be accounted for in the planning decision and must therefore be obligatory.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	868057	Full Name		Organisation Details	Orbit Homes Limited
Agent ID	868056	Agent Name	Mr Michael Hendry	Agent Organisation	Director PlanSurv Limited

Comment Details

Title	Paragraph	Number	3.1
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The Local Plan' suggested delivery rate appears to be too low to meet what is likely to be the OAN for Breckland. A rate of delivery in the region of at least 900 dwellings a year is likely to be needed in order to support the future level of economic growth and also address on-going future projected decline in household formation rates. Further allocations will be needed across the district such as the land at Haverscroft House Farm, London Road, Attleborough that has a resolution to grant planning permission for 200 dwellings (3PL/2016/0325/F) as well as an engrossed section 106 agreement agreed by all parties and awaiting signatures.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The Council is being proactive in trying to overcome any constraints to delivery and working with the developer to help bring the site forward. The housing trajectory has been revised a number of times to reflect a realistic build out rate and commencement date, informed by the most up to date evidence and regular meetings with the developer. The site in question is counted as a commitment in the overall housing figures in Policy HOU 02, which sets the level of allocations required in each settlement and therefore the planning permission is recognised in the Local Plan. The site is not allocated in the plan, as it is not required to meet the identified housing target of 4000 dwellings for Attleborough. Providing the S106 agreement is agreed, the site can be delivered without allocation.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	11968	Full Name	Mr Garth Hanlon	Organisation Details	Abel Developments
Agent ID	11888	Agent Name	Mr Garth Hanlon	Agent Organisation	Director Savills

Comment Details

Title		Number	Policy HOU 01- Development Re
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

The Plan needs to make full provision for OAN.

13- If you feel the plan is unsound, please tell us why

Breckland Council is currently in a position where is can not demonstrate a five year housing land supply. A recent appeal decision concludes that the area has experienced persistent under delivery of housing (PINS Ref: APP/F2605/W/16/3154813). It is within this context that it is requested that the Council seeks to plan for an adequate and steady supply of housing throughout the plan period. It is noted at Draft Policy HOU 01 that Breckland Council is seeking to plan for the provision of a minimum of 15,298 new dwellings over the plan period 2011 to 2036. An average of 612 dwellings per annum. On 14 th September 2017 the Department for Communities and Local Government (DCLG) published a

Local Plan Pre-Submission - Comments and Response Schedule

consultation document entitled Planning for the right homes in the right places. This was accompanied by a spreadsheet which applies the proposed formula to calculate housing need. In respect of Breckland, it has been suggested by DCLG 680 dwelling per annum over the period 2016 to 2026. Notwithstanding the proposed transitional arrangements stated at Table 1 of the DCLG Planning for the right homes in the right places consultation document, the Council could find itself in a position where it is not planning to meet the full objectively assessed need. On the basis that the Council is now aware of these new figures, it is considered that the Authority should forward plan and to look to increase its housing numbers to this new OAN. The effect of this would be to amend the wording to read: To enable the District to meet future housing needs the Local Plan will provide for no less 17,000 new homes between 2011 and 2036, an average of 680 dwellings per annum.☒

Breckland Council Response

Officer Response

The Local Plan has sought to respond to changes within national policy. The Planning for the right homes in the right places remains a consultation at this stage and the Government has not provided its response yet. The consultation does however provide for transitional arrangements for Local Plans dependent upon their stage of production. Breckland's Local Plan would be covered by these arrangements which would support the continuation of data from the Central Norfolk Strategic Housing Market Assessment.

The target within the Local Plan is set out as a minimum in order to not constrain housing growth within the District.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129978	Full Name	Orbit Homes (2020) Limited	Organisation Details	Orbit Homes (2020) Limited
Agent ID	1130567	Agent Name	Mr Geoff Armstrong	Agent Organisation	Armstrong Rigg Planning

Comment Details

Title		Number	Policy HOU 01- Development Re
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy HOU 01- Development Requirements (Minimum) This policy is unsound as the housing requirement is neither positively prepared, justified, nor is it consistent with national policy. Policy HOU 01 states that the Local Plan will provide for no less than 15,298 new homes between 2011 and 2036, an average of 612 dwellings per annum and that the annualised level of new housing provision will increase during the plan period, from 584 per year for the first 5 years (2017/18 to 2021/22) to 622 per year from 2021/22. The supporting text to this policy explains at Paragraph 3.3 that the reason for this stepped housing trajectory is to reflect the delivery timelines of the two Sustainable Urban Extensions in Thetford and Attleborough.

We consider that the housing need identified in this policy is unsound on the basis that: 1. It fails to adequately consider market signals and specifically housing affordability in calculating an appropriate uplift on household projections; and 2. It fails to justify the use of a stepped trajectory Market Signals “ Housing Affordability The Central Norfolk Strategic Housing Market Assessments (SHMA) response to the market signals for the Central Norfolk Housing Market Area (HMA) is to propose an uplift of 10% across the entire area. We consider that this 10% uplift is too low. Affordability across the HMA is poor and particularly so in the areas outside Norwich. The Office for National Statistics (ONS) latest data on the ratio of house price to work-place based earnings ¹ (which is the governments recommended source for affordability data in the current consultation on housing needs methodology ²) shows that median house prices in Breckland are 8.19 times higher than median earnings for jobs in the district. The data also shows a worsening trend in Breckland over the last 15 years with the ratio having increased from 4.33 in 2001. The Local Plan Expert Group s recommendations to central government published in March 2016 ³ , recommend at Appendix 6 that where the ratio of median quartile house prices to median earnings is above 7 and less than 8.7, a 20% uplift should be applied. Furthermore, using the proposed new housing needs methodology contained in the governments current consultation, the levels of affordability in the district would require a 26.19% uplift against household projections. Whilst the governments current housing needs methodology consultation can only be given limited weight as it is still a consultation and could change, it does give a reasonable indication of the level of uplift in relation to market signals that the government consider to be reasonable. We would therefore consider an uplift of an additional 10% on the current uplift to be more appropriate to provide a meaningful adjustment to account for market signals. An additional 10% uplift would result in a need for an increase of 1,391 dwellings (based on Figure 95 of the SHMA) between 2011 and 2036, or an additional 73 dwellings per year for the remaining 19 years of the Local Plan period. This would require an annual delivery rate of 685 new homes. This level of uplift is also in line with the requirement being proposed in the g overnments housing needs methodology consultation which gives a figure of 680 dwellings per annum for Breckland. In respect of the above, the Local Plan Pre-Submission Publication cannot be considered to be positively prepared in its current form as it is not based on a strategy that seeks to meet the true objectively assessed need for new homes in the district. It is therefore unsound. Recommendation: In order to make the

Local Plan Pre-Submission - Comments and Response Schedule

plan sound we consider that an additional 10% uplift on household projections needs to be planned for (circa 1,391 dwellings). As is discussed further below, Land off Greenfields Road represents a uniquely sustainable opportunity to deliver an additional 65 dwellings towards this required uplift. Stepped Housing Trajectory The Council propose within Policy HOU 01 to use a stepped trajectory in relation to housing delivery in order to extend the period over which the back log in housing will be met. National Planning Practice Guidance (PPG) states that Local Planning Authorities should aim to deal with any undersupply within the first 5 year of the plan period where possible (ID: 3-035-20140306) . The Local Plan Pre-Submission Publication indicates that the Council consider a stepped trajectory to be necessary to reflect the delivery times of the Sustainable Urban Extensions in Thetford and Attleborough. This approach is not considered to be justified, nor is it in line with national policy in the PPG as there is nothing to suggest that it wouldnt be possible for the Council to meet its backlog in the first 5 years of the plan.

Recommendation: The proposed stepped trajectory is not considered to be sound and we recommend that further sites should be allocated for delivery in the next five years to meet the Councils current undersupply between 2011 and 2016 of 669 dwellings 4 and any undersupply resulting from the additional 10% uplift recommended above. Land off Greenfields Road is deliverable within 5 years and is considered to be a uniquely sustainable option to help the Council meet their backlog in housing delivery.

Breckland Council Response

Officer Response

Comment noted. Whilst the Central Norfolk SHMA has not been subject to examination, it has been considered as part of a section 78 appeal reference APP/Y2620/W/16/3150860 where it was considered to represent a pragmatic and robust approach to the calculation of OAN.

The PPG sets out that the household projections should form the starting point for OAN. However paragraph 17 of the PPG allows for a more nuanced approach, encouraging the use of sensitivity testing specific to local circumstances based on alternative assumptions in relation to the underlying demographic projections, including migration levels. The representation questions the use of the 10 year migration trend, however paragraph 159 of the NPPF is clear that in identifying the scale and mix of housing the SHMA should take into account migration and demographic change.

The representation makes reference to the Local Plan Experts Group which the recent Government consultation on a standardised approach to housing numbers has moved away from. The Government has not provided a formal response yet to its consultation, therefore it is not possible to provide weight to its findings around numbers. However it is worth noting that the consultation does include a transitional period which would include the continuation of existing approach for plans which would be submitted prior to 31st March.

Local Plan Pre-Submission - Comments and Response Schedule

The stepped trajectory has been developed to reflect the use of sustainable urban extensions and the initial slower delivery rates due to infrastructure provision. The NPPF at paragraph 52 notes that the supply of housing can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1122575	Full Name	Mary Anne Feakes	Organisation Details	Chairman Garboldisham Parish Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.2
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Reference: Page 98 Section 3.218 - 3.227 Garboldisham Garboldisham Parish Council have studied this pre-submission document and wish to make the following comment. Ref: 3.219. As has been their contention throughout this process, Garboldisham Parish Council do not feel that the identification as a Local Service Centre village in the Local Plan is appropriate with regard to item (5) Bus Services. The only reason that there is any bus accessing Bury St Edmunds from Garboldisham is because it provides a convenient turning point for those buses to and from Hopton to Bury St Edmunds, Suffolk, and as such is subsidised by Suffolk County Council. As we have previously warned, since this current local plan has

Local Plan Pre-Submission - Comments and Response Schedule

been in formation, one of the buses has been withdrawn already. This is the only public transport available in the village, apart from a shoppers bus on a Thursday to Norwich, which is also vulnerable due to cuts. As one of the main concerns of the Local Plan (Section 4.7 Page 145), is to cut the reliance on private transport, the loss, and further potential loss of our sparse public transport should, in our opinion, preclude Garboldisham from being a Local Service Centre. Ref. 3.219 Businesses. Garboldisham Parish Council were surprised to read that there are currently 25 viable businesses in the Village. Ref. 3.222 Waste Water Treatment. This section reads as if the village has a universal Waste Water Treatment Works. The only Waste Water Treatment Works in the village serves 16 properties which were previously social housing in Back Street, now under the auspices of Flagship Housing. All other properties rely on individual septic tanks, or in the case of Elm Grove, Chapel Close and Thomas Bole Close, group waste collection points. The current Waste Water Treatment Works would therefore need huge structural work to accommodate all 35 new properties, or eventually, the entire village.

Breckland Council Response

Officer Response

The Local Service Centre Topic Paper methodology defined the criteria of Public Transport as: "An assessment of the level of public transport access within the village. This has included looking at the frequency of services and whether you can reach a higher order settlement for normal working hours". In the case of Garboldisham the Simonds No.338 bus connects the village to Bury St. Edmunds, a higher order settlement, with the first bus departing at 06:35am and the last returning at 17:30. This meets the criteria regarding normal working hours. It is therefore considered that the Garboldisham meets the criteria in regards to public transport. Comments noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1133624	Full Name	Mr James Millard	Organisation Details	Millard Tuddenham
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Breckland Local Plan Pre-Submission Publication	Number	
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The PSP as currently proposed is fundamentally flawed/unsound in that it has serious inconsistencies with local and national planning policy as well as fundamental errors with site and hierarchy of settlements selection process. See attachment.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The representation relates to the five year housing land supply, the OAN and DCLGs recent consultation planning for the right homes in the right places.

Whilst the Central Norfolk SHMA has not been subject to examination, it has been considered as part of a section 78 appeal reference APP/Y2620/W/16/3150860 where it was considered to represent a pragmatic and robust approach to the calculation of OAN.

The PPG sets out that the household projections should form the starting point for OAN. However paragraph 17 of the PPG allows for a more nuanced approach, encouraging the use of sensitivity testing specific to local circumstances based on alternative assumptions in relation to the underlying demographic projections, including migration levels. The representation questions the use of the 10 year migration trend, however paragraph 159 of the NPPF is clear that in identifying the scale and mix of housing the SHMA should take into account migration and demographic change.

The representation makes reference to the Local Plan Experts Group which the recent Government consultation on a standardised approach to housing numbers has moved away from. The Government has not provided a formal response yet to its consultation, therefore it is not possible to provide weight to its findings around numbers. However it is worth noting that the consultation does include a transitional period which would include the continuation of existing approach for plans which would be submitted prior to 31st March.

Whilst the Council cannot currently demonstrate a five year housing land supply, this does not include the allocations which are part of the Local Plan, furthermore it does not reflect the stepped trajectory as set out within Policy HOU01.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	868057	Full Name		Organisation Details	Orbit Homes Limited
Agent ID	868056	Agent Name	Mr Michael Hendry	Agent Organisation	Director PlanSurv Limited

Comment Details

Title	Paragraph	Number	3.2
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The suggested delivery rate is too low to meet the identified need and should be revised with additional allocation being made to meet demand.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The housing trajectory has been revised a number of times to reflect a realistic build out rate and commencement date, informed by the most up to date evidence and regular meetings with the developers. It is considered that the delivery rate will meet the OAN and, therefore, additional allocations will not be required in order to meet demand.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1137235	Full Name	Mr Mark Behrendt	Organisation Details	Planning Manager - Local Plans House Builders
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy HOU 01- Development Re
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The policy is unsound as the housing requirement is not justified and is inconsistent with national policy The Council state that their housing requirement is for a minimum of 15,928 new homes between 2011 and 2036 at 612 dwellings per annum. We consider this assessment of needs to be unsound on the basis that it: fails to take adequate consideration of market signals; and fails to justify the use of a stepped trajectory Whilst we have concerns regarding the Councils decision to move away from the published population and household projections and apply a ten-year migration trend, these concerns are minimal given this has had negligible impact on the projections for Breckland. However, we would note that the PPG

considers the published projections to be robust and that whilst sensitivity testing is important where there is no indication that the official projections are inappropriate they should be used. The Central Norfolk SHMA provides no justification for moving away from the official projections and the use of a ten-year migration trend. No evidence is given, as outlined in 2a-017 of the PPG, as to any specific local circumstances that would support the Council in deviating from the published projections and as such this approach is unjustified. However, as highlighted above, the difference for Breckland between projections based on the ten and five-year migratory trend is ultimately minimal. The SHMA's response to the market signals for the Central Norfolk HMA is to propose an uplift of 10% across the entire area. This is then reduced to 8.5% as it is considered that the demographic amendment for concealed households represents an element of this uplift. We would agree that the market signals set out in chapter 4 of the 2017 SHMA indicate that an uplift is required. However, we would disagree with the level of uplift that has been proposed. Affordability across the HMA is poor with lower quartile ratio house prices to income being well above the national average. It is also significantly worse in those areas outside of Norwich where ratios are close to or over 9. There has also been a worsening trend over the last ten years. In Breckland the Lower Quartile (LQ) affordability ratios are now higher than they were prior to the financial crises of 2008 (8.76 in 2015 and 8.52 in 2007). On this indicator alone the Local Plan Expert Group considered an uplift of between 25% and 30% would be appropriate. Other authorities experiencing similar signals have also looked to uplift their OAN by a greater amount than has been recommended for Breckland. Most recently Canterbury uplifted their OAN by 20% on the basis of a LQ affordability ratio of just over 9 and significant long term increases in house prices. We also consider it necessary for Council to consider an uplift to take account of the high need for affordable housing that has been identified in the SHMA. At paragraph 3.5 of the Local Plan the Council outline that 35.7% of all new homes must be affordable to meet the level of needs identified in the SHMA. Given that PPG states that: An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes and the Council has indicated that viability limits delivery to just 25% of qualifying developments then an uplift of more than 10% would be appropriate. We would therefore suggest that this level of affordable housing need is also justification for increasing the Council's total housing requirement. The approach taken by the Council in offsetting the adjustment made to the

demographic base for concealed families and homeless households against market signals uplift is not consistent with paragraph 2a-015 of PPG. This paragraph considers adjustments for suppressed household formation to be part of the demographic starting point rather than an uplift relating to market signals. As described in paragraph 4.109 of the 2015 SHMA these are households that exist but that have not been captured by the household projections and are households that are currently in need of new homes. We consider such households to form part over the baseline need and to subtract them from the market signals uplift is inconsistent with national policy. However, we do not disagree with the Council that the level of concealed and homeless households should be considered an indicator show that a market uplift is required. This indicator alongside affordability ratios, delivery rates and housing costs should all be considered when deciding the degree of uplift. This uplift should be made to the demographic starting point, which would include any demographic adjustments related to suppressed household formation. As such the subtraction of this demographic element from the market signal is not appropriate and is unjustified. In conclusion we would consider an uplift in excess of 20% to be more appropriate to provide any meaningful adjustment. This would require an annual delivery rate of 682 new homes. This level of uplift is also in line with the level of delivery being proposed in the Government's latest consultation on the standard methodology of housing needs. Using the proposed standard methodology Breckland would be required to deliver 680 dwellings per annum. Whilst this can only be given limited weight as it is still a consultation and could change, it does give a reasonable indication of the level of uplift in relation to market signals that the Government consider to be reasonable.

Housing trajectory The Council propose within HOU 01 to use a stepped trajectory in relation to housing delivery in order to extend the period over which the back log in housing will be met. PPG has established that the backlog in housing needs should be met within the first five years of the Plan where possible. The Council have indicated that the stepped trajectory is necessary to reflect the delivery times of the Sustainable Urban Extensions however this does not mean it would not be possible to address the backlog within the first five years of the plan. As such we do not consider the stepped trajectory to be justified and further sites should be allocated for delivery in the first five years of the plan. In particular we would suggest the Council allocate smaller sites which will not only deliver housing within five years but also help smaller developers, a sector the Government is keen to support.

Local Plan Pre-Submission - Comments and Response Schedule

Breckland Council Response

Officer Response

Comment noted. Whilst the Central Norfolk SHMA has not been subject to examination, it has been considered as part of a section 78 appeal reference APP/Y2620/W/16/3150860 where it was considered to represent a pragmatic and robust approach to the calculation of OAN.

The PPG sets out that the household projections should form the starting point for OAN. However paragraph 17 of the PPG allows for a more nuanced approach, encouraging the use of sensitivity testing specific to local circumstances based on alternative assumptions in relation to the underlying demographic projections, including migration levels. The representation questions the use of the 10 year migration trend, however paragraph 159 of the NPPF is clear that in identifying the scale and mix of housing the SHMA should take into account migration and demographic change.

The representation makes reference to the Local Plan Experts Group which the recent Government consultation on a standardised approach to housing numbers has moved away from. The Government has not provided a formal response yet to its consultation, therefore it is not possible to provide weight to its findings around numbers. However it is worth noting that the consultation does include a transitional period which would include the continuation of existing approach for plans which would be submitted prior to 31st March.

The stepped trajectory has been developed to reflect the use of sustainable urban extensions and the initial slower delivery rates due to infrastructure provision. The NPPF at paragraph 52 notes that the supply of housing can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1133331	Full Name	Lexham Estate	Organisation Details	Lexham Estate
Agent ID	1032227	Agent Name	Ms Lydia Voyias	Agent Organisation	Savills (UK) Ltd

Comment Details

Title		Number	Policy HOU 01- Development Re
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Breckland Council is currently in a position where is can not demonstrate a five year housing land supply. A recent appeal decision concludes that the area has experienced persistent under delivery of housing (PINS Ref: APP/F2605/W/16/3154813). It is within this context that it is requested that the Council seeks to plan for an adequate and steady supply of housing throughout the plan period. It is noted at Draft Policy HOU 01 that Breckland Council is seeking to plan for the provision of a minimum of 15,298 new dwellings over the plan period 2011 to 2036. An average of 612 dwellings per annum. On 14 th September the Department for Communities and Local Government (DCLG) published a

Local Plan Pre-Submission - Comments and Response Schedule

consultation document entitled Planning for the right homes in the right places. This was accompanied by a spreadsheet which applies the proposed formula to calculate housing need. In respect of Breckland, it has been suggested by DCLG 680 dwelling per annum over the period 2016 to 2026. Notwithstanding the proposed transitional arrangements stated at Table 1 of the DCLG Planning for the right homes in the right places consultation document, the Council could find itself in a position where it is not planning to meet the full objectively assessed need.

Breckland Council Response

Officer Response

The Local Plan has sought to respond to changes within national policy. The Planning for the right homes in the right places remains a consultation at this stage and the Government has not provided its response yet. The consultation does however provide for transitional arrangements for Local Plans dependent upon their stage of production. Breckland's Local Plan would be covered by these arrangements which would support the continuation of data from the Central Norfolk Strategic Housing Market Assessment.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	874753	Full Name	Ms Heidi Frary	Organisation Details	Ovington Parish Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	3	Policy HOU 01- Development Re
Chapter Number				

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Some comments were made as part of the Preferred Direction consultation, but a greater level of understanding has developed.		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

In Preferred directions document in section 2.2 (pg14) it was reported that population growth from 138233 to 153313 (ONS sub-national population prediction 2012-2037) a population increase of 15080. In section 3.51 (pg 40) this was translated into a need for 15784 houses, more than 1 dwelling per person. After repeated requests for clarification Breckland suggested the information was in the SHMA and was due to changes to living habits such as divorce and those currently living with their parents and in need of a house of their own (over crowding). Consulting the SHMA (2013 was latest version available for download at the time), states that: Overcrowding is at a low level across all tenures in

Local Plan Pre-Submission - Comments and Response Schedule

Breckland This seems to go against the given reason for the mismatch. Councillors are concerned at the flippant justification as it clearly does not come anywhere near addressing the magnitude of the mismatch. Councillors were generally disappointed in the SHMA as a key document feeding the LP as it presents data that has such a wide range (deviation) that no meaningful result can be reliably drawn. The SHMA repeatedly excused itself, indicating further assessment is required and overall Councillors felt it left more questions than it answered. In section 3.3 (pg31) of the pre-submission there has been a 2017 update to reflect the most recent Government predictions with the population now predicted to rise to 153700. It misses the initial figure in the report, therefore making it less obvious that the population rise has only risen by a tiny fraction at 15467. The plan now calls for no less than 15298 new homes, still about one dwelling for each new person. A small survey of new houses built in Breckland suggests that they are not single person dwellings but on average suitable for circa 2½ persons per dwelling.

Breckland Council Response

Officer Response

Comment noted. The SHMA sets out the detailed evidence to justify the housing target for Breckland. The SHMA examines a range of factors in deriving the target including transactional vacancies, second homes, concealed families and homeless households, market signals and economic growth (figure 96 - projected households and dwellings over the 21 year period 2015-36, CNSHMA, pg 127). The target is therefore not solely based on predicted population change, but is based on an in depth consideration of a wide range of factors which influence the housing need.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.8
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	This is new text.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The referenced topic paper "Optional Technical Standards" is not available in the public domain and therefore it is incorrect to state that it is evidence for Policy HOU 10. Such evidence must be provided by the Council during the consultation period or further consultation allowed when it is made available.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1134647 Full Name Mr Tony Needham
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Policy HOU 02 - Level and Locati
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The issue was raised in October 2016 - a detailed report was submitted in January 2017. Issues relating to the transport study have been raised throughout the Local Plan Preparation and are well documented.		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The plan is not Justified , it is not based on sound and credible evidence, an additional housing allocation was added at a late stage of the plan development. The only justification was that there would be slow delivery rate in the far south of the district during the plan period, it was not a positive allocation on the basis of housing need in the north of the district. The planning authority have not developed a sufficient understanding of the road network in Dereham to fully understand the impact of developments on congestion and the economic knock-on effect of the increased congestion. It has not identified a deliverable solution to the

Local Plan Pre-Submission - Comments and Response Schedule

ongoing congestion problems. Prior to January 2016 the Town Council were content with the level of growth proposed in Dereham. In February 2016 Breckland increased the allocation to Dereham with little justification. Following the Town Council's objections, justification for the increase was provided after the decision was made to increase the allocation. The increase in allocation without an up to date employment land study or a more detailed understanding of the road network is not using sound evidence to justify the plan. Effective. The infrastructure delivery planning for Dereham, highways has not been demonstrated to be effective or deliverable. Within the Infrastructure Study carried out by EDAW for the LDF it was recommended at para 13.26 that as a result of the growth in Dereham for the LDF, "the impact needs further investigation in the form of detailed transport modelling to fully understand the impact placed on the transport infrastructure within the town and the A47 junctions." Because of the cost this detailed modelling was not carried out as part of the LDF and there has only been limited Transport Study in Dereham Breckland Council acknowledge that there are problems with congestion, but its scope are limited and the results are flawed. The transport study commissioned as evidence to support the local plan did not initially consider Saturdays. Following evidence supplied from the Town Council, a Saturday survey was commissioned. The conclusions of the data did not correspond with the observed conditions on the day of the survey. The Town Council asserts that the Transport study is not sufficiently detailed to form adequate conclusions as it only looked at individual junctions in isolation rather than a detailed traffic model of the town. It identified that a signalised roundabout would be required at Tavern Lane Junction but there is not any clear strategy for the delivery of the roundabout or an understanding what impact such a roundabout would have on the whole network. Within the Infrastructure Delivery Plan (August 2017) much of the low cost interventions identified to improve junction capacity have been committed via separate funding from NCC. The cost of the signalised roundabout did not include land purchase, the total cost therefore is unlikely to be covered by developer contributions. To be acceptable the detailed modelling of the road network would need to be carried out before allocation can be made in Dereham. The Town Council has commissioned a comprehensive set of survey data which could be used to develop detailed modelling of the highway network. The merging Dereham Neighbourhood Plan has identified that locating development where it will either reduce or not contribute to congestion is high priority for residents.

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The Local Plan has been the subject of three regulation 18 consultations in advance of the regulation 19 pre-submission publication period. During the regulation 18 consultation the distribution of housing growth has changed in order to respond to comments received during these periods. A key element of the change has been further evidence being provided which has suggested that the delivery periods for the two sustainable urban extensions would continue beyond the end of the plan period. Therefore it has been necessary to reconsider the spatial distribution to reflect delivery rates and enable the whole OAN to be delivered over the plan period. The District predominantly falls within a single housing market area, influenced by Norwich, and the strategic housing market assessment has provided an OAN reflecting the District boundaries. On this basis the distribution of development across the District (rather than a north south split as suggested within the representation) is considered to be appropriate. The issues and options consultation sought views on the overall distribution of housing growth across Breckland. At this stage a balanced distribution of growth was supported. It is considered that the approach reflects the presumption in favour of sustainable development as set out within paragraph 14 of the NPPF. The Dereham Transport Study provides solutions to the evidence transport issues within the town. The housing allocations within the Local Plan make reference to the need to contribute towards highways improvements in line with the studies findings, this is therefore considered to mitigate the transport issues. The Dereham neighbourhood plan is at an early stage in its formulation and has not been subject to either a regulation 14 or 16 consultation period, therefore it is considered to be at an early stage and no weight can be applied to it at present. However the Council has previously committed to working with the Town Council going forward on the neighbourhood plan. No further changes proposed to the Local Plan in response to the representation.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.8
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Deferral of planned development in the two SUE's beyond the plan period has not been justified and has a significant impact on the level of housing allocations to all other settlements.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

One of the key tests in the NPPF is deliverability. Latest information has been used to determine the rate at which sites will come forward. It has been shown that the delivery of the SUEs will extend beyond the plan period, therefore other sites have been identified in order to meet the OAN figure for the Local Plan and ensure that all sites within the Local Plan are delivery.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.9
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The text concerned is new.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The allocation of housing to different centres is a fundamental part of the Plan and yet it is stated that each local service centre " has been assumed " to see approximately 10% of the " estimated " number of households in 2011. It is understood the Council has done a lot of work on site allocations over the period 2011-2017 and it is therefore inappropriate and unjustifiable to used assumed and estimated data for such an important issue.. Additionally it is unnecessary to use another assumption - that of household size - given that the number of households in any given settlement can be readily obtained from the 2011 census data . Far greater justification and evidence is required in support of percentages of growth

Local Plan Pre-Submission - Comments and Response Schedule

attributed to different centres in Policy HOU 02.

Breckland Council Response

Officer Response

Comments noted. This approach seeks to apportion growth commensurate to the population of the local service centres.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.9
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The text concerned is new.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The allocation of housing to different centres is a fundamental part of the Plan and yet it is stated that each local service centre " has been assumed " to see approximately 10% of the " estimated " number of households in 2011. It is understood the Council has done a lot of work on site allocations over the period 2011-2017 and it is therefore inappropriate and unjustifiable to used assumed and estimated data for such an important issue.. Additionally it is unnecessary to use another assumption - that of household size - given that the number of households in any given settlement can be readily obtained from the 2011 census data . Far greater justification and evidence is required in support of percentages of growth

Local Plan Pre-Submission - Comments and Response Schedule

attributed to different centres in Policy HOU 02.

Breckland Council Response

Officer Response

Comments noted. This approach seeks to apportion growth commensurate to the population of the local service centres.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129978	Full Name	Orbit Homes (2020) Limited	Organisation Details	Orbit Homes (2020) Limited
Agent ID	1130567	Agent Name	Mr Geoff Armstrong	Agent Organisation	Armstrong Rigg Planning

Comment Details

Title		Number	Policy HOU 02 - Level and Locati
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy HOU 02 - Level and Location of Growth This policy is unsound as it sets an unjustified distribution of development that cannot deliver the required level of housing for the next five years. Policy HOU 02 requires 50% of new homes over the plan period to be delivered in the Sustainable Urban Extensions (SUEs) at Attleborough and Thetford. The SUEs are not predicted to start delivering houses for several years and, as outlined above, the Councils over-reliance on them as a source of housing during the plan period has resulted in the proposal for an unjustified stepped approach to housing delivery that is contrary to national policy. The proposed distribution of housing is therefore not considered to be an

Local Plan Pre-Submission - Comments and Response Schedule

appropriate strategy and Policy HOU 02 is therefore unjustified and unsound. To remedy this situation, we consider that additional allocations need to be identified outside of Thetford and Attleborough that are deliverable within the next 5 years. We consider that Dereham is the most sustainable location for these additional allocations. This is demonstrated by paragraph 3.115 of the Local Plan which states that Dereham had a population of 18,609 at the 2011 census and is currently the second largest town in Breckland after Thetford. In comparison, Attleborough had a population of just 10,482 at the 2011 census and yet paragraph 1.22 of the Local Plan states that Thetford and Attleborough are considered to be major towns, whereas Dereham is only a medium sized town. It is clear from this that Dereham has been overlooked as a location for sustainable growth and that it can sustainably accommodate many more homes than currently proposed. Recommendation: More development needs allocating outside of the SUEs to ensure the Council can meet its annual housing requirement for the first five years of the plan. As the districts second largest town we consider Dereham to be the most sustainable location for this growth.

Breckland Council Response

Officer Response

The Local Plan carries forward the strategic urban extensions proposed through the Core Strategy. The NPPF notes at paragraph 52 that the supply of housing can sometimes be best achieved through planning larger scale development, such as new settlements or extensions to existing villages and towns. The development within Thetford has the benefit of planning permission, whilst the urban extension within Attleborough is currently being determined.

The housing trajectory set out in HOU01 reflects the infrastructure requirements for the two SUE's and includes a stepped trajectory to reflect the approach that these will take longer to develop. The Local Plan does contain other sites which will meet the housing need in the immediate period post adoption. A number of the sites have the benefit of the decision to grant planning permission and are therefore likely to start delivering in the short term which will enable the authority to boost the supply of housing.

The regulation 18 issues and options consultation consulted on a range of options in relation to the distribution of housing growth. In terms of Dereham, the town has a number of constraints which restricts the ability of the town to expand beyond the level of growth proposed , these are set out within the Infrastructure Delivery Plan.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1032087	Full Name	Mr Chris Kennard	Organisation Details	Finance Director The Shadwell Estate Compan
Agent ID	1029372	Agent Name	Mr Paul Sutton	Agent Organisation	

Comment Details

Title		Number	Policy HOU 02 - Level and Locati
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy HOU 02 “ Level and Location of Growth The Core Strategy and the Thetford Area Action Plan originally sought the provision of 6,500 dwellings to be allocated at Thetford. However, following the examination and adoption of the Thetford Area Action Plan, only 5,000 dwellings were allocated to Thetford in the form of a large sustainable urban extension to the north of Thetford. This allocation has been promoted by Pigeon Developments and Breckland Council granted outline planning permission for up to 5,000 dwellings, 22.5ha of employment land, local centres, three primary schools, green infrastructure, playing fields, amenity area and means of access (subject to a S106 agreement), on 27th November 2015 (Application ref:

3PL/2011/0805/O). Phase 1 of the development (625 dwellings) was expected to commence in Autumn 2016 but this is now unlikely to happen until at least 2019, when a mere 20 houses may be delivered. As a consequence, the Council's latest five-year housing land supply statement (published July 2017), estimates that the first houses on this site will not be completed until 2019-2020, and that the total number of dwellings will not be delivered during the Local Plan period " i.e. to 2036. With this context in mind, we consider the plan will neither be effective at delivering housing, due to the very low numbers to be delivered in the next five-year period; nor is it consistent with national policy, which requires plans to significantly boost housing delivery. The Council's Five-Year Housing Land Supply Assessment states at paragraph 4.4: The five-year land supply statement shows that the Council is unable to currently demonstrate a five year land supply. The Council recognises that steps need to be taken to remedy the situation. The emerging Local Plan is the key resolution of the current position, a number of allocations for housing development will be made on land that would not currently be considered suitable. On adoption these will form part of the Council's forward looking supply. In addition, the Council will consider favourably development on sustainable sites which fall immediately adjacent to settlement boundaries which meet the relevant requirements of the Development Plan in order to boost the supply of housing in the short term. [emphasis added] Thetford has been identified as a one of two Key Settlements, along with Attleborough which are to receive 50% of the District's growth. Despite this, Thetford is planned to receive no additional dwellings over and above the allocation at Thetford Sustainable urban extension, which is to provide 3668 dwellings through the existing Local Plan. The site has been granted outline planning permission. No reserved matters application have been submitted and the site is known to have significant issues in terms of delivering infrastructure required ahead of dwellings being occupied. We consider that the Plan will not be effective in delivering the required housing growth. It is unclear from the Local Plan itself how the development strategy will actually deliver a consistent level of housing growth sites, which are developable with a reasonable prospect, that are available and could be viably developed, over the plan period. The plan places a significant reliance on two strategic sites, which are notoriously slow to deliver and face significant challenges in terms of their ability to frontload infrastructure. In its current form the development strategy will not deliver the Council's expectations. As such further allocations should be included and these should be focused on bringing forward more sites. As identified, our

Local Plan Pre-Submission - Comments and Response Schedule

clients land, east of Arlington Way, Thetford, is a sustainable site, adjacent to the settlement boundary of Thetford. It should be included as a housing allocation on the basis that it is capable of delivering housing within the short-term, unlike the strategic housing site allocated.

Breckland Council Response

Officer Response

The Local Plan carries forward the strategic urban extensions proposed through the Core Strategy. The NPPF notes at paragraph 52 that the supply of housing can sometimes be best achieved through planning larger scale development, such as new settlements or extensions to existing villages and towns. The development within Thetford has the benefit of planning permission, whilst the urban extension within Attleborough is currently being determined.

The housing trajectory set out in HOU01 reflects the infrastructure requirements for the two SUE's and includes a stepped trajectory to reflect the approach that these will take longer to develop. The Local Plan does contain other sites which will meet the housing need in the immediate period post adoption. A number of the sites have the benefit of the decision to grant planning permission and are therefore likely to start delivering in the short term which will enable the authority to boost the supply of housing.

Development in Thetford outside of the SUE remains constrained by a number of environmental constraints, most notably in relation to protected habitats. It is acknowledged that the land adjacent to Arlington Way is the subject of a planning application, however there remains outstanding issues in this regard, particularly the ability to achieve safe access.

Potential amendment to the plan

No amendment proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	3	Policy HOU 02 - Level and Locati
Chapter Number				

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

1) There is a zero allocation of new houses to Thetford from 2017-2036. This is unacceptable for one of the two "key" settlements in the district. It presumably results from developers not working quickly enough to deliver the SUE, but instead land-banking. Notwithstanding the SUE there should still be other development in Thetford over the plan period. As specified the consequence is that other less sustainable settlements have been allocated greater shares of new housing. 2) For consistency of terminology with Policy HOU 04 amend "villages with boundaries" to "rural settlements with boundaries". 3) As noted in the comment to paragraph 3.10 no evidence has been presented to justify an allocation of 7% of growth to the 17

Local Plan Pre-Submission - Comments and Response Schedule

rural settlements so this is just an arbitrary allocation. 4) For villages (settlements) with boundaries the policy notes there are zero housing allocations included within the Local Plan although paragraph 3.10 states that landowners and developers have given evidence of available sites. The allocation to rural settlements lacks any substantive basis and merely "makes up the numbers". 5) Email correspondence between Saham Toney parishioners and Breckland planning policy officers has identified that Breckland Council intends to publish a breakdown by settlement of the overall 150 house allocation in an appendix to the Local Plan which will form a modification to the Plan, but that the appendix will only be available during examination of the Plan. This is unacceptable as such an important document must form part of this consultation not a subsequent one which would only serve to delay examination. Saham Toney Parish Council seeks to support a sustainable and proportionate share of the overall allocation but cannot do that unless that share is defined and agreed. During preparation of its Neighbourhood Plan, via the Breckland Neighbourhood Plan Officer the Parish Council has requested a meeting between the 17 rural settlements and Breckland Council to discuss and agree individual allocations to each settlements or at least a method of calculating such an allocation, but has received no response. There is precedence for example in the South Oxfordshire Local Plan which has been carried forward into the made Woodcote Neighbourhood Plan. Since Breckland Council claims to have evidence from landowners and developers of sustainable and deliverable sites in the 17 rural settlements it should be straightforward to present this to the relevant parish councils, reach agreement on allocations and update the Local Plan accordingly. Not doing so simply results in uncertainty for 17 local communities. 6) Paragraph 3.3 and Policy HOU 01 both state the objectively assessed need (OAN) for housing between 2011 and 2036 is 15,298. Yet Policy HOU 02 specifies a total of 15,950 new houses over the plan period, an increase of 652 that lacks any evidence or justification. this means for example the entire future allocation to 17 rural settlements (150 houses) could be deleted (since it also lacks evidence or justification) and the OAN would still be satisfied. The individual allocations in Policy HOU 02 should be reduced on a justifiable basis to result in a total of 15,928.

Breckland Council Response

Officer Response

1) Thetford will see 3,668 dwellings built over the plan period. There is no allocation because the Thetford SUE has outline planning permission and is therefore captured in the 'Completions/Commitments (2011-March 2017) and saved allocations' heading of the table. 2) Comment noted. 3) The 7% figure is taken from and informed by Policy HOU 04, where each settlement with a settlement boundary will be expected to increase by 5% from the date of adoption of the plan. This figure is considered to be proportionate to the levels of services and

Local Plan Pre-Submission - Comments and Response Schedule

facilities within these settlements. The table in policy HOU 02 shows that between 2011-2017 902 dwellings have been completed or have planning permission. The increased figure of 150 over the remainder of the plan period is therefore not considered to be unjustified. Furthermore, policy HOU 02 exceeds the figure required in the OAN by 652 dwellings. 4) There are no allocations, HOU 04 sets a criteria based approach to development in these settlements. 5) The policy sets out that a 5% increase will be applied to each of the settlements over the plan period. This will be applied to the number of dwellings within each of the settlement boundaries. 6) To ensure that the plan is flexible, in line with national planning policy, the OAN figure has been exceeded.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	868057	Full Name		Organisation Details	Orbit Homes Limited
Agent ID	868056	Agent Name	Mr Michael Hendry	Agent Organisation	Director PlanSurv Limited

Comment Details

Title		Number	Policy HOU 02 - Level and Locati
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4 - Is the plan positively prepared?	No
5 - Is the plan justified?	Yes	6 - Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10 - Have you raised this at Issues and Options?	Yes	11 - If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

A further 200 dwellings should be added to the Attleborough Commitment column to take account of the resolution to grant planning permission (3PL/2016/0325/F) on land at Haverscroft House Farm, London Road, Attleborough and the recently engrossed Section 106 agreement in order to reflect an up to date position with regards existing commitments.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The site in question is counted as a commitment in the overall housing figures in Policy HOU 02, which sets the level of allocations required in each settlement and therefore the planning permission is recognised in the Local Plan. The site is not allocated in the plan, as it is not required to meet the identified housing target of 4000 dwellings for Attleborough. Providing the S106 agreement is agreed, the site can be delivered without allocation.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	873890	Full Name	Mrs Faye LeBon	Organisation Details	Parish Clerk Swanton Morley Parish Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.9
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Swanton Morley Parish Council would like to know why a figure of 10% was used for all local service centres and not a figure that takes into account the individual needs of each settlement (whether a settlement is able to take 10% or whether a settlement would benefit from more than 10%. The plan reads as if 10% makes the balancing figure required for growth, therefore this is what each LSC will get.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The 10% figure allows for an equal distribution of growth across all of the Local Service Centres. The 10% figure was derived from the population information in the 2011 census and applying a householder multiplier figure, which assumed 2.3 people per household. The allocation policies state 'at least' in regards to the number of dwellings proposed. This allows for further flexibility in the allocations. Neighbourhood Plans also provide the opportunity to exceed the 10% growth target

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1137235	Full Name	Mr Mark Behrendt	Organisation Details	Planning Manager - Local Plans House Builders
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	3	Policy HOU 02 - Level and Locati
Chapter Number				

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

HOU 02 “ Level and Location of Growth This policy is unsound as it is unjustified As set out above the level and location of growth set out within HOU 02 cannot be justified as the Council cannot show that there is a five-year housing land supply. Consideration will need to be given to increasing allocations Local Service Centres and identifying those Villages with Boundaries which are able to support additional allocations. In particular the villages of Beetley, Carbrooke, Mundford, Saham Toney and Yaxham have all been identified as villages with boundaries and as such have not been identified specifically for a housing allocation despite being accessible by public transport, containing a school and having community facilities,

Local Plan Pre-Submission - Comments and Response Schedule

with Yaxham containing all the services expected of Local Service Centre. In addition, these settlements are of the same scale as many of those identified as local service centres and further allocations could be supported by service improvements allowing these settlements to perform in the higher tier of the hierarchy. We consider each of these settlements could support further development and should have a housing target and allocations set out in the Local Plan.

Breckland Council Response

Officer Response

The SHMA sets out the OAN requirement for the District as 15,298 new dwellings per annum. HOU02 allocates land for 15,950 dwellings within the Local Plan between 2011 and 2036. Through the regulation 18 issues and options consultation and the preferred directions consultation different approaches to the definition of local service centres were included. The Local Service Centre Topic Paper has assessed the level of service provision within settlements, Beetley, Carbrooke, Mundford and Saham Toney do not meet the full criteria for being designated as local service centres. Whilst Yaxham & Clint Green together can demonstrate the five services these are located across the two settlements and are outside recognised walking distances.

Policy HOU01 includes a stepped trajectory which reflects the infrastructure requirements associated with the SUE and delivery starting slightly later within the plan period.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	875126	Full Name	Spaceward	Organisation Details	
Agent ID	1130567	Agent Name	Mr Geoff Armstrong	Agent Organisation	Armstrong Rigg Planning

Comment Details

Title		Number	Policy HOU 02 - Level and Locati
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy HOU 02- Level and Location of Growth The policy is unsound as it sets an unjustified distribution of development that cannot deliver the required level of housing for the next five years. Policy HOU 02 requires 50% of new homes over the plan period to be delivered in Sustainable Urban Extensions (SUEs) at Attleborough and Thetford. The SUEs are not predicted to start delivering houses for several years and as outlined above, the Councils over-reliance on them as a source of housing during the plan period has resulted in the proposal for an unjustified stepped approach to housing delivery that is contrary to national policy. The proposed distribution of housing is therefore not the most appropriate strategy

Local Plan Pre-Submission - Comments and Response Schedule

and Policy HOU 02 is considered to be unjustified and unsound. Recommendation: We consider that additional allocations need to be identified outside of Thetford and Attleborough that are deliverable within the next 5 years. We consider that Dereham is the most sustainable location for these additional allocations. This is demonstrated by paragraph 3.115 of the Local Plan which states that Dereham had a population of 18,609 at the 2011 census and is currently the second largest town in Breckland after Thetford. In comparison, Attleborough had a population of just 10,482 at the 2011 census and yet paragraph 1.22 of the Local Plan states that Thetford and Attleborough are considered to be major towns, whereas Dereham is only a medium sized town. It is clear from this that Dereham has been overlooked as a location for sustainable growth and that it can sustainably accommodate many more homes than currently proposed.

Breckland Council Response

Officer Response

In relation to this representation, Policies HOU01 and HOU02 need to be considered together. The OAN has been assessed through the Central Norfolk SHMA and the stepped trajectory has been included reflecting infrastructure requirements within Attleborough and Thetford, and the delivery rates for the site. Policy HOU02 already allocates above the OAN requirement as set out within Policy HOU01. Further to this a number of the sites in the other market towns have the decision to grant planning permission subject to the completion of a section 106 agreement and therefore delivery is anticipated to start quickly on these sites.

Additional development in Dereham would impact upon the infrastructure within the town. Capacity in relation to infrastructure provision is set out within the Infrastructure Delivery Plan.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1131135	Full Name	Mr Ian Martin	Organisation Details	Yaxham Parish Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	3	Policy HOU 02 - Level and Locati
Chapter Number				

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

This designation of the settlements within Yaxham Parish recognises their small village rural nature, the distributed nature of settlement within the parish and lack of local services capable of serving the whole community in a sustainable fashion. Yaxham has seen and continues to see small scale organic growth at a rate that is likely to meet or exceed the 7% growth designated for such villages (HOU 02). Indeed at present currently permitted properties equal almost 15% of the current

13- If you feel the plan is unsound, please tell us why

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1131105	Full Name	Nicol Perryman	Organisation Details	c/o Savills Great Hockham Estate
Agent ID	1131089	Agent Name	Miss Nicol Perryman	Agent Organisation	Planner Ingleton Wood LLP

Comment Details

Title		Number	Policy HOU 02 - Level and Locati
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

On behalf of the Great Hockham Estate, we feel that part of the Policy is sound. We support the identification of Hockham within the 'Villages with Boundaries' tier of the settlement hierarchy. It is agreed that the village provides the range of services which justifies its designation in the 'Villages with Boundaries' tier. Accordingly, this aspect of the Local Plan is considered sound. However, we do not support the approach to housing growth in these settlements.

13- If you feel the plan is unsound, please tell us why

On behalf of the Great Hockham Estate, we feel that part of the Policy is unsound. We do not support the general approach to housing growth for Villages with Boundaries. The proposed allocation of 7% growth for Villages with Boundaries is not justified or supported by any documents presented within the evidence base. It is therefore considered that this is an arbitrary allocation which does not take into consideration either the need for growth or the characteristics of individual rural settlements. The lack of any new allocation for co-ordinated growth in these areas demonstrates a lack of flexibility for local communities to adapt to change and provide the growth required to maintain their vitality, which is contrary to

Local Plan Pre-Submission - Comments and Response Schedule

paragraph 14 of the NPPF. It is therefore considered that this blanket approach would not promote sustainable development and this Policy is unsound.

Breckland Council Response

Officer Response

Policy HOU02 is also closely related to Policy HOU04 and it is considered that they need to be considered together. Policy HOU02 allocated 7% of the growth over the plan period to villages with settlement boundaries. Villages with boundaries have some services and facilities to support development but do not have the full range of services and facilities to be designated as Local Service Centres. The services are not considered to be appropriate to support a larger scale expansion which would be the case with an allocation.

Policy HOU04 seeks to allow a more responsive approach to needs within these areas, by allowing for some growth outside of settlement boundaries for market dwellings where it would normally be restricted. The policy seeks to ensure that the settlement does not expand by more than 5% from the point of adoption of the Local Plan. This reflects the existing size of the settlement and the infrastructure provision available.

Policy HOU02 does not restrict the use of neighbourhood plans, to meet needs above the target and it is considered this is more appropriate mechanism in these areas.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.11
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The text in question is new.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The statement that new homes targets are provided in each settlement in the settlement hierarchy (ref,. policy GEN 03) is false. No such targets are provided individually for the rural settlements with boundaries which form part of the hierarchy.This means that the statement that certainty is provided for communities progressing or considering a neighbourhood plan is also untrue in the case of the 17 rural settlements. Saham Toney Parish Council is preparing a neighbourhood plan and is experiencing much difficulty and uncertainty because of this omission.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1125802	Full Name	Ms Geraldine Sayers Cowper	Organisation Details	Parish Clerk Banham Parish Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	3	Policy HOU 02 - Level and Locati
Chapter Number				

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Public transport; at present the is only one bus to Diss per week, on Saturday, leaving at 09.23 and returning at 12 noon. From Monday to Friday there are two buses to Norwich, leaving at 06.38, arriving at 08.14, and at 09.26 arriving at 10.35. The only public transport to service Banham are buses from Norwich to Banham are at 13.15, 16.10 and 17.40, arriving in Banham at 14.15, 17.08 and 18.43 respectively. This hardly conforms with the criterion at 2.14 (p18 of the pre-submission document) to consider the frequency of services and whether it is possible to reach destinations within normal working hours by public transport. Clearly this is not the case with Diss, where many local people work. Schools:

Local Plan Pre-Submission - Comments and Response Schedule

Banham Primary School has a list of 20 children waiting for reception places and have only 3 places across the other six groups. The school does not anticipate vacancies being available in the numbers most likely required by this development (and the one of 53 houses in Kenninghall Road, not yet built) unless they receive funding for more classrooms to be built and for extra teaching, catering, cleaning and admin staff and equipment. At present its capacity is for 109 pupils. Old Buckenham is the nearest place with a High School and has a primary school, which necessitates motor travel. Employment Opportunities: Much has been made of the number of businesses in Banham, which is misleading. Most are singly operated with no opportunities for recruitment. Of the few which may have opportunities, Banham Zoo recruits seasonal workers in Summer, mostly at the minimum wage, the garage is mainly staffed by family and old retainers and Acorn Park School has limited contracts due to term times. A trawl of the internet reveals only 4 available posts, two are highly technical, the other two for care workers, one in mental health. Other employees, such as the shops, have well established, long serving staff with rare opportunities for job seekers.

Breckland Council Response

Officer Response

The Local Service Centre topic paper provides greater details on the level of services and facilities within each of the village. The Regulation 18 Issues and Options consultation sought views on the way in which Local Service Centres should be defined. As set out within the Local Service Centre topic paper Banham meets the requirements to be classified as a service centre. Furthermore Norfolk County Council as the education authority have confirmed there is sufficient capacity to accommodate the level of allocation.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1132853	Full Name	Martin Goymour	Organisation Details	Goymour Properties
Agent ID	1132852	Agent Name	Mr Jon Jennings	Agent Organisation	Cheffins Planning

Comment Details

Title		Number	3	Policy HOU 02 - Level and Locati
Chapter Number				

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	My clients land holding was presented to a meeting with the Local Plan teams on the 6th February 2017. As requested the site was formally submitted to the Council for consideration in this local plan. In addition, the representations also included a specific wording for the safeguarding of Banham Zoo and its specific development aspirations.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Local Plan Pre-Submission - Comments and Response Schedule

It is considered that the percentage of growth being directed to the Local Service Centres is too low. The plan does not propose an even distribution of growth with Attleborough taking 50% of the proposed growth, with no further allocations being proposed in Thetford. This uneven distribution of growth raises questions as to whether this growth can be delivered in the short term, especially when the costs and delays associated with bringing infrastructure forward are taken into account. The 15% being directed towards Local Service Centres in some instances does not appear to correspond to the scale of the village it is being directed towards and the employment opportunities available. For example, the Council recognises that Banham is a significant source of local employment, whereas the totality of growth being directed towards this village is very limited and is located a considerable distance from the zoo, reducing the potential for employees residing in this village to walk to this facility. In addition, there is a need for a wider range of house types to be provided which recognises the diverse range of housing required in connection with the zoo. This policy is also inflexible and does not allow other more suitable sites to come forward to meet an identified need arising from the expansion of an existing employment facility such as Banham Zoo. In view of the above it is contended that there needs to be a closer correlation between housing and existing employment.

Breckland Council Response

Officer Response

The plan proposes a balanced distribution of growth as consulted upon within the regulation 18 issues and options consultation. The plan period runs from 2011 until 2036 and the Thetford allocation is included within the committed figure, therefore the total requirement for Thetford and Attleborough between 2011 and 2036 equates to 50% of the planned growth for the District.

The total requirement for the Local Service Centres is 15% over the plan period. Within each of the settlements the new allocation requirement equates to a 10% increase in the number of dwellings from the 2011 census. This therefore reflects the scale of the village and infrastructure provision within it.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1133331	Full Name	Lexham Estate	Organisation Details	Lexham Estate
Agent ID	1032227	Agent Name	Ms Lydia Voyias	Agent Organisation	Savills (UK) Ltd

Comment Details

Title	Breckland Local Plan Pre-Submission Publication	Number	
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Proposals map has only been recently		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

It is specified within Policy HOU02 that there are 5 dwelling commitments / or completions in the period 2011 to September 2016. It is noted that the Council has identified a number of sites which benefit from Planning Permission for Housing. It is questioned why the Council has chosen to include this information. In some cases the draft proposal map refers to planning permission obtained well before the proposed plan period and where development appears to have been constructed.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The plan period begins in 2011 in line with data in the Central Norfolk Strategic Housing Market Assessment. Completions were calculated from this point onwards.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.7
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The text is new.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

It is stated in the second sentence "Having regard to this figure..."; however it is not made clear by description what figure is being referred to, nor is any figure stated. It is hence difficult to follow the intended logic of the wording through to the actual housing allocations. It is also impossible to ascertain if the policy is adequately justified without clarity on what figure is being referred to. The same sentence goes on to say "...the rest of the housing target (note: i.e. that not directed to local service centres) is directed to the larger market towns...". This is incorrect and should either read "...to the larger market towns and the rural settlements with boundaries ...", or the allocation to the rural settlements with boundaries should be

Local Plan Pre-Submission - Comments and Response Schedule

deleted for consistency with this paragraph's text.

Breckland Council Response

Officer Response

Comment noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1134348	Full Name	Maggie Oechsle	Organisation Details	NP4Yaxham" Yaxham Neighbourhood Plan W
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	3	Policy HOU 02 - Level and Locati
Chapter Number				

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

This designation of the settlements within Yaxham Parish recognises their small village rural nature, the distributed nature of settlement within the parish and lack of local services capable of serving the whole community in a sustainable fashion. Yaxham has seen and continues to see small scale organic growth at a rate that is likely to meet or exceed the 7% growth designated for such villages (HOU 02). Indeed at present currently permitted properties equal almost 15% of the current

13- If you feel the plan is unsound, please tell us why

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130852	Full Name	Mrs Hilary Clutten. Clerk to Old Bucken Council	Organisation Details	Clerk Old Buckenham Parish Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.9
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

OBPC believes that to apply a blanket 10% uplift in dwelling numbers across all Local Service Centres is unjustified, and fails to take into consideration local circumstances. During earlier rounds of consultation, some villages expressed a desire for greater than 10% growth. In the case of Old Buckenham, the Parish Council expressed concerns about the ability of the villages infrastructure and its physical constraints, to accommodate 10% growth. These concerns have been borne out by Breckland Councils inability to identify suitable sites to accommodate the proposed level of growth, despite two Calls for Sites during which a significant number of sites were put forward, but discounted for technical reasons such as

Local Plan Pre-Submission - Comments and Response Schedule

highway safety. To insist upon allocating 10% growth to all villages, regardless of their individual desire or ability to accommodate this level of growth is irrational and unsound. In instances where the Call for Sites process has not been able to identify suitable sites in a specific settlement, such as Old Buckenham, the level of growth for that settlement should be reduced, and the shortfall made up elsewhere, in locations where there are suitable sites and where the Parish has expressed a desire for greater than 10% growth. Furthermore, based on the figures provided within the Draft Local Plan, the level of growth applied to Old Buckenham equates to 12.5% rather than 10%. Based on a population of 1270, and a household multiplier of 2.3 people per dwelling, a 10% increase in dwelling numbers would equate to 55 additional dwellings, and not the 69 proposed. This is of real significance for Old Buckenham, as a figure of 55 would result in a shortfall of only 3 dwellings, taking into account completions, commitments and the proposed allocation of 20 dwellings at St Andrews Close.

Breckland Council Response

Officer Response

Paragraph 3.9 sets out that each of the Local Service Centres receives an allocation equivalent to 10% growth. This is a new target and does not include the committed growth up to March 2017. The allocation is for 37 dwellings which is under the 10% growth target.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	609986	Full Name	Mrs Erica Whettingsteel	Organisation Details	Managing Director EJW Planning Ltd
Agent ID	598312	Agent Name	Mrs Erica Whettingsteel	Agent Organisation	Managing Director EJW Planning Ltd

Comment Details

Title		Number	Policy HOU 02 - Level and Locati
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

This policy is unsound as it is not consistent with national policy as it restricts growth within the rural areas. Breckland is a predominantly rural area and its Local Plan policies need to recognise this with a better distribution of growth across the District. The NPPF seeks to support a prosperous rural economy and acknowledges the need to promote development in rural areas by locating housing where it will enhance or maintain the vitality of rural communities. Paragraph 14 of the NPPF makes it clear that local planning authorities should meet objectively assessed needs with sufficient flexibility to adapt to rapid change, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

Local Plan Pre-Submission - Comments and Response Schedule

The policy as drafted does not allow for the flexibility required to deliver growth elsewhere, if one, or other of the proposed SUEs are, for any reasons delayed in coming forward. It also puts significant pressure on the market towns to deliver more than a quarter of the total housing growth in the District.

Breckland Council Response

Officer Response

The Local Plan Issues and Options consultation document, which went out to consultation in November 2014 to January 2015, asked the question what options should the spatial strategy for the district consider. This set out four options: Focused development pattern; dispersed/Scattered development pattern; balanced development pattern; and development of new settlement or upgrading existing settlement. The Local Plan Preferred Directions document, which went out for consultation in January to February 2016, then set out a response to the Issues and Options. Overall responses were in favour of balanced development across the district highlighting concerns around the feasibility of development of a new settlement. The level of growth apportioned to the Thetford and Attleborough SUEs is based on up-to-date information from the developers trajectory information. It is considered that a large proportion of these developments will come forward within the plan period, as set out in HOU 02 - Level and Location of Growth. Policy HOU 04 and HOU 05 recognise the rural nature of the authority and provide for additional, small scale growth in areas where growth would not normally be directed.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1132253	Full Name	Glavenhill Strategic Land	Organisation Details	Glavenhill Strategic Land
Agent ID	1132250	Agent Name	Jane Crichton	Agent Organisation	Lanpro Services

Comment Details

Title		Number	Policy HOU 02 - Level and Locati
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	During the previous consultation periods the village was proposed to be designated as a Local Service Centre and my client's site was the preferred site LP[113]007. The declassification of the village and therefore the site happened in February 2017 outside of any formal consultation period. We did make representation to the Local Plan Working Group in March 2017.		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Yaxham was previously designated to be a Local Service Centre (LSC) and this was consulted at the regulation 18 stage (Sep-Oct 2016). It was Breckland officers professional opinion that Yaxham met the criteria as published in the preferred options consultation of the emerging Local Plan September 2016. Yaxham was proposed to be a LSC within the Breckland Emerging Local Plan as it was considered by your officers to meet Brecklands criteria of having all 5 local services within 800m (10 min walk) which are: Public Transport Community Facility Employment Shop/Post Office School This designation was informed by the Local Service Centre Topic Paper published in May 2015 and was prepared following the Issue and Options Consultation and included comments that had been received at that stage and provides an analysis and recommendation on the potential of LSC villages. Officers also confirmed this in their reports to the Local Plan Working Group (LPWG) dated 15th July 2016, 14th December 2016 and 3rd February 2017. At the meetings of the 15th July and 14th December 2016 this approach to Yaxham being a LSC was agreed and endorsed by the LPWG. The site was proposed to be the preferred site for growth in Yaxham in the Regulation 18 preferred site options (September 2016) the site (ref: LP[113]007) is noted as (emphasis added): The site itself is within 800m (10 minutes walking distance) to most key services, meaning that the site is sustainable and will limit the use of personal car journeys. There is a footpath to the school at Clint Green. The site sits within the Wensum and Tud Settled Tributary Farmland. Development considerations in this area should seek to conserve the existing rural road pattern, resist upgrade/calming measures which could have an urbanising influence; ensuring that any new development reflects the existing material and stylistic vernacular within the settlements No fundamental constraints to the development of the site have been identified. In the accompanying Sustainability Appraisal (SA) Breckland offices conclude that The Preferred Site LP[113]007 scores positively against the SA objectives, particularly in regards to Land, Water and Soil Resources, Inclusive Communities and Population and Human Health. The site does receive a negative outcome for SA objective 1 as it is greenfield but it also acknowledges that all sites submitted are greenfield and therefore all sites proposed scored a negative outcome. In the officers report to the LPWG of 3rd February 2017 the officers confirm that further work had been undertaken on certain settlements proposed to be a LSC specifically in relation to employment and public transport. This further work shows that Yaxham does meet the criteria which has been applied and undertaken in a consistent manner across the District. In conclusion to Yaxham, officers write Overall it is considered that the

Local Plan Pre-Submission - Comments and Response Schedule

services and facilities within the parish support the whole of the parish and LSC status will help to protect and maintain these facilities. At that meeting members voted contrary to officer recommendation to make Yaxham a LSC due to Yaxham school being over 800m walking distance from the village. Yaxham is now classified as being a Village with Boundaries and residential development is restricted to the principles set out in policy HOU4. It should be noted that the Guidelines for the Identification of Hazards and the Assessment of Risk of Walked Routes to School (October 2000) confirms that in accordance with the 1996 Education Act, suitable walking distances to schools are 2 miles (3.2km) for children under 8, and 3 miles (4.8km) for 8 years of age and older children. My client contends that the reasons for recommending that Yaxham be removed from the LSC list and now included within the list of settlements under Policy HOU4 are unclear. The assessment work by professional officers to-date is clear in that Yaxham meets the criteria for being a LSC. It would appear that Yaxham is only included in the HOU4 settlements on the basis that the previously allocated site in the emerging Local Plan is some 1020m distance from Yaxham Primary School. This distance equates to a 12 ¾ minute walk time as opposed to the 800m/10 minute walk time that is the LSC test in the emerging Local Plan. My client has serious concern that the 5-criteria tests for LSCs are not being applied consistently across all the emerging allocations within the LSC settlements. We have examined all the emerging allocations and can confirm that the emerging housing allocations in the Local Service Villages of Banham, Harling, Narborough, Mattishall, Old Buckenham, Shipdham and Sporle all fail at least one of the 800m/10 minute tests. In fact, the emerging allocations in Mattishall, Old Buckenham, Shipdham and Sporle all fail the 800m walk-distance to a Primary School test. Given the obvious lack of clarity and consistency in the assessment of sites and villages proposed to accommodate planned housing growth demonstrated by the decision to deselect Yaxham as a LSC it seems only appropriate that all settlements proposed as a LSC should be reassessed to ensure a consistent approach is taken if strict enforcement of an 800m distance is to be applied. Failure to do so would lead to a lack of consistency in decision making going forwards and a Local Plan which may be found to be unsound at examination.

Breckland Council Response

Officer Response

Clint Green and Yaxham collectively have the services and facilities to be considered a Local Service Centre and this was originally proposed through the emerging Local Plan. Through Local Plan Working Groups it was argued that the distance between Yaxham and Clint Green is approximately 1km. The school is located in Clint Green and, therefore, the distance between the two settlements was considered to be too great for the settlements to be jointly designated as a Local Service Centre. Yaxham on its own merits would only have 4 of the services and

Local Plan Pre-Submission - Comments and Response Schedule

facilities and, would therefore, fall under the policy HOU 04.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136859	Full Name	Mr Richard Crosthwaite	Organisation Details	Gladman Developments Limited
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy HOU 02 - Level and Locati
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

See attached.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The letter states that there is an over-reliance on the two Sustainable Urban Extensions and that alternative sites should be found to meet the need in the district.

The level of growth apportioned to the Thetford and Attleborough SUEs is based on up-to-date information from the developers trajectory information.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 255168 Full Name Mr Chris Smith
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Policy HOU 02 - Level and Locati
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Given the changes requested to Policy GEN03, the allocation of dwellings should be altered to correspond. Hopkins Homes would suggest that this is likely to result in new allocations of approximately 2,000 dwellings to Dereham and 750 dwellings each to both Watton and Swaffham, with the residual 500 dwellings remaining allocated to Attleborough.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The Local Plan Issues and Options consultation document, which went out to consultation in November 2014 to January 2015, asked the question what options should the spatial strategy for the district consider. This set out four options: Focused development pattern; dispersed/Scattered development pattern; balanced development pattern; and development of new settlement or upgrading existing settlement. The Local Plan Preferred Directions document, which went out for consultation in January to February 2016, then set out a response to the issues and options. Overall responses were in favour of balanced development across the district.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1132181	Full Name	Mr Daniel Hewett	Organisation Details	Taylor Wimpey UK Ltd
Agent ID	1132169	Agent Name	Mr Graeme Free	Agent Organisation	DLP Planning Ltd

Comment Details

Title		Number	Policy HOU 02 - Level and Locati
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy HOU2 – Level and Location of Growth

2.4 For the purposes of this representation we do not intend to undertake a thorough analysis of the Council’s Objective Assessment of Need (OAN). However we note the dwelling target included in the policy is broadly in accordance with the Government’s recent consultation entitled ‘Planning for the right homes in the

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1133331	Full Name	Lexham Estate	Organisation Details	Lexham Estate
Agent ID	1032227	Agent Name	Ms Lydia Voyias	Agent Organisation	Savills (UK) Ltd

Comment Details

Title		Number	Policy HOU 02 - Level and Locati
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Notwithstanding the support for the Policy HOU 02 “ Level and Location of Growth in terms of the distribution of growth throughout the District. Separate representation has been made in response to Draft Policy HOU 01 about the potential for the Council to fall short in meeting its full objectively assessed housing need which has a consequence for the individual minimum settlement targets. Support is given to the proposed distribution of housing growth which seeks to direct 15% of growth to Local Service Centres, including Litcham. It is however requested that the policy wording reiterates that the suggested housing targets for additional dwellings in the period are minimum targets . Support is given to the

Local Plan Pre-Submission - Comments and Response Schedule

footnote reference that Neighbourhood Plans can seek to exceed the stated housing targets.

Breckland Council Response

Officer Response

Policy HOU02 is closely related to policy HOU01 and also the individual residential allocation policies within the plan. Policy HOU01 clearly sets out that the overall OAN is a minimum figure, whilst the individual site allocation policies all state approximately. It is not considered appropriate or necessary therefore to make further amendments to Policy HOU02.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1132458	Full Name	Roland Bohn	Organisation Details	Albanwise Limited
Agent ID	1132456	Agent Name	Anna Bend	Agent Organisation	Amec Foster Wheeler

Comment Details

Title		Number	Policy HOU 02 - Level and Locati
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

In relation to the settlement hierarchy and distribution of growth, Policy HOU2 states that 15% growth will be in the Local Service Centres. However, Paragraph 3.9 and the sections within the Local Plan for each of the Local Service Centres has not been updates and indicate that only a10% growth is to be allocated to these settlements. There is, therefore, inconsistency within the Plan, and as such the Council is not allocating a sufficient number of dwellings to these villages, the allocations for which should be increased to at least 15%. Whilst the level of housing to be delivered to the Key Settlements has increased to 50%, the Council is relying on two major urban extensions at Attleborough and Thetford to deliver the

Local Plan Pre-Submission - Comments and Response Schedule

majority of this growth, with 3,100 dwellings to be delivered beyond the Plan period. Therefore, it is appropriate for the housing numbers proposed at Attleborough and Thetford to be re-distributed within the remainder of the District, to ensure that the Districts housing targets to 2036 are delivered in full, if the Local Plan is to be found sound at Examination. As such, the distribution of housing for the Key Settlements should be reduced to 47%, to relieve pressure and reliance on the SUEs, and allow other sustainable sites within the District to come forward for development in the short-term to ensure the Council can meet its five year supply requirements. It is considered that the Council should include a higher proportion of growth to the Local Service Centres, which are more sustainable locations to support additional growth than the rural areas. These villages require steady growth to support and maintain the services within them. As such it is suggested that the Council should increase the housing allocation for the Local Service Centres, and reduce the level within the less sustainable rural areas. In addition, the blanket 10% increase for the Local Service Centres is not considered to be an efficient way of planning for housing delivery, as growth of these villages should be based on sustainability and on an individual basis. Requested Change It is suggested that the housing distribution should be revised as follows: Key Settlements - 47% Market Towns - 28% Local Service Centres - 23% Rural Areas - 2% As a minimum, the housing targets for the Local Service Centres should be increased to 15% in accordance with Policy HOU2 which currently conflicts with the proposed allocations for these villages.

Breckland Council Response

Officer Response

Policy HOU02 seeks to provide a balanced distribution of growth to meet the needs of the District whilst also seeking to ensure the plan delivers sustainable development as required by paragraph 14 of the NPPF.

The representation makes reference to the difference between 15% growth for Local Service Centres (LSC) and each LSC only receiving a 10% increase. The 15% refers to the proportion of the whole growth going to LSCs equivalent to 2,278 dwellings. This represents 15% of the total OAN as set out within Policy HOU01. Each LSC has received a new allocation broadly equivalent to 10% growth in the number of households from the 2011 Census. This approach reflects variation in size of the LSCs and seeks to ensure that there is sufficient capacity within the settlements infrastructure to accommodate the growth. It allows individual settlements circumstances to be considered as noted within the representation.

Policy HOU02 allocates land above OAN as set out in Policy HOU01. This has occurred to ensure that there is sufficient flexibility within the plan to meet OAN.

Local Plan Pre-Submission - Comments and Response Schedule

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID: 1130852 Full Name: Mrs Hilary Clutten. Clerk to Old Bucken Council Organisation Details: Clerk Old Buckenham Parish Council
 Agent ID: Agent Name: Agent Organisation:

Comment Details

Title: Number: Policy HOU 02 - Level and Locati
 Chapter Number: 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Not raised before because this policy approach has not appeared in previous versions of the draft Local Plan		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

OBPC objects to Breckland Councils approach to the level and location of growth. Specifically, to allocate housing in settlements where no suitable sites have been identified is not sound. In the case of Old Buckenham, a significant number of sites were put forward by landowners in and around the village during the initial Call for Sites and during the second targeted Call for Sites. With the exception of one, none of these were considered suitable for residential development for a variety of technical reasons such as highway safety or impact on the historic environment. The expectation, therefore, that suitable sites will come forward during the plan period, to accommodate 17 dwellings in the case of Old Buckenham, is unrealistic

Local Plan Pre-Submission - Comments and Response Schedule

and does not represent a sound approach to distributing the Districts housing growth. This approach gives no certainty that the necessary level of housing growth will be delivered within the District, and significantly threatens the Councils future ability to demonstrate an adequate 5-year housing land supply. In instances where the Call for Sites process has not been able to identify suitable sites in a specific settlement, the level of growth for that settlement should be reduced, and the shortfall made up elsewhere, in locations where there are suitable sites.

Breckland Council Response

Officer Response

Policy HOU02 allocates above the OAN requirement set out within Policy HOU01. It is acknowledged that whilst a site has been included within the plan in Old Buckenham for the majority of the growth, the remaining houses would need to come forward under Policy HOU03. Through the call for sites, it was not possible to identify a larger site to allocate, however Policy HOU03 does not prevent a smaller site coming forward to meet the remainder of the growth.

As policy HOU02 allocated above policy HOU01 requirement, the use of policy HOU03 to meet the remainder of the growth in certain settlements is not considered to present a soundness issue.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1032208	Full Name		Organisation Details	Hans House Group of Companies
Agent ID	1032205	Agent Name	Mr Jamie Roberts	Agent Organisation	Pegasus Group

Comment Details

Title		Number	Policy HOU 02 - Level and Locati
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Further to policy GEN3, policy HOU2 directs development in the order of 2,650 additional dwellings to Attleborough over the Plan period (in addition to existing commitments). Yet the HOU2 figure appears simply to be a retrofitting of forecast delivery rates at the Attleborough SUE (policy GEN4, discussed below) rather than a reflection of its true capacity and potential to accommodate growth. We note that previous versions of the Plan (including the Preferred Directions version) sought to direct a higher level of growth of some 4,000 dwellings, to Attleborough. There is potential at Attleborough to deliver further housing commensurate with its status at the top of the settlement hierarchy and to make the most of its sustainability

Local Plan Pre-Submission - Comments and Response Schedule

credentials. As such, policy HOU2 is not justified nor positively prepared and an increase in the amount of housing to be directed to Attleborough should be considered.

Breckland Council Response

Officer Response

The Local Plan carries forward the strategic urban extensions proposed through the Core Strategy. The NPPF notes at paragraph 52 that the supply of housing can sometimes be best achieved through planning larger scale development, such as new settlements or extensions to existing villages and towns. The urban extension within Attleborough is currently the subject of a planning application which is being determined by the Council.

The level of growth proposed for Attleborough will see a significant increase to the population of the town, furthermore it also has regard to infrastructure capacity within the town. The infrastructure requirements are set out within the Infrastructure Delivery Plan.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1125802	Full Name	Ms Geraldine Sayers Cowper	Organisation Details	Parish Clerk Banham Parish Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.9
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The figure of 10% appears to have been arbitrarily assumed. Banham Parish Council is unaware of any housing need survey, specific to Banham, conducted by Breckland Council, at any time. On the contrary, numerous previous Heads of the Planning Department have categorically stipulated that there is no housing need in Banham, with the exception for a need for social housing through requests from those who have stated a desire to live here or in a neighbouring village. At the time of Banham's designation as a Local Service Centre, it was stipulated 'without further development', which was assured by the then Head of Planning, Phil Daines. To assume that all LSCs can sustain 10% of further development without

Local Plan Pre-Submission - Comments and Response Schedule

ascertaining whether this is possible, needed or even lawful undermines the soundness of Policy HOU 02.

Breckland Council Response

Officer Response

Local Service Centres represent the larger villages within the district that have a range of services and facilities. In order to protect and enhance these services and facilities additional residential growth is required. The Local Plan seeks to allocate the largest proportion of growth to the most sustainable locations within the district. 10% growth has been applied to each of the Local Service Centres to ensure that the approach is consistent and that growth is not disproportionate to the size of the settlement.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	609986	Full Name	Mrs Erica Whettingsteel	Organisation Details	Managing Director EJW Planning Ltd
Agent ID	598312	Agent Name	Mrs Erica Whettingsteel	Agent Organisation	Managing Director EJW Planning Ltd

Comment Details

Title	Development Outside of the Boundaries of Local Service Centres	Number	Policy HOU 03
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy HOU 03 provides for circumstances where the Local Plan has not identified sufficient sites to achieve the Councils house target. It sets out a range of criteria, all of which must be met in order for further development to be supported: These criteria are too prescriptive, particularly bullet point (2) which limits the number of dwellings to be provided. This does not take account of the opportunities that larger brownfield sites outside of settlement boundaries may provide in delivering a greater increase in housing numbers. The policy is therefore unsound as it does not accord with the NPPFs objective for Boosting significantly the supply of housing (paragraph 47) or encouraging the development of brownfield sites in preference

Local Plan Pre-Submission - Comments and Response Schedule

to greenfield sites.

Breckland Council Response

Officer Response

The Local Plan Issues and Options consultation document, which went out to consultation in November 2014 to January 2015, asked the question what options should the spatial strategy for the district consider. This set out four options: Focused development pattern; dispersed/Scattered development pattern; balanced development pattern; and development of new settlement or upgrading existing settlement. The Local Plan Preferred Directions document, which went out for consultation in January to February 2016, then set out a response to the Issues and Options. Overall responses were in favour of balanced development across the district highlighting concerns around the feasibility of development of a new settlement. Policy HOU 03 Development Outside of the Boundaries of Local Service Centres provides the policy framework to boost the supply of housing in areas where sustainable sites could not be identified. The policy has to ensure that whilst development can come forward this can not be disproportionate to the level of growth seen in other Local Service Centres. The policy must seek to maintain the Level and Location of Growth as set out in policy HOU 02.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1132458	Full Name	Roland Bohn	Organisation Details	Albanwise Limited
Agent ID	1132456	Agent Name	Anna Bend	Agent Organisation	Amec Foster Wheeler

Comment Details

Title	Development Outside of the Boundaries of Local Service Centres	Number	Policy HOU 03
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy HOU3 indicates that development in the Local Service Centres would be permitted where it does not exceed the housing allocation for that village. The Council currently does not have a five year supply of deliverable housing sites, and as of April 2017 has less than four years supply. In addition, the housing target for the District has increased by 373 dwellings since the Preferred Sites and Settlement Boundaries consultation, and as such it is necessary for the council to find further sites to ensure that the Districts housing requirements to 2036 can be met. As the Council does not have a five year supply, in accordance with Paragraph 49 of the NPPF relevant housing supply policies should not be considered up-to-date. For the

Local Plan Pre-Submission - Comments and Response Schedule

Local Plan to be found sound at Examination, and comply with the NPPF, the Council should not be restricting housing delivery where it exceeds the proposed allocation, where sustainable sites outside of the settlement boundary, such as Albanwise Limited's site at Bawdeswell, are available for development. It is, therefore, considered that Policy HOU3 is too restrictive, and in the absence of a five-year supply is in conflict with the NPPF. In addition, this policy does not allow sufficient flexibility to housing delivery, as it is evident that allocations may not come forward for development as expected, and there is significant reliance on the SUEs in delivering the District's housing needs. Requested Change It is suggested that criteria 2 of Policy HOU3 2. It would not lead to the number of dwellings in the settlement exceeding the housing target; ~~is~~ removed.

Breckland Council Response

Officer Response

HOU03 has been developed to reflect the development requirements set out within HOU04. The criteria seeks to ensure that the locations does not receive a development which would result in a significant over allocation which may be more appropriate for other locations higher up the settlement hierarchy. On this basis the requirements within criteria 2 are considered to be appropriate and no further change is proposed. The policy allows for additional growth where it would be in conformity with other policies within the plan

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 868883 Full Name Mr David Cockburn
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Development Outside of the Boundaries of Local Service Centres Number Policy HOU 03
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Items 2 & 3 of the criteria for HOU 03 has already been breached for Bawdeswell with the approval of 40 houses instead of 36 for the site adjacent to Two Fields Way. This application has only recently been approved. It is immediately adjacent to the settlement boundary; It would not lead to the number of dwellings in the settlement exceeding the housing target; the design contributes to conserving, and where possible enhancing, the historic nature and connectivity of communities; and the development avoids coalescence of settlements.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Local Plan Pre-Submission - Comments and Response Schedule

It appears already, as in the case of Bawdeswell, that Breckland planners will ignore HOU 03.

Breckland Council Response

Officer Response

The planning application process and the Local Plan process are on-going and separate from one another. The application was assessed against the adopted Core Strategy and in line with national policy. Once the Local Plan has been adopted and is found sound policy HOU 03 will have full weight in plan making decisions.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1133331	Full Name	Lexham Estate	Organisation Details	Lexham Estate
Agent ID	1032227	Agent Name	Ms Lydia Voyias	Agent Organisation	Savills (UK) Ltd

Comment Details

Title	Development Outside of the Boundaries of Local Service Centres	Number	Policy HOU 03
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

It is noted within Draft Policy HOU02 that there is a target to accommodate 22 additional dwellings within the Local Service Centre of Litcham. However it is noted that Housing Allocations are unable to meet Local Plan Housing Target. The Council has therefore proposed Draft Policy HOU03 to allow flexibility for sites beyond but adjacent to the settlement boundaries of Local Service Centres to come forward for residential development. Support is given to Draft Policy HOU03 specifically in so far as it provides flexibility for appropriate sites. It however suggested that the wording of the policy is amended as follows: Where the Local Plan does not identify sufficient sites to achieve the housing target, then further development will

Local Plan Pre-Submission - Comments and Response Schedule

be allowed subject to being supported by other policies within the Local Plan and meeting all of the following criteria: 1. It is immediately adjacent to the settlement boundary; 2. The design contributes to conserving, and where possible enhancing, the historic nature and connectivity of communities; and 3. The development avoids coalescence of individual settlements. 4. Opportunities for self build dwellings which meet the criteria set out above will be considered in accordance with national guidance. Criteria 2 seeks to limit the amount of housing considered acceptable through this policy. However it is noted at paragraph 3.11 of the Draft Local Plan clearly identifies that settlement housing targets are minimum housing requirements. It is considered that development should not be limited in this way. Criteria 4 is considered to be ambiguous in the context of Litcham and suggested wording is requested to provide clarity.

Breckland Council Response

Officer Response

HOU03 has been developed to reflect the development requirements set out within HOU04. The criteria seeks to ensure that the locations does not receive a development which would result in a significant over allocation which may be more appropriate for other locations higher up the settlement hierarchy. On this basis the requirements within criteria 2 are considered to be appropriate and no further change is proposed.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1125802	Full Name	Ms Geraldine Sayers Cowper	Organisation Details	Parish Clerk Banham Parish Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Development Outside of the Boundaries of Local Service Centres	Number	Policy HOU 03
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

LP(003)012: Farmland behind Wayland Way: This is agricultural land outside the village boundary and not immediately adjacent to it, as required by Policy HOU 03, but next to a designated open space (LP(003)009). Building here will also contravene HOU 03 by failing to conserve or enhance the historic nature of the village, as it is part of the countryside which envelopes it.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The policy Banham Housing Allocation 1 sets out that the existing designated open space will be replaced through the site LP[003]003. The site LP[003]012 and LP[003]009 represents a sustainable expansion of the village.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1131135	Full Name	Mr Ian Martin	Organisation Details	Yaxham Parish Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Development Outside of the Boundaries of Local Service Centres	Number	Policy HOU 03
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Yaxham welcomes the adoption by the emerging Local Plan of a policy element at the centre of the recently made Yaxham Neighbourhood Plan, namely supporting "development [that] avoids coalescence of settlements" – HOU 03 point 4., HOU 04 point 5., and with different wording HOU 05.

On this basis it is considered that this element of the Plan as it affects the Parish of

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1134348	Full Name	Maggie Oechsle	Organisation Details	NP4Yaxham" Yaxham Neighbourhood Plan W
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Development Outside of the Boundaries of Local Service Centres	Number	Policy HOU 03
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Yaxham welcomes the adoption by the emerging Local Plan of a policy element at the centre of the recently made Yaxham Neighbourhood Plan, namely supporting “development [that] avoids coalescence of settlements” – HOU 03 point 4., HOU 04 point 5., and with different wording HOU 05. On this basis it is considered that this element of the Plan as it affects the Parish of Yaxham meets the test of “soundness” in that it is:

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	975295	Full Name	Mr Graeme Robertson	Organisation Details	
Agent ID	1136182	Agent Name	Mr Thomas Darwall-Smith	Agent Organisation	Keystone Planning Limited

Comment Details

Title	Development Outside of the Boundaries of Local Service Centres	Number	Policy HOU 03
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Development of sites outside the boundaries of Local Service Centres that are addressed by draft Policy HOU 03 should remove the reference in bullet (2), the development should not lead to the number of dwellings in the settlement exceeding the housing target since this is not consistent with the spirit of national policy that is set out in paragraph 50 of the National Planning Policy Framework that seeks to boost significantly the supply of housing

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

HOU03 has been developed to reflect the development requirements set out within HOU04. The criteria seeks to ensure that the locations does not receive a development which would result in a significant over allocation which may be more appropriate for other locations higher up the settlement hierarchy. On this basis the requirements within criteria 2 are considered to be appropriate and no further change is proposed.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136859	Full Name	Mr Richard Crosthwaite	Organisation Details	Gladman Developments Limited
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Development Outside of the Boundaries of Local Service Centres	Number	Policy HOU 03
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy HOU 03 “ Development outside of the Boundaries of Local Service Centres
 6.6.1 This policy states that development outside of the boundaries of the Local Service Centres will normally be resisted where the Local Plan housing target (as set in Policy HOU 02) is provided for unless supported by other policies within the Local Plan. Policy HOU 03 also states that in circumstances where the Local Plan does not identify sufficient sites to achieve the housing target in Local Service Centres, further development will be allowed subject to being supported by other policies of the Local Plan and meeting specific criteria. Although this criteria would not actively restrict development outside settlement boundaries as a matter of principle, it

Local Plan Pre-Submission - Comments and Response Schedule

seeks to impose a limit on the number of dwellings that can be delivered in each Local Service Centre as a result i.e. Policy HOU 03 seeks to restrict development in Local Service Centres to the respective housing target that applies to each settlement. 6.6.2 This approach is considered unsound. The Council acknowledge that the overall housing requirement should be considered as the minimum to be achieved. Gladman therefore question the justification behind the approach taken in policy HOU 03 which would frustrate the delivery of sustainable development opportunities being delivered to meet a minimum housing target. Notwithstanding this, the use of normally be resisted is not considered a positive approach to growth and is likely to lead to inconsistencies being made through the decision making process. Accordingly, this policy is contrary to the requirements of the Framework which makes clear that only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan. This policy is therefore not considered to be positively prepared, effective or consistent with national policy.

Breckland Council Response

Officer Response

HOU03 has been developed to reflect the development requirements set out within HOU04. The criteria seeks to ensure that the locations does not receive a development which would result in a significant over allocation which may be more appropriate for other locations higher up the settlement hierarchy. On this basis the requirements within criteria 2 are considered to be appropriate and no further change is proposed. The policy allows for additional growth where it would be in conformity with other policies within the plan

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.24
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The text in question is new.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

For greater clarity and robustness amend "Proposals must be of a size, design and scale that seek to meet an identified need and respects the setting." to "Proposals must be of a size, design and scale that seek to meet an identified need in the settlement itself and respects the local setting." Without this change an identified need in Breckland could be used to justify development in a settlement where no specific need exists.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.23
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The text in question is new.		
Do you wish to appear at the Examination in Public?		No					

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Saham Toney Parish Council strongly supports the principle that significant benefit to the local community must be shown before any proposal is permitted, but note our support is subject to our comments on paragraph 3.22.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1131135	Full Name	Mr Ian Martin	Organisation Details	Yaxham Parish Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy HOU 04 - Rural Settlements
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Yaxham welcomes the adoption by the emerging Local Plan of a policy element at the centre of the recently made Yaxham Neighbourhood Plan, namely supporting "development [that] avoids coalescence of settlements" – HOU 03 point 4., HOU 04 point 5., and with different wording HOU 05.

On this basis it is considered that this element of the Plan as it affects the Parish of

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy HOU 04 - Rural Settlementen
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	This is a completely revised policy.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The classification of Saham Toney as a rural settlement with boundary is fully supported by the Parish Council. But note: Other aspects of the Policy are unsound as noted in a separate comment..

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1131636	Full Name	Blue Oak Developments	Organisation Details	Blue Oak Developments
Agent ID	1130567	Agent Name	Mr Geoff Armstrong	Agent Organisation	Armstrong Rigg Planning

Comment Details

Title		Number	Policy HOU 04 - Rural Settlement
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	These policies were not included in draft versions of the plan and this is therefore the first time they have been consulted on.		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy HOU 04 " Rural Settlements with Boundaries Policy HOU 04 states that appropriate development will be allowed immediately adjacent to the settlement boundary of the Rural Settlements with Boundaries, subject to being supported by other policies within the Local Plan (with the exception of Policy GEN 05 Settlement Boundaries) and where all of the following criteria are satisfied. We support criteria 4, but consider criteria 1, 2, 3 and 5 to be unsound as set out below: 1. It is minor development of an appropriate scale and design to the settlement of up to 5 dwellings: No justification is given for why development of more than 5 dwellings would be inappropriate in the Rural Settlements with Boundaries. We have

reviewed the settlements in this category and note that the majority of them are already characterised by suburban style estates of many more than 5 dwellings. It is therefore clear that developments at a scale greater than 5 dwellings are not by definition inappropriate in these settlements. This policy criteria is therefore considered to be too arbitrary a figure and it is not justified in that it would prevent larger schemes from being delivered that would provide more community benefits in terms of contributions to affordable housing and tariff style planning obligations (section 106 planning obligations), which Planning Practice Guidance states cannot be sought from developments of 10-units or less (ID: 23b-031-20161116). Emerging Policy HOU 07 is in accordance with this national guidance in requiring housing contributions from developments of 11 or more units. In the context of the above, it is clear that there is no reasoned justification for restricting developments in the Rural Settlements with Boundaries to no more than 5 dwellings and that this criteria would have a negative impact on securing community benefits from these developments. This fact is further compounded by the supporting text to the policy at Paragraph 3.16 which states that, while larger developments that could deliver affordable homes are not considered appropriate in these settlements, it is " highly likely that there will continue to be a need for the provision of affordable homes in these communities " . This statement is clearly contradictory in that recognises a need for affordable homes, but supports a policy that will specifically restrict the potential for delivering affordable homes. In recognising a need for affordable housing in the Rural Settlements with Boundaries , but not effectively planning for its delivery, this policy can clearly not be considered justified, effective or positively prepared. It is also considered to be contrary to national policy at NPPF Paragraph 54 which requires local planning authorities to plan for housing to reflect local needs and particularly affordable housing, where it states that authorities should consider allowing some market housing that would facilitate the provision of additional affordable housing to meet local needs. Recommendation: Amend policy criteria to "It is development of an appropriate scale and design to the settlement". 2. It would not lead to the number of dwellings in the settlement increasing by more than 5% from the date of adoption of the Plan. The settlement refers to the number of dwellings inside the defined settlement boundary: No justification or evidence is presented as to why it would be inappropriate for the Rural Settlements with Boundaries to grow by more than 5%. Emerging Policy HOU 02 " Level and Location of Growth identifies that following the first 6 years of the plan period between 2011-2017 these settlements have either accommodated or

have committed development totalling 902 dwellings. There are 17 Rural Settlements with Boundaries identified in the plan, which on average appear to have less than 500 dwellings each within the settlement boundary. This indicates that the total number of dwellings in the Rural Settlements with Boundaries is somewhere around 8,500 (although this is likely to be an overestimate). 5% of 8,500 is just 425 dwellings, which is significantly lower than the 902 dwellings already completed or committed in the first 6 years of the plan period. It is clear from the above that the Rural Settlements with Boundaries have already been considered to be sustainable locations for growth of more than 10% in just 6 years of the plan period and yet they are to be restricted to just 5% more growth for the remaining 18 years of the plan. This is considered to be overly restrictive and unsound as it would be ineffective in meeting the ambition of this policy to flexibly allow for growth in rural areas to " support local services, balance residential needs and employment opportunities and seeks to enhance the rural economy, thereby helping to maintain the vitality of rural communities ". It is also true that the growth so far in the Rural Settlements with Boundaries has not been equal, with some settlements having grown or due to grow substantially, while others have very little committed growth. This raises a question as to why it is considered acceptable for some Rural Settlements with Boundaries to grow by over 10%, while others are restricted to just 5% growth. If the Local Plan is committed to allowing growth to maintain the vitality of rural communities, this policy criteria needs amending to allow for more growth in settlements that have not already seen significant levels of growth. It is also clear that the figure of 902 homes either completed or committed in the Rural Settlements with Boundaries over the first 6 years of the plan period represents a not insignificant proportion of total growth. By restricting further growth in these communities, the Local Plan will effectively remove an important source of housing land supply at a time when the Council cannot demonstrate a 5 year supply of housing. Recommendation: Amend policy criteria to " It would not lead to the number of dwellings in the settlement increasing significantly above that at the date the plan is adopted. Significance will be judged with reference to the sustainability of the settlement and the capacity of local services and infrastructure to accommodate new development. The settlement refers to the number of dwellings inside the defined settlement boundary ". 3. Development provides a significant community benefit: We consider that in its current form this requirement does not meet the requirements of NPPF Paragraph 204 which states that planning obligations should only be

sought where they are fairly and reasonable related in scale and kind to the development. The policy currently restricts proposals to just 5 dwellings and yet requires "significant community benefits" . This implies that the Council would seek planning obligations that are not fairly and reasonably related in scale and kind to the potential developments and suggest that planning permissions could essentially be bought by the highest bidder who is willing or able to make the biggest contribution. In respect of the above, this policy criteria is not considered sound in its current form as it is contrary to national policy. This said, we do support some parts of the detailed justification for this policy contained at paragraphs 3.21-3.23 which set-out what will be considered to be a community benefit. This list includes demonstrations of conformity with aspirations identified in a neighbourhood plan; demonstrations of local social or economic needs; and provision of a community facility, asset or financial contributions towards such facilities which meet an identified need established in documentation such as a Parish or Neighbourhood Plan. We would support these elements in so far as they are based on needs identified in a made neighbourhood plan or involve the objective assessment of local social or economic needs. However, the list also includes demonstrations of local support such as the views of the parish council or surveys of local opinion prepared independently. These elements are far too subjective and cannot be relied upon to ensure that sufficient growth comes forward to support local services and maintain the vitality of rural communities. Recommendation: To ensure conformity with national policy, this criteria needs amending to avoid it being interpreted as requiring a level of contribution that is not fairly related to the size of proposed developments. We recommend the following revised wording: "The development meets identified residential, social and/or economic needs and would benefit the local community through supporting local services, facilities or assets".

4. The design contributes to preserving, and where possible enhancing, the historic nature and connectivity of communities: We agree that this is an important consideration in promoting sustainable development in the Rural Settlements with Boundaries .

5. The development avoids coalescence of settlements. In order for this policy criteria to be considered sound, more information is needed to define what is meant by a settlement. It is noted from the settlement boundary maps for each of the Rural Settlements with Boundaries , that some of the settlements comprise more than one settlement boundary (as areas between two slightly separated built up areas have been excluded from the boundary). It is also noted that in some case, built up areas that are in close proximity to settlement

Local Plan Pre-Submission - Comments and Response Schedule

boundaries have been excluded from them. We consider that further explanation is needed to define the term settlement and to clarify that no restriction should be placed on developments that would lead to the coalescence of two parts of the same settlement, unless other material considerations such as landscape or heritage indicate development should be restricted. Recommendation: Include a definition of settlement that specifies that Rural Settlements with Boundaries can constitute more than one settlement boundary and/or built up area and that the coalescence of these areas is not restricted. Conclusion This letter has detailed our clients concerns regarding the specific policy criteria set by Policy HOU 04 " Rural Settlements with Boundaries and Policy HOU 05 " Small Villages and Hamlets Outside of Settlement Boundaries. We support the principle set out in these policies that these settlements should be considered suitable for appropriate development, but consider that the current criteria set-out to judge appropriateness do not meet the tests of soundness set out at National Planning Policy Framework (NPPF) Paragraph 182 (i.e. whether it is positively prepared, justified, effective and consistent with national policy). We have made several recommendations to amend the criteria set by these policies to ensure that the Local Plan can be considered sound.

Breckland Council Response

Officer Response

The policy intention is to allow for small scale growth in areas that wouldn't necessarily be places that development would come forward. Small scale growth would be in conformity with paragraph 28 of the NPPF in helping to support a prosperous rural economy and boosting the housing supply in line with paragraph 47 of the NPPF. Affordable housing provision in rural settlements is supported by the affordable housing exceptions policy (HOU 14).

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	609986	Full Name	Mrs Erica Whettingsteel	Organisation Details	Managing Director EJW Planning Ltd
Agent ID	598312	Agent Name	Mrs Erica Whettingsteel	Agent Organisation	Managing Director EJW Planning Ltd

Comment Details

Title		Number	Policy HOU 04 - Rural Settlement
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The wording of the draft policy has changed		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The listed criteria are too prescriptive, particularly bullet points (1) and (2) which limit the number of dwellings to be provided. This does not take account of larger brownfield sites outside of settlement boundaries coming forward that may provide for a greater increase in housing numbers. The housing number limit would affect the viability of redeveloping brownfield sites which often have greater development costs. The policy is therefore unsound as it does not accord with the NPPFs objective for Boosting significantly the supply of housing (paragraph 47) or Paragraph 17 that encourages the development of brownfield sites in preference to greenfield sites.

Local Plan Pre-Submission - Comments and Response Schedule

Breckland Council Response

Officer Response

The policy intention is to allow for small scale growth in areas that wouldn't necessarily be places that development would come forward. Small scale growth would be in conformity with paragraph 28 of the NPPF in helping to support a prosperous rural economy and boosting the housing supply in line with paragraph 47 of the NPPF. The policy does not restrict development on brownfield sites and, as such, is also in accordance with Paragraph 17 of the NPPF.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129859	Full Name		Organisation Details	Breckland Bridge Ltd
Agent ID	1126421	Agent Name	Mrs Sarah Hornbrook	Agent Organisation	Associate Planner Ingleton Wood

Comment Details

Title		Number	Policy HOU 04 - Rural Settlement
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

On behalf of Breckland Bridge Limited, we strongly support the sentiments expressed in paragraph 3.17, specifically the need to maintain the vitality of rural communities, support local services and enhance the rural economy. In addition, the general approach promoted in paragraph 3.17, whereby rather than seeking to restrict development to within existing Settlement Boundaries it will be possible to secure planning permission on appropriate sites outside the Settlement Boundary, to provide a sensitive approach to rural housing, which is responsive to local circumstances, is also supported. However, it is considered that proposed Policy HOU 04 includes elements that are unjustified, and consequently unsound.

Proposed Policy HOU 04 allows appropriate development immediately adjacent to the Settlement Boundary, subject to being supported by other policies within the Local Plan and where all of five criteria are satisfied. These include two restrictions on the quantum of development “ no more than 5 dwellings will be allowed on any site, and the cumulative total of new dwellings adjacent to any particular settlement must not exceed a 5% increase in the total number of dwellings at the date of Adoption of the Plan. It is considered that these restrictions are not justified, and there is no clear explanation of why these levels of development are deemed the appropriate limits for rural settlements. Limiting development to no more than 5 units in such locations may make development unviable, given the infrastructure costs often associated with new development. A greater number of units is far more likely to provide sufficient returns to enable a developer / landowner to make a scheme viable. In addition, this scale of development would make no contribution towards local infrastructure, and would not deliver affordable housing. A further requirement of proposed Policy HOU 04 is to demonstrate that there will be a significant community benefit arising from the proposed development. This is considered wholly unjustifiable; residential developments in rural locations are often subject to local opposition, and if a planning application is able to demonstrate that it accords with the Adopted Development Plan, or material considerations exist to justify development, it should not be refused just because there is local opposition (or a lack of community support) which could be based entirely on issues which do not constitute material planning considerations. Community aspirations could easily be unattainable, and are often unquantifiable; a requirement to deliver such aspirations could render a scheme unviable. Based on the foregoing, it is considered more appropriate to use the Settlement Boundary as a positive policy tool; enabling the identification of sites that are, in principle, suitable for development and which would provide a logical extension to the village, whilst also creating a clear defensible boundary. As well as providing a degree of control and certainty in respect of the future location of developments within rural settlements, the suggested approach has the potential to deliver wider community benefits. More specifically, a series of small scale developments around the settlement boundary, as envisaged by the current proposed Policy, will result in developments avoiding the need to deliver affordable housing. Furthermore, by virtue of their size, it is unlikely that any developments will generate sufficient financial obligations which could be used to enhance community facilities within the locality. In contrast, a larger development would

Local Plan Pre-Submission - Comments and Response Schedule

potentially be able to contribute to both affordable housing, for which there is likely to be a local need, and the provision of enhanced community facilities. It is considered that this approach would be entirely in accordance with paragraph 157 of the NPPF, which states that Local Plans should plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this framework. In light of the above, it is proposed that the settlement boundary of Colkirk should be extended slightly from that currently proposed, to include an area of land measuring approx. 0.95 hectares located to the west of Whissonsett Road (see attached plan with site outlined in red). This proposal provides a logical extension to the village and allows any future development in the village during the plan period to be accommodated in a coordinated manner. The attached aerial view of the site shows that the site is clearly separated from the agricultural land to the south and east by a mature boundary hedge, and its development would balance the estate-style development on the opposite side of Whissonsett Road (Timperley Estate), providing a defensible boundary. Furthermore, the village facilities continue further south on Whissonsett Road, with both the allotments and playing fields located beyond the site. An initial review of the highways and transportation issues affecting the site has previously been undertaken by Richard Jackson Engineering Consultants, and submitted in support of our Representations on the Preferred Site Options and Settlement Boundaries Consultation (also appended to this Representation for clarity). This highlights that it is possible to provide a pedestrian footway along Whissonsett Road, to link in with the existing provision on School Road and provide a greatly improved and safer pedestrian link from the village to the playing fields and allotments south of the village. The site is located within Flood Zone 1 (Low Risk) and there are no heritage assets in the immediate vicinity. As previously described, the site is enclosed by a mature hedge, which provides a defensible boundary, and would screen views of the development from the surrounding countryside. The site is, consequently, entirely deliverable, in accordance with the NPPF definition.

Breckland Council Response

Officer Response

The policy intention is to allow for small scale growth in areas that wouldn't necessarily be places that development would come forward. Small scale growth would be in conformity with paragraph 28 of the NPPF in helping to support a prosperous rural economy and boosting the housing supply in line with paragraph 47 of the NPPF. The policy does not restrict development on brownfield sites and, as such, is also in accordance with Paragraph 17 of the NPPF.

Local Plan Pre-Submission - Comments and Response Schedule

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.17
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The text in question is new.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

This paragraph twice mentions employment with respect to Policy HOU 04. But Policy HOU 04 deals with housing (ref its criteria 1) and not development for employment. Hence either employment references should be removed from 3.17 or criteria for such development should be added to Policy HOU 04 or a new policy for employment in rural settlements.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

It is considered that the settlements listed in Policy HOU 04 have services and facilities that will need to be supported and strengthened over the plan period. It is considered that there is a direct relationship between directing housing to the most sustainable locations and the ability to support key services and facilities within these locations. Further policies within the plan seek to address the issue of employment both within and outside of General Employment Areas.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1131105	Full Name	Nicol Perryman	Organisation Details	c/o Savills Great Hockham Estate
Agent ID	1131089	Agent Name	Miss Nicol Perryman	Agent Organisation	Planner Ingleton Wood LLP

Comment Details

Title	Paragraph	Number	3.17
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4 - Is the plan positively prepared?	No
5 - Is the plan justified?	No	6 - Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	No	10 - Have you raised this at Issues and Options?	No	11 - If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

On behalf of the Great Hockham Estate, we support the sentiments of paragraph 3.17, which seeks to allow growth outside of settlement boundaries of the existing rural settlements provided that a sensitive approach to sustainable rural housing is followed, which is responsive to local circumstances. We agree that a sensitive level of growth would support local services and allow the vitality of rural communities to be maintained, in line with the NPPF.

13 - If you feel the plan is unsound, please tell us why

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1131105	Full Name	Nicol Perryman	Organisation Details	c/o Savills Great Hockham Estate
Agent ID	1131089	Agent Name	Miss Nicol Perryman	Agent Organisation	Planner Ingleton Wood LLP

Comment Details

Title		Number	Policy HOU 04 - Rural Settlements
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

On behalf of the Great Hockham Estate, we support the sentiments expressed in paragraph 3.17, which constitutes the supporting text to Policy HOU 04. Paragraph 3.17 seeks to allow growth outside settlement boundaries of the existing rural settlements provided that a sensitive approach to sustainable rural housing is followed, which is responsive to local circumstances. We agree that a sensitive level of growth would support local services and allow the vitality of rural communities to be maintained, in line with the NPPF. However, it is considered that Policy HOU 04 is not consistent with the principles outlined in its supporting text, as the Policy itself includes elements that are not justified, not positively

prepared and contrary to the NPPF. Consequently, the Policy is considered unsound. Proposed Policy HOU 04 allows appropriate development immediately adjacent to the settlement boundary, subject to being supported by other policies within the Local Plan and where all of five criteria are satisfied. We support the principle of co-ordinated growth adjacent to the settlement boundary, however, it is considered that the proposed criteria is too prescriptive and ultimately would not promote sustainable development. The first two criteria comprise restrictions on the quantum of development, requiring no more than 5 dwellings to be allowed on any site, and the cumulative total of new dwellings adjacent to any settlement not exceeding a 5% increase in the total number of dwellings at the date of Adoption of the Plan. It is considered that these restrictions are not justified and there is no clear explanation of why these levels of development are deemed the appropriate limits for rural settlements. Limiting development to no more than 5 units in such locations may make development unviable, given the infrastructure costs often associated with new development. A greater number of units would provide sufficient returns to enable a developer / landowner to make a scheme viable. In addition, this scale of development would make no contribution towards local infrastructure and would not deliver affordable housing. Compounded by the lack of site specific allocations for any of the rural settlements with a boundary, this Policy does not consider the different needs of rural settlements and the growth that they may individually require over the Plan period. A further requirement of proposed Policy HOU 04 is to demonstrate that there will be a significant community benefit arising from the proposed development. This is considered wholly unjustifiable; residential developments in rural locations are often subject to local opposition, and if a planning application is able to demonstrate that it accords with the Adopted Development Plan, or material considerations exist to justify development, it should not be refused just because there is local opposition (or a lack of community support) which could be based entirely on issues which do not constitute material planning considerations. Community aspirations could easily be unattainable, and are often unquantifiable; a requirement to deliver such aspirations could render a scheme unviable. Moreover, even if local support is gained for residential development, the level of growth is ultimately limited by the arbitrary criteria on quantum of development. This negates the ability for communities to strategically plan for their individual local needs. Consequently, this would render the neighbourhood planning process too restrictive for the local communities that wish to see growth beyond 5% and 5 dwellings. Accordingly, it is

Local Plan Pre-Submission - Comments and Response Schedule

considered that this obstructive approach does not promote the core principles of neighbourhood planning set out in the NPPF. Based on the foregoing, it is considered more appropriate to use the settlement boundary as a positive policy tool; enabling the identification of sites that are, in principle, suitable for development and which would provide a logical extension to the village, whilst also creating a clear defensible boundary. As well as providing a degree of control and certainty in respect of the future location of developments within rural settlements, the suggested approach of identifying site specific allocations or co-ordinated extensions to the settlement boundary has the potential to deliver wider community benefits. More specifically, a series of small scale developments around the settlement boundary, as envisaged by the current proposed Policy, will result in developments avoiding the need to deliver affordable housing. Furthermore, by virtue of their size, it is unlikely that any developments under this proposed Policy will generate sufficient financial obligations which could be used to enhance community facilities within the locality. In contrast, a larger, focussed development would potentially be able to contribute to both affordable housing, for which there is likely to be a local need, and the provision of enhanced community facilities. It is considered that this approach would be entirely in accordance with paragraph 157 of the NPPF, which states that Local Plans should plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this framework.

Breckland Council Response

Officer Response

The policy intention is to allow for small scale growth in areas that wouldn't necessarily be places that development would come forward. Small scale growth would be in conformity with paragraph 28 of the NPPF in helping to support a prosperous rural economy and boosting the housing supply in line with paragraph 47 of the NPPF. The policy does not restrict development on brownfield sites and, as such, is also in accordance with Paragraph 17 of the NPPF.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1128366	Full Name	Mr Richard Smith	Organisation Details	on behalf of Norfolk County Council NPS Prop
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy HOU 04 - Rural Settlement
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

We believe the proposed criteria to allow development adjacent to settlement boundaries in policy HOU 04 is too prescriptive and would not result in a very sustainable form of development. The policy restricts development to no more than 5 units of accommodation. It is considered that the amount of housing should be dependent upon the individual site characteristics, scale of the village, site size, viability (brownfield sites), accessibility etc. This would ensure an appropriate and sustainable scale of development is allowed for each site/village in accordance with NPPF advice. For example Norfolk County Council owns Gressenhall Depot a 0.84 hectare brownfield site adjacent to the settlement boundary of Beetley. The site

Local Plan Pre-Submission - Comments and Response Schedule

was included as a reasonable alternative for development in Breckland Councils Emerging Site Options document. The site scored well being brownfield and adjacent to the settlement boundary and was considered to be deliverable in the 2015 SHLAA. However the site was not allocated for development or included within a revised settlement boundary. Although policy HOU 04 would allow for development immediately adjacent to settlement boundaries, it restricts the number of units to 5. The housing number limit would affect the viability of redeveloping this brownfield site which will have greater development costs and prevent the redevelopment for a more appropriate use. This may result in less sustainable greenfield land being developed. It also highlights the problem with this threshold as it fails to recognise site specific issues and constraints. We believe policy HOU 04 should be less prescriptive in terms of housing numbers and should be worded to be more responsive to individual site circumstances/sustainability criteria. Policy HOU 04 is considered to be unsound as the policy is too prescriptive and does not allow individual site circumstances to be considered when developing sites outside of the settlement boundary. The policy would prevent a proper consideration of sustainability issues e.g. how many dwellings would be appropriate on each site taking into account site context, individual site constraints, settlement size, services and facilities and local housing need. The policy would not, therefore, maximise the potential for sustainable development as a one rule fits all approach has been taken for all development outside of settlement boundaries. This would make the policy and plan ineffective and unsound.

Breckland Council Response

Officer Response

The policy intention is to allow for small scale growth in areas that wouldn't necessarily be places that development would come forward. Small scale growth would be in conformity with paragraph 28 of the NPPF in helping to support a prosperous rural economy and boosting the housing supply in line with paragraph 47 of the NPPF. The policy does not restrict development on brownfield sites and, as such, is also in accordance with Paragraph 17 of the NPPF.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.22
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The text in question is new.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

1) Replace "Evidence could comprise" with "Evidence shall comprise". there must be no doubt about what evidence is required in support of a proposal. 2) Re demonstration of local support: (a) delete "e.g." since this leaves too much room for interpretation resulting in necessary evidence not being submitted; (b) see our comment to paragraph 3.21 regarding evidence of parish council support; (c) a single defined method of surveying local opinion must be stated to ensure a consistent approach in all cases. As a minimum it must be specified that either all households or all eligible voters in a parish must be canvassed; (d) As written a developer could address just one of the example means of showing evidence of

Local Plan Pre-Submission - Comments and Response Schedule

local support and satisfy the criteria in this respect: this is unacceptable - parish council support and a survey of local opinion, at least, must be obligatory forms of evidence; (e) in the 3rd and 4th bullet points incorrect terminology has been used - "adopted Neighbourhood Plan" should be "made Neighbourhood Plan".

Breckland Council Response

Officer Response

Comments noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.21
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The text in question is new.		
Do you wish to appear at the Examination in Public?		No					

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

1) Amend "Applicants should demonstrate ..." to "Applicants shall demonstrate..." since demonstration of adequate evidence must be obligatory. 2) It is unclear how a developer would demonstrate "appropriate" support by the parish council. Breckland's Neighbourhood Plan Officer has repeatedly told Saham Toney Parish Council that the Parish Council cannot consult with developers during the process of an application, although the Parish Council would be willing to do so. Define how a developer would demonstrate parish council support in practice.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1130821 Full Name Mr Pablo Dimoglou
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Policy HOU 04 - Rural Settlementen
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4 - Is the plan positively prepared?	Yes
5 - Is the plan justified?	Yes	6 - Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10 - Have you raised this at Issues and Options?	No	11 - If you have not raised this issue before please state why	As District Councillor, I did raise issues at the Local Plan Working Group meetings but was unable to comment for much of the proceedings due to having declared a personal interest		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

I believe the Yaxham and Clint Green should be classified as a Local Service Centre. Additionally - the two settlements of Yaxham and Yaxham Clint Green have always been seen as one village. There has been an aspiration locally to allow development between the two settlements, bringing them closer together. This policy seems to prevent that. ** Further,in relation to other communities - if a settlement which is not a Local Service Centre due to the lack of services - is able to progress and attract beneficial services for it's residents - such as schools, bus routes etc we must allow them to grow. The policy HOU 4 is far too restrictive, and

Local Plan Pre-Submission - Comments and Response Schedule

I feel will allow Nimbyism to strangle growth - even where growth is appropriate and needed.

Breckland Council Response

Officer Response

Clint Green and Yaxham collectively have the services and facilities to be considered a Local Service Centre and this was originally proposed through the emerging Local Plan. Through Local Plan Working Groups it was argued that the distance between Yaxham and Clint Green is approximately 1km. The school is located in Clint Green and, therefore, the distance between the two settlements was considered to be too great for the settlements to be jointly designated as a Local Service Centre. Yaxham on its own merits would only have 4 of the services and facilities and, would therefore, fall under the policy HOU 04.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy HOU 04 - Rural Settlements
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	This is a completely revised policy.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

1) The policy fails to clarify that a "rural settlement" comprises an entire parish rather than just the developed village. This lack of clarity is intensified by earlier inconsistency of terms (i.e. use of the word village instead of settlement). 2) "Appropriate development will be allowedsubject to being supported by other policies within the Local Plan*..." to be amended to "Appropriate development will be allowedsubject to being supported by other policies within the Local Plan* and in made Neighbourhood Plans..." in order to reflect the weight that must be given to made neighbourhood plans when making planning decisions. 3) Amend criteria (2) from "It would not lead to the number of dwellings..." to "It would not

Local Plan Pre-Submission - Comments and Response Schedule

lead to the cumulative number of dwellings...", since as written it can be interpreted that any one development could increase the number of dwellings by 5%. 4) A means of establishing the number of dwellings inside the settlement boundary should be added or the actual numbers stated in the Plan. Clarity is also required as to how that number will be measured on the date of the Plan's adoption. This date should more reasonably be the start of the Plan period in 2011 since that is when the housing allocations commence. As specified there is no clarity or certainty for planning officers, developers or the local community as to what the numerical cap is. 5) Criteria (4) is entirely subjective and requires better definition as to what would be acceptable in order to be rigorously applied. 6) With reference to our comment (5) to Policy HOU 02 there is no clear, justifiable and logical link between the fact that overall allocation in the 17 settlements is 150 but each could see development up to 5% of the number of dwellings within the settlement boundary. Without provision of housing numbers within the settlement boundaries it is not possible to be exact, but it is likely that applied across all 17 settlements the 5% limit would result in around double the number of houses as the 150 allocation. If the intention is to allow development within a range of numbers, that should be stated in the policy (subject to the agreement of the 17 parish councils to their individual allocations). 7) Criteria should be added to prevent the co-location of more than one development of up to 5 houses - i.e. to prevent one development of 5 houses immediately adjacent to another.

Breckland Council Response

Officer Response

Rural settlements are defined as the area that is within the settlement boundary. This is made clear on the policies map.

It is recognised that further information is required as to the calculation of the 5%. It is proposed that this is to be based purely on the number of dwellings within the defined settlement boundary and the 5% figure is then added to this. It may be necessary to include a modification to the document to set out the level of development within the villages, this will be discussed as part of the hearing sessions.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136859	Full Name	Mr Richard Crosthwaite	Organisation Details	Gladman Developments Limited
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy HOU 04 - Rural Settlements
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy HOU 04 " Rural Settlements with Boundaries 6.7.1 Whilst recognising that these settlements are lower down the settlement hierarchy, we consider that the proposed approach is not consistent with the national policy for reasons as outlined in response to Policy HOU 03. However, this policy also adds an additional restrictive policy stance than Policy HOU 03 were it seeks to limit the development to up to 5 dwellings and the number of dwellings in the settlement increasing by 5% from the adoption of the Plan. The intentions of this policy will lead to having an adverse impact on the ability of these areas to grow sustainability and will limit their ability to deliver affordable housing given that Policy HOU 07 only seeks

Local Plan Pre-Submission - Comments and Response Schedule

affordable housing contributions from sites of 11 or more dwellings. 6.7.2 Gladman would also question the approach taken in the supporting text which indicates that development will only be allowed should there be a demonstration of local support. This is not a land use issue, as such, it should form no basis in the decision making process. Indeed, of particular concern is the method of measuring the level of support. A Town/Parish Council is not representative of everyone in a particular community and not all members of the local community would have input into the parish council consultation responses to planning applications. Similarly, participation through a neighbourhood planning exercise will vary and it would likely be those who are opposed to developments to participate in such exercises rather than those who are in support. Notwithstanding this, no criteria is provided on what level of support is required to demonstrate this. As such, this is not considered consistent with the presumption in favour of sustainable development or paragraph 154 of the Framework. A development proposal could be considered acceptable and sustainable on all matters, but could still be refused on the basis of lack of community support that may not have been based on planning matters.

Breckland Council Response

Officer Response

The policy intention is to allow for small scale growth in areas that wouldn't necessarily be places that development would come forward. Small scale growth would be in conformity with paragraph 28 of the NPPF in helping to support a prosperous rural economy and boosting the housing supply in line with paragraph 47 of the NPPF. The policy does not restrict development on brownfield sites and, as such, is also in accordance with Paragraph 17 of the NPPF.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1133624	Full Name	Mr James Millard	Organisation Details	Millard Tuddenham
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Breckland Local Plan Pre-Submission Publication	Number	
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The PSP as currently proposed is fundamentally flawed/unsound in that it has serious inconsistencies with local and national planning policy as well as fundamental errors with site and hierarchy of settlements selection process. See attached.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The attached letter makes the case that Yaxham should be a Local Service Centre and that the proposed site LP[113]005 should be allocated through the Local Plan.

Clint Green and Yaxham collectively have the services and facilities to be considered a Local Service Centre and this was originally proposed through the emerging Local Plan. Through Local Plan Working Groups it was argued that the distance between Yaxham and Clint Green is approximately 1km. The school is located in Clint Green and, therefore, the distance between the two settlements was considered to be too great for the settlements to be jointly designated as a Local Service Centre. Yaxham does not, therefore, meet the criteria to be classified a Local Service Centre. As a result no sites will be allocated through the Local Plan.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1125802	Full Name	Ms Geraldine Sayers Cowper	Organisation Details	Parish Clerk Banham Parish Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.16
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

LP(003)012: Farmland behind Wayland Way: This is agricultural land outside the village boundary and not immediately adjacent to it, as required by Policy HOU 03, but next to a designated open space (LP(003)09). Building here will also contravene HOU 03 by failing to conserve or enhance the historic nature of the village, as it is part of the countryside which envelopes it. LP(003)09: Open Space behind Wayland Way: Designated Open Space adjoining farmland. With LP(003)012 will create increased traffic movement and disruption in an area where many elderly and disabled people live. This land was previously turned down for development as needing a full arcghaeological survey. LP(003)003: Land to the

Local Plan Pre-Submission - Comments and Response Schedule

South of Greyhound Lane: Outside the village boundary and within the Banham Conservation Area. Risk of surface water flood and fluvial flood risk. Situated near a sharp bend on a single track lane with no visibility which is unsuitable and would be hazardous because of the amount of increased traffic generated. Banham has an elongated shape spread over 6.24 square miles and the Parish Council anticipates that most users of a play area at this location would not walk to the venue as being too far, as is the case with most children being driven to the Primary School in the centre of the village. The part of Greyhound Lane next to the proposed area has received many complaints about parking, especially from local farmers unable to access their fields because of obstruction. The point at 3.209 (p 94 of the pre-submission document) of a footpath link from the proposed new development with this site is of concern to the Parish Council, as it appears that this can only be achieved by crossing Greyhound Lane, which it considers to be dangerous, especially for any children who may wish to use the proposed facility. Once past the existing houses, there is no pedestrian refuge on either side of Greyhound Lane and no space to create one on the north side. Banham already has a fully equipped play area in two sections; an enclosed one for toddlers and one for older children up to 12, at the Community Centre, with access to a large car park.

Breckland Council Response

Officer Response

It is proposed that the housing allocation is focused on sites LP[003]009 and LP[003]012. The allocation is situated within a sustainable location within the village. The designated open space will be redistributed to site LP[003]003, there will be no residential development on this site. Site LP[003]012 has been assessed through the Historic Characterisation Study, which stated that "Development proposals must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken as to inform an appropriate design response. The setting of the conservation area will be an additional factor in the formation of proposals." As such one of the key development considerations states that "Development proposals should seek to protect and enhance the setting of Banham Conservation Area"

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1134348	Full Name	Maggie Oechsle	Organisation Details	NP4Yaxham" Yaxham Neighbourhood Plan W
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy HOU 04 - Rural Settlement
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Yaxham welcomes the adoption by the emerging Local Plan of a policy element at the centre of the recently made Yaxham Neighbourhood Plan, namely supporting “development [that] avoids coalescence of settlements” – HOU 03 point 4., HOU 04 point 5., and with different wording HOU 05. On this basis it is considered that this element of the Plan as it affects the Parish of Yaxham meets the test of “soundness” in that it is:

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy HOU 04 - Rural Settlementen
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	This is a new policy		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

While the setting of an upper limit to development in rural settlements with boundaries is welcomed justification needs to be added for this criteria stated (5% of dwellings within the settlement boundary) specifically for each rural settlement, since the sustainability conditions in each will differ. While some may be able to support 5% growth others may not, or indeed, none may be able to do so. When the Plan is adopted it must state the exact number of dwellings within the settlement boundary of each settlement so that the number is clear to all, rather than hidden in Breckland Council's database. With regard to development "immediately adjacent to the settlement boundary", in the case of Saham Toney,

Local Plan Pre-Submission - Comments and Response Schedule

and many of the other sixteen rural settlements, existing development, and hence the settlement boundary largely follows a ribbon pattern along side roads. Policy HOU 04 omits consideration of access to new development sites adjacent to the boundary. Criteria to guide what is and is not acceptable in this respect should be added.

Breckland Council Response

Officer Response

The policy intention is to allow for small scale growth in areas that wouldn't necessarily be places that development would come forward. Small scale growth would be in conformity with paragraph 28 of the NPPF in helping to support a prosperous rural economy and boosting the housing supply in line with paragraph 47 of the NPPF. Applications for development in locations adjacent to the settlement boundary will still need to adhere to all other policies in the Local Plan related to amenity, design and access, so the location of the development it is not a guarantee of permission. It may be necessary to include a modification setting out the precise number of houses which makes up the 5% upper limit for each named settlement, however this would be subject to discussion at the hearing sessions.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1132253	Full Name	Glavenhill Strategic Land	Organisation Details	Glavenhill Strategic Land
Agent ID	1132250	Agent Name	Jane Crichton	Agent Organisation	Lanpro Services

Comment Details

Title		Number	Policy HOU 04 - Rural Settlements
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	During the previous consultation periods the village was proposed to be designated as a Local Service Centre and my client's site was the preferred site LP[113]007. The declassification of the village and therefore the site happened in February 2017 outside of any formal consultation period. We did make representation to the Local Plan Working Group in March 2017.		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Local Plan Pre-Submission - Comments and Response Schedule

Yaxham was previously designated to be a Local Service Centre (LSC) and this was consulted at the regulation 18 stage (Sep-Oct 2016). It was Breckland officers professional opinion that Yaxham met the criteria as published in the preferred options consultation of the emerging Local Plan September 2016. Yaxham was proposed to be a LSC within the Breckland Emerging Local Plan as it was considered by your officers to meet Brecklands criteria of having all 5 local services within 800m (10 min walk) which are: Public Transport Community Facility Employment Shop/Post Office School This designation was informed by the Local Service Centre Topic Paper published in May 2015 and was prepared following the Issue and Options Consultation and included comments that had been received at that stage and provides an analysis and recommendation on the potential of LSC villages. Officers also confirmed this in their reports to the Local Plan Working Group (LPWG) dated 15th July 2016, 14th December 2016 and 3rd February 2017. At the meetings of the 15th July and 14th December 2016 this approach to Yaxham being a LSC was agreed and endorsed by the LPWG. The site was proposed to be the preferred site for growth in Yaxham in the Regulation 18 preferred site options (September 2016) the site (ref: LP[113]007) is noted as (emphasis added): The site itself is within 800m (10 minutes walking distance) to most key services, meaning that the site is sustainable and will limit the use of personal car journeys. There is a footpath to the school at Clint Green. The site sits within the Wensum and Tud Settled Tributary Farmland. Development considerations in this area should seek to conserve the existing rural road pattern, resist upgrade/calming measures which could have an urbanising influence; ensuring that any new development reflects the existing material and stylistic vernacular within the settlements No fundamental constraints to the development of the site have been identified. In the accompanying Sustainability Appraisal (SA) Breckland offices conclude that The Preferred Site LP[113]007 scores positively against the SA objectives, particularly in regards to Land, Water and Soil Resources, Inclusive Communities and Population and Human Health. The site does receive a negative outcome for SA objective 1 as it is greenfield but it also acknowledges that all sites submitted are greenfield and therefore all sites proposed scored a negative outcome. In the officers report to the LPWG of 3rd February 2017 the officers confirm that further work had been undertaken on certain settlements proposed to be a LSC specifically in relation to employment and public transport. This further work shows that Yaxham does meet the criteria which has been applied and undertaken in a consistent manner across the District. In conclusion to Yaxham, officers write Overall it is considered that the

Local Plan Pre-Submission - Comments and Response Schedule

services and facilities within the parish support the whole of the parish and LSC status will help to protect and maintain these facilities. At that meeting members voted contrary to officer recommendation to make Yaxham a LSC due to Yaxham school being over 800m walking distance from the village. Yaxham is now classified as being a Village with Boundaries and residential development is restricted to the principles set out in policy HOU4. It should be noted that the Guidelines for the Identification of Hazards and the Assessment of Risk of Walked Routes to School (October 2000) confirms that in accordance with the 1996 Education Act, suitable walking distances to schools are 2 miles (3.2km) for children under 8, and 3 miles (4.8km) for 8 years of age and older children. My client contends that the reasons for recommending that Yaxham be removed from the LSC list and now included within the list of settlements under Policy HOU4 are unclear. The assessment work by professional officers to-date is clear in that Yaxham meets the criteria for being a LSC. It would appear that Yaxham is only included in the HOU4 settlements on the basis that the previously allocated site in the emerging Local Plan is some 1020m distance from Yaxham Primary School. This distance equates to a 12 ¾ minute walk time as opposed to the 800m/10 minute walk time that is the LSC test in the emerging Local Plan. My client has serious concern that the 5-criteria tests for LSCs are not being applied consistently across all the emerging allocations within the LSC settlements. We have examined all the emerging allocations and can confirm that the emerging housing allocations in the Local Service Villages of Banham, Harling, Narborough, Mattishall, Old Buckenham, Shipdham and Sporle all fail at least one of the 800m/10 minute tests. In fact, the emerging allocations in Mattishall, Old Buckenham, Shipdham and Sporle all fail the 800m walk-distance to a Primary School test. Given the obvious lack of clarity and consistency in the assessment of sites and villages proposed to accommodate planned housing growth demonstrated by the decision to deselect Yaxham as a LSC it seems only appropriate that all settlements proposed as a LSC should be reassessed to ensure a consistent approach is taken if strict enforcement of an 800m distance is to be applied. Failure to do so would lead to a lack of consistency in decision making going forwards and a Local Plan which may be found to be unsound at examination.

Breckland Council Response

Officer Response

Clint Green and Yaxham collectively have the services and facilities to be considered a Local Service Centre and this was originally proposed through the emerging Local Plan. Through Local Plan Working Groups it was argued that the distance between Yaxham and Clint Green is approximately 1km. The school is located in Clint Green and, therefore, the distance between the two settlements was considered to be too great for the settlements to be jointly designated as a Local Service Centre. Yaxham on its own merits would only have 4 of the services and

Local Plan Pre-Submission - Comments and Response Schedule

facilities and, would therefore, fall under the policy HOU 04.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.22
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			
Do you wish to appear at the Examination in Public?		No					

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The reference to Garboldishams rich historic environment and description of designated heritage assets in paragraph 3.220 of the opening text is helpful in outlining the defining aspects of Garboldisham.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1031284	Full Name	Jane Crichton	Organisation Details	Senior Planner Lanpro Services
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy HOU 05 - Small Villages a
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

We would argue that East Tuddenham does have sufficient services to meet the standards necessary for it to have a settlement boundary. The village has: A village hall which offers an extensive range of services and activities; Public transport is available in the village with the Konectbus services 4 (Dereham to Norwich) and 13A (Dereham to Easton College) which provide regular services; ¢ A church; and ¢ There are a small-scale employment opportunities. We would argue that East Tuddenham does have sufficient services to justify retaining its settlement boundary.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The approach to the retention of settlement boundaries is set out within the Local Service Centre topic paper, this includes the requirement for settlements to include 3 out of 5 key services and facilities to retain a settlement boundary. East Tuddenham only meets 2 of the 5 criteria and therefore it is not proposed to retain a settlement boundary. This approach has been subject to consultation at regulation 18.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1134647 Full Name Mr Tony Needham
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Policy HOU 05 - Small Villages a
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	This policy has been evolving and this is the first time it has been seen in this form, therefore this is the first time there has been an opportunity to comment on this precise form of wording.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Not Positively Prepared. The policy does not adequately meet the objective. The wording needs to be amended to be considered Sound. Policy Criteria. 1) Development must comprise "infilling" but at criteria (5) developments must not "harm or undermine a visually important gap." While infilling is defined in the supporting text, visually important gap is not defined. "Access to an existing highway" is unclear and should be clarified. 2) There does not seem to be any cap on the total amount of developments, which could lead to multiple applications for three units leading to unsustainable developments. The policy needs to be clarified

Local Plan Pre-Submission - Comments and Response Schedule

to prevent multiple applications.

Breckland Council Response

Officer Response

The policy seeks to allow limited development within existing hamlets, it refers to infilling, this has been included so as to ensure that it does not lead to the creation of isolated new dwellings within the countryside, which would be contrary to paragraph 55 of the NPPF. A cap on the number of applications has not been included. This is in part due to the complexities of assessing a defined settlement limit when there is no settlement boundary and there may be more than one hamlet or cluster of dwellings within a parish. The policy does however seek to embrace localism by requiring parish council support for an application. No further change is proposed to the policy.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID: 1128366 Full Name: Mr Richard Smith Organisation Details: on behalf of Norfolk County Council NPS Prop
 Agent ID: Agent Name: Agent Organisation:

Comment Details

Title: Number: Policy HOU 05 - Small Villages a
 Chapter Number: 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy HOU 05 restricts the amount of dwellings that can be built in rural villages without settlement boundaries to 3 units. This will restrict village growth, potential demand for services and facilities and the provision of sufficient housing to meet local need. This approach will not deliver thriving rural communities as required by NPPF advice. As an example, the Primary School in Mileham had to be closed in 2015 as there was not sufficient school place demand. Due to the school closure Mileham has now been included within the other rural areas with no settlement boundary and a lower housing allowance. This could result in other services and facilities such as the village shop, post office and bus services being lost in the

Local Plan Pre-Submission - Comments and Response Schedule

village as the size and growth of the village will be unable to support them. We would suggest the scale of development is increased in villages/rural areas outside of the settlement boundaries to encourage local villages/communities to thrive. We would suggest the policy should be less prescriptive in terms of housing numbers and worded to be more responsive to individual site/village circumstances. This would ensure small housing schemes are viable, provide a mix of house types to meet local need and the scale of development supports existing services and facilities. Policy HOU 05 is considered to be unsound as it would restrict village growth, potential demand for services and facilities and the provision of sufficient housing to meet local need. The policy and plan would be ineffective and will not deliver thriving rural communities as required by NPPF advice.

Breckland Council Response

Officer Response

The policy intention is to allow for small scale growth in areas that wouldn't necessarily be places that development would come forward. Small scale growth would be in conformity with paragraph 28 of the NPPF in helping to support a prosperous rural economy and boosting the housing supply in line with paragraph 47 of the NPPF. The policy does not restrict development on brownfield sites and, as such, is also in accordance with Paragraph 17 of the NPPF.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	609986	Full Name	Mrs Erica Whettingsteel	Organisation Details	Managing Director EJW Planning Ltd
Agent ID	598312	Agent Name	Mrs Erica Whettingsteel	Agent Organisation	Managing Director EJW Planning Ltd

Comment Details

Title		Number	Policy HOU 05 - Small Villages a
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The wording of the policy has changed		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The criteria as drafted, are too restrictive, particularly bullet point (3) that requires the applicant to demonstrate the appropriate support of the Parish Council. Whilst the use of the word appropriate indicates that any support must be for planning reasons, or other material considerations, a lack of support may actually be for reasons other than those related to planning issues. The inclusion of bullet point 3 is therefore unsound and unreasonable as it is a test that the applicant is not necessarily able to meet.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The policy intention is to allow for small scale growth in areas that wouldn't necessarily be places that development would come forward. Small scale growth would be in conformity with paragraph 28 of the NPPF in helping to support a prosperous rural economy and boosting the housing supply in line with paragraph 47 of the NPPF. The policy does not restrict development on brownfield sites and, as such, is also in accordance with Paragraph 17 of the NPPF. Local support in these areas would determine if there is a need in the smallest, least sustainable villages within the district where we would not normally seek to direct growth.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130112	Full Name	Mr Iain Hill	Organisation Details	Breckland Bridge
Agent ID	1032077	Agent Name	Mr Iain Hill	Agent Organisation	

Comment Details

Title		Number	Policy HOU 05 - Small Villages a
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

On behalf of Breckland Bridge Limited, we strongly support the sentiments expressed in paragraph 3.25, specifically the recognition that in areas outside the identified Settlement Boundaries, there are living and working communities whose social and economic viability must be addressed. However, it is considered that proposed Policy HOU 05 includes elements that are unjustified, and consequently unsound.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130112	Full Name	Mr Iain Hill	Organisation Details	Breckland Bridge
Agent ID	1032077	Agent Name	Mr Iain Hill	Agent Organisation	

Comment Details

Title	Paragraph	Number	3.25
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

On behalf of Breckland Bridge Limited, we disagree with the proposed designation of Colkirk as one of the Small Villages and Hamlets Outside of Settlement Boundaries, and consider that this proposal is unsound as it is unjustified. Paragraph 3.25 of the draft Local Plan states that, For those areas with 2 or fewer of the services / facilities, settlement boundaries have been removed. It is assumed that this refers to the services/facilities considered in the Local Service Centre Topic Paper, August 2017, which not only established which settlements met the required criteria for designation as a Local Service Centre, but also contained a Rural Parish Service Audit. The Topic Paper identifies that Colkirk has 3

Local Plan Pre-Submission - Comments and Response Schedule

of the listed services/facilities: a school, community facility, and employment. It is therefore unclear why a Settlement Boundary has not been proposed for the village. Furthermore, it is apparent that the criteria for selecting which villages should have Settlement Boundaries has been inconsistently applied. For example, Shropham is proposed to have a Settlement Boundary, but the Rural Parish Service Audit in the August 2017 Topic Paper shows that it only has 2 of the 5 services/facilities required. In addition, we dispute the Council's conclusion that Colkirk does not have access to Public Transport. There is a Shopper Bus Service which provides access to Fakenham (on a Tuesday) and Dereham (on a Friday). It is evident from reviewing the Services Audit in the August 2017 Topic Paper that various other villages, notably Lyng, Shropham, Thompson, Gressenhall and Mundford have no access to public transport, but are still considered to be sufficiently sustainable locations to justify Settlement Boundaries. In addition, Colkirk is within close proximity (3 miles) of the extensive range of services and employment opportunities provided within Fakenham. Accordingly, whilst journeys by private car will be required, they will be limited in their distance. This situation has previously been acknowledged as acceptable by both Officers and Members of the Council, in the recent planning application at Herne Lane, Beeston, reference 3PL/2016/0269/O. On this basis, we request that Colkirk is recognised as a Rural Settlement with a Boundary that is subject to proposed Policy HOU 04.

Breckland Council Response

Officer Response

The Local Service Centre Topic paper defines the criteria as follows: Public Transport - An assessment of the level of public transport access within the village. This has included looking at the frequency of services and whether you can reach a higher order settlement for normal working hours. Community Facility - This can include a number of different facilities such as a village hall, public house, restaurant or cafe. Employment - The assessment has looked at the level of employment available within the village. This has included whether there is a business park and also the size of the businesses within the settlement. (In order to determine whether a parish met the Employment criterion, a separate criteria was set. The parish must have approximately 20 businesses within the villages, with at least two of these businesses employing 10 or more people.) Shop/Post Office School Colkirk has a school and a pub. There are no shopping facilities, the bus does not meet the criteria to be able to reach a higher order settlement for normal working hours, and the village has only 17 businesses, 2 of which employ over 10 people. It is therefore considered that the village only has 2 of the 5 services meaning that it is defined under policy HOU 05.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1131135	Full Name	Mr Ian Martin	Organisation Details	Yaxham Parish Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy HOU 05 - Small Villages a
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Yaxham welcomes the adoption by the emerging Local Plan of a policy element at the centre of the recently made Yaxham Neighbourhood Plan, namely supporting "development [that] avoids coalescence of settlements" – HOU 03 point 4., HOU 04 point 5., and with different wording HOU 05.

On this basis it is considered that this element of the Plan as it affects the Parish of

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136859	Full Name	Mr Richard Crosthwaite	Organisation Details	Gladman Developments Limited
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy HOU 05 - Small Villages a
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The policy states development in smaller villages and hamlets outside of defined settlement boundaries will be limited apart from in exceptional circumstances. Gladman do not approve of the exceptional circumstances test contained in HOU 05. The Framework only seeks to prevent development in areas of high national importance. Paragraph 116 of the Framework makes clear that major developments in these areas should be refused unless exceptional

Local Plan Pre-Submission - Comments and Response Schedule

circumstances are demonstrated. There is nowhere in the Framework where the exceptional circumstances test relates to development in the open countryside. Gladman contend that this element of the policy is unjustified and should be deleted.

Breckland Council Response

Officer Response

Policy HOU 05 does not relate to major development proposals (NPPF para 116) and is more closely related to para 55 of the NPPF which promotes sustainable development in rural areas, stating that housing should be located where it will enhance or maintain the vitality of rural communities and sets exceptions for development in the countryside. Policy HOU 05 provides detailed, local criteria for minor development in small villages and hamlets and does not override, or conflict with the exceptional circumstances for housing in the countryside set out in para 55 of the NPPF.

Potential amendment to the plan

No proposed amendments.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	973939	Full Name	Mr Julian Gibson	Organisation Details	Clerk Stow Bedon & Breckles Parish Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy HOU 05 - Small Villages a
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

My Council was pleased that its opinions would be more strongly taken into account in HOU 05 and that the percentage increase in development proposal had been dropped.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1131636	Full Name	Blue Oak Developments	Organisation Details	Blue Oak Developments
Agent ID	1130567	Agent Name	Mr Geoff Armstrong	Agent Organisation	Armstrong Rigg Planning

Comment Details

Title		Number	Policy HOU 05 - Small Villages a
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	These policies were not included in draft versions of the plan and this is therefore the first time they have been consulted on.		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy HOU 05 - Small Villages and Hamlets Outside of Settlement Boundaries Development in smaller villages and hamlets outside of defined settlement boundaries will be limited apart from in exceptional circumstances where planning permission may be granted subject to being supported by other policies within the Local Plan (with the exception of Policy GEN 05 Settlement Boundaries) and if all of the following criteria are satisfied. We support criteria 4, but consider criteria 1, 2, 3 and 5 to be unsound as set out below. We also consider that the reference to exceptional circumstances is unsound. Exceptional Circumstances: The requirement for development to be limited apart from in exceptional circumstances is

considered unsound as it would restrict the ability of the policy to ensure the continued economic and social viability of these rural settlements (which is set out as the aim of this policy at paragraph 3.25). The requirement for exceptional circumstances is therefore considered to impact on the effectiveness of this policy, rendering it unsound. Recommendation: Amend policy wording to: "Development in smaller villages and hamlets outside of defined settlement boundaries will be limited, but planning permission would be granted subject to 1." Policy Criteria: 1. The development comprises of sensitive infilling and rounding off of a cluster of dwellings with access to an existing highway: The supporting text to this policy criteria at paragraphs 3.28- 3.31 includes a definition of infill development and of rounding off development. These definitions are, however, confusing in terms of what is allowed and what is not allowed (particularly in the case of rounding off development) and potentially (depending on what the definitions actually intend) too restrictive. In order for this policy to be effective and to not prevent appropriate development from coming forwards, we consider that the requirement needs to be simplified. Harborough District Council in Leicestershire are a similar rural authority to Breckland and are currently consulting on their Pre-Submission Local Plan. The document includes at Policy GD4 an allowance for new residential development on sites " which are within or physically and visually connected to settlements ". We consider this approach to be more positive, flexible and to enable a wider variety of proposals to come forward that would then be judged on their merits as opposed to trying to meet an arbitrary definition of infill or rounding off. Recommendation: Amend policy wording to: " The development site is within or physically and visually connected to the settlement". 2. It is minor development of an appropriate scale and design to the settlement of up to 3 units: No justification is given for why development of more than 3 dwellings would be inappropriate. In many cases these small rural communities could benefit enormously from growth to support local facilities and services. Setting an arbitrary figure of 3 dwellings is therefore not considered to be a positive approach to meeting the needs of these communities and would also comprise the need for the district to boost significantly the supply of new homes in accordance with NPPF Paragraph 47. A more positive approach would be to specify that development should be of an appropriate scale and design to the settlement, but not to set a maximum figure which would allow the authority greater flexibility in assessing individual proposals on their own merits. Recommendation: Amend policy criteria to "It is development of an appropriate scale and design to the settlement". 3. It

Local Plan Pre-Submission - Comments and Response Schedule

can be demonstrated that there is appropriate support by the parish council: We consider that this requirement would severely restrict the delivery of new homes in rural villages and hamlets and would not represent an objective assessment of the planning merits of proposed developments. This criteria is therefore not considered to be effective or sound as it would prevent appropriate development from coming forwards and fail to ensure the continued economic and social viability of these rural settlements. We agree that effective community consultation with Parish Councils should be encouraged, but Breckland Council are the Local Planning Authority and this policy would effectively grant powers to local parish councils to make planning decisions which would be contrary to national planning policy. Recommendation: Amend policy to require effective consultation with parish councils, but remove reference to requiring their support.

4. The design contributes to enhancing the historic nature and connectivity of communities: We agree that this is an important consideration in promoting sustainable development in these settlements.

5. The proposal does not harm or under-mine a visually important gap that contributes to the character and distinctiveness of the rural scene: This criteria is open to interpretation regarding the definition of a visually important gap. We are not aware of any assessment that has been undertaken by the Council to identify specific gaps that should be protected and it is therefore not considered appropriate to require their protection as this criteria could effectively result in objections to any piece of land being development. Recommendation: Revise policy criteria to: "The proposal contributes to the character and distinctiveness of the rural scene".

Conclusion This letter has detailed our clients concerns regarding the specific policy criteria set by Policy HOU 04 " Rural Settlements with Boundaries and Policy HOU 05 " Small Villages and Hamlets Outside of Settlement Boundaries. We support the principle set out in these policies that these settlements should be considered suitable for appropriate development, but consider that the current criteria set-out to judge appropriateness do not meet the tests of soundness set out at National Planning Policy Framework (NPPF) Paragraph 182 (i.e. whether it is positively prepared, justified, effective and consistent with national policy). We have made several recommendations to amend the criteria set by these policies to ensure that the Local Plan can be considered sound.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The policy intention is to allow for small scale growth in areas that wouldn't necessarily be places that development would come forward. On this basis the requirements for exceptional circumstances are deemed to be appropriate. Small scale growth would be in conformity with paragraph 28 of the NPPF in helping to support a prosperous rural economy and boosting the housing supply in line with paragraph 47 of the NPPF.

All applications will still need to be determined in accordance with national planning policy and other policies which make up the development plan for the District, including neighbourhood plans and the local plan.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1131261	Full Name	Mr Trevor Wenman (Parish Clerk New PC)	Organisation Details	Clerk New Buckenham Parish Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy HOU 05 - Small Villages a
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4 - Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The comments relate to how the different policies relate to one another, which did not become apparent until the consultation draft became available. It also refers to changes made to the wording since the consultation stage.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The relationship between HOU4 and HOU5 is not clear. HOU4 says that permitted development should not increase the number of dwellings by more than 5% from the date of the adoption of the Plan . No such limit is specified for HOU5 areas, leaving us with the ambiguity over whether the reference to possible permitted developments of up to three dwellings in HOU5 refers to any one development, or the total of new dwellings allowed over the plan period., or the total of new dwellings allowed from the date of adoption of the plan. At the consultation stage

Local Plan Pre-Submission - Comments and Response Schedule

it was proposed that villages with no settlement boundary would be permitted growth of 5% over the plan period “ this no longer appears in HOU5. The 5% criterion appears now applies to settlements with a settlement boundary (HOU4) whereas at the consultation stage this figure was 10%. In addition it is not clear how change of use applications which bring, for example, redundant agricultural buildings into residential use, would be treated in relation to any limits on development. The intention of this HOU4 and HOU5 is clear, but its actual implementation leaves areas of doubt and uncertainty which may hamper local councils in seeking to interpret the rules in the future.

Breckland Council Response

Officer Response

The intention of HOU05 is that it applies to the smallest settlements in Breckland, where the principle of new dwellings would not normally be acceptable. The policy seeks to reflect that there may be more than one hamlet within a parish, and therefore calculating limits would not be possible. The policy does however require parish council support for a scheme.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy HOU 05 - Small Villages a
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	This is new policy wording.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Greater clarity and definition is required to distinguish between those places covered by policy HOU 04 and those by HOU 05. At present it is possible to interpret that both to apply to a given settlement. In the case of Saham Toney for example, since Policy HOU 04 does not specify it applies to the entire parish it could be interpreted that Policy HOU 05 applies to outlying areas of the parish. The Parish Council does not believe this to be intention and considers that of the two policies only HOU 04 applies to the parish but would like to see that clarified and defined in the wording of the two policies.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted. It is the intention that Hou04 applies solely to the settlement boundaries and not the whole parish, which may also include other outlying hamlets.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1133658	Full Name	Mandy Maguire	Organisation Details	Bridgham Parish Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy HOU 05 - Small Villages a
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why	13- If you feel the plan is unsound, please tell us why
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Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment blank

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1134348	Full Name	Maggie Oechsle	Organisation Details	NP4Yaxham" Yaxham Neighbourhood Plan W
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy HOU 05 - Small Villages a
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The focus of the Yaxham response is on how the overall Plan affects the parish of Yaxham and whether in this context it is considered to meet the test of "Soundness".

Yaxham is therefore pleased to note that in the settlement hierarchy the parish's main settlements of Yaxham and Clint Green are expressly classed as within the

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	874753	Full Name	Ms Heidi Frary	Organisation Details	Ovington Parish Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy HOU 05 - Small Villages a
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Some comments were made as part of the Preferred Direction consultation, but a greater level of understanding has developed.		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy Criteria. 1) Development must comprise sensitive infilling the use of an emotive and undefined term sensitive leaves the policy unclear and open to challenge. The term access to an existing highway is odd because to be viable surely all properties must have access to an existing highway, either directly or via a new link. Is this clause attempting to do something else? 2) There is no limit on the total number of developments, it could encourage multiple applications for three units leading to an overall unsustainable development. Carefully crafted applications could leave future opportunity for further infill. 3) Yet another incorrect use of the word appropriate. After the Parish Council has formally

Local Plan Pre-Submission - Comments and Response Schedule

considered an application there can only be two outcomes either supported or unsupported. (5) developments must not harm or undermine a visually important gap visually important gaps not defined and leaves this policy open to challenge.

Breckland Council Response

Officer Response

The policy intention is to allow for small scale growth in areas that wouldn't necessarily be places that development would come forward. Small scale growth would be in conformity with paragraph 28 of the NPPF in helping to support a prosperous rural economy and boosting the housing supply in line with paragraph 47 of the NPPF.

The policy requires applications to demonstrate appropriate support from the parish council, this would therefore prevent concerns around carefully crafted schemes and over development.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy HOU 06 - Principle of Ne
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	This is a new policy.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

It is unclear how SHMA housing needs regarding size, type and tenure on a district wide basis could be applied on a settlement by settlement basis. The Council should provide more guidance on this aspect.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The Local Plan is a strategic plan at the district level. Neighbourhood Plans have the opportunity to add to the policy by producing localised evidence to inform neighbourhood plan policies.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.37
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	This is new text.		
Do you wish to appear at the Examination in Public?		No					

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Amend "can be of a lower density, in the interests of efficient use of land..." to "can be of a lower density, however in the interests of efficient use of land..." for better clarity.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.36
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The text in question is new		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Amend "...Design and Access Statement should set out why a higher density is appropriate..." to "...Design and Access Statement shall set out why a higher density is appropriate...", since density of development has a great impact on the character and feel of a settlement (which the Council seeks to protect in other Plan clauses and policies) it must be obligatory to justify higher values rather than by choice as worded.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.34
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4 - Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	This is new text.		
Do you wish to appear at the Examination in Public?		No					

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The SHMA sets out the type and size of new housing needed on a district wide basis. In order to apply its recommendations to individual settlements the Council needs to provide more evidence and justification of those individual needs. For example the SHMA identifies that in Breckland the predominant need is for 3 bedroom houses (more than 75% of the total) but there is no evidence to either support or discount this with respect to Saham Toney. Recent development in Saham Toney has seen a preponderance of 4 and 5 bedroom houses but there is no information to suggest that meets local demand. The Council should provide more guidance on types and sizes of new houses needed in particular settlements where

Local Plan Pre-Submission - Comments and Response Schedule

allocations have been made.

Breckland Council Response

Officer Response

The CNSHMA provides evidence at a district wide level, specifically at the housing market area level. The neighbourhood plan process offers the opportunity to use local data to inform neighbourhood plan policies.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.42
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The text is new.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The term "very good walking access" requires definition. This could be taken from the "Guidelines for Providing For Journeys on Foot" by the Institution of Highways and Transportation Table 3.2 (as referenced in Department of Transport guidelines).

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy HOU 07 - Affordable Hous
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	This policy has been rewritten.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Criteria 1 of this policy coupled with the 5 house limit in Policy HOU 04 will mean that affordable housing is not delivered in rural settlements with boundaries. A mechanism should be added to ensure some level of affordable housing is delivered in those settlements or a justification provided as to why this is not considered necessary.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Policy HOU 14 - Affordable Housing Exceptions allows for the opportunity to deliver 100% affordable housing sites in rural areas where there is a justified need.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1128735	Full Name		Organisation Details	Rentplus
Agent ID	1128739	Agent Name	Mrs Meghan Rossiter	Agent Organisation	Tetlow King Planning Ltd

Comment Details

Title		Number	Policy HOU 07 - Affordable Hous
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Responding to emerging changes in national planning policy.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

We consider this policy to be unsound in its current form. The National Planning Policy Framework (NPPF) does not expect affordable housing to be retained in perpetuity unless delivered on rural exception sites. Whilst the definition of affordable housing contained in the NPPF expects provisions to be made for affordable housing to remain at an affordable price, this is not as onerous as the policy expectation set out for all affordable rented housing. This should be amended to properly reflect the national approach, as this enables all providers of affordable housing to manage affordable properties more flexibly. Policies should be responsive to local circumstances and needs without recourse to the planning

system if an affordable housing provider wishes to switch a property's tenure. In our experience this is well already well covered by clauses set out within Section 106 planning obligations, and does not force unnecessary planning applications. Point iv of this policy should be removed. Whilst paragraph 3.51 references the publication of the Government's housing White Paper in March 2017, it would be further helpful within this supporting text for reference to be made to the range of affordable housing products that would best meet local housing needs. For example, there is a clear need for affordable rented products, but also a clear and significant aspiration locally for housing to purchase. Paragraphs 4.145-4.148 set out the potential scale of demand for starter homes, but this overlooks the contribution that could be made by the rent to buy model to meeting local housing needs. Unlike starter homes, there is no need for a mortgage deposit to access rent to buy housing, as each home is rented at an affordable rent for a set period before each home is purchased. This bridges a considerable gap many households experience in saving for a deposit while renting, often in prohibitively expensive private rented accommodation. Enclosed with this consultation response is an Affordable Housing Statement setting out the details of the rent to buy model as delivered by Rentplus, which uses a partnership approach in combination with local planning authorities and Registered Providers (details of completed schemes can be viewed on their website. Rentplus homes are allocated as with other affordable housing tenures through the local choice based lettings scheme and targeted lettings plans, and provide households with a managed route to home ownership at years 5, 10, 15 or 20 after the initial occupation. Rentplus provides a 10% gifted deposit to assist with each purchase. As rent to buy homes are initially occupied at an affordable rent, they are accessible to a significant proportion of local households in need; one recently completed Rentplus scheme was 30% filled by households living in social and affordable rented properties, releasing those homes for families in need. The SHMA notes the "clear group of private renters ... who in the past have been owner occupiers and they form an identifiable need to occupy the proposed delivery of at least 10% affordable home ownership units on larger sites" (paragraph 4.147). For Policy HOU 07 to be sufficiently responsive to national planning policy we recommend the below amendments: "i. Residential development proposals capable of delivering 11 or more units (or exceeding a Gross Internal Area of 1000 sq m) will be expected to deliver a proportion of the development as affordable housing on-site to help meet existing and future affordable housing needs of the District as set out in the current Central Norfolk

Local Plan Pre-Submission - Comments and Response Schedule

Strategic Housing Market Assessment (CNSHMA) and other up to date local housing needs surveys; ... iii. The size, mix, type and tenure of affordable homes, as defined in national policy, will meet the full range of identified housing needs and aspirations of Breckland as established by the CNSHMA, local housing needs surveys and agreed by Breckland District Council;" These amendments will ensure that the policy is effective by ensuring it remains responsive to the local market and local housing needs across the whole of the Plan period and not solely the static view provided by the SHMA. This will ensure that individual developments may respond to housing needs identified in a specific area as the SHMA does not provide detailed data below the district level. The references to meeting the full range of housing needs and aspirations will also ensure the policy remains consistent with the emerging national planning policy approach set out in multiple consultation documents and statements by this Government. Indeed, the Housing Minister Alok Sharma recently confirmed in the House of Commons that the definition of affordable housing to be included in the next iteration of the NPPF is to include rent to buy and therefore this should be considered as part of the response to meeting local housing needs. We consider the above recommended amendments are justified by the evidence set out in the SHMA which recognises a significant level of need for affordable rented products, but also a significant demand for housing to purchase. Without considering models not explicitly set out in the current national definition of affordable housing, many families across Breckland may miss the opportunity to purchase their own home and obtain housing security.

Breckland Council Response

Officer Response

It is accepted that clause iv of the policy is not reflective of the recent changes within the Housing and Planning Act 2016, and that the definition of affordable housing in the NPPF and glossary of the Local Plan recognises that affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative housing provision. It may be necessary to include a modification in this regard, however this will be subject to discussion at the hearing sessions.

The definition of affordable housing is contained in national planning policy NPPF, which the government has indicated is subject to change in recognition of new affordable home ownership products and starter homes. Alternative affordable home ownership products such as the rent to buy model are not limited by local planning policies. It is therefore proposed not to modify policy HOU 07 with the suggested wording in the representation.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.58
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	This is new text.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Evidence is required to justify that the level of the commuted sum (£50,000) is adequate and reasonable to allow development of an affordable home: it seems a very small sum for that purpose. A mechanism also needs to be introduced to increase the level of the commuted sum over the period of the Plan since what may be adequate in 2017 is almost certain to be wholly inadequate by 2036.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

This figure was taken from the Council's Local Plan CIL Viability Assessment and is considered to be the most up to date evidence. Comment noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1133952	Full Name	Orbit and Longhurst	Organisation Details	Orbit and Longhurst (in capacity of Housing As
Agent ID	1133949	Agent Name	Laura Handford	Agent Organisation	

Comment Details

Title		Number	Policy HOU 07 - Affordable Hous
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	We were not aware of these specific policies at an earlier time.		
Do you wish to appear at the Examination in Public?		No					

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

HOU 07 " Affordable Housing i. Agreed " this threshold ensures delivery of affordable housing on smaller schemes which previously would have avoided affordable provision. It is imperative that the Council is flexible in regards to the tenure on the smaller developments where potentially low number of rented units (e.g. under 5) may be unviable for the developer and/or inappropriate for an RP. In lieu, low cost home ownership products should be supported to ensure the delivery of some affordable housing. ii. Agreed " this percentage better reflects the viability of schemes in the district and should support the acceleration of delivery of all types of homes, avoiding lengthy delays arising from viability negotiations. iii.

Local Plan Pre-Submission - Comments and Response Schedule

Although the mix of affordable needs to reflect the need of the local area at the time of consideration, there are not any clear recommendations within the CNSHMA as to how this would be made up. A clear definition of the split between affordable rented and intermediate sale products is crucial within this policy. Without this developers will make assumptions during the pre-planning, land negotiation stages. These assumptions may not be as Breckland would be expecting to see which has the potential to lead to delays whilst the developer re-works their financial appraisals. A clear tenure split is typical of Local Plans and something we would welcome and expected to see. In terms of the types of homes required, again this is also key and something we would expect to see in this policy, as per other neighbouring Local Authorities, who provide a percentage for each of the house types per number of bedrooms, to be provided for example 1 beds “ 35% 2 beds - 30% 3 beds “ 30% 4 beds - 15% Again this clarity will only help to support developers in achieving a viable scheme in the first instance which supports delivery in the district. iv. Agreed “ although suitable Mortgagee in Possession clauses are essential with the S106 agreement to enable RPs to borrow against these homes and generate future capacity for investment in new affordable homes. v. The first part of this policy needs to reflect the practicalities of pepper-potting to the suggested level of single units. This is in terms of both initial acquisition by the RP and longer term management. It would be practical, and not to the detriment of the sustainability of the community created within new development, to allow for clusters of affordable housing of say no more than 8. This aligns with policies in other neighbouring districts which have been successful in delivering affordable housing and ensuring tenure blind communities. vi. In order to support the accelerated delivery of all housing tenures we would suggest that the Council withhold the ability to negotiate directly with the developer on the affordable housing delivery (either overall percentage or tenure split) in instances where the impact is marginal. Reverting in the first instance to the lengthy option of full viability is both costly to the developer and creates unnecessary delays in which both impact on the initial viability of the scheme and overall the provision of affordable housing.

Breckland Council Response

Officer Response

Support noted for parts of the policy. With regard to the tenure split policy clause iii sets this according to need identified in the CNSHMA (currently a tenure split of 70:30 rented to shared ownership/intermediate products, CNSHMA 2017). The SHMA is updated and recommendations regarding the tenure split may change depending on market characteristics, national policy and other factors therefore the policy wording allows for flexibility in the policy when linked directly to the evidence base. The SHMA also provides evidence to determine the

Local Plan Pre-Submission - Comments and Response Schedule

mix of house types per number of bedrooms. Developers would therefore have certainty of the expected tenure split and house type as this is identified in the CNSHMA.

With regard to clause v. the policy is not prescriptive regarding the definition of clusters as it depends on the scale of development on site (to determine what would appear as a cluster) but also must have regard to the individual site characteristics, viability and delivery timescales. The policy requirements are informed by evidence on viability and need therefore should be applicable in the majority of cases. The requirement for an open book viability assessment is open and transparent and ensures that the policy will be enforced unless evidence is provided to the contrary.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1137235	Full Name	Mr Mark Behrendt	Organisation Details	Planning Manager - Local Plans House Builders
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	3	Policy HOU 07 - Affordable Hous
Chapter Number				

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

HOU 07 Affordable Housing This policy is unsound as it is unjustified and not effective The Viability Assessment has not taken into account all the costs associated with the polices set out in the Local Plan. The impact of the requirements on residential development in HOU 10 " Technical design standards and policy ENV 04 - Open space, sport and recreation have not been considered as part of the whole plan viability testing as is required by both the NPPF and PPG. The Viability Assessment sets out a very marginal picture of viability across the Borough. This assessment has led to a reduction in the affordable housing contribution from the Councils initial policy of a 36% contribution and shown that

Local Plan Pre-Submission - Comments and Response Schedule

the impact of even rates of CIL as low as £50 per square metre as having an impact on viability and the ability of development to deliver the 25% affordable housing requirement. The combination of both HOU 10 and ENV 04 could have a significant impact and must be tested if this policy is to be effectively justified. Part iv of this policy requires affordable rented accommodation to be provided in perpetuity, however, given the Governments drive to widen the scope of the right to buy to include homes provided by Housing Associations there must be questions as to the effectiveness and legality of this policy. Whilst this is a Voluntary Right to Buy scheme there are provisions support this in the Housing and Planning Act 2017 and this policy could limit the involvement of Housing Associations in this scheme and the objective of Government to widen home ownership. Therefore, to require this policy is not consistent with Government policy on the right to buy.

Breckland Council Response

Officer Response

Section 8 of the Local Plan and CIL Viability Assessment assessed the Local Plan requirements, reviewing the development management policies in the emerging plan (including ENV 04) and considering the impact they may have on development viability. This information informed the recommended affordable housing target. Further evidence has been developed to support policy HOU 10 in the form of a topic paper.

It is accepted that clause iv of the policy is not reflective of the recent changes within the Housing and Planning Act 2016, and that the definition of affordable housing in the NPPF and glossary of the Local Plan recognises that affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative housing provision. It may be necessary to make a modification however this will be discussed further at the hearing sessions

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	609986	Full Name	Mrs Erica Whettingsteel	Organisation Details	Managing Director EJW Planning Ltd
Agent ID	598312	Agent Name	Mrs Erica Whettingsteel	Agent Organisation	Managing Director EJW Planning Ltd

Comment Details

Title		Number	Policy HOU 07 - Affordable Hous
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The Policy requires affordable housing to be distributed across developments as single units or small clusters, rather than in a single area. More precision is needed and therefore a definition of small clusters is required. This would be better dealt with stating the size of the anticipated clusters; for example clusters of no greater than 10-15 units.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The policy is not prescriptive regarding the definition of clusters as it depends on the scale of development on site (to determine what would appear as a cluster) but also must have regard to the individual site characteristics, viability and delivery timescales.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 971309 Full Name mr les scott
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Paragraph Number 3.52
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	the new affordable housing target wasn't available previously		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Having assessed the district target at 35.7% but recognised that it is not possible to achieve the target due to developer constraints, the target has been set at 25%. To conform to the requirements of the NPPF there needs to be a policy to address this shortfall.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The CNSHMA provides an affordable housing need for the District and an uplift is secured within the OAN in order to meet this need. The plan wide viability assessment seeks to set a level of affordable housing that is viable for developers to deliver. This approach is in line with paragraph 173 of the NPPF.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1132269 Full Name Mr Robert Whittaker
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Policy HOU 07 - Affordable Hous
 Chapter Number 3

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4 - Is the plan positively prepared?	Yes
5 - Is the plan justified?	Yes	6 - Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10 - Have you raised this at Issues and Options?	No	11 - If you have not raised this issue before please state why	I believe that I have raised this issue on at least two previous occasions; once in a formal written consultation response, and once in person at an event in Watton. I am afraid that I do not recall the precise dates and stages of these representations.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

I believe that the proposal in policy HOU 7 (ii) to the Affordable Housing requirement at only 25% defies logic and makes this part of the Plan unsound. The value of 25% appears arbitrary and is significantly below the assessed need of 35.7% for Breckland. This need should be taken as a lower bound for any planning target, as it will not apply to all developments, the Thetford SUE (which will contribute a large number of homes towards Breckland's targets) already has a lower affordable homes requirement set, and historically delivery has fallen far

Local Plan Pre-Submission - Comments and Response Schedule

short of the requirement set in planning policy. In particular, the proposal in HOU 7 (ii) to set the Affordable Housing requirement at 25% fails to meet any of the four "soundness" criteria: This part of the plan has not been positively prepared, as the reduction in the affordable housing below the needs assessment on all sites is a negative reaction to the feasibility issue on some sites. A positive approach would be to only allow a reduction in the requirement on those sites where a higher percentage would be unviable, and to also look at other measures that could be employed to meet the affordable housing needs of the district. These could include, for example, insisting on a larger quota where this would be viable, and allowing developers in an unviable location to offset their requirement by supporting additional affordable housing elsewhere. The reduced requirement is not justified, as (a) there is already a mechanism for developers to reduce the affordable housing requirement on developments where such provision would not be economically viable, and (b) there is no justification at all for reducing the requirement in cases where the provision would be viable. This part of the plan is not effective, as it will all but guarantee that the affordable housing requirements for the District will not be met. Few, if any, significant developments will voluntarily go above the 25% requirement of the policy, and (judging by historical data) may actually be permitted to deliver less on economic feasibility grounds. This part of the plan is not consistent with the NPPF requirement to plan to meet the full objectively assessed needs for market and affordable housing in the District. As above, the reduced quota will all but guarantee that the affordable housing requirements for the District will not be met. If the sites selected for development in the plan are unable to viably meet the District's needs for affordable housing when taken together, then that choice of sites is itself unsound. Other sites should then be considered in addition to or as a replacement for some of the existing earmarked sites. Any assessment of viability should take into account the fact that rigorously enforcing a higher affordable homes quota will increase house prices and reduce development land values, thus making it more viable to build a higher proportion of affordable homes.

Breckland Council Response

Officer Response

The Local Plan CIL and Viability Assessment published in March 2017 provides the evidence for a lower affordable housing target than the target to address the identified need derived from the CNSHMA. The NPPF clearly sets out in para 173 that the sites and scale of development set out in the plan should not be subject to a scale of obligations and policy burdens that their ability to be developed viably is threatened. The Viability Assessment demonstrates when considering example typologies of sites in the plan that the majority of sites are undeliverable if the affordable housing target is set higher than 25%. The Council must consider all available evidence when setting the appropriate balance of

Local Plan Pre-Submission - Comments and Response Schedule

affordable housing.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1132036	Full Name	De Merke Estates	Organisation Details	De Merke Estates
Agent ID	1132034	Agent Name	Mr Stuart Thomas	Agent Organisation	Berrys

Comment Details

Title		Number	Policy HOU 07 - Affordable Hous
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	This issue was not apparent prior to the publication of the policies and proposals contained within the Pre-Submission Breckland Local Plan.		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The Housing White Paper published earlier this year was clear that Local Authorities are expected to deliver starter homes as a mixed package of affordable housing. Rather than set a threshold, the Government announced Local Authorities will be required to promote starter homes and work with developers for their provision. The Plan should therefore refer to Starter Homes and encourage their inclusion in development proposals as part of the "Affordable provision".

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Para 3.51 recognises the Governments intentions to amend the NPPF definition of affordable housing to include starter homes. The policy refers to affordable housing as defined in national policy, which will take into account any subsequent changes in the definition thus ensuring the policy is flexible and could include starter homes.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129978	Full Name	Orbit Homes (2020) Limited	Organisation Details	Orbit Homes (2020) Limited
Agent ID	1130567	Agent Name	Mr Geoff Armstrong	Agent Organisation	Armstrong Rigg Planning

Comment Details

Title		Number	Policy HOU 07 - Affordable Hous
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

HOU 07 - Affordable Housing This Policy is largely considered sound, but the specific requirements regarding the distribution of affordable housing across a development (point v.) and viability testing (point vi.) are considered unjustified and therefore unsound. We consider that points i-iv of Policy HOU 07 are sound: i. The threshold of 11 units or greater than 1,000 sqm GIA is considered sound as it is in line with national policy and it will ensure delivery of affordable housing on smaller schemes which previously would have avoided affordable provision. It is imperative that the Council is flexible in regards to the tenure on the smaller developments where potentially low number of rented units (e.g. under 5) may be

unviable for the developer and/or inappropriate for an RP. In lieu, low cost home ownership products should be supported to ensure the delivery of some affordable housing; ii. The requirement for 25% of qualifying developments to be affordable housing is considered sound as it better reflects the viability of schemes in the district and should support the acceleration of delivery of all types of homes, avoiding lengthy delays arising from viability negotiations; iii. The requirement for the the mix of affordable housing to reflect the need of the local area at the time of consideration is agreed as sound. iv. Orbit Homes agree that affordable rented housing provision on site should be maintained as affordable housing in perpetuity, although suitable Mortgagee in Possession clauses are essential with the S106 agreement to enable RPs to borrow against these homes and generate future capacity for investment in new affordable homes. We wish to raise concern regarding points v-vi of Policy HOU 07 which in their current form we do not consider to be sound: v. This part of the policy states that the council will seek for affordable housing to be distributed across the development as single units or small clusters. We consider that this policy should be amended to reflect the practicalities of "pepper - potting" to the suggested level of single units. This is in terms of both initial acquisition by the RP and longer term management. It would be practical, and not to the detriment of the sustainability of the community created within new development, to allow for clusters of affordable housing of say no more than 10. This aligns with policies in other neighbouring districts which have been successful in delivering affordable housing and ensuring tenure blind communities. Recommendation: In its current form this policy does not reflect the most appropriate strategy and can therefore not be considered sound. We recommend the policy is amended to allow for small clusters of affordable housing up to a maximum of 10 properties. vi. This part of the policy requires an open book viability assessment where schemes do not meet the above policy requirements. In order to support the accelerated delivery of all housing tenures we would suggest that the Council withhold the ability to negotiate directly with the developer on the affordable housing delivery (either overall percentage or tenure split) in instances where the impact is marginal. Reverting in the first instance to the lengthy option of full viability is both costly to the developer and creates unnecessary delays in which both impact on the initial viability of the scheme and overall the provision of affordable housing. Recommendation : In its current form, this policy could affect the deliverability of the plan over its period by increasing delays in decision-making and therefore the delivery of affordable housing. This policy cannot therefore be

Local Plan Pre-Submission - Comments and Response Schedule

considered effective and is unsound. We recommend that the policy is amended to give the Council greater flexibility in whether to request an open book viability assessment or not. For example: " The Council reserve the right to request an open book viability assessment where schemes to not meet the above policy requirements".

Breckland Council Response

Officer Response

Policy HOU07 at criteria v. seeks to achieve a distributed approach to affordable housing across a development. site. The intention of the criteria is to avoid large areas of just affordable housing within the site in order to create more integrated communities. The policy does allow for exceptions to this approach in the interest of either viability or management by registered providers. It is therefore considered that the policy already meets the requirements of the proposed changes as included within the representation and no further change to the policy in this regard would be required. In relation to criteria vi the representation refers to the use of viability appraisals where the affordable housing level is below the policy requirement. The Strategic Housing Market Assessment sets out the affordable housing requirements within Breckland, it is important to meet the Districts full objectively assessed need including that for affordable housing. It is not therefore proposed to change the policy at this stage when a developer cannot meet the affordable housing thresholds.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129978	Full Name	Orbit Homes (2020) Limited	Organisation Details	Orbit Homes (2020) Limited
Agent ID	1130567	Agent Name	Mr Geoff Armstrong	Agent Organisation	Armstrong Rigg Planning

Comment Details

Title	Number	Policy HOU 10 - Technical Desig
Chapter Number	3	

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy HOU 10 - Technical Design Standards This policy is unsound as it is not supported by sufficient evidence on viability and is therefore contrary to national planning policy. Policy HOU 10 sets optional building regulation requirements and nationally described space standards for water efficiency, internal space and the accessibility of homes. It states that this is to ensure new homes provide quality living environments for residents both now and in the future and to help deliver sustainable communities. Planning Practice Guidance states that local planning authorities should consider the impact of using these standards as part of their Local Plan viability assessment (ID: 56-003-20150327) . There is a considerable cost

Local Plan Pre-Submission - Comments and Response Schedule

impact relating to these higher standards and it is essential that they are assessed as part of the whole plan viability assessment. The Local Plan and CIL Viability Assessment 2017 does not appear to reference the optional standards for accessibility or water efficiency and while it does mention the nationally described space standards it states that " The Council has no current plans to introduce these standards, however has asked for an assessment of their introduction. On the whole the modelling is in line with these requirements ". This statement suggests that an incomplete assessment may have been carried out, but no results of this assessment or conclusion is drawn regarding the impact of applying these standards on viability. The inclusion of these standards in HOU 10 is therefore contrary to national policy in the PPG and must be considered unsound. We note that the Council have mentioned that further supporting evidence is set out in the "Optional Technical Standards" Topic Paper however this has not been published under the Councils evidence base and it is therefore unclear if it addresses viability issues. In addition to the above issues regarding the impact of the optional standards on the viability of developments, we consider that insufficient justification has been provided to demonstrate that there is a need to set specific space standards in the district over and above the design requirements of building regulations. Recommendation : Delete this policy as insufficient evidence has been provided to justify applying the optional technical design standards.

Breckland Council Response

Officer Response

Paragraph 8.15 of the Local Plan and CIL Viability Assessment states that the modelling is in line with the Nationally Described Space Standard Requirement. The policy wording also states that the standards will apply 'subject to viability'.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.77
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	This is new text.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The last sentence "However, national standards for some issues that can be applied by planning authorities." does not make any sense and appears to be incomplete. It should be rewritten in a way that is understandable.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	3	Policy HOU 10 - Technical Desig
Chapter Number				

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	This is a new policy.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The final sentence refers to Building regulations and BS8300 for parking space. Elsewhere in the Plan reference for this is made to Appendix 2 of the Plan. It is not made clear if the different references are compatible. Plan references should be consistent to avoid confusion and misinterpretation.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

BS8300 refers to accessible parking standards while Appendix 2 sets out parking standards.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136859	Full Name	Mr Richard Crosthwaite	Organisation Details	Gladman Developments Limited
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy HOU 10 - Technical Desig
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy HOU 10 “ Technical Design Standards for New Homes 6.9.1 The above policy seeks to impose the optional technical standards for new homes as set out in the 2015 Written Ministerial Statement. Gladman does not consider this policy is supported by robust evidence as no consideration has been given to the implementation of the optional technical standards and whether this is actually achievable across the entire plan area. Indeed, the impact on viability has not been considered through the latest Viability Assessment (2017) as no reference is made to the Optional Technical Standards within this document. In addition, the Council has failed to assess the impacts on viability of the Plan as a whole in terms of

Local Plan Pre-Submission - Comments and Response Schedule

delivering the above policy and what effects it may have on other policies such as the provision of affordable housing. The inclusion of this policy is therefore unjustified.

Breckland Council Response

Officer Response

Paragraph 8.15 of the Local Plan and CIL Viability Assessment states that the modelling is in line with the Nationally Described Space Standard Requirement. The policy wording also states that the standards will apply 'subject to viability'.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	609986	Full Name	Mrs Erica Whettingsteel	Organisation Details	Managing Director EJW Planning Ltd
Agent ID	598312	Agent Name	Mrs Erica Whettingsteel	Agent Organisation	Managing Director EJW Planning Ltd

Comment Details

Title	Number	Policy HOU 10 - Technical Desig
Chapter Number	3	

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Planning Practice Guidance states that Local Planning Authorities should consider the impact of using these standards as part of their Local Plan viability assessment (ID 56-003-20150327). The proposed higher standards would d have significant cost implications ad it is important that this is assessed as part of the whole plan viability assessment. The Council's CIL Viability Assessment 2017 does not address the optional standards for accessibility or water efficiency and whilst it mentions nationally described space standards it states that the Council has no current plans to introduce these standards. This would indicated that work in this regard is incomplete and the impact of applying these standards on viability not properly

Local Plan Pre-Submission - Comments and Response Schedule

considered. In sufficient justification has been provided to demonstrate that there is a need to set specific space standards over and above the design requirements of Building Regulations. Policy HOU10 is therefore unsound as it is contrary to national policy set out in the PPG

Breckland Council Response

Officer Response

Paragraph 8.15 of the Local Plan and CIL Viability Assessment states that the modelling is in line with the Nationally Described Space Standard Requirement. The policy wording also states that the standards will apply 'subject to viability'.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	502323	Full Name	Attleborough Land Ltd	Organisation Details
Agent ID	1130556	Agent Name	Mr John Long	Agent Organisation

Comment Details

Title	Number	Policy HOU 10 - Technical Desig
Chapter Number	3	

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

Policy HOU 10 seeks to impose additional design standards on dwellings (beyond Building Regulations). The policy should be caveated so that it only applies where it can be proven to be technically deliverable and economically viable to do so. It is suggested that the Policy should be amended to clarify that it will not be applied where meeting the requirement would not be technically deliverable or would render a proposal unviable.

13- If you feel the plan is unsound, please tell us why

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1137235	Full Name	Mr Mark Behrendt	Organisation Details	Planning Manager - Local Plans House Builders
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy HOU 10 - Technical Desig
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

HOU 10 - Technical design standards Policy is unsound as it has not be justified Paragraph 56-007 sets out the evidence required in order to justify the implementation of the optional technical standard for accessible buildings. One of the key elements of this policy is the need to ensure that the Council has considered the impact of this standard on viability. There is a considerable cost impact relating to these higher standards and it is essential that these are assessed as part of the whole plan viability assessment. Having examined the Local Plan and CIL Viability Assessment 2017 we cannot find any reference to the optional standards for accessible homes and therefore the inclusion of these standards in

Local Plan Pre-Submission - Comments and Response Schedule

HOU 10 is unjustified. We note that the Council have mentioned that further supporting evidence is set out in the Optional Technical Standards Topic Paper however this has not been published under the Councils evidence base.

Breckland Council Response

Officer Response

Paragraph 8.15 of the Local Plan and CIL Viability Assessment states that the modelling is in line with the Nationally Described Space Standard Requirement. The policy wording also states that the standards will apply 'subject to viability'.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1135889	Full Name	Mr Stewart Patience	Organisation Details	Anglian Water Services Ltd
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy HOU 10 - Technical Desig
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

Reference is made to all residential development within Breckland District meeting the optional higher water efficiency standard (110 litres/per person/per day).

The Anglian Water region is identified as an area of serious water stress in the Environment Agency's document entitled 'Water Stressed Areas Final Classification (2013)'.

13- If you feel the plan is unsound, please tell us why

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1131634	Full Name	Mountleigh Development Holdings	Organisation Details	Mountleigh Development Holdings
Agent ID	1130567	Agent Name	Mr Geoff Armstrong	Agent Organisation	Armstrong Rigg Planning

Comment Details

Title	Number	Policy HOU 10 - Technical Desig
Chapter Number	3	

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy HOU 10 - Technical Design Standards This policy is unsound as it is not supported by sufficient evidence on viability and is therefore contrary to national planning policy. Policy HOU 10 sets optional building regulation requirements and nationally described space standards for water efficiency, internal space and the accessibility of homes. It states that this is to ensure new homes provide quality living environments for residents both now and in the future and to help deliver sustainable communities. Planning Practice Guidance states that local planning authorities should consider the impact of using these standards as part of their Local Plan viability assessment (ID: 56-003-20150327) . There is a considerable cost

Local Plan Pre-Submission - Comments and Response Schedule

impact relating to these higher standards and it is essential that they are assessed as part of the whole plan viability assessment. The Local Plan and CIL Viability Assessment 2017 does not appear to reference the optional standards for accessibility or water efficiency and while it does mention the nationally described space standards it states that " The Council has no current plans to introduce these standards, however has asked for an assessment of their introduction. On the whole the modelling is in line with these requirements ". This statement suggests that an incomplete assessment may have been carried out, but no results of this assessment or conclusion is drawn regarding the impact of applying these standards on viability. The inclusion of these standards in HOU 10 is therefore contrary to national policy in the PPG and must be considered unsound. We note that the Council have mentioned that further supporting evidence is set out in the "Optional Technical Standards" Topic Paper however this has not been published under the Councils evidence base and it is therefore unclear if it addresses viability issues. In addition to the above issues regarding the impact of the optional standards on the viability of developments, we consider that insufficient justification has been provided to demonstrate that there is a need to set specific space standards in the district over and above the design requirements of building regulations. Recommendation: Delete this policy as insufficient evidence has been provided to justify applying the optional technical design standards.

Breckland Council Response

Officer Response

Paragraph 8.15 of the Local Plan and CIL Viability Assessment states that the modelling is in line with the Nationally Described Space Standard Requirement. The policy wording also states that the standards will apply 'subject to viability'.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1133952	Full Name	Orbit and Longhurst	Organisation Details	Orbit and Longhurst (in capacity of Housing As
Agent ID	1133949	Agent Name	Laura Handford	Agent Organisation	

Comment Details

Title		Number	Policy HOU 10 - Technical Desig
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	We were not aware of these specific policies at an earlier time.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

See attached form.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The form attached looks at all aspects of policy HOU 10. There is agreement to the water efficiency standards. However, there is some dispute over the internal space standards, with arguments formed around the impact upon viability. Paragraph 8.15 of the Local Plan and CIL Viability Assessment states that the modelling is in line with the Nationally Described Space Standard Requirement. The policy wording also states that the standards will apply 'subject to viability'.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	3.99
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	This is new text.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

In addition to Council policies GEN 02 and COM 01 make reference to relevant policies of any made Neighbourhood Plans. Otherwise this policy risks not giving weight to those neighbourhood plan policies when planning decisions are made.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Where neighbourhood plans are adopted they will be given weight in plan making decisions.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	609986	Full Name	Mrs Erica Whettingsteel	Organisation Details	Managing Director EJW Planning Ltd
Agent ID	598312	Agent Name	Mrs Erica Whettingsteel	Agent Organisation	Managing Director EJW Planning Ltd

Comment Details

Title		Number	Policy HOU 12 - Conversion of B
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4 - Is the plan positively prepared?	No
5 - Is the plan justified?	No	6 - Is the plan effective?	No	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10 - Have you raised this at Issues and Options?	No	11 - If you have not raised this issue before please state why	Not seen a draft of this policy previously		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy HOU12 permits the re-use of appropriately located and constructed buildings in the countryside for economic purposes, and their re-use for residential purposes where a commercial use has been shown not to be viable. In addition it indicates that the residential re-use of modern agricultural or industrial buildings of no aesthetic value, regardless of their location will not be considered appropriate. The wording of this policy has not changed significantly from that set out in the adopted Policy CP20. It does not therefore accord with the NPPF, which takes a more positive approach to the conversion and redevelopment for residential purposes of all redundant, or disused buildings regardless of their age, type of

Local Plan Pre-Submission - Comments and Response Schedule

construction, or previous use. The policy as drafted is therefore unsound as it does not accord with more up-to-date policies and guidance provided by the NPPF and NPPG.

Breckland Council Response

Officer Response

Part Q of the Town and Country Planning GPDO 2015 states that development is not permitted by Class Q if 'the cumulative floor space of the existing building or buildings changing use under Class Q within the established agricultural unit exceeds 450 square meters; the cumulative number of separate dwellinghouses developed under Class Q within an established agricultural unit exceeds 3'. The wording of the policy is therefore in conformity with this as modern agricultural or industrial buildings will, in all likelihood, exceed these thresholds. This is also in conformity with paragraph 55 of the NPPF, which states that local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances such as: "where the development would re-use or disused buildings and lead to an enhancement of the immediate setting". The policy as worded would seek to exclude modern agricultural or industrial buildings, which again would not enhance the immediate setting by being converted. The policy is therefore in conformity with the NPPF and permitted development rights.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	609986	Full Name	Mrs Erica Whettingsteel	Organisation Details	Managing Director EJW Planning Ltd
Agent ID	598312	Agent Name	Mrs Erica Whettingsteel	Agent Organisation	Managing Director EJW Planning Ltd

Comment Details

Title		Number	Policy HOU 13 - Agricultural Wo
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Not previously seen draft of this policy		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy HOU 13 permits the development of permanent dwellings in the countryside for full-time workers in a range of rural activities. The title of this policy should be substituted for Rural Workers Exceptions or Essential Worker Dwellings to reflect the wider definition described in the policy and to accord with wording used in Paragraph 55 of the NPPF.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted. The policy itself makes reference to catering for rural workers in the supporting text and the policy wording itself identifies the ways in which rural workers can support the rural economy. This is in line with paragraph 55 of the NPPF.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	3	Policy HOU 14 - Affordable Hous
Chapter Number				

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	This is a rewritten policy.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

There are several mentions of an "element of market housing" being permitted in certain circumstances. What those circumstances might be is not defined and therefore very subject and subject to wide interpretation. Similarly what quantity or proportion of market housing would comprise "an element" is not defined and could be argued to be any number that suited a developer. Hence while the intention of this policy is good, its means of implementation in a way that will deliver the intention are very unclear and impossible to apply consistently and robustly.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted. The policy clauses and supporting text ensures that the purpose of any scheme is to provide affordable housing to meet an identified local need supported by evidence. The policy is not prescriptive in its implementation, but does recognise that on occasion, where evidenced, some market housing may be required to reap the benefits of affordable housing provision. Any case officer would consider the proposal in detail to ensure that any market housing element is absolutely necessary to make the scheme viable.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1132853	Full Name	Martin Goymour	Organisation Details	Goymour Properties
Agent ID	1132852	Agent Name	Mr Jon Jennings	Agent Organisation	Cheffins Planning

Comment Details

Title		Number	Policy HOU 14 - Affordable Hous
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	My clients land holding was presented to a meeting with the Local Plan teams on the 6th February 2017. As requested the site was formally submitted to the Council for consideration in this local plan. In addition, the representations also included a specific wording for the safeguarding of Banham Zoo and its specific development aspirations.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Local Plan Pre-Submission - Comments and Response Schedule

The inclusion of an employment connection within the parish is supported and recognises the importance of employees in rural areas being able to live close to where they work.

Breckland Council Response

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1133952	Full Name	Orbit and Longhurst	Organisation Details	Orbit and Longhurst (in capacity of Housing As
Agent ID	1133949	Agent Name	Laura Handford	Agent Organisation	

Comment Details

Title		Number	Policy HOU 14 - Affordable Hous
Chapter Number	3		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	We were not aware of these specific policies at an earlier time.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

HOU 14 " Affordable Housing Exceptions The principle of this policy is sound and supported. Point d) needs to exclude low cost home ownership, any restriction will severely effect the ability of potential purchasers to secure mortgages. It would be sensible to secure these homes in perpetuity by using the Rural Repurchase clause operated by the HCA. This allows individuals the ability to staircase to 100% (and thus widening the mortgage market) but ensures that the onwards sale of the property is back to the RP, for conversion back into a low cost home ownership property. As per comments on HOU 07, point vi, the Council should retain the ability to negotiate with the RP on the viability of a scheme which includes Open

Local Plan Pre-Submission - Comments and Response Schedule

Market units, rather than reverting to a third party viability in each case. The financial appraisal of affordable led exceptions sites would typically be freely shared between the RP and the Council. As it is in the RPs interest to maximise the affordable provision and not be seeking to maximise profits from the market dwellings, the financial appraisal should be easy to understand and unnecessarily withheld by the RP. Neighbouring authorities have an agreed ratio of market to affordable homes on exceptions site which may be a better solution for this point. As cross subsidy is typical of exceptions sites in Norfolk and Suffolk, locally operating RPs are sure to be able to provide example costings to support a suggested ratio. Determining this ratio within the policy enables the RP to confidently undertake initial site appraisals and land negotiations, in line with as per our earlier comments at HOU 07 iii.

Breckland Council Response

Officer Response

Remaining as affordable housing in perpetuity is fundamental to exception sites. Permission is being granted on land that ordinarily would not be permitted for development but is accepted on the basis that identified need for affordable housing outweighs the policy considerations. With regard to specifying ratios for market housing; the policy clauses and supporting text ensures that the purpose of any scheme is to provide affordable housing to meet an identified local need supported by evidence. The policy is not prescriptive in its implementation, but does recognise that on occasion, where evidenced, some market housing may be required to reap the benefits of affordable housing provision. Any case officer would consider the proposal in detail to ensure that any market housing element is absolutely necessary to make the scheme viable. Any developer would have to demonstrate that market housing was necessary to deliver the scheme and the most transparent way to do so is through an open book viability assessment.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1030375	Full Name	West Suffolk Planning Policy	Organisation Details	St. Edmundsbury Borough Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy TR 01 Sustainable Transp
Chapter Number	4		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The issue is ongoing and this is considered the most of appropriate forum to raise this.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

West Suffolk meet with Breckland under the duty to co-operate, and during these discussion sit will be important to ensure that the highway requirements of cumulative developments (particularly those using the cross-boundary A134) are adequately addressed, to enable appropriate growth within both districts.

13- If you feel the plan is unsound, please tell us why

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted, no further changes required. Breckland will continue to work with Forest Heath and St Edmundsbury through the Duty to Co-Operate

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 972215 Full Name MRS KIRSTY HEATH
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Paragraph Number 4.4
 Chapter Number 4

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The A47 surrounding Dereham desperately needs resurfacing and dualling due to increase in the number of accidents occurring resulting in the loss of lives.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

These considerations fall outside of the remit of the Local Plan.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	874753	Full Name	Ms Heidi Frary	Organisation Details	Ovington Parish Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy TR 01 Sustainable Transp
Chapter Number	4		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4 - Is the plan positively prepared?	Yes
5 - Is the plan justified?	No	6 - Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	Yes	10 - Have you raised this at Issues and Options?	No	11 - If you have not raised this issue before please state why	#Deleted		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Ovington is a small parish and as such we are well aware of the cost of building new foot-ways and bus stops which has been a large draw on our resources. This is a very weak and inadequate policy compared with the strong message in the NPPF. The Policy does not widen the choice or travel opportunities, the policy should better mirror the importance given to sustainable transport in the NPPF. Point (b) Sustainable transport is far more than access to a bus stops. NPPF para 3 stipulates developments should be located where there is access to high quality public transport facilities. Para 35 also states that plans should exploit opportunities for sustainable transport modes, the Local Plan policy does not

Local Plan Pre-Submission - Comments and Response Schedule

exploit opportunities for cycling or walking. Point (d) this is an outcome, the policy lacks action to deliver this outcome. This policy would be deemed sound if it reflected the NPPFs strong emphasis on maximising the use of sustainable transport NPPF 34.

Breckland Council Response

Officer Response

The Local Plan seeks to promote sustainable development and a key way in which it achieves this is through the spatial distribution of new dwellings. The distribution seeks to allocate development in the most sustainable locations where there is different public transport options and also where services can be reached by foot.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1134647 Full Name Mr Tony Needham
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Policy TR 01 Sustainable Transp
 Chapter Number 4

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

This policy has not been Positively Prepared. The policy does not adequately meet the objective. The wording needs to be amended to be considered Sound. This is a very weak and inadequate policy compared with the strong message in the NPPF. The Policy does nothing to widen the choice or travel opportunities, the policy should better mirror the importance given to sustainable transport in the NPPF. Point a) this is supported. Point b) this should relate to public transport hubs rather than just bus stops. NPPF para 35 - stipulates developments should be located where there is access to "high quality public transport facilities" not just "bus stops". Para 35 also states that plans should exploit opportunities for sustainable

Local Plan Pre-Submission - Comments and Response Schedule

transport modes, the Local Plan policy does not exploit opportunities for cycling and public transport hubs. Point d) this is an outcome not an action, what is lacking is the policy to deliver this outcome. There are no studies to identify how a coherent cycle network could be developed in all communities experiencing growth. There needs to be a clear understanding of sustainable transport in the market towns so that sustainable modes of transport can be fully exploited. This policy would be deemed sound if it reflected the NPPF's strong emphasis on maximising the use of sustainable transport in para 34 of the NPPF. The emerging Dereham Neighbourhood Plan has identified that providing an improved walking and cycling network is a high priority for residents along with supporting long term improvements a rail service.

Breckland Council Response

Officer Response

Comments noted the policy seeks to promote a safe efficient and convenient sustainable transport network. Wherever possible development is directed to more sustainable locations where there is public transport. Point b of the policy references (by way of example) bus stops and this does not exclude public transport hubs. In relation to point d this is also supported by the bullet points setting out what development should do. This includes the requirement that development should promote opportunities for sustainable transport.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 966641 Full Name MR TIM BORNETT BORNETT
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Policy TR 02 Transport Require
 Chapter Number 4

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Consideration should have occurred to a long term aim to provide a rail link between Attleborough and the Norwich to Diss line.This would offset traffic on the B1077.Help to reduce pollution et al.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Improvements to the National rail network fall outside the remit of the Breckland Local Plan. It should be noted however that Network Rail are a specific consultee within the Local Plan process.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Transport	Number	4
Chapter Number	4		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Chapter 4: Transport There are a number of major transport infrastructure projects on-going or upcoming within Norfolk. We support a cross boundary strategic level consideration of transport infrastructure and look forward to being involved in specific proposals as they progress. All proposed transport infrastructure schemes and route options should take into consideration their impacts on heritage assets and their setting alongside archaeological potential.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1135560 Full Name Mr John Carey Bennett
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Transport Number 4
 Chapter Number 4

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why	My focus on previous plans has been on Local Issues - connected to Shipdham - we moved here from West Hertfordshire in November 2014. Shipdham has 1000 vehicles a day passing though it and it will be detrimentally affected by the increase in traffic. The Emerging Local Plan looks at the whole of Brecklands and therefore must take account of Commercial and Residential movements of people and goods as well as where they are situated. All the relevant factors must be included. We lived in Hertfordshire for 8 years - Herts Planning at Markyate PC, Dacorum District and County levels taught me a lot about Road Infrastructure issues and Planning,		
Do you wish to appear at the Examination in Public? No							

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The Emerging Local Plan 2011-2036 is unsound in one main respect: There is a lack of consideration and an absence of analysis on the impact that the potential residential and commercial developments will have on the communications infrastructure that links these Breckland communities. Traditionally this missing infrastructure analysis is about road traffic and the facilities supporting the road network for safe passage, refuelling and repair, incident alerts and management, repair and upkeep of surfaces, drainage, signage and control systems, adequate fast access for emergency services and increasingly, intelligent transport systems. Its importance as a planning factor is increasing as it is required to address social developments, health and safety, emergency planning and business profitability. The Emerging Local Plan proposes developments in Brecklands that will more than double the traffic on the main routes (A47, A11 plus A1075, A1065 and A134) in the first 10 years of the period. In particular, the A1075 will be of increasing importance for a resurgence of Dereham, Thetford and Attleborough linking businesses, their workforces and the multiple new residential initiatives. The A1075 cuts through multiple villages and townships and is already a safety hazard in Shipdham. Surveys in Shipdham show that up to 1,000 vehicles of all types every day pass through the village. Alternative cross-county routes are on minor roads and are unsuitable for commercial and frequent personal use. The lack of a plan for the road infrastructure as part of the Emerging Local Plan makes the Local Plan incomplete. By omitting key planning factors, when applied to people's private lives, working hours and recreation, the Plan becomes an unsound basis for decision-making and community development. In order to complement the Emerging Local Plan, a full review of the Communication Infrastructure by the Highways Agency is necessary. It must address the changing patterns of transport caused by the introduction of hybrid and electric models for all new cars in the next 5 years and the phasing out of diesel and ICE vehicles in the next 15 years, all within the core timescale of the Emerging Local Plan. These factors will affect the traditional road infrastructure in ways that are as yet unforeseeable. Both Plans need to have contingency measures built into them to manage these uncertain outcomes. Although these radical initiatives are driven by Urban and National Planning Authorities globally, they will impact Brecklands in the same time frame. The A47, A11 and A1075 provide vital road traffic links for Norfolk with East Anglia, the UK and Europe. Road Transport is going to go through extraordinary changes by 2036 and these should be taken into consideration. Road Infrastructure is probably the only one topic which needs more than a few paragraphs. It needs a complete

Local Plan Pre-Submission - Comments and Response Schedule

section in conjunction with Highways. All in other aspects, the Emerging Local Plan is a good planning document.

Breckland Council Response

Officer Response

Norfolk County Council Highways department have been consulted throughout the local plan preparation process. The Infrastructure Delivery Plan sits alongside the Local Plan to highlight the infrastructure improvements required to support the delivery of housing through the plan period.

Potential amendment to the plan

No amendments required.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1118963 Full Name Mr John Dunford
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Transport Number 4
 Chapter Number 4

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Poor compliance with the use of Rail Transport. There have been discussions for some years now to re-open the Norfolk Circular Railway Line. If this was carried out it would provide not only a satisfactory link for non car users but provide a focus of where development could be caried out in a way that would considerably stop and quite likely reduce the growth in Road Traffic by providing a non road solution for commuting into Norwich and elsewhere. Industry could be encouraged to grow on the linear path of such a re opened Railway giving a sustainable future to the County that would be believable. the plan makes many of the correct noises about concerns for Road Traffic reductions but I am sorry to say these are all just noises

Local Plan Pre-Submission - Comments and Response Schedule

without any substance.

Breckland Council Response

Officer Response

Policy TR01 supports improvements to rail connections both within the District and across the wider area, therefore future improvements to rail services are captured under this policy. Further to this, Network Rail also form a specific consultee throughout the preparation of the Local Plan.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Environment	Number	5
Chapter Number	5		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Chapter 5: Environment We recommend that paragraph 5.1 of the supporting text is amended to refer to the historic environment alongside the natural and built environment. There is concern with paragraph 5.7 which starts by stating that the planned levels of growth could impact upon the Districts natural and historic environment. Whilst it is appreciated that development management policies can help regulate the implementation of development proposals and manage change on a case by case basis there is concern that the fundamental growth planned within the Local Plan will not be sustainable if it cannot be delivered without harming the historic environment. Crucially, the NPPF identifies the protection and

Local Plan Pre-Submission - Comments and Response Schedule

enhancement of the historic environment as being a key strand in what it defines sustainable development (paragraph 7). The inclusion of this sentence implies that the plan is unsound in its most fundamental form as the growth planned cannot be sustainable if it cannot protect or enhance the historic environment. We request that this sentence is omitted from the Plan.

Breckland Council Response

Officer Response

Comment noted. Para 5.1 does not exclude the historic environment as it is considered to be fundamental to both the built and natural environment. Para 5.7 recognises that planned growth could impact on the District's natural and historic environment. Recognising that there is an impact is not necessarily negative but provides justification for the formulation of policies to address any potential impact.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy ENV 01 Green Infrastruct
Chapter Number	5		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy ENV01: Green Infrastructure Landscape, parks and open space 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. It may be helpful to make reference in the text to the role GI can have to play in enhancing and conserving the historic environment. It can be used to improve the setting of heritage assets and to improve access to it, likewise heritage assets can help contribute to the quality of green spaces by helping to create a sense of place and a tangible link with local history. Opportunities can be taken to link GI networks into already existing green spaces in town or existing

Local Plan Pre-Submission - Comments and Response Schedule

historic spaces such as church yards to improve the setting of historic buildings or historic townscape. Maintenance of GI networks and spaces should also be considered so that they continue to serve as high quality places which remain beneficial in the long term.

Breckland Council Response

Officer Response

Comment noted. Whilst the policy and supporting text does not make explicit reference to the linkages between green infrastructure and heritage, the policy wording supports the delivery of a network of green infrastructure in the district which will help to achieve these linkages.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	874753	Full Name	Ms Heidi Frary	Organisation Details	Ovington Parish Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy ENV 01 Green Infrastruct
Chapter Number	5		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Some comments were made as part of the 'Preferred Direction' consultation, but a greater level of understanding has developed.		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

This policy has not been prepared positively as it is contrary to paragraph 165 of the NPPF. This policy is not justified , it has not based on sound and credible evidence. It is not effective , the wording of the policy will not have the stated effect of protecting green infrastructure. The policy is very poorly worded. The concept in the Policy of valuing all Green Infrastructure ignores particular local GI strategies that assert that certain elements of Green Infrastructure do have greater value than others. A continuous hedge connecting a pond and a copse must have hugely greater value than a longer but isolated gappy hedge. In 5.8 Green Infrastructure is identified as all types of green space. In 5.10 the Plan is proposing

Local Plan Pre-Submission - Comments and Response Schedule

that the policy recognises the value of all green infrastructure which is fine, but the wording dilutes higher value assets. The policy states that the Network of Green infrastructure in the district ... should be safeguarded and retained. The policy only makes sense if the Green Infrastructure Network has been identified.

Breckland Council Response

Officer Response

Comment noted. Higher value GI sites are already protected through designations such as those listed in policy ENV 02 (para 5.16) or, more locally, through the protected designated open space as shown in the Policies Maps and supported by the Breckland Open Space Assessment. Additionally the Council, as part of the wider Norfolk Strategic Framework are collectively developing a Norfolk wide green infrastructure map in recognition that the GI network cross authority boundaries, in order to enhance these corridors. Parish Councils have the opportunity to designate local green space in line with the NPPF definition, through the Local Plan or in Neighbourhood Plans.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1032053 Full Name Dr Nicky Grandy
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Policy ENV 01 Green Infrastruct
 Chapter Number 5

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	New/revised text.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

With respect to the second sentence in the last paragraph in policy ENV 01, if a development will have a detrimental effect on the quantity or function of existing green infrastructure, how can the green infrastructure network be enhanced as a result of the development? Some clarification of what is meant is needed here.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The intention of the policy is to require applicants to compensate for any detrimental impact on the existing network. A modification is recommended to provide clarity to the policy wording.

Potential amendment to the plan

Policy ENV 01, amend 3rd para second sentence where it is considered that the development will have a detrimental effect on the quantity or function of existing green infrastructure, compensatory provision will be required in the form of new and/or enhancements of green infrastructure. Where appropriate, the Council will seek to secure planning obligations provision for the future management and/or maintenance of green infrastructure.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1134647 Full Name Mr Tony Needham
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Policy ENV 01 Green Infrastruct
 Chapter Number 5

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	In the preferred direction consultation the Dereham Green Infrastructure Strategy was mentioned, but its mention has now been omitted. At that time the draft policy made sense for Dereham because of the mention of the Dereham Green Infrastructure Strategy, now the mention of the Strategy has been omitted the policy does not make any sense.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Local Plan Pre-Submission - Comments and Response Schedule

This policy is not Justified , it is not based on sound and credible evidence. It is not Effective , the wording of the policy will not have the stated effect of protecting green infrastructure. It has not been prepared positively as it is contrary to paragraph 165 of the NPPF. This policy, as it is, is poorly worded. The concept in the Policy of valuing all Green Infrastructure ignores the Dereham Green Infrastructure Strategy and other local GI strategies that assert that certain elements of Green Infrastructure do have greater value than others. In 5.8 Green Infrastructure is identified as all types of green space. In 5.10 the Plan is proposing that the policy "recognises the value of all green infrastructure". The policy only makes sense if a Network of Green Infrastructure has been identified. In Dereham's case it has been identified. the policy should recognise that Green Infrastructure Strategies already exist, and that new strategies will come along. Norfolk County Council (partly funded by Breckland District Council) are currently producing a County wide GI plan showing priority green corridors. Despite the Dereham Green Infrastructure Strategy being part of the evidence base for the Local Plan, none for the details of the strategy have been incorporated into the site allocation policies. The emerging Dereham Neighbourhood Plan has identified Green Infrastructure as a high priority for residents and Town Council has commissioned work to update the Dereham Green Infrastructure Strategy and develop policies which support the connectivity of habitats.

Breckland Council Response

Officer Response

The supporting text in para 5.10 states that rather than identify key green infrastructure linkages for protection, the Council is seeking in its policy to recognise the value of all green infrastructure. This approach means that no green infrastructure is excluded from opportunities for enhancement, simply because it was not defined on a map. This does not devalue the evidence already produced for Thetford and Dereham, which will be considered by the Council in relation to relevant planning applications.

In terms of recognising higher value GI sites, these are already protected through designations such as those listed in policy ENV 02 (para 5.16) or, more locally, through the protected designated open space as shown in the Policies Maps and supported by the Breckland Open Space Assessment. The Council, as part of the wider Norfolk Strategic Framework are collectively developing a Norfolk wide green infrastructure map in recognition that the GI network cross authority boundaries, in order to enhance these corridors. Parish and Town Councils also have the opportunity to designate local green space in line with the NPPF definition, through the Local Plan or in Neighbourhood Plans.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 973437 Full Name Mr Peter Bush
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Policy ENV 02 Sites of Internatio
 Chapter Number 5

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Toftwood site LP[025]030 slopes towards the river Tud with Badley Moor SSSI (SAC) only a short distance downstream. Contaminated run-off from the site will enter the river, this then runs through the SSSI creating pollution risk. This site should not be considered suitable due to the close proximity of a river and SSSI.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Natural England raised no soundness objections with the pre-submission publication of the Local Plan.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1032053 Full Name Dr Nicky Grandy
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Policy ENV 02 Sites of Internatio
 Chapter Number 5

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	New/revised text.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

With respect to the first paragraph of ENV 02, I presume that this means that development will only be permitted where it can be demonstrated that there will be no adverse effect, including after mitigation measures are put in place. If so, this is not clear as currently written.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	462653	Full Name	Mike Jones RSPB	Organisation Details	Conservation Officer RSPB
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	5	Policy ENV 03 The Brecks Protec
Chapter Number	5			

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The issue refers to the text in the current draft.		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

We strongly support the policy in principle but are concerned to note that there is not sufficient evidence in the plan to demonstrate that adverse effects on the Breckland SPA from increased visitor pressure from housing allocations will be avoided. The supporting HRA for the plan correctly identifies that the nightjar and woodlark breeding populations of the Breckland SPA are vulnerable to the increases in recreational pressure that the plan will produce. It refers to the need for monitoring and mitigation requirements which are necessary to ensure that the growing, cumulative recreational pressure on the Breckland SPA does not reach a level which produces an adverse effect. If the plan does not include sufficient

Local Plan Pre-Submission - Comments and Response Schedule

measures to monitor visitor pressure and provide mitigation measures to prevent an adverse effect occurring, then the plan may result in an adverse effect on the Breckland SPA. In order for the plan to be legally compliant and sound it needs to demonstrate that it can avoid this adverse effect. The existing adopted LDF includes policy support for this approach in the Site Allocation and Thetford Area Action Plan DPDs, in the form of an access monitoring and mitigation framework. Whilst there is a statement in the policy text in the submission plan that the council will work with partners to develop a framework of measures that manage and monitor access, this alone does not provide any certainty that a framework will be developed in order to ensure that adverse effects on the Breckland SPA can be avoided. At present there is no information on what monitoring and mitigation measures the framework would consist of, who would be responsible, what partners the Council would aim to work with, what the timescales for delivery would be and how the work would be funded. Without the formal inclusion of a framework in the plan there can be no certainty that the monitoring and mitigation (if demonstrated to be necessary through the monitoring) would be delivered, leaving the plan unable to demonstrate it would meet the legal requirements of the Habitats Regulations, and therefore leaving it unsound. The measures required to address this are simple, and replicable as they are currently in place in adopted Breckland planning policy, and similar policies exist in neighbouring local authorities plans. The issue is widely recognised and has led to a county wide visitor pressure baseline study (Panter et al, 2017 “referenced in the plan HRA) being produced, which can act as a useful baseline of visitor pressure against which to measure the impacts of the plan. The RSPB has extensive experience of advising on these issues in the Brecks and in other areas of the country where sensitive wildlife sites are subject to increasing visitor pressure from housing allocations. We would be very happy to offer our help to the Council in preparation of such a framework and as a partner in the adopted framework.

Breckland Council Response

Officer Response

General support for the policy noted. It may be necessary to make amendments to the Local Plan to provide clarity on the proposed Monitoring and Mitigation Framework, in line with HRA requirements, this will be discussed further through the hearing sessions

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	462653	Full Name	Mike Jones RSPB	Organisation Details	Conservation Officer RSPB
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	5	Policy ENV 03 The Brecks Protec
Chapter Number	5			

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The issue refers to the text in the submission draft.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

We note in the supporting text, in paragraph 5.23 that no evidence of a negative impact of agricultural or commercial buildings was found in the 2013 research. It should be noted that this was in part due to the relatively small number of agricultural and commercial buildings that were found in the research. Whilst the proportion of existing agricultural and commercial buildings compared to residential buildings is small and is likely to remain so, we request that the scale of this development in the buffer is monitored and detailed in the annual monitoring reports for future reference.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted. Para 2.23 does acknowledge that 'due to the sample size and number of buildings identified there needs to be an element of caution applied to the results'. Consideration will be given to the suggestion of monitoring the number of agricultural and commercial buildings developed in the buffer zone in the AMR. There may be technical constraints in terms of reporting of prior notifications, however this could be further investigated.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1134647 Full Name Mr Tony Needham
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Policy ENV 04 Open Space, Spor
 Chapter Number 5

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4 - Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Recent experience with current applications has resulted in developers trying to use all open space as a contribution to outdoor play space. Development control officers have not understood the difference between open space and outdoor play space, it was previously felt that the policy was sufficiently robust but recent experience suggest that the wording needs to be improved. The desire to have additional open space in south of Dereham was raised as part of the Open Spaces Assessment consultation.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Local Plan Pre-Submission - Comments and Response Schedule

Not Positively Prepared. The policy does not adequately meet the objective. the wording needs to be amended to be considered Sound. For existing provision. Condition (a) - at the beginning of the sentence should be reworded to read "... That where there is an excess of both recreation and amenity open space..." The justification for this is that there could be an excess of amenity space but a shortfall of recreation open space, but the excess of one type helps mitigate the shortfall in the other and should be protected. At the end of the sentence the wording should be changed to "... will not result in a current or likely shortfall, of any particular type of open space, during the plan period." The reasoned justification for this is that if there is a shortfall in play space but an excess of amenity, the excess of one helps mitigate the shortfall in another. There is evidence that developers are trying to incorporate any piece of open space as part of their contribution towards Outdoor Playing Space. It would be helpful if there was clarity built into this policy to prevent it being misinterpreted. Clarity should be given that outdoor play space is a particular type of open space and that they should be laid out specifically for the purpose of outdoor play and no other purpose. Dereham along with many other settlements have a significant shortfall in outdoor play space, the policy does not help to address this shortfall. The emerging Dereham Neighbourhood Plan has identified that the provision of open space is a high priority for residents.

Breckland Council Response

Officer Response

The intention of clause a of policy ENV 04 is that there is sufficient open space that any proposed loss would not result in a deficiency overall. However, there is a recognised difference in need between types of open space and it is important that this is addressed by the policy. This may require an amendment to the policy, however this would be discussed through the hearing sessions.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	500604	Full Name	Mr Philip Raiswell	Organisation Details	Sport England
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy ENV 04 Open Space, Spor
Chapter Number	5		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Sport Englands view is that for a policy relating to the protection and provision of facilities for outdoor sport, it must be based on a robust and up to date evidence base. For playing pitches, this requires an assessment using Sport Englands methodology Playing Pitch Strategy Guidance (covering pitch sports) and Assessing Needs and Opportunities Guidance (covering other outdoor and indoor sports facilities). These guidance documents are specified within the DCLG Planning Practice Guidance as the recommended guidance documents for such assessments: <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green->

Local Plan Pre-Submission - Comments and Response Schedule

space/open-space-sports-and-recreation-facilities/ As far as I am aware the open space assessment carried out does not follow the above methodology, and therefore is not considered to be a robust evidence base on which to base policies relating to outdoor and indoor sports facility provision. Sport England previously made these representations at the Issues and Options stage in January 2015.

Breckland Council Response

Officer Response

The government guidance 'Open space, sports and recreation facilities' states that 'Authorities and developers may refer to Sport England's guidance on how to assess the need for sports and recreation facilities' Paragraph: 002 Reference ID: 37-002-20140306, it does not state that this is the definitive methodology. The NPPF requires local authorities to use a proportionate evidence base in forming planning policies in Local Plans. The Council have produced the Breckland Open Space Assessment (2015) and The Indoor and Built Sports and Recreational Facilities Study (2017) which form the evidence base for developing policy ENV 04. These studies are considered to provide a robust, up to date evidence base to inform the policy.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Occupancy rates	Number	Table 5.1
Chapter Number	5		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The table is new.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

There is no evidence for the occupancy rates given in the table. They seem to be very low which will result in lower provision of open space under policy ENV 04. For example only 3 people in a 4 bedroom house. Provide evidence for the figures used.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The table is taken from the 2007 Open Space Study. At this point in time household occupancy rates were considered to be 2.4 people per dwelling. The CNSHMA sets a figure of 2.3 people per dwelling. It is considered that the reduction of 0.1 person per dwelling would not have an impact upon the figures in the table. Therefore these figures are still considered to be up to date and robust.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129978	Full Name	Orbit Homes (2020) Limited	Organisation Details	Orbit Homes (2020) Limited
Agent ID	1130567	Agent Name	Mr Geoff Armstrong	Agent Organisation	Armstrong Rigg Planning

Comment Details

Title		Number	Policy ENV 04 Open Space, Spor
Chapter Number	5		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy ENV 04 " Open Space, Sport & Recreation This policy is unsound as it is unjustified in requiring a rural standard of outdoor playing space provision in urban areas. Policy ENV 04 requires all new development to provide a contribution towards outdoor playing space equivalent to 2.56 hectares per 1,000 population, which equates to 25.6 sqm per person, broken down into 17.6 sqm of outdoor sport area and 8 sqm of children's play space. The figure of 25.6 sqm per person represents an increase on current outdoor playing space standards contained at Core Strategy Policy DC11 which requires 24 sqm per person. The standards set out in both adopted Policy DC11 and emerging Policy ENV 04 are taken from guidelines

Local Plan Pre-Submission - Comments and Response Schedule

set out by Fields in Trust (FIT), of which the latest guidelines are contained in their Guidance for Outdoor Sport and Play Beyond the 6 Acre Standard (2015), which are an update on previously more detailed guidelines in Planning and Design for Outdoor Sport and Play (2008). The standards recommended by FIT are for 0.8ha of childrens play space per 1,000 people and either 1.6ha of outdoor sports provision in urban areas or 1.76ha in rural areas per 1,000 people. These standards have not changed between the adoption of Policy DC11 and the development of emerging Policy ENV 04 and it is therefore unclear why the Council has chosen to use the rural standards over the urban standards in the new Local Plan. The FIT guidelines suggest a higher level of provision should be provided in rural areas due to the distance between facilities on offer (i.e. the distance between villages), whereas in urban areas adjoining neighbourhood facilities are much closer to one another which means they are accessible by more people. It is clear from this that the 25.6 sqm standard should apply in Brecklands rural areas, but that requiring the same standard in Brecklands towns is unjustified. Recommendation : This policy should be updated to require 24 sqm of outdoor playing space per person in urban areas of the district (e.g. the market towns).

Breckland Council Response

Officer Response

Policy ENV 04 is based on local evidence in the form of the Breckland Open Space Assessment (2015) which cites the FIT standards and justifies the use of these figures as a national benchmark in the assessment of open space provision. It highlights that open space deficiency is highest in more populated areas, particularly the market towns. It recommends that in light of the quantitative audit findings of provision within Breckland, future open space provision needs to be addressed within the Local Plan period till 2036. The Fields in Trust (FIT) guidelines set out in the 'Guidance for Outdoor Sport and Play Beyond the 6 Acre Standard (2015)' no longer differentiates between urban and rural areas and provides an updated national standard. However, there is little justification to deviate from the policy recommendations set out in the Breckland Open Space Assessment due to the critical need for open space provision in Breckland district.

Potential amendment to the plan

No amendment proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1131634	Full Name	Mountleigh Development Holdings	Organisation Details	Mountleigh Development Holdings
Agent ID	1130567	Agent Name	Mr Geoff Armstrong	Agent Organisation	Armstrong Rigg Planning

Comment Details

Title		Number	Policy ENV 04 Open Space, Spor
Chapter Number	5		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy ENV 04 “ Open Space, Sport & Recreation This policy is unsound as it is unjustified in requiring a rural standard of outdoor playing space provision in urban areas. Policy ENV 04 requires all new development to provide a contribution towards outdoor playing space equivalent to 2.56 hectares per 1,000 population, which equates to 25.6 sqm per person, broken down into 17.6 sqm of outdoor sport area and 8 sqm of children's play space. The figure of 25.6 sqm per person represents an increase on current outdoor playing space standards contained at Core Strategy Policy DC11 which requires 24 sqm per person. The standards set out in both adopted Policy DC11 and emerging Policy ENV 04 are taken from guidelines

Local Plan Pre-Submission - Comments and Response Schedule

set out by Fields in Trust (FIT), of which the latest guidelines are contained in their Guidance for Outdoor Sport and Play Beyond the 6 Acre Standard (2015), which are an update on previously more detailed guidelines in Planning and Design for Outdoor Sport and Play (2008). The standards recommended by FIT are for 0.8ha of childrens play space per 1,000 people and either 1.6ha of outdoor sports provision in urban areas or 1.76ha in rural areas per 1,000 people. These standards have not changed between the adoption of Policy DC11 and the development of emerging Policy ENV 04 and it is therefore unclear why the Council has chosen to use the rural standards over the urban standards in the new Local Plan. The FIT guidelines suggest a higher level of provision should be provided in rural areas due to the distance between facilities on offer (i.e. the distance between villages), whereas in urban areas adjoining neighbourhood facilities are much closer to one another which means they are accessible by more people. It is clear from this that the 25.6 sqm standard should apply in Brecklands rural areas, but that requiring the same standard in Brecklands towns is unjustified. Recommendation: This policy should be updated to require 24 sqm of outdoor playing space per person in urban areas of the district (e.g. the market towns).

Breckland Council Response

Officer Response

Policy ENV 04 is based on local evidence in the form of the Breckland Open Space Assessment (2015) which cites the FIT standards and justifies the use of these figures as a national benchmark in the assessment of open space provision. It highlights that open space deficiency is highest in more populated areas, particularly the market towns. It recommends that in light of the quantitative audit findings of provision within Breckland, future open space provision needs to be addressed within the Local Plan period till 2036. The Fields in Trust (FIT) guidelines set out in the 'Guidance for Outdoor Sport and Play Beyond the 6 Acre Standard (2015)' no longer differentiates between urban and rural areas and provides an updated national standard. However, there is little justification to deviate from the policy recommendations set out in the Breckland Open Space Assessment due to the critical need for open space provision in Breckland district.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	874753	Full Name	Ms Heidi Frary	Organisation Details	Ovington Parish Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy ENV 05 Protection and En
Chapter Number	5		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Some comments were made as part of the 'Preferred Direction' consultation, but a greater level of understanding has developed.		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

It is not effective, the wording of the policy is subjective. As with many policies: 'for the sake of its own intrinsic beauty' is a highly subjective term.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Paragraphs 21, 50 and 157 of the NPPF makes it clear that policies should be flexible and not overly prescriptive.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1032053 Full Name Dr Nicky Grandy
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Policy ENV 05 Protection and En
 Chapter Number 5

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	New/revised text.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Paragraph 2 of policy ENV 05 uses the phrase 'release of land'. Why is this phrase being used here when elsewhere reference is made to proposals/applications being permitted or not? There should be consistency across the document.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136859	Full Name	Mr Richard Crosthwaite	Organisation Details	Gladman Developments Limited
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy ENV 05 Protection and En
Chapter Number	5		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy ENV 05: Protection and Enhancement of the Landscape 6.10.1 This policy states: The landscape of the District will be protected for the sake of its own intrinsic beauty, its benefit to the rural character and in the interests of biodiversity, geodiversity and historic conservation|. 6.10.2 The policy as currently worded is not consistent with the approach required by paragraph 113 of the Framework which refers to the need for criteria based policies in relation to proposals affecting protected wildlife or geodiversity sites or landscape areas, and that protection should be commensurate with their status and gives the appropriate weight to their importance and contribution to wider networks. As

Local Plan Pre-Submission - Comments and Response Schedule

currently drafted, Gladman does not consider that this policy aligns with the requirements of the Framework given that it seeks to protect the Districts landscape for the sake of its own intrinsic beauty. Opinions on landscape are highly subjective and this policy as currently worded will likely lead to inconsistencies being made through the decision making process. 6.10.3 Further where adverse impacts are unavoidable mitigation measures should be considered before a development proposal would be rejected. A blanket landscape restriction on development such as the one proposed does not accord with the approach taken in national policy. Further, it is not enough to simply seek to protect a landscape of view across a nice field, it must exhibit some demonstrable physical attributes which elevates its importance above simply being an area of under developed countryside. 6.10.4 This policy is not considered to be consistent with national policy and should be revisited.

Breckland Council Response

Officer Response

Policy ENV 05 makes explicit reference to the findings of the Councils Landscape Character Assessment and Settlement Fringe Landscape Assessment in the consideration of the release of land. These studies define the quality of the landscape and specific areas referred to in the policy which should be provided a higher degree of protection. Whilst there is always a degree of subjectivity in assessing impact on the landscape, the policy gives a clear policy steer to inform decisions on planning applications as it is supported by, and linked directly to detailed evidence base documents.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	874753	Full Name	Ms Heidi Frary	Organisation Details	Ovington Parish Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy ENV 06 Trees, Hedgerows
Chapter Number	5		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Some comments were made as part of the 'Preferred Direction' consultation, but a greater level of understanding has developed.		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

This policy has been significantly weakened since the Preferred Directions consultation. The current wording reduced the protection this policy should provide for trees and hedgerows. Second paragraph, the words "Development requiring loss of protected trees and hedgerows will be resisted, " There is then an open parenthesis without a corresponding closed parenthesis. The remain paragraph should follow: "... including preserved trees, protected hedgerows (BS5837:2012) will only be permitted in exceptional circumstances where:" Point (a) start the sentence " it can be clearly demonstrated that the removal of a tree..." Point (b) this is a wholly subjective measure and because it is subjective provides

Local Plan Pre-Submission - Comments and Response Schedule

no effective protection for protected trees and hedgerows. It should be removed as it is the case that there can be an exception to any policy if the planning committee permit it. The planning committee has the power to make exception to the policy as that power already exists. The wording places little value on trees and even less on hedgerows. As written this policy allows for the removal of a mature standard oak tree as long as it is replacing with a bare rooted whip. Where hedgerows are removed they should be replaced native hedging.

Breckland Council Response

Officer Response

Comment noted. The policy text has not changed significantly from the wording presented in the Preferred Directions Consultation. Policies in the plan provide some flexibility so as not to stifle development where the benefits would outweigh the loss. This is a difficult balance to strike, however the policy wording and supporting text makes clear that the Council seeks to avoid the loss of protected trees and hedgerows unless there are exceptional or overriding benefits in accepting their loss (this point is made in the first paragraph of the policy). In addition, in the exceptional case that an established tree was lost, the policy sets conditions which would allow for the eventual re-establishment of a tree of the same scale. However, modifications are recommended to clarify that the loss of a protected tree (as opposed to trees) should be replaced with at least a single tree and that loss of protected hedgerow should be replaced, where possible, in recognition that losses must be adequately compensated for.

Potential amendment to the plan

Policy ENV 06 (after point b) add wording to state:
Where the loss of such features is demonstrably unavoidable, adequate replacement provision, preferably by native species of the same or greater value will be sought.
Amend current wording in the para to state:
'where the loss of a protected tree is accepted...'

Amendment ID

PM/E/06/B

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1134647 Full Name Mr Tony Needham
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Policy ENV 06 Trees, Hedgerows
 Chapter Number 5

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The wording has significantly changed since the preferred direction consultation. The Town Council gave detailed comments on the wording of the proposed policy in the preferred direction version.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

This policy has not been Positively Prepared. The policy does adequately meet the objective. The wording needs to be amended to be considered sound. The wording of this policy has significantly changed since the Preferred Directions consultation. The new wording significantly weakens the protection this policy should provide for significant trees and hedgerows. Second paragraph, the words "loss of protected trees and hedgerows will be resisted" should be included. At the end of the last sentence the words "only in exceptional circumstances" should be inserted between the words 'permitted' and 'where.' Point a) insert the words "here it can

Local Plan Pre-Submission - Comments and Response Schedule

be clearly demonstrated that" at the beginning of the sentence. Point b) this is a wholly subjective measure and because it is subjective, provides no effective protection for protected trees and hedgerows. It should be removed as it is the case that there can be an exception to any policy if the planning committee permit it. The planning committee has the power to make exceptions to any policy there doesn't need to be a policy saying that there can be an exception to the policy as that power already exists. Next paragraph - the wording in the LDF and the Preferred Directions consultation was more acceptable. The proposed wording places no value on the Trees and ignores hedgerows altogether. The policy allows for the removal of an 800 year old veteran oak tree by replacing it with a bare rooted whip. Where hedgerows are removed they should be replaced with native hedging. The emerging Dereham Neighbourhood Plan has identified Green Infrastructure as a high priority for residents and the Town Council has commissioned work to update the Dereham Green Infrastructure Strategy and develop policies which support the connectivity of habitats.

Breckland Council Response

Officer Response

ENV 06 is not materially different from the version consulted on at Preferred Directions and the wording is largely unchanged. The policy wording and supporting text makes clear that the Council seeks to avoid the loss of protected trees and hedgerows unless exceptional criteria are met. In addition, in the exceptional case that an established tree was lost, the policy sets conditions which would allow for the eventual re-establishment of a tree of the same scale. However, modifications may be required to clarify that the loss of a protected tree (as opposed to trees) should be replaced with at least a single tree and that loss of protected hedgerow should be replaced, where possible, in recognition that losses must be adequately compensated for. Any modifications would need to be discussed further through the hearing sessions.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	5	Policy ENV 07 Designated Herita
Chapter Number	5			

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy ENV07: Designated Heritage Assets The supporting text at paragraphs 5.55 and 5.63 recognises that the historic environment is a finite and irreplaceable resource and is welcomed. The supporting text is also locally specific and makes reference to the districts rich and diverse heritage and the role that that the areas geology has played in providing diverse building materials. The supporting text however makes no reference to heritage at risk. The policy is made up of paragraphs but these are not numbered, we recommend that the policy points are labelled with numbers or letters to aid identification. The wording of the first sentence requires clarification as it could be interpreted to mean that the settings

of only listed buildings and conservation areas need to be considered whereas the settings for registered parks and gardens, and scheduled monuments do not. This is rectified in the second paragraph which compounds the incongruity of the wording in the first paragraph. This paragraph refers to archaeological sites which are not a designated asset equivalent to scheduled monuments and there is no clarification as to what is meant by an archaeological site in this context. It is requested that the word and in the phrase conserve and enhance is changed to read conserve or enhance. The use of the word and is a more stringent test beyond that outlined by the statutory obligation of the 1990 Act. The second paragraph ends by stating that, 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 historic or architectural interest; this includes internal features, floor plans and spaces or any object or structure within the curtilage of a listed building that predates 1 st July 1948 (emphasis added). The intention to outline the fact that a listed buildings interest often goes beyond its list description and includes its interior is understandable. Nevertheless it is inadvisable to compile a list of features considered by the Council to have historical or architectural interest as such a list could not be exhaustive given the range and varied nature of listed buildings and therefore could be read to imply that absence from the list equates to absence of interest. The third paragraph of the policy is effectively a policy provision for enabling development. By definition in the NPPF, enabling development is development that is not otherwise in accordance with adopted policy and is therefore not a necessary component of a local plan document. A stand-alone policy on enabling development is not necessary as it covered entirely by paragraph 140 the NPPF and should be applied on a case by case basis depending on the merits of a particular proposal rather than as part of the Plan. A local plan should adequately set out a positive strategy for the historic environment without the need to include such a policy. There is also concern about what is meant by a building with particular architectural or historic interest; if this is meant to refer to listed buildings or locally listed buildings then that should be stated, at present it could be interpreted to exclude certain types of listed building which are of architectural or historic interest i.e. listed, but not of particular interest. It is unclear how this distinction is to be interpreted. The fourth paragraph of the policy relates to archaeology. The desire to ensure that archaeological remains are left in situ is welcomed. It is recommended that the can is replaced should in the second sentence to read where appropriate,

archaeological remains should be left in situ. Where archaeological remains cannot be left in situ the policy requires satisfactory excavation and recording to be carried out before the development is begun. It may be helpful to outline how this will be secured in order to outline expectations to prospective applicants, for example via a condition or in some cases a legal agreement. This will help provide certainty from the outset so that applicants can then plan effectively which should reduce pressure for development to start before the archaeology can be properly excavated and recorded.

Conservation areas We encourage that the local plan process provides a basis for the continued update and management of Conservation Management Plans, identifying each conservation areas local identity and distinctiveness. These should identify features that typify and contribute to this special distinctiveness as well as allow for less tangible judgments of character, quality of place and special distinctiveness. The plan will be more robust where it directs future development to take account of the special and distinctive character of Conservation Areas, emphasising that this is a cumulative result of built form, materials, spaces and street patterns, uses and relationships to surrounding features such as the surviving historic buildings and street patterns. Breckland has 51 conservation areas, 2 of which are on the Heritage at Risk Register (HAR), and none of which benefit from a conservation area appraisal or management plan. This was highlighted as a major point of concern by us in earlier consultations. Since then further work has been carried out to produce a Historic Characterisation Study (dated March 2017). This work was focused on supporting the site allocations process and falls short of being a true characterisation study. Instead it reads more as a series of short Heritage Impact Assessments which is a useful tool and helpful in for assessing the site allocations put forward in the Plan. Whilst the Historic Characterisation Study helps understand and support the site allocations it is inadequate to provide guidance to prospective applicants and decision makers on the continued management of conservation areas. We request that policy ENV07 is amended to include a commitment to undertake a programme of work to develop conservation area appraisals. With 51 conservation areas and limited Council resources we appreciate that this will be a long term project but a commitment should be made to begin producing these within the Local Plan starting with those most likely to experience development pressures and those on the HAR register. It would be useful if the production of conservation area appraisals/management plans appeared as a monitoring indicator, for example the production of five per year. We would also welcome provision for any future designation of conservation

Local Plan Pre-Submission - Comments and Response Schedule

areas within cities, districts and boroughs as well as specific provision for the landscape setting of different parts of the area.

Breckland Council Response

Officer Response

Comments noted, a number of the changes to wording are considered to be acceptable where it adds greater clarity to the policy. This is likely to require a modification however this will be discussed further through the hearing sessions

In relation to conservation area appraisals, the Council undertook further work in liaison with Historic England following the closing of the Regulation 18 Preferred Sites and Settlement Boundaries consultations in response to Historic England's comments. The methodology was discussed and agreed with Historic England prior to the work being undertaken, on the basis that this would provide sufficient information to support the Local Plan. Further to this the NPPF does not state that Local Planning Authorities should have an up to date conservation area. The 1990 Planning (Listed Buildings and Conservation Areas) Act 1990 states that: (1) Every local planning authority" (a) shall from time to time determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance, and (b) shall designate those areas as conservation areas. (2) It shall be the duty of a local planning authority from time to time to review the past exercise of functions under this section and to determine whether any parts or any further parts of their area should be designated as conservation areas; and, if they so determine, they shall designate those parts accordingly. (3) The Secretary of State may from time to time determine that any part of a local planning authority's area which is not for the time being designated as a conservation area is an area of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance; and, if he so determines, he may designate that part as a conservation area. (4) The designation of any area as a conservation area shall be a local land charge.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1128257	Full Name	Mr David Robertson	Organisation Details	Norfolk County Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	5	Policy ENV 07 Designated Herita
Chapter Number	5			

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy ENV 07: Generally this policy is good, although it is confused about the types of heritage assets that are legally designated and those that are not. Scheduled Monuments, Listed Buildings, Conservation Areas and registered parks and gardens are legally designated (see paragraph 132 of the National Planning Policy Framework, for example; there are no protected wrecks, protected battlefields or World Heritage Sites in Breckland/Norfolk). The main problem is the policy considers all heritage assets included in the Historic Environment Record as designated “ although Scheduled Monuments, Listed Buildings, Conservation Areas and registered parks and gardens feature in the Historic Environment Record, the

Local Plan Pre-Submission - Comments and Response Schedule

majority of heritage assets included in the Historic Environment Record are not legally designated. This confusion means there is considerable scope for this policy to be challenged by developers, their agents and members of the public and it is not consistent with the legal and policy definition of designated heritage assets (sections 132-134 and 137-138 of the National Planning Policy Framework, for example). It is therefore not effective nor compliant with legislation or national policy. Norfolk County Council Historic Environment Service highlighted this confusion in comments provided on an earlier draft of the plan. Revising the text would take away the confusion and ensure this section of the plan is sound. The revised text could read: The significance of designated heritage assets, including nationally protected listed buildings and their settings, scheduled monuments, archaeological sites, registered parks and gardens, conservation areas and their settings, will be conserved and enhanced and given the highest level of protection. Proposals that would affect the significance of a designated heritage asset will be required to provide sufficient information to enable any impact to be assessed. Development that will affect any designated heritage asset will be subject to comprehensive assessment and will be expected to conserve and, wherever possible, enhance the character, appearance and setting of Conservation Areas, Scheduled Monuments, Historic Parks and Gardens and other designated areas of historic interest. 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; this includes internal features, floor plans and spaces or any object or structure within the curtilage of a listed building that predates 1st July 1948. The conversion of listed buildings or buildings of particular architectural or historic interest within Conservation Areas for economic or residential purposes in locations that would otherwise be unacceptable will be considered where this would ensure the retention and ongoing conservation of the building. Proposals will be considered having regard to national policy and relevant guidance.

Breckland Council Response

Officer Response

Comment noted. Reference to archaeology is considered to be relevant and should be included within policy ENV07. It is acknowledged that reference to the Historic Environment Record may lead to confusion around what is a designated heritage asset and what is a non-designated heritage asset. To rectify this it is proposed to amend paragraph 5.60 within the reasoned justification.

Potential amendment to the plan

Amend paragraph 5.60 within the reasoned justification. Include the following sentence at the end of the paragraph:

Amendment ID

PM/E/07/A

Local Plan Pre-Submission - Comments and Response Schedule

'In addition the record includes a number of non-designated assets.'

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1128257	Full Name	Mr David Robertson	Organisation Details	Norfolk County Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	5.54
Chapter Number	5		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Sections 5.54-5.63: There is confusion in this text about the types of heritage assets that are legally designated and those that are not. Scheduled Monuments, Listed Buildings, Conservation Areas and registered parks and gardens are legally designated (see paragraph 132 of the National Planning Policy Framework, for example; there are no protected wrecks, protected battlefields or World Heritage Sites in Breckland/Norfolk). The main problem is these sections consider all heritage assets included in the Historic Environment Record as designated “ although Scheduled Monuments, Listed Buildings, Conservation Areas and registered parks and gardens feature in the Historic Environment Record, the

majority of heritage assets included in the Historic Environment Record are not legally designated. This confusion means there is considerable scope for these sections of the plan to be challenged by developers, their agents and members of the public and it is not consistent with the legal and policy definition of designated heritage assets (sections 132-134 and 137-138 of the National Planning Policy Framework, for example). It is therefore not effective and not compliant with legislation or national policy. Norfolk County Council Historic Environment Service highlighted this confusion in comments provided on an earlier draft of the plan. Revising the text would take away the confusion and ensure this section of the plan is sound. The revised text could read: 5.54 Paragraph 126 of the National Planning Policy Framework states that: local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment. The NPPF also states that local plans should include strategic policies to deliver the conservation and enhancement of the historic environment (paragraph 156) and should identify land where development is inappropriate because of its environmental or historic significance (paragraph 157). 5.55 The historic environment of Breckland is recognised as a unique and irreplaceable resource. Breckland District is fortunate to possess a rich and diverse architectural heritage, displaying the use of a wide range of materials, dictated prior to industrialism by the immediate geology and landscape of the surrounding area. Typically, the use of brick, flint, chalk, clay lump and timber framing for walling with thatch; clay tiles and, in later years following industrialism, slates for roofing. 5.56 The District also contains numerous designated heritage assets: over 1,500 Listed Buildings, 50 Conservation Areas, 200 scheduled monuments and 9 Historic Parks and Gardens included on the Historic England Register, designated to assist in the conservation and enhancement of particular features of historic or architectural interest. Breckland also has a wealth of other important non-designated heritage assets that contribute to both the urban and rural contexts and the historic environment as a whole. 5.57 The character of the District is defined by the combination of elements such as the mixture and style of buildings, the extent and form of open spaces, the quality and relationship of buildings, prevalent building materials and the amount of trees or other green features. These features contribute to the overall character of the area and need to be recognised and respected in proposals for new development. ADDED FROM 5.60 A number of existing documents analyse particular aspects of the heritage significance of the District. IDEALLY THESE DOCUMENTS SHOULD BE NAMED 5.58 There are many

Local Plan Pre-Submission - Comments and Response Schedule

types of heritage asset within the District, some of which are protected through national or local designations, others which have no formal designation or protection. The Council has developed two separate policies to deal with the different types of assets. Designated Heritage Assets 5.59 There are a total of 50 Conservation Areas in the District, most based on historic village centres. It is important that the nature of conservation areas and historic buildings is maintained to ensure their protection for future generations and their continued contribution to the economic prosperity of the District. Social, environmental and cultural benefits are derived from this link to the past and it helps to reinforce a sense of place, quality of life, local identity and character. 5.60 DELETED (as refers to undesignated heritage assets and documents that describe designated and undesignated heritage assets) 5.61 There are 1,536 Listed Buildings in the District, including 113 Grade I and 102 Grade II*. Whilst the majority of the listed buildings in the District are in good or reasonable repair, a number of buildings are in severe disrepair. There are 25 Grade I or Grade II* Listed Buildings at Risk as registered by Historic England. 5.62 There are also 9 Registered Parks and Gardens (all Grade II), 130 scheduled monuments, plus three shared with adjoining Local Authorities. 5.63 Breckland Council understands that heritage assets are an irreplaceable resource and the policy below aims to conserve designated heritage assets in a manner appropriate to their significance.

Breckland Council Response

Officer Response

Comment noted. It is acknowledged that reference to the Historic Environment Record may lead to confusion around what is a designated heritage asset and what is a non-designated heritage asset. To rectify this it is proposed to amend paragraph 5.60 within the reasoned justification.

Potential amendment to the plan

Amend 5.60 with the following sentence at the end of the paragraph:
'In addition the record includes a number of non-designated assets.'

Amendment ID

PM/E/07/A

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	5.64
Chapter Number	5		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Comment relates to new text		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

In order to safeguard non-designated heritage assets adequately Breckland Council should introduce a local list. In the absence of such a list Policy ENV 08 and its supporting text should refer to the definition of such assets in made Neighbourhood Plans.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted. It is considered that policies ENV 07 and ENV 08 provide protection of the historic environment.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1128257	Full Name	Mr David Robertson	Organisation Details	Norfolk County Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy ENV 08 Non-Designated
Chapter Number	5		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy ENV 08: When a development has the potential to affect the significance of a heritage asset, paragraph 128 of the National Planning Policy Framework requires applicants to describe this significance. This requirement is covered by ENV 08s expectation that appropriate assessments (potentially called Heritage Statements) will be provided. However, where known heritage assets are or there is potential for heritage assets with archaeological interest to be present on a development site, paragraph 128 also requires an appropriate desk-based assessment and, where necessary, a field evaluation. This requirement is not currently covered by ENV 08, which must be updated to include it. Leaving this requirement out may

Local Plan Pre-Submission - Comments and Response Schedule

result in developers and their agents refusing to commission desk-based assessments and field evaluations. It also means that the draft plan is not consistent with national planning policy. The Historic Environment Service highlighted this issue in comments provided on an earlier draft of the plan. The revised text could read: Development will be expected to conserve and wherever possible enhance the character, appearance and setting of non-designated historic assets. Proposals that could affect known or previously unrecognised heritage assets will be expected, through agreement with the Council, to undergo an appropriate assessment in line with the significance of the asset. The assessment must provide sufficient information for any impact to be assessed. As a minimum the relevant Historic Environment Record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. The conversion of non-designated buildings of particular architectural or historic merit for economic or residential purposes in locations that would otherwise be unacceptable will be considered where this would ensure the retention of the building. Proposals will be considered having regard to relevant national policy and relevant guidance. In the case of traditional dwellings which positively contribute to the character of Breckland, applications for replacement will be expected to be accompanied by a Design and Access Statement which includes a structural survey that demonstrates that the demolition is necessary and that there is no alternative and viable solution of renovation to provide an acceptable standard of accommodation. Where a development site includes or has the potential to include heritage assets with archaeological interest, an appropriate desk-based assessment and, where necessary, a field evaluation will be required to allow any impact to be assessed. Where appropriate, archaeological remains can be left in situ following further design and/or carefully considered engineering work. If the benefits of a particular development are considered to outweigh the importance of retaining archaeological remains in situ satisfactory excavation and recording of remains, with provision for dissemination and archiving of the results, will be required before development is begun.

Breckland Council Response

Officer Response

Comment noted. It may be necessary to amend the policy to include wording on archaeology, any modification to the policy would need to be discussed at the hearing sessions.

Local Plan Pre-Submission - Comments and Response Schedule

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	5.69
Chapter Number	5		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	This is new text		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The referenced SFRA does not address flood risk in the parish of Saham Toney, nor in any of the other 16 rural settlements with boundaries. But all 17 settlements are allocated housing development which may be subject to flood risk. The Council must add sufficient information to allow the assessment of flood risk due to new developments in the 17 rural settlements.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The criteria based approach would mean that planning applications would need to be submitted. Through the application process the issue of flood risk would be assessed.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	5	Policy ENV 09 Flood Risk & Surf
Chapter Number	5			

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Policy has been rewritten		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

While the policy addresses the use of SuDS it does not cover the situation where groundwater is inundated to the point where SuDS will not function as intended. Add criteria to address this omission. The term "medium and higher flood risk areas must be defined, and it must be made clear that reference for these is to be made to the Environment Agency's "live" online flood risk maps rather than any maps taken at a particular point in time. Flood risk is regularly reassessed and climate change also has an ongoing influence so flood risk areas may be larger in say 5-10 years and the Plan must take account of that.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Medium and High risk flood risk is defined in national guidance and in the glossary of the local plan as being Flood zone 3a and 3b, respectively. Comment noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1134647 Full Name Mr Tony Needham
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Policy ENV 09 Flood Risk & Surf
 Chapter Number 5

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4 - Is the plan positively prepared?	Yes
5 - Is the plan justified?	No	6 - Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10 - Have you raised this at Issues and Options?	No	11 - If you have not raised this issue before please state why	Recent experience with developers have resulted in additional volumes of water being delivered to watercourses which have not needed to deal with these volumes previously causing flooding off site.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Not Positively Prepared. the policy does adequately meet the objective. The wording needs to be amended to be considered Sound. While the run-off rate from any site may not increase, the overall volume would increase, developers should therefore be required to rehabilitate water courses off-site to ensure that these additional volumes can be accommodated.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Norfolk County Council as Lead Local Flood Authority produce a guidance note which includes more detailed information for consideration when assessing applications including regarding run off rates and volume. A reference to LLFA guidance is made in the policy. The LLFA have not raised any soundness issues with regard to the policy wording.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy ENV 08 Non-Designated
Chapter Number	5		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy ENV08: Non-Designated Heritage Assets We very much welcome the inclusion of a standalone policy which addresses non-designated heritage assets. Robust provision for these heritage assets will increase the soundness of your forthcoming plan.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	874753	Full Name	Ms Heidi Frary	Organisation Details	Ovington Parish Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy ENV 09 Flood Risk & Surf
Chapter Number	5		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The flooding of 23 June 2016 highlighted new issues around water management.		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

It is inadequate to simply maintain the run-off rate from any site. If this rate continues for longer the volume would increase and could overwhelm downstream resources. Developers should therefore be required to either have storage or rehabilitate water courses off-site to ensure that these additional volumes can be accommodated.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Norfolk County Council as Lead Local Flood Authority produce a guidance note which includes more detailed information for consideration when assessing applications including regarding run off rates and volume. A reference to LLFA guidance is made in the policy. The LLFA have not raised any soundness issues with regard to the policy wording.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1135889	Full Name	Mr Stewart Patience	Organisation Details	Anglian Water Services Ltd
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy ENV 09 Flood Risk & Surf
Chapter Number	5		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The above policy refers to the application of SuDS principles to mitigate the potential for surface water flooding.

Anglian Water support the requirement for applicants to include the provision of Sustainable Drainage Systems (SuDS) so as not to increase flood risk and to reduce flood risk where possible. The use of SuDS would help to reduce the risk of surface

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	5	Policy ENV 10 Renewable Energ
Chapter Number	5			

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	New policy		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Add to the phrase "...other relevant policies in the Local Plan..." the text "and made Neighbourhood Plans" to ensure such plans are also given weight when making planning decisions.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	5	Policy ENV 10 Renewable Energ
Chapter Number	5			

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy ENV10: Renewable Energy Development

We support the inclusion of a specific policy relating to renewable energy technologies. A sustainable approach should secure a balance between the benefits that such development delivers and the environmental costs it incurs. We welcome point (i) of the policy which seeks to limit and mitigate any such cost to the historic

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	874753	Full Name	Ms Heidi Frary	Organisation Details	Ovington Parish Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy ENV 10 Renewable Energ
Chapter Number	5		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Some comments were made as part of the Preferred Direction consultation, but a greater level of understanding has developed.		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The Parish of Ovington has embraced renewable energy with an extremely high rate of solar PV and wind turbines installations per capita. This policy has not been positively prepared, nor is it justified, nor effective, nor does it comply with the NPPF. This is an aggressive negatively worded policy with multitudinous list of subjective reasons to reject a renewable energy development and no recognition of balancing benefits. point (i) it is difficult to quantify 'adverse impact' as these are highly subjective, whereas the benefits can be quantified in CO2 reduction or kWh produced. point (ii) refers to outlook. It was understood that in planning terms nobody is entitled to a view. If 'outlook' is introduced in this policy, it should

Local Plan Pre-Submission - Comments and Response Schedule

be consistently applied throughout all other polices. This policy is a reads like a political campaign message.

Breckland Council Response

Officer Response

The policy wording seeks to take into consideration a wide range of different types of renewable energy development at differing scales. The policy is conformity with NPPF and NPPG, supporting the transition to a low carbon future.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1134647	Full Name	Mr Tony Needham	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title	Breckland Local Plan Pre-Submission Publication	Number
Chapter Number	6	

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The Council has developed a much greater technical understanding of the Town Centre which has been driven by the Neighbourhood Plan consultation identifying the a vibrant town centre as a high priority for residents of Dereham.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Not Positively prepared. The policy will not meet the objectives of maintaining a vibrant town centre. Whilst the main text of the draft Local Plan outlines those saved employment allocations from the 2012 Site Specific Policies & Proposals DPD which as proposed to be taken forward in the new Local Plan, the main text appears to be silent on the saved town centre/retail allocation which is to the taken forward. This is despite the Town Centre Inset Proposals Map for Dereham showing the George Road/Cowper Road allocation (D6) as a 'saved retail allocation'. Given

Local Plan Pre-Submission - Comments and Response Schedule

the importance of identifying land to accommodate identified needs, the main text of the draft Local Plan needs to make specific reference to D6 including the range of land uses which are considered acceptable and the key issues for bringing forward redevelopment of the different parts of this area. The Town Council considers that the Wrights Walk Phase II area should also be identified as a potential town centre redevelopment opportunity along with the further opportunities in the town centre which may also be identified via the Dereham Neighbourhood Plan. These site allocations should be shown on the proposals maps and the main text in order that the Plan meets the expectations of paragraph 23 of the NPPF. The emerging Dereham Neighbourhood Plan for Dereham has identified a vibrant town centre as high priority for residents.

Breckland Council Response

Officer Response

It may be necessary to include a modification to clarify the Council's intention to retain the George Road/Cowper Road allocation (D6) as a saved retail allocation in the Local Plan. A modification would be subject to discussion at the hearing sessions.

The Wrights Walk Phase II area has not featured as a previous allocation. Evidence has not been provided during the development of the Breckland Local Plan to support its inclusion as a retail allocation. This does not preclude the Council from considering the site for development/regeneration as part of the Council Market Town Initiative Program or from featuring as an allocation in Dereham Town Councils Neighbourhood Plan, where supported by evidence.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	6	Employment Allocation Attlebor
Chapter Number	6			

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Attleborough Employment Allocation 1: LP(002)029 and LP(002)007: Land to the west of London Road The Grade II White Lodge Inn sits immediately to the west of this site. It is a low rise building which sits in open land, buildings in this area sit alone and are separated out from each other. Development at this site must therefore be sensitive to the setting of the listed building. Any development of this site will need to preserve or enhance this designated heritage asset and its settings. The text and the policy should also refer to potential archaeological remains and require an archaeological assessment to be submitted upon application. These requirements should be included in the policy and supporting text of the Plan.

Local Plan Pre-Submission - Comments and Response Schedule

Breckland Council Response

Officer Response

The Policy has been developed to meet both the requirements of Local Plan policy EC01 and the aspirations of the Attleborough Neighbourhood Plan. Planning applications for the development of the site will have to have regard to all relevant policies within the Local Plan (including policies ENV07 and ENV08 on the historic environment) and the NPPF.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	442915	Full Name	Mr Stephen Faulkner	Organisation Details	Norfolk County Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	6	Employment Allocation Attlebor
Chapter Number	6			

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Issue not raised previously there was no inconsistency in the Reg 18 version between policies as outlined below in respect of the new Plan (Reg 19).		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The Local Plan in paragraph 2.32 (page 22) refers to a strategic employment site of 10 ha in Attleborough, which is allocated in the Plan on sites LP[002]029 & LP[002]007 (Page 179) and in Policy Attleborough Employment Allocation 1 (page 180). Policy EC 01 of the Local Plan (page 177) refers to new employment allocations of at least 10 ha for Attleborough. While supporting the allocated sites in Attleborough for employment uses, it is felt that the figure of 10 ha referred to in paragraph 2.32 and in the above Policy (Attleborough Employment Allocation 1) should be changed to as at least 10 ha which would be consistent with Policy EC 01 (Economic Development) of the Local Plan (page 177). As written paragraph

Local Plan Pre-Submission - Comments and Response Schedule

2.32 and Policy Attleborough Employment Allocation 1 are inconsistent with Policy EC 01 and as such creates uncertainty in the Plan making it ineffective and unsound.

Breckland Council Response

Officer Response

Comment noted.

Potential amendment to the plan

Add 'at least 10 ha' to the policy wording

Amendment ID

PM/EE/AE1/A

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	6	Employment Allocation Snetttert
Chapter Number	6			

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Snetterton Heath Employment Allocation 1: LP(087)010A: Land to the northwest of the General Employment Area The Grade I listed Church of All Saints and Grade II listed Old Rectory lie to the northwest of the proposed site allocation. Although set a distance away from the site the land separating them is open and so the setting of these of heritage assets could be affected by the height of the development of the site. Any development of this site will need to preserve or enhance these designated heritage assets and their settings. These requirements should be included in the policy and supporting text of the Plan.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted - Policy ENV 07 and ENV 08 would also be read alongside this policy, which would give further weight to the historic environment.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	6	Employment Allocation Snetttert
Chapter Number	6			

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Snetterton Heath Employment Allocation 2: LP(087)009: Land to the east of the General Employment Area There are no known designated heritage assets within the proposed site allocation boundary and none nearby which would be affected. The Grade II listed remains of a C15 stone cross lie at a crossroad to north of the site and given its nature and distance of separation from the site is unlikely to be affected by its development. Closer to the site is Gallows Hill Tumulus, a scheduled monument to the south of the site. The scheduled monument is screened from the site by existing development, so development of the proposed site allocation is unlikely to result in an impact upon the setting of the scheduled monument beyond

Local Plan Pre-Submission - Comments and Response Schedule

that which already exists. The presence of the scheduled monument does however increase the potential for other archaeological remains of interest to be present. The text and the policy should refer to potential archaeological remains and require an archaeological assessment to be submitted upon application. This requirement should be included in the policy and supporting text of the Plan.

Breckland Council Response

Officer Response

Comment noted - Policy ENV 07 and ENV 08 would also be read alongside this policy, which would give further weight to the historic environment.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1133548	Full Name	Justin Brookes	Organisation Details	
Agent ID	1133456	Agent Name	Emer Costello	Agent Organisation	DLP Planning Ltd

Comment Details

Title		Number	Policy EC 01 Economic Develop
Chapter Number	6		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

See attached.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The response sets out that the Employment Growth Study 2013 is out of date. This, however, represents the most up-to-date and robust evidence regarding employment within the district.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1132036	Full Name	De Merke Estates	Organisation Details	De Merke Estates
Agent ID	1132034	Agent Name	Mr Stuart Thomas	Agent Organisation	Berrys

Comment Details

Title		Number	Policy EC 01 Economic Develop
Chapter Number	6		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy ECO1 is supported as it is considered that it enables an appropriate supply of employment land within the settlement of Swaffham over the Plan period (9ha.).

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1134647 Full Name Mr Tony Needham
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Policy EC 01 Economic Develop
 Chapter Number 6

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	As PD06 in preferred directions.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Not Positively Prepared. The policy does not adequately meet the objectives set out in Para 20, 21 of the NPPF. Dereham Town Council has consistently looked for a balanced approach to development with Jobs growth balancing with housing growth. The Town has recently lost employment land off Westfield Road to residential development and housing allocation 2 will result in the loss of employment. The existing employment sites are mostly built out and it cannot currently be demonstrated that allocation D5 is deliverable because of access and willingness of land owner to bring it forward for employment. It is believed that an additional 3 Ha employment land for Dereham is insufficient to provide a variety of

Local Plan Pre-Submission - Comments and Response Schedule

opportunities for potential employers or the level of jobs to account for the growth in Dereham over the plan period. The employment land study completed in 2013 did not take account of Dereham's increased employment potential resulting from the announcement of the completion of the dualing of the A47 to Norwich. Dereham, with better access to Norwich and receiving a larger housing growth, is allocated 3.1ha of employment land while Swaffham, which is more distant from Norwich will be given an allocation of 8.8ha of employment land. This mismatch does not seem to be based on sound evidence. The emerging Dereham Neighbourhood Plan has a vision which would like to see a balanced approach taking advantage of the A47 improvements to deliver greater employment growth.

Breckland Council Response

Officer Response

The Employment Growth Study and Land Review of 2013 is considered to provide the most up-to-date robust evidence in regards to employment land. The findings of the study support the strategy as set out in EC 01.

Whilst Neighbourhood Plans must be in line with the strategic objectives of the Local Plan this does not stop NPs from exceeding targets.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1128193	Full Name	Mr James McSwiney	Organisation Details	Snetterton Park Limited
Agent ID	500563	Agent Name	Keymer Cavendish	Agent Organisation	

Comment Details

Title		Number	Policy EC 02 - Snetterton Heath
Chapter Number	6		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Whilst we and numerous recently published employment-focused reports support commercial development at Snetterton Heath, landowners Snetterton Park Limited, who own 28 hectares in the southwest of the general employment area, feel that Policy EC01 is unsound because: it has not been positively prepared many of the other restrictions are not justified and it is inconsistent with national policy General background In 2015 South Norfolk, Breckland and Forest Heath Councils commissioned Bruton Knowles together with Amion Consulting to advise on how economic growth might be delivered in the recently dualled A11 corridor. At that time, paragraph 2.3.4 of the report noted that Snetterton Heath was a key

employment centre with 24 hectares of land allocated for industrial and commercial development in the period to 2026. Of the 14 Key Location Sites in the A11 Growth Corridor, six are in Breckland District, of which Snetterton Heath is one. There is significant economic development potential offered by the A11 Corridor but there are barriers to growth. One of these is the deficiency in electricity power, identified as being around 5MW. A biomass plant has been constructed at Snetterton and is now in operation generating 44MW of green electricity a year. The project was developed through a Joint Venture between Eco2 and Icen Energy Limited. However, output from the plant is fed to the National Grid at Diss. There is significant economic development potential offered by the A11 Corridor but there are barriers to growth. One of these is the deficiency in electricity power, identified as being around 5MW. A biomass plant has been constructed at Snetterton and is now in operation generating 44MW of green electricity a year. The project was developed through a Joint Venture between Eco2 and Icen Energy Limited. However, output from the plant is fed to the National Grid at Diss. To enable electricity to be delivered to Snetterton, a transformer would be required to reduce the voltage, which would likely cost £2m-£6m. Norfolk County Council has a licence to deliver 1MW into the local grid and is looking to develop a PV farm to deliver this supply. Match funding of 50% is in place to deliver this project which has a cost of £1.8m. The Council and Local Enterprise Partnership are now funding a project to connect Snetterton Heath to the grid and to the biomass boiler at a cost of approximately £3 million to produce 6MW of power. They will implement the project in such a way that the power supply can be increased in stages (eg a second 6MW for another £3 million etc). This is to be implemented by February 2019. Drainage of foul and surface water is another issue, and Snetterton Heath in particular has insufficient sewer capacity, but an onsite solution could be provided. The report stated that most of the development sites in the A11 Growth Corridor are in private ownership and releasing the land for development may require the Council to sell the vision for the A11 Corridor to landowners. This is not the case with Snetterton Park Limited, owners of land parcel LP [087]011, who support development at Snetterton Heath and will offer their land. Additionally, the landowners will work to encourage and support the A11 technology corridor project. In terms of deliverability, Snetterton Heath has been allocated the site reference BL3 with development timescales of short term (2015-21), medium term (2021-26), long term (2026-31) and beyond 2031. However Snetterton Heath has been identified as a site which would appear to make a significant contribution to

overall development criteria. The report concludes that transformation of the A11 Growth Corridor could lead to the construction of over 700,000 square metres of new employment floor space and the creation of 15,000 job opportunities. The preferred option is to drive forward the transformation by targeting eleven sites in seven major development areas and establish the likely level of public sector resources available to facilitate development. The Breckland Employment Growth Study 2013 produced by Nathaniel Lichfield shows in paragraph 6.9, table 6.1 a 16.2% decline in manufacturing during the period 2011-2031 with a predicted loss of 1,280 jobs. Therefore no barriers should be placed in the way of any form of employment at Snetterton Heath. When it comes to the exact wording of Policy EC02 “ Snetterton Heath “ paragraph 2 is far too restrictive in suggesting only B1 and B2 uses in the southern extent of the general employment area (GEA). Although the report states B1 and B2, it does not specifically state that B8 uses are forbidden but that, nonetheless, for a prospective occupier the likelihood of gaining consent for a freestanding warehouse, or even a warehouse constructed in association with adjacent manufacturing, is uncertain. This is a particular disincentive to an occupier when the planning application fee alone for a 5,000 square metre warehouse would be around £20,000. A clear policy would facilitate development. National policy The NPPF is insistent that sustainable development also involves an economic role and stresses the necessity to ensure that sufficient land of the right type is available in the right place at the right time to support growth. It is felt that the restrictive nature of Policy EC02 paragraph 2, suggesting that B8 use should be excluded from this development, contradicts this economic imperative. The result of this infringes paragraph 9 in that it will not make it easier for jobs to be created at Snetterton Heath. Similarly, at paragraph 14, the need for flexibility to adapt around rapid change is emphasised, but again if the type of development is restricted on the un-zoned land southwest of the GEA, the objectives of the NPPF are thwarted. It is incomprehensible that in July 2016 Breckland Council published and then withdrew a map which identified the Snetterton Park land (28 hectares) as site LP [087]011 [see plan Snetterton Land Use & Site Assessment Map (July 2016) attached] and designated the site as retail because it had operated as a Sunday and Bank Holiday market for many years. The landowners do not necessarily require a retail allocation, but they want the flexibility to perhaps have buildings with trade counters, or even showrooms for the sale of commercial vehicles or high-performance cars and motorcycles. Certainly, if the Council wants the site to be fully developed, some clarity is

required. Planning principles Paragraph 17 of the NPPF states: Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals...taking account of the needs of the residential and business communities. Sustainable development Paragraph 19 states: Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system. Sustainable development Paragraph 19 states: Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system. We submit that the current wording of Policy EC02 does not achieve that objective, nor does it proactively meet the development needs of business, in accordance with paragraph 20. Indeed, these policies are already proving to be a potential barrier to investment (paragraph 21) and do not positively and proactively encourage sustainable economic growth. Paragraph 21 continues to state: Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances. Policy EC02 does not do this and we repeat that it is not therefore sound. Snetterton Park Limited are prepared to take a flexible attitude as to how the Local Plan should be adjusted. The simplest solution would be to extend the Snetterton GEA to cover the whole of the Snetterton Park land totalling 28 hectares [see map GEA extension - map 6.1 Summary of Snetterton Heath Allocations attached]. The majority of this land already has implemented planning consents for various market/retail uses. The remainder has been car parking for many years so it is effectively all previously developed land. In these circumstances, whilst Snetterton Park have no objection to the new allocations being suggested north and south of the A11, it seems ironic that greenfield land is being promoted in preference to brownfield land. We do not suggest these greenfield allocations should be deleted, but merely that all the previously developed land is included within the GEA " in other words, the full 28 hectares of the Snetterton Park landholding. In summary, whilst we support the promotion of economic development at Snetterton Heath and indeed the early suggestions that at least 20 hectares of land should be identified at Snetterton Heath as proposed in Policy EC01 and paragraph 6.14. But that at least seems to have been forgotten at paragraph 6.16 and there is the unnecessary suggestion that 20 hectares should be the maximum allocation. Paragraph 6.7 of the Local

Local Plan Pre-Submission - Comments and Response Schedule

Plan suggests that up to 74.7 hectares of employment land might be required yet the Local Plan suggests delivering less than this. What possible problem would there be in simply extending the GEA at Snetterton Heath to include the previously developed land which lies between GEA and the A11? In conclusion, the aims of Snetterton Park Limited are: To get B8 allocation on their land The reports imply that this is a sector that will experience most growth in the region. A good number of the enquiries that they have received from manufacturers also include substantial aspects of warehousing and logistics. A number of the enquiries have been from logistics companies. B8 allocation will assist the landowners to develop the site. Complete clarity in the planning policy will encourage development and enable the various landlords to compete on an even playing field. Clarity on how the rest of the site is zoned. Either get the whole site allocated as GEA land, or leave the GEA allocation as it is and get the rest of the land allocated as brownfield (a term that the Council has used in various documents to describe the site). Currently the majority of the site has a very ambiguous status, which is not attractive from a development point of view. The second option (brownfield) might be preferable. The zoning implied in the Local Plan (motorsport and engineering will be actively encouraged), is understandable, but the Council reports indicate that growth on the A11 corridor will not come from manufacturing, but from logistics and other activities. Where engineering hubs have been successful they have required intense support (i.e. Hethel, land supplied by the Council, no need to make a profit etc.). The Council has been proactive in resolving the power and transport issues in the area, which will greatly assist development in general. If it really wants more motorsport/engineering, it will probably need to put a support package together. With the amendments suggested on this form, the Plan: Ć will be positively prepared Ć will not be subject to unjustified restrictions Ć will be consistent with national policy

Breckland Council Response

Officer Response

The 2013 Employment land and growth study identified a need for an additional allocation of 20 hectares for employment use at Snetterton Heath. Policy EC 01 sets out to meet this need for 'at least' 20 hectares at Snetterton - these are met through Snetterton Employment Allocation 1 and 2.

Policy EC 02, alongside policy EC 03, allows for further economic development to come forward above the 20 hectare allocation. The wording of the policy seeks to outline uses that are preferred within each area to reflect current uses and wider aspirations for the site, as set out through the Land Owners Consortium meetings. The policy offers flexibility by starting that preferred uses are 'encouraged' and 'will be preferred'. This does not, in itself, rule out further development on the site of other uses; however, as these are not allocations they would be

Local Plan Pre-Submission - Comments and Response Schedule

assessed based on the individual merits of the scheme proposed.

The policy is informed by robust data as set out in the Employment Growth Study and Land Review 2013.

Potential amendment to
the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	6	Policy EC 02 - Snetterton Heath
Chapter Number				

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy EC02: Snetterton Heath We welcome the inclusion of point 4 of the policy which requires development to have a minimal impact upon the surrounding landscape. We recommend that the policy is expanded at this point to ensure that development has regard to the protection or enhancement of the historic environment.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The landscape Character Assessment has regard to the historic environment. All Policies including policies ENV 07 and ENV 08 on the historic environment would also have to be considered alongside policy EC 02.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1131249	Full Name	Stapleford Group Thetford Ltd	Organisation Details	Stapleford Group Thetford Ltd
Agent ID	1133058	Agent Name	Mr David Barker	Agent Organisation	Evolution Town Planning

Comment Details

Title		Number	Policy EC 03 General Employme
Chapter Number	6		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Our client did not have an appropriate interest in the land at the time of the previous representations.		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

1. Policy EC03 states that sites identified as General Employment Areas on the Policies Map will be protected for employment uses. This includes the former Viking factory site which is currently subject to a pending planning application (LPA Ref. 3PL/2017/0949/F) for a retail development. 2. Draft Policy EC03 however permits proposals for mixed-use developments in identified employment areas where they: Incorporate a significant employment element; Are compatible with existing employment uses; Support the improvement of an employment area that is in need of upgrading; Do not constrain the operations of adjoining businesses; and Are capable of reinstatement for business and industrial use. 3. Paragraph 6.67

of the draft Local Plan adds that: "Appropriate proposals to diversify and ensure the long-term sustainability of existing employment areas will therefore be supported where they contain a significant employment element, contribute positively to the viability of the employment land and would not undermine, and are otherwise compatible with, existing employment uses." 4. Whilst it is recommended that the Viking site is omitted from the wider employment allocation at Caxton Way, and/or reallocated for economic development, if the Council are not agreeable to this it is recommended that draft Policy EC03 is amended to support employment generating uses such as retail on allocated employment sites for the following reasons. 5. NPPF uses a more appropriate term, 'economic development' to refer to uses which create jobs. Indeed, the NPPF moves away from previous policy approaches which sought to allocate land for Class B uses. Paragraph 22 of the NPPF provides flexibility for alternative uses of employment sites, highlighting that planning policies: "should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities." 6. The NPPF also recognises that sustainable economic growth can be delivered through the provision of a range of economic uses, including retail. Paragraph 19 is instructive in the case, noting that the planning system should do "everything it can to support sustainable economic growth. Planning should operate to engage and not act as an impediment to sustainable growth". 7. Whilst the Viking site has been allocated for employment since 1999 in the Local Plan, it has been vacant since 2009 when the factory closed. The former factory is long demolished and the site will never be developed for Class B uses as it will simply not be viable. Despite being actively marketed for employment purposes for eight years there has been limited interest from B1, B2 or B8 users as evidenced in the attached marketing report. As such the site, has remained vacant. 8. The site has however received interest from retailers including the current proposal and previously in 2013 which resulted in a planning application being submitted for a supermarket on the site (LPA Ref. 3PL/2012/0213/O). Whilst this application was refused by the council on retail impact grounds, despite being allocated for employment in the Local Plan, planning officers concluded in their committee report that the: "site is not considered to be

significant in employment land terms or to be of strategic importance." The Committee Report continued, "the demand for such sites in this locality appears to be rather limited." 9. The Committee Reported added that: "refusal of the application on loss of employment land grounds would not be justified given the available evidence on employment land supply in Thetford." 10. This is supported by evidence in the Breckland Employment Growth Study (BEGS) form November 2013 which concluded that there is a good supply of employment land in Thetford. The BEGS also notes that the quality of the employment at the Caxton Way Industrial Estate which included the Viking site is of a low quality in comparison to other sites in Thetford. 11. In short, the Council has recognised that the Viking site is no longer a viable employment site. This will not change in the future because the Caxton Way Industrial Estate is poorer quality than other sites in Thetford. Therefore, safeguarding the site for employment purposes is unnecessary and cannot be justified. 12. As such, the Council should support alternative employment generating uses such as retail on the site which is an economic wealth generator and employment creating land use. The re-use of the Viking site for another form of economic development will not have a harmful effect on Class B employment land supply within Breckland. 13. Higher value non-B uses, including retail will also provide for the efficient re-use of the site, and will deliver a wide range of economic and social benefits for the local community; including creating new jobs in accordance with the overall economic objectives of the Local Plan. The proposed retail scheme on the site will create up to 200 jobs. This is likely to be significantly more than would be created even if a Class B employment scheme was viable (and is not). 14. The importance of the retail sector to the national economy and the benefits of the employment opportunities provided are recognised in the King Sturge report entitled 'The Contribution of the Retail Sector to the Economy, Employment and Regeneration'. The document corroborates the benefits of retail employment and the value to the local economy. 15. Although retail proposals would have to pass the retail policy tests, it is important the Plan recognise that in an increasingly competitive world, the need to accommodate the new ways by which we earn our living and support a strong, responsive and competitive economy. This can only happen if policies and allocations are flexible and recognise that high value non-B Class uses can deliver significant social and economic benefits, including employment opportunities. 16. In summary, the Viking site is: Currently cleared; It has been unsuccessfully marketed for B Class uses; Caxton Way Industrial Estate is of low quality; The principle of non-B Class uses has been

Local Plan Pre-Submission - Comments and Response Schedule

accepted; and It is currently the subject of an application for economic development. 17. For these reasons, the Viking site must be exclude from the wider 'General Employment Area' allocation. it should either be unallocated (white) land, or it could ne identified as an 'opportunity' site for economic development. 18. Alternatively, the wider General Employment Area site could be designated for Economic Development in accordance with the NPPF. On this basis we suggest that the first bullet point of Draft Policy EC05 is redrafted to state: 'Incorporate a significant element of economic development', 19. The third and fifth bullet points should be deleted as they are meaningless. This will ensure that the plan is positively prepared to take advantage of the opportunities for growth, is justified by being the most appropriate strategy, is effective by being sufficiently flexible to be deliverable and accords with National Planning Policy.

Breckland Council Response

Officer Response

Policy EC 03 General Employment Areas seeks to maintain the function of these employment areas which make significant contributions towards the local economy and provide an important source of local employment. The policy is worded in a way so that it is flexible, in line with the findings of the Employment Growth Study, to allow for other higher value non-B uses on part of allocated sites, in order to unlock the site's potential and fund any associated infrastructure works. It is considered that the findings of the Employment Growth Study support the existing General Employment Areas and it is not proposed to make changes to these in line with pending planning applications. It is considered that the policy wording is flexible, in line with the NPPF.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136116	Full Name	Eastern Attachments Limited	Organisation Details	Eastern Attachments Limited
Agent ID	1136100	Agent Name	Mr Ian Douglass	Agent Organisation	Head of Planning Lanpro Services

Comment Details

Title		Number	Policy EC 03 General Employme
Chapter Number	6		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4 - Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Note for Information: We act on behalf of Eastern Attachments (EA) who are a steel fabrication business currently based at Maurice Gaymer Road, Attleborough. EA are currently preparing a Reserved Matters Planning application in pursuance of planning permission 3PL/2016/0417/O, Land to the east of London Road, Attleborough. Consent was granted by Breckland Council on 8 th July 2016 for 13,710 sq m of B1, B2 and B8 uses at the site. The subject site sits within the General Employment Area off London Road, Attleborough as identified in the Pre-Submission local plan.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Local Plan Pre-Submission - Comments and Response Schedule

Our client is supportive of the identification of the site subject of planning permission 3PL/2016/0417/O, Land to the east of London Road, Attleborough as a General employment area in the emerging local plan. Eastern Attachments produces material handlin

Breckland Council Response

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1133548	Full Name	Justin Brookes	Organisation Details	
Agent ID	1133456	Agent Name	Emer Costello	Agent Organisation	DLP Planning Ltd

Comment Details

Title		Number	Policy EC 03 General Employme
Chapter Number	6		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

See attached.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The response sets out that the Employment Growth Study 2013 is out of date. This, however, represents the most up-to-date and robust evidence regarding employment within the district.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	6	Policy EC 04 Employment Devel
Chapter Number				

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy EC4: Employment Development Outside General Employment Areas Part (d) of the policy seeks to protect traditional buildings of clear architectural or historic interest from being removed. It is not clear what the policy means by the term traditional in this sense and if a building of clear architectural or historic interest refers to a listed building. If so, a listed building as a designated heritage asset should not be considered for demolition without consideration of the proper tests embodied within paragraphs 132-134 of the NPPF. The policy implies that demolition and replacement will be acceptable if the criteria of the policy are met and so does not conform with national policy. The policy contains no provision to

Local Plan Pre-Submission - Comments and Response Schedule

ensure that development preserves or enhances nearby heritage assets and their settings.

Breckland Council Response

Officer Response

The policy would be read alongside, and not independent of, policies ENV 07 and ENV 08, which seek to preserve or enhance the historic environment.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1131249	Full Name	Stapleford Group Thetford Ltd	Organisation Details	Stapleford Group Thetford Ltd
Agent ID	1131244	Agent Name	Mr Andrew Astin	Agent Organisation	Indigo Planning

Comment Details

Title		Number	Policy EC 05 Town Centre and R
Chapter Number	6		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Have not made comments in previous consultations.		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

See attached letter

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The attached letter seeks to dispute the findings of the Breckland Retail Study Addendum 2017. Representing a company based in Thetford, the letter seeks to question the levels of convenience and comparison floorspace outlined in the study. The 2017 Retail Study Addendum presents a concise update to the existing Breckland Retail Study (2010) and the Breckland Retail Study Update (2014). A more comprehensive explanation of how data was used to inform retail projections is contained in the earlier reports. The Addendum does take into account both ONS population projections and growth proposed in the Local Plan (which factors in housing commitments and completions). Additionally, the specific housing schemes referred to in Indigo's statement (350 houses consent, Norwich Road), (180 houses, Thetford Road) are within Attleborough and Watton respectively, not Thetford. The representation points to technical issues with the Retail Impact Study which have been raised with the consultant and found to be defensible. Overall the evidence is sufficiently robust to inform policy in the plan and more detailed points can be discussed during the Examination.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	11968	Full Name	Mr Garth Hanlon	Organisation Details	Abel Developments
Agent ID	11888	Agent Name	Mr Garth Hanlon	Agent Organisation	Director Savills

Comment Details

Title		Number	Policy EC 05 Town Centre and R
Chapter Number	6		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

In respect of Swaffham, draft Policy EC 05 Town Centre and Retail Strategy seeks to direct limited retail floorspace growth based upon the evidence of the 2017 Breckland Retail Study Addendum. Having regard to the figures contained in that Addendum, as it relates to the projections of new floorspace in Swaffham over the plan period up to 2036, the following are relevant to the town Convenience retail floorspace 0 net sq m Comparison retail floorspace 1073 net sq m Gross food and beverage floorspace 220 sq m The Councils evidence base is informed by population growth projections taking into account the proposed distribution of growth across throughout the District in accordance with proposed spatial strategy

Local Plan Pre-Submission - Comments and Response Schedule

found at Draft Policy HOU 02. In respect of Swaffham, as mentioned in separate representations, the Council is seeking to plan for a minimum of 1,612 new homes, of which it is stated at paragraph 3.148 that 1,007 have either already been completed or are committed, with a further 525 dwellings benefitting from a resolution to grant planning permission subject to S106 agreement. A large proportion of growth is coming forward to the south of the town. The Retail Study considers growth at a high theoretical level. Abel Homes has however considered the existing distribution of retail, services and facilities within Swaffham in relation to the growth coming forward. It is considered that there is a need for additional facilities to the south of the town such as local shops, a doctors surgery, and a care home. The introduction of new facilities into the south of the town will assist in enhancing the sustainability credentials of the area. It is considered that the District Council has missed an opportunity to allocate Land West of Brandon Road, Swaffham (LP[097]014). This site has the potential to accommodate approximately 200 dwellings, a care home, a Health Centre, and local shops. It is considered that this proposal has potential to deliver a wide range of public benefits to the surrounding area and contribute to an enhanced environment with the additional of new facilities

Breckland Council Response

Officer Response

Whilst Policy EC 05 Town Centre and Retail Strategy sets out findings from the 2017 Retail Study Addendum the policy is also worded in order to be flexible. The policy states that "retail and other town centre development will be supported, provided that it is of an appropriate scale that reflects the size and role of the centre, respects the character of the centre, including any special architectural and historical interest and contributes to maintaining and enhancing its existing retail function".

This flexible approach is considered to be in line with national policy.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	6	Policy EC 05 Town Centre and R
Chapter Number			6	

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy EC05: Town Centre and Retail Strategy The conservation and enhancement of the historic environment can improve the quality of local places and reinforce local character and distinctiveness. This can help create attractive and pleasant places that people want to visit. It is therefore recommended that the historic environment is mentioned in the third bullet point at the end of the policy so that it reads, Deliver improvements to the built and historic environment †. This will recognise the role the historic environment has to play in helping establish local identity and sense of place whilst seeking its enhancement.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

It is intended that policies ENV 07 and ENV 08 will be read alongside Policy EC 05. This will recognise the role that the historic environment has to play in establishing local identity and sense of place.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1134647	Full Name	Mr Tony Needham	Organisation Details	
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy EC 05 Town Centre and R
Chapter Number	6		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Some comments were made as part of the Preferred Directions, but a greater level of understanding of town centre issues has been developed along with understanding that this is a big priority for residents and recent experience of the sequential test not being used effectively.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why	13- If you feel the plan is unsound, please tell us why
	Not Positively Prepared. The policy does not adequately meets the objectives set out in Para 23-37 of the NPPF. Not justified , it has not based on sound and credible evidence. The Town Council supports the move away from having policies relating to detailed restrictions on the amount of specific Classes of use within the town centre. The Town Council supports the desired outcome of the policy to maintain a vibrant and viable town centre, the policy has insufficient clarity to provide this

protection. Words should be included so that there is clarity regarding the detail required in the sequential test, e.g. a detailed assessment of whether there are any suitable and available sites/premises in sequentially preferable location to accommodate main town centre use proposals outside of primary shopping areas (taking into account the need for applicants to be flexible in scale and format). The words "except where it serves a local need" should be removed as it introduces a very low threshold, is vague and almost anybody could justify anything on the basis of serving a local need. The justification for giving protection to rural shops and facilities on the basis of maintaining viability and vibrancy is sound. The wording should be changed however to make it clear that this policy relates to shops and services in all rural areas not only those in designated service centre. It should also be extended to local facilities and services in the Market Towns. The Local Plan justifies allocations south of Dereham, even though they are 2km from the Town Centre, on the basis that there are local shops and other services in this location. If these shops and services are needed to make these allocation acceptable, then it makes sense that these local services and facilities are given protection in the planning system. Policy EC05 and Table 6.3 indicate that the net convenience goods floorspace capacity for Dereham is 1,950sqm net between 2017-2036. This is taken from Breckland retail Study 2017 Addendum. However, following a review of the 2017 Addendum report, we are concerned that the convenience goods expenditure/floorspace capacity assessment does not take into account the recently developed ALDI store in Dereham. If this is the case then the floorspace capacity figure for Dereham in EC05 and Table 6.3 is an over-estimate. The small amount of comparison goods floorspace within the ALDI store will also affect the comparison goods floorspace figure in EC05 and Table 6.3. In addition, the contents of EC05 and Table 6.3 just provide the total level of quantitative capacity/need for the period 2017-2036. In light of the reasonable comments in paragraph 6.2 of Retail Study 2017 Addendum (which repeat the contents of paragraph 7.54 of the 2014 Retail Study) it is considered that the levels of capacity/need for the different parts of the assessment period (i.e. 2017-2026 and 2026-2036) should be provided. EC05 sets the threshold for the retail impact test in Dereham at 1,000sqm gross. It would appear that this is based upon advice on impact thresholds on the level of forecast capacity (at that time) and also, in relation to Dereham, that it is "capable of absorbing more trade diversion and impact." However, no justification is provided for this statement and it would appear that NLP's approach is contrary to the NPPG which asks for consideration of the

Local Plan Pre-Submission - Comments and Response Schedule

following factors: scale of proposals relative to town centres the existing viability and vitality of town centres cumulative effects of recent developments whether local town centres are vulnerable likely effects of development on any town centre strategy impact on any other planned investment These factors were not considered by NLP and the Town Council considers if these factors are taken into account then the threshold will need to be set much lower. The Town Council considers that a much lower threshold is justified when the size of existing retail stores in Dereham town centre is considered. Out of centre retail proposals, particularly comparison goods proposals, in the size range 500-1,00sqm are likely to be particularly harmful to the health of the centre. The emerging Dereham Neighbourhood Plan has identified that improving the vibrancy of the Town Centre is a big priority for residents. The Town Council has commissioned additional studies to look at the town centre, this may produce additional policies and action points to improve the vibrancy of the town centre.

Breckland Council Response

Officer Response

The Breckland Retail Study (2010) update (2014) and addendum (2017) provides a detailed understanding of the retail offer and need in Dereham. The sequential test is set out in detail in para 24 of the NPPF, therefore policy EC 05 does not seek to repeat this in full, but to set a lower threshold for impact assessment based on evidence on local retail conditions (Breckland Retail Study). The evidence states that in Thetford and Dereham, the floorspace projections are generally higher and the centres are larger, therefore providing the justification for a higher impact threshold figure than the Districts other town centres.

Planning policies should not be so prescriptive so as to stifle sustainable development proposals which do not meet rigid criteria. The clause 'except where it meets a local need' would only apply in cases where it can be evidenced that there is a definitive need, specific to the immediate local area. The policy wording does provide protection to rural shops and facilities in Breckland District, not just Local Service Centres. The policy is complemented by Policy COM 04 Community Facilities which provides protection for the loss, or change of use of community buildings (definition includes local shops). A review of the retail evidence in relation to the technical point regarding the completion of Aldi in Dereham is being undertaken.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	12056	Full Name	Sainsbury's Supermarkets Ltd	Organisation Details	
Agent ID	1132273	Agent Name	Victoria Chase	Agent Organisation	Indigo Planning Ltd

Comment Details

Title		Number	Policy EC 05 Town Centre and R
Chapter Number	6		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			
Do you wish to appear at the Examination in Public? No							

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy EC 05 Town Centre and Retail Strategy Policy EC 05 sets out the Councils approach to the sequential test and retail impact assessments for new developments within the borough. The policy includes locally set thresholds for proposals located outside of the defined centres and requires all proposals on the edge of or outside a defined centre to demonstrate compliance with the retail tests. The National Planning Policy Framework states that local planning authorities should promote competitive town centre environments and recognise town centres as the heart of their communities and purse policies to support their viability and viability. In drafting policies, local planning authorities should define

Local Plan Pre-Submission - Comments and Response Schedule

the extent of town centres and primary shopping areas, and set policies that make clear which uses will be permitted in such locations. Policy EC 05 states that an impact assessment for retail, leisure and/or office schemes will be required on schemes of 1,000 sqm gross and over in Thetford and Dereham, and 500 sqm gross and over in Attleborough, Swaffham and Watton. We consider that a more appropriate impact threshold for new retail development in out of centre locations is 750sqm across the borough wide.

Breckland Council Response

Officer Response

The 2014 Retail Study Update recommends the thresholds of 500sqm gross for Swaffham, Attleborough, Watton and the villages and 1000sqm gross for Thetford and Dereham. This is based on the analysis carried out in the study. This is considered to be the most robust and up-to-date evidence regarding thresholds for impact assessments.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 975280 Full Name Mr Andrew Thornton
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Policy EC 06 Farm Diversificatio
 Chapter Number 6

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

A site we submitted LP(086) 011 was incorrectly classified as for residential development rather than for leisure related activity and tourism. On the basis of Policy EC 06 I am surprised that it was not taken forward as a possible site for development. It fulfils the criteria in EC06 and at the same time promotes tourism and leisure activity within Breckland which is in keeping with Breckland Strategic Vision.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

No tourism related development has been allocated through the local plan. The policies EC06 and EC07 are proposed to encouraged Farm Diversification and Tourism Related Development in the district.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy EC 06 Farm Diversificatio
Chapter Number	6		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy EC06 Farm Diversification: This policy requires development to have regard to residential amenity, biodiversity, the natural environment and landscape character. We request that the historic environment is recognised as well. Retaining, maintaining and conserving our rural heritage in all its various forms not only enhance the appearance and character of the countryside, it also brings considerable benefits to local economies and communities. The adaptive reuse of some traditional farm buildings can help secure beneficial uses for vacant or derelict historic buildings and places.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

It is intended that policies ENV 07 and ENV 08 will be read alongside Policy EC 06. This will ensure that the historic environment is recognised.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1132853	Full Name	Martin Goymour	Organisation Details	Goymour Properties
Agent ID	1132852	Agent Name	Mr Jon Jennings	Agent Organisation	Cheffins Planning

Comment Details

Title	Number	Policy EC 07 Tourism Related De
Chapter Number	6	

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	My clients land holding was presented to a meeting with the Local Plan teams on the 6th February 2017. As requested the site was formally submitted to the Council for consideration in this local plan. In addition, the representations also included a specific wording for the safeguarding of Banham Zoo and its specific development aspirations.		

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Local Plan Pre-Submission - Comments and Response Schedule

Whilst the first two paragraphs of this policy are broadly supported there are concerns that leisure, tourism and cultural development and visitor accommodation attracting a significant number of visitor accommodation attracting a significant number of visitors should be located within, or be accessible to, the five market towns is too restrictive. This policy fails to recognise that many of the major tourist attractions are located in the open countryside and that their continued expansion and enhancement is required to ensure that they remain viable. It is questioned whether this policy accords with paragraph 28 of the NPPF which state that Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should: —support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings; ; .. —support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres; The policy also fails to acknowledge that paragraph 34 of the NPPF states that Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. However this needs to take account of policies set out elsewhere in this Framework, particularly in rural areas. In view of the above it is contended that this policy is amended to more closely accord with the advice contained within the NPPF, with greater recognition being given to the enhancement and expansion of existing large-scale tourist attractions in rural areas. In fact, due to the unique role of Banham Zoo it is recommended that this is dealt with by a specific policy for the zoo, although Policy EC 07 also needs to acknowledge the need to support the provision and expansion of tourist and visitor facilities and recognise that they are not always located in the most sustainable locations or readily accessible by alternative modes to the private car.

Breckland Council Response

Officer Response

The role of Banham Zoo to the rural economy is recognised in para 6.91 of the supporting text. Policy EC07 is positively worded to support the enhancement and expansion of tourism attractions. This is detailed in the first part of the policy. In terms of new tourist related development the policy outlines this can take place in more rural areas where the environment and infrastructure can accommodate the visitor impact, but

Local Plan Pre-Submission - Comments and Response Schedule

larger scale proposals attracting a significant number of visitors should be within or accessible to the main towns. This approach is considered to be in conformity with the NPPF in supporting the rural economy.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	6	Policy EC 07 Tourism Related De
Chapter Number	6			

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy EC07: Tourism Related Development Local distinctiveness and a sense of place are important in shaping the identities of rural communities, and also underpin many tourism activities. The impact of change on historic character should be carefully considered when decisions on future development are being made. The policy should recognise that there is an opportunity for development to help enhance historic context or significance and can in, some instances, improve public access to historic environment.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

It is intended that policies ENV 07 and ENV 08 will be read alongside Policy EC 07. This would give consideration to the impact upon the historic environment.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID: 963732 Full Name: Mr Christopher Blow Organisation Details: Parish Council Neighbourhood Plan Work Gro
 Agent ID: Agent Name: Agent Organisation:

Comment Details

Title: Number: Policy EC 07 Tourism Related De
 Chapter Number: 6

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	This is a rewritten policy.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Further to our comments on paragraph 6.94 the policy should be updated to provide specific criteria for tourist related development in rural settlements rather than simply refer to the criteria of policies HOU 04 and 05, which (a) cover residential developments which may not be appropriate for a large hotel for example; (b) do not cover the development of tourist attractions or infrastructure . Justification for the revised wording should be added to paragraph 6.94 or a new one.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted. A hotel, under the Use Classes Order, would be C1 and not count as a dwelling under policy HOU 04. Policies HOU 04 and 05 are mentioned in the supporting text to ensure that these settlements are in line with the settlement hierarchy of the Local Plan. The settlement hierarchy seeks to encourage development in the most sustainable locations.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Consultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	6.94
Chapter Number	6		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	This is new text.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The policy specifies that development of visitor accommodation shall be in accordance with policies HOU 04 and HOU 05 in rural areas, as applicable. Policy EC 07 itself is not limited to visitor accommodation - it also covers such development as tourist attractions and infrastructure. Even a single hotel (which would count as one dwelling under Policy HOU 04 could be of such a size as to be completely inappropriate in a rural settlement. Tourist related development should hence not be simply referred to policies HOU 04 and 05 where it is proposed in rural areas. Instead specific criteria for such development in rural settlements should be included in Policy EC 07, with justification added to this paragraph or a new one.

Local Plan Pre-Submission - Comments and Response Schedule

Breckland Council Response

Officer Response

Comment noted. A hotel, under the Use Classes Order, would be C1 and not count as a dwelling under policy HOU 04. Policies HOU 04 and 05 are mentioned in the supporting text to ensure that these settlements are in line with the settlement hierarchy of the Local Plan. The settlement hierarchy seeks to encourage development in the most sustainable locations.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 975280 Full Name Mr Andrew Thornton
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Number Policy EC 07 Tourism Related De
 Chapter Number 6

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

A site we submitted LP(086) 011 was incorrectly classified as for residential development rather than for leisure related activity and tourism. O I am surprised that it was not taken forward as a possible site for development as it promotes tourism and leisure activity within The Brecks which is in keeping with Breckland Strategic Vision. The possible sites should be reviewed.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

No tourism related development has been allocated through the Local Plan. However, Policy EC 07 Tourism Related Development provides the opportunity for tourism related development to come forward.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	6	Policy EC 08 Advertising and Sig
Chapter Number	6			

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy EC08: Advertising and Signs We welcome reference to the need for development to have particular regard to the historic character of frontages.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Land east of Dereham Business Park	Number	Saved Policy - Policy D5
Chapter Number	6		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Saved Policy D5: Land east of Dereham Business Park There are no known designated heritage assets within this site allocation boundary, however the Grade II listed Borrow Hall lies to the south of the site separated by a stretch of relatively open land. Although set a distance away from the site the land separating the site from the listed building is open and so the setting of this heritage asset could be affected by the height of the development of the site. Any development of this site will need to preserve or enhance these designated heritage assets and their settings. These requirements should be included in the policy and supporting text of the Plan. Point (e) of the policy seeks to minimise the appearance of any

Local Plan Pre-Submission - Comments and Response Schedule

development by using landscape screening which is welcomed.

Breckland Council Response

Officer Response

This policy has been saved from the Site Specific Policies and Proposals DPD, it is not therefore considered appropriate to amend the policy.

Any planning application would need to meet the policy expectations of the Local Plan (including policies ENV07 and ENV08 on the historic environment) and also the NPPF.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1134647 Full Name Mr Tony Needham Organisation Details
 Agent ID Agent Name Agent Organisation

Comment Details

Title Land east of Dereham Business Park Number Saved Policy - Policy D5
 Chapter Number 6

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	This site as a saved policy was not consulted on.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Not effective. it has not been demonstrated that this land is deliverable during the plan period. It does not currently have access to the highway. To be deemed sound the policy would need to take into account an up-to-date employment land study and allocate on the basis of this study. There is no clear evidence that this land is deliverable . a) Provision should ne made for an eventual highways link to the A47 junction to the east of the site at the Mattishall Road. b) There should be a footway and cycle path link to the north as Cherry lane is claimed as a restricted byway and therefore can be used by cyclists. c) Stipulating noise attenuation seems a bit odd given its distance from residential properties d) The need for new structural

Local Plan Pre-Submission - Comments and Response Schedule

landscaping seems a bit onerous. The policy that working hours may be restricted is again a bit onerous and would make potential developers look elsewhere. The conditions contained in the policy are too restrictive by comparison with allocation SW2&3 in Swaffham, these unnecessary restrictions will deter potential developers bringing employment to Dereham on these sites. The emerging Dereham Neighbourhood Plan has identified that having a balanced development in Dereham which will support additional employment growth is a high priority for residents.,

Breckland Council Response

Officer Response

The employment land study was updated in 2017 and this re-iterated the 2013 study supports the retention of the site as an employment allocation. The policy has been brought forward as a saved policy and, therefore, the criteria are not subject to change. The Council are pro-actively working with the landowner to overcome any remaining constraints.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1132036	Full Name	De Merke Estates	Organisation Details	De Merke Estates
Agent ID	1132034	Agent Name	Mr Stuart Thomas	Agent Organisation	Berrys

Comment Details

Title	Land to the North of the Eco-Tech Centre	Number	Saved Policy - Policy SW2
Chapter Number	6		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The issues was not apparent prior to the publication of the policies and proposals contained within the Pre-Submission Breckland Local Plan.		
Do you wish to appear at the Examination in Public?				Yes			

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

We wish to object to criterion c of Saved Policy SW2: Land to the North of the Eco-Tech Centre as this restricts development on the site until vacant, developable land in the existing Eco-Tech centre has been developed. This restriction is considered inappropriate as it reduces the choice and range of employment sites available in the settlement and may therefore constrain employment development if the remaining sites on the Eco-Tech centre do not meet the requirements of potential future occupiers (requirements such as size and configuration). It is therefore contended that criterion c of Saved Policy SW2 may result in the Plan failing to deliver sufficient land to meet economic development needs.

Local Plan Pre-Submission - Comments and Response Schedule

Breckland Council Response

Officer Response

There is currently 1.2 hectares of available land on the Eco-Tech centre General Employment Area. Criterion c states that access is only to be provided from the Eco-Tech Employment Area, therefore development of the existing site is fundamental to the expansion of the site.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1132036	Full Name	De Merke Estates	Organisation Details	De Merke Estates
Agent ID	1132034	Agent Name	Mr Stuart Thomas	Agent Organisation	Berrys

Comment Details

Title	Land to the North of the Eco-Tech Centre	Number	Saved Policy - Policy SW2
Chapter Number	6		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Saved Policy SW2 is supported in as much as the land to the North of the Eco-Tech Centre is an appropriate location for employment development to meet identified needs.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Consultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Land to the North of the Eco-Tech Centre	Number	Saved Policy - Policy SW2
Chapter Number	6		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

As with site SW2 above the site is located in bordered by existing development, namely West Acre Road to the west and Breckland Park School to the east. There are no known designated heritage assets within the site or nearby which could be affected.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Land to the West of the Eco-Tech Employment Area	Number	Saved Policy - Policy SW3
Chapter Number	6		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			
Do you wish to appear at the Examination in Public?		No					

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Saved policy SW3: Land to the west of the Eco-Tech Centre, Swaffham As with site SW2 above the site is located in bordered by existing development, namely West Acre Road to the west and Breckland Park School to the east. There are no known designated heritage assets within the site or nearby which could be affected.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy COM 01 - Design
Chapter Number	7		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	This is a rewritten policy.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

In the last but one paragraph "current best practice" is referred to. Some guidance as to what this comprises and/or where to find it should be added to ensure consistency of approach by those making planning proposals.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Consultee Details

Person ID 502323 Full Name Attleborough Land Ltd Organisation Details
Agent ID 1130556 Agent Name Mr John Long Agent Organisation

Comment Details

Title Number Policy COM 01 - Design
Chapter Number 7

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4 - Is the plan positively prepared?	No
5 - Is the plan justified?	No	6 - Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10 - Have you raised this at Issues and Options?	No	11 - If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13 - If you feel the plan is unsound, please tell us why

Policy COM 01 seeks to impose additional design requirements on scheme. The policy should be caveated so that it only applies where it can be proven to be technically deliverable and economically viable to do so. It is suggested that the Policy should be amended to clarify that it will not be applied where meeting the requirement would not be technically deliverable or would render a proposal unviable.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The NPPF states that planning should always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings as one of the 12 core planning principles. Policy COM01 seeks to implement this within the Local Plan. The policy itself does not set specific thresholds for incorporating different standards it also does not require set materials. It is therefore not considered necessary to amend the policy wording.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID: 1136480 Full Name: Katie Parsons
 Agent ID: Agent Name

Organisation Details: Historic Environment Planning Adviser Histori
 Agent Organisation

Comment Details

Title: Chapter Number: 7 Number: Policy COM 01 - Design

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy COM 01: Design We very much welcome point (a) of the policy which seeks to preserve or enhance the special character of the historic environment and heritage assets. It is noted that the plan does not contain any policies which relate to the shopfronts. The retention of original/historic or significant shopfronts elements are often integral to the character of these buildings and that of the wider street scene. Therefore a development management policy should be place in order to manage their change successfully. It is considered the policies should highlight the importance of retaining or restoring historic shopfront features both in terms of the positive contribution historic shopfronts make to the character of

Local Plan Pre-Submission - Comments and Response Schedule

an area but also the economic benefit of providing traditional and bespoke shopping units to shopowners. A good example of how historic shopfronts can positively contribute to an area both aesthetically and economically is where Derby City Council teamed up with English Heritage (now Historic England) to help restore an area of Victorian and Edwardian shops, the Strand. The restoration of a number of shops within the area has meant that a previously underused section of the city provides bespoke shopping, now sees a much larger footfall and is considered to be a National success. The council have also seen a ripple effect of surrounding properties being restored. As well as including conservation and design issues within these policies the Council could consider additional advice within a Supplementary Planning Guide on Historic Shopfronts, especially given the importance and contribution the Historic shopping areas within the settlements of Suffolk make to the wider area

Breckland Council Response

Officer Response

It is considered that the retention of historic shopfronts are preserved or enhanced through existing policies ENV 07 and ENV 08.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy COM 02 Healthy Lifestyle
Chapter Number	7		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	This is a rewritten policy.		
Do you wish to appear at the Examination in Public?		No					

Representation

14 - If you feel that the plan is sound, please tell us why	13- If you feel the plan is unsound, please tell us why
	In item (ii) for full clarity add definition to specify if the criteria of 5 dwellings / 1000m2 should both apply or only one of them (i.e insert the word either "and" or "or" between those two.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted - the intention is that this would be relevant for development of 5 or more dwellings or 1000m2 or more of non-residential development.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129978	Full Name	Orbit Homes (2020) Limited	Organisation Details	Orbit Homes (2020) Limited
Agent ID	1130567	Agent Name	Mr Geoff Armstrong	Agent Organisation	Armstrong Rigg Planning

Comment Details

Title				Number	Policy COM 02 Healthy Lifestyle
Chapter Number	7				

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

COM 02 " Healthy Lifestyles This policy is unsound as it is not justified or effective. We recognise the importance of ensuring new development supports the wider aims of local authorities and their partners to improve the health and well-being of their residents and workforce. However, the requirement for all large and complex applications to undertake a Health Impact Assessment (HIA) and all applications to demonstrate how they have mitigated any potential negative effects on health is unnecessary and an additional burden on applicants. The PPG sets out that HIAs "may be a useful tool to use where there is expected to be significant impacts" but it also outlines the importance of the local plan in considering the wider health

Local Plan Pre-Submission - Comments and Response Schedule

issues in an area and ensuring policies respond to these. As such Local Plans should already have considered the impact of development on the health and well-being of their communities and set out policies to address any concerns. Where a development is in line with policies in the local plan an HIA should not be necessary. Only where there is a departure from the plan should the Council consider requiring an HIA. Recommendation : This policy should be amended to only require a Health Impact Assessment where there are expected to be significant impacts and there is a departure from the development plan.

Breckland Council Response

Officer Response

Comment noted. The PPG states that there HIAs may be a useful tool to use where there is expected to be significant impacts. The policy itself only seeks Health Impact Assessments for large and complex proposals.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1131634 Full Name Mountleigh Development Holdings
Agent ID 1130567 Agent Name Mr Geoff Armstrong

Organisation Details Mountleigh Development Holdings
Agent Organisation Armstrong Rigg Planning

Comment Details

Title Number Policy COM 02 Healthy Lifestyle
Chapter Number 7

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy COM 02 " Healthy Lifestyles This policy is unsound as it is not justified or effective. We recognise the importance of ensuring new development supports the wider aims of local authorities and their partners to improve the health and well-being of their residents and workforce. However, the requirement for all large and complex applications to undertake a Health Impact Assessment (HIA) and all applications to demonstrate how they have mitigated any potential negative effects on health is unnecessary and an additional burden on applicants. The PPG sets out that HIAs "may be a useful tool to use where there is expected to be significant impacts" but it also outlines the importance of the local plan in

Local Plan Pre-Submission - Comments and Response Schedule

considering the wider health issues in an area and ensuring policies respond to these. As such Local Plans should already have considered the impact of development on the health and well-being of their communities and set out policies to address any concerns. Where a development is in line with policies in the local plan an HIA should not be necessary. Only where there is a departure from the plan should the Council consider requiring an HIA. Recommendation: This policy should be amended to only require a Health Impact Assessment where there are expected to be significant impacts and there is a departure from the development plan.

Breckland Council Response

Officer Response

Comment noted. The PPG states that there HIAs may be a useful tool to use where there is expected to be significant impacts. The policy itself only seeks Health Impact Assessments for large and complex proposals.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1137235	Full Name	Mr Mark Behrendt	Organisation Details	Planning Manager - Local Plans House Builders
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy COM 02 Healthy Lifestyle
Chapter Number	7		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

COM 02 “ Healthy Lifestyles This policy is unsound as it is not justified or effective. We recognise the importance of ensuring new development supports the wider aims of local authorities and their partners to improve the health and well-being of their residents and workforce. However, the requirement for all large and complex applications to undertake a Health Impact Assessment (HIA) and all applications to demonstrate how they have mitigated any potential negative effects on health is unnecessary and an additional burden on applicants. The PPG sets out that HIAs may be a useful tool to use where there is expected to be significant impacts but it also outlines the importance of the local plan in considering the wider health issues

Local Plan Pre-Submission - Comments and Response Schedule

in an area and ensuring policies respond to these. As such Local Plans should already have considered the impact of development on the health and well-being of their communities and set out policies to address any concerns. Where a development is in line with policies in the local plan an HIA should not be necessary. Only where there is a departure from the plan should the Council consider requiring an HIA.

Breckland Council Response

Officer Response

Comment noted. The PPG states that there HIAs may be a useful tool to use where there is expected to be significant impacts. The policy itself only seeks Health Impact Assessments for large and complex proposals.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy COM 02 Healthy Lifestyle
Chapter Number	7		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4 - Is the plan positively prepared?	Yes
5 - Is the plan justified?	Yes	6 - Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10 - Have you raised this at Issues and Options?	Yes	11 - If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13 - If you feel the plan is unsound, please tell us why

Policy COM02: Healthy Lifestyles The continued protection or enhancement of the historic environment can contribute to the provision of high quality places in both rural areas and towns/villages which can impact upon wellbeing. Parks and gardens often have historic links which can be help improve the experience of the place for those visiting or using it. We recommend that the historic environment is listed alongside natural green spaces and high quality open spaces on bullet point 5 of paragraph 7.11 of the supporting text. The use of historic spaces for recreational or leisure purposes may encourage people to visit and thus help promote knowledge of local historic places.

Local Plan Pre-Submission - Comments and Response Schedule

Breckland Council Response

Officer Response

Policies within the Local Plan should be read as a whole.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy COM 03 Protection of Am
Chapter Number	7		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Rewritten policy.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The second sentence notes "unacceptable effects" on the residential amenity of neighbours and "adequate" levels of amenity for future occupants. Both of those terms are completely subjective and therefore impossible to apply consistently or robustly when making planning decisions. Replace that terminology with clear, well-defined terms that leave no room for doubt as to what is required.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The policy needs to be read in conjunction with other policies within the plan and also national policy requirements. Providing specific requirements ma prevent good design within a scheme.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1130821	Full Name	Mr Pablo Dimoglou	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title		Number	Policy COM 03 Protection of Am
Chapter Number	7		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4 - Is the plan positively prepared?	Yes
5 - Is the plan justified?	Yes	6 - Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	As District Councillor, I did raise issues at the Local Plan Working Group meetings but was unable to comment for much of the proceedings due to having declared a personal interest		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

I believe the policy COM 03 has some merit, however it seeks to introduce further restrictions which will adversely affect the poorest in society. For instance - point 4 - Overlooking private amenity space. So, effectively - if a developer wants to build a terrace of 5 houses - my presumption is that each upstairs bedroom will over look the next door amenity space. Therefore, this policy could be used against the creation of new lower priced homes which are greatly needed in our district. We cannot all afford to live in spacious detached houses and this policy is too prescriptive and restrictive.

Local Plan Pre-Submission - Comments and Response Schedule

Breckland Council Response

Officer Response

The policy provides a number of criteria that will be given due regard to when assessing planning applications. This is in line with paragraph 17 of the NPPF which seeks to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Breckland Local Plan Pre-Submission Publication	Number	
Chapter Number	8		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Monitoring The Plan does not include and monitoring indicators. We recommend the inclusion of indicators to measure how successful historic environment policies are. These can include preparation of a local list, completion of conservation area action plans and management plans, reduction in the number of assets that are classified as heritage at risk. As mentioned earlier in this letter, it would be helpful to include a monitoring indicator to reflect to the production of conservation area appraisals or management plans.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The Implementation Strategy (section 8.14-8.20) explains how the Local Plan policies will be complemented by a monitoring framework set in the Annual Monitoring Report. Consideration will be given to the the suggested monitoring indicators relating to heritage.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136859	Full Name	Mr Richard Crosthwaite	Organisation Details	Gladman Developments Limited
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	8.2
Chapter Number	8		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			
Do you wish to appear at the Examination in Public? Yes							

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Implementation and Monitoring 7.1.1 Paragraph 8.20 of the BLP provides details of how the Council intends to manage and monitor the implementation of its Local Plan. As discussed elsewhere throughout this response, it is the view of Gladman that further flexibility and contingency is required within the Plan in order to ensure that development needs can be met in full over the plan period. It is considered necessary for any such approach to include a clear monitoring and review mechanism within policy wording to ensure that the Local Plan is fully responsive to changes in circumstance relating to the development needs of the area and the maintenance of a five year housing land supply.

Local Plan Pre-Submission - Comments and Response Schedule

Breckland Council Response

Officer Response

The Implementation Strategy (section 8.14-8.20) sets out how policies will be monitored through the Authorities Monitoring Report. Policy HOU 02 provides for a greater level of growth than is required to meet the minimum development requirements set in Policy HOU 01, therefore there is flexibility in the plan in relation to housing delivery. This is likely to require a modification, which will need to be discussed further at the hearing sessions.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	8	Policy INF 01 Telecommunicatio
Chapter Number				

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Policy INF01: Telecommunications Advanced, high quality telecommunications infrastructure is essential for sustainable growth. The development of high speed broadband technology and other communications networks also play a vital role in enhancing provision of local community facilities and services. However, the siting and location of telecommunications equipment can affect the appearance of the public realm, streetscene, the historic environment and wider landscapes. The consideration of their positioning is therefore important, particularly in conservation areas. We suggest that you refer to the following guidance which you may find helpful: Cabinet Siting and Pole Siting Code of Practice :

Local Plan Pre-Submission - Comments and Response Schedule

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/205744/Final_Cabinet_and_Pole_Siting_COP_Issue_1_2_.pdf We request that the policy is amended to require development to have regard to the need to protect or enhance the historic environment to ensure that applicants properly consider the siting, design and positioning of equipment in this context.

Breckland Council Response

Officer Response

The policy wording states that "Any building-mounting installations would not have an unduly detrimental impact on the character or appearance of the building". The intention of this wording is to provide protection for the historic environment. Policies ENV 07 and ENV 08 would also be read alongside this policy to provide further protection of the historic environment.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 963732 Full Name Mr Christopher Blow
 Agent ID Agent Name

Organisation Details Parish Council Neighbourhood Plan Work Gro
 Agent Organisation

Comment Details

Title Paragraph Number 8.5
 Chapter Number 8

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	This is rewritten text.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The final part of the first sentence "...it is known that existing infrastructure will need to be upgraded to meet the needs of all the new development." does not seem to be logical in the context of locations that development will be directed towards. It is suggested that it should actually read "...it is known that existing infrastructure will not need to be upgraded to meet the needs of all the new development."

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	868057	Full Name		Organisation Details	Orbit Homes Limited
Agent ID	868056	Agent Name	Mr Michael Hendry	Agent Organisation	Director PlanSurv Limited

Comment Details

Title		Number	Policy INF 02 Developer Contrib
Chapter Number	8		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	Not come up as an issue before.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The draft policy fails to allow for consideration of viability as part of the negotiations of developer contributions and therefore is not effective, positively prepared or consistent with national policy as it cannot easily respond to changing economic circumstances. The first sentence of Policy INF02 should be reworded to read "The Council will secure site specific developer contributions in order to properly service, manage and mitigate the impact of development, subject to viability, which:" The proposed changes will allow the issue of viability to be considered during the negotiation of the developer contributions so that delivery is not frustrated.

Local Plan Pre-Submission - Comments and Response Schedule

Breckland Council Response

Officer Response

Policy INF 02 Developer Contributions seeks to set out the types of infrastructure that will be required to make development acceptable. Policies within the Local Plan have been subject to a plan wide viability assessment, and are, therefore, considered to be viable in line with paragraph 173 of the NPPF. Other policies within the plan such as affordable housing, open space etc. include a viability caveat.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1135889	Full Name	Mr Stewart Patience	Organisation Details	Anglian Water Services Ltd
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy INF 02 Developer Contrib
Chapter Number	8		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

To represent Anglian Waters interest as sewerage undertaker.

13- If you feel the plan is unsound, please tell us why

Reference is made to the circumstances in which the District Council will consider whether there is a need for developer contributions to mitigate the impact of the development. However no reference is made to the phasing of development to ensure its aligned with the necessary infrastructure including that provided by Anglian Water. It is therefore proposed that the following wording is added to Policy INF 02: Planning Permission will only be granted if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet all the necessary requirements arising from the proposed development. Development proposals must consider all of the infrastructure implications of a scheme; not just

Local Plan Pre-Submission - Comments and Response Schedule

those on the site or its immediate vicinity. Consideration must be given to the likely timing of infrastructure provision. As such, development may need to be phased either spatially or in time to ensure the provision of infrastructure in a timely manner. Conditions or a planning obligation may be used to secure this phasing arrangement.

Breckland Council Response

Officer Response

Phasing is addressed in point 8 of policy INF 02. The requirement for phasing is also noted in the Implementation Strategy (following policy INF 02) which links to the Council Infrastructure Plan.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	8.6
Chapter Number	8		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4 - Is the plan positively prepared?	No
5 - Is the plan justified?	Yes	6 - Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10 - Have you raised this at Issues and Options?	No	11 - If you have not raised this issue before please state why	This is new text.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13 - If you feel the plan is unsound, please tell us why

The referenced Infrastructure Development Plan has not been made available by the Council as part of this consultation and therefore cannot be considered as evidence to justify or explain Policy INF 02. It also means reviewers cannot make fully informed representations about that policy. The Council must either make the document available during this consultation or publish it for another consultation at a future date before examination of the Plan.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

The draft Infrastructure Delivery Plan is available on the Planning Policy document library page of the Council's website.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1135889	Full Name	Mr Stewart Patience	Organisation Details	Anglian Water Services Ltd
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Paragraph	Number	8.11
Chapter Number	8		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4 - Is the plan positively prepared?	No
5 - Is the plan justified?	Yes	6 - Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	Yes	10 - Have you raised this at Issues and Options?	No	11 - If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Reference is made to the District Council potentially seeking developer contributions for utilities. Developers contribute directly to Anglian Water for the provision of water supply and wastewater network improvements via the provisions set out in the Water Industry Act 1991. Generally, we would not expect water supply or wastewater network improvements to be included in CIL. Remove reference to utilities from the list of potential developer contributions set out in Para 8.11 of the Local Plan.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Utilities does not solely relate water infrastructure. The term utilities can refer to a commodity or service including water, electricity and gas which is delivered by a utilities provider. Further to this paragraph 8.12 sets out that this is an indicative rather than exhaustive list. It is not therefore considered appropriate to remove the term.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129753	Full Name	Mr Douglas McNab	Organisation Details	Education and Skills Funding Agency
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Policy INF 02 Developer Contrib
Chapter Number	8		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

One of the tests of soundness is that a Local Plan is 'effective' i.e. the plan should be deliverable over its period. In this context and with specific regard to planning for schools, there is a need to ensure that education contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments. The ESFA supports policy INF 2 on developer contributions, noting the detailed information on education

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	868057	Full Name		Organisation Details	Orbit Homes Limited
Agent ID	868056	Agent Name	Mr Michael Hendry	Agent Organisation	Director PlanSurv Limited

Comment Details

Title	Appendix 1 - Housing Trajectory	Number	
Chapter Number	9		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	Yes	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The projected level of completions is over estimated and further allocations are required to ensure delivery.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comments noted. Delivery rates have been informed by past completions rates within Breckland, and also deliverability information from land owners.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1122865	Full Name	Mr John Dennis	Organisation Details
Agent ID		Agent Name		Agent Organisation

Comment Details

Title	Appendix 3 - Policy HOU 04 settlement boundaries	Number
Chapter Number	11	

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4 - Is the plan positively prepared?	No
5 - Is the plan justified?	Yes	6 - Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10 - Have you raised this at Issues and Options?	No	11 - If you have not raised this issue before please state why	School car parking Caston		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

We own the land next to the Caston Church of England School, on the same side, as marked black on map enclosed. With the future development happening in Griston, Watton, Hingham and other close areas to Caston. There is only parking on the road for the school. We may consider allowing an area of land for parking. If you allowed planning for houses as well.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comments Noted. Policy HOU 04 allows for minor development in rural settlements with boundaries. This would include Caston.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1131085 Full Name R. N. Smith
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Beetley Settlement Boundary Number Map .2
 Chapter Number 11

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

We agree and support keeping the settlement boundary for Beetley as it is at present.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1128366	Full Name	Mr Richard Smith	Organisation Details	on behalf of Norfolk County Council NPS Prop
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Beetley Settlement Boundary	Number	Map .2
Chapter Number	11		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Norfolk County Council owns Gressenhall Depot a 0.84 hectare brownfield site adjacent to the settlement boundary of Beetley. The site was included as a reasonable alternative for development in Breckland Councils Emerging Site Options document. The site scored well being brownfield and adjacent to the settlement boundary and was considered to be deliverable in the 2015 SHLAA. However, the site has been excluded from the settlement boundary of Beetley. Although policy HOU 04 would allow for development immediately adjacent to settlement boundaries, it currently restricts the number of units to 5 (a separate representation has been made in response to policy HOU 04 to allow more

Local Plan Pre-Submission - Comments and Response Schedule

flexibility with regard to housing numbers). The housing number limit would affect the viability of redeveloping this brownfield site which will have greater development costs and prevent the redevelopment for a more appropriate use. We would suggest this brownfield site be included within the settlement boundary so that planning permission can be sought for a greater number of houses to ensure the redevelopment of the site is viable. The exclusion of the Gressenhall Depot site from within Beetley settlement boundary would prevent its redevelopment as although policy HOU 04 allows development of up to five houses outside the settlement boundary, this would not be viable for the redevelopment of the brownfield site. This is likely to result in other housing developments on greenfield land being required to meet local housing demand which would not result in the most sustainable form of development. The settlement boundary, housing policy and plan would not therefore be consistent with NPPF policy and would be ineffective and unsound.

Breckland Council Response

Officer Response

Beetley is included within Policy HOU04 as a rural settlement which is proposed to retain its settlement boundary. The village does not meet the criteria to be classified as a local service centre as there are no shopping facilities within the village. Policy HOU04 is limited to 5 dwellings in order to reflect the position of these villages within the district wide settlement hierarchy. Whilst these villages retain some services and facilities to support growth larger scale development would not be sought in these areas as there would be implications on their ability to achieve sustainable development as set out within the NPPF.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1121461 Full Name Mr Ian Tarry
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Beetley Settlement Boundary Number Map .2
 Chapter Number 11

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	We have recently moved to Beetley		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

The settlement boundary is sensible and requires no change, our village is not a service centre and lacks the infrastructure to support any change to the current plan, current number of developments in Beetley far exceed future need for our rural village!

13- If you feel the plan is unsound, please tell us why

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	873983	Full Name	Leigh	Organisation Details	Clerk Beetley Parish Council
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Beetley Settlement Boundary	Number	Map .2
Chapter Number	11		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The Parish Council has consistently requested that the settlement boundary be amended to incorporate a parcel of land that the Parish Council considers is suitable for development. The consultations have requested that sites were considered so why were the Parish Council not listened to. Members attended meetings and discussions concerning this and were informed that this site was reasonable. The Parish Council also feels that the restriction to 5 houses which is now lower than originally does not facilitate satisfactory development of the site. Any development along the Fakenham Road could be designed to maintain the street scene at this point. There has been infill along Fakenham Road to the south

Local Plan Pre-Submission - Comments and Response Schedule

of this parcel of land and this would be no more of an intrusion than the 8 houses built previously.

Breckland Council Response

Officer Response

Beetley is included within Policy HOU04 as a rural settlement which is proposed to retain its settlement boundary. This site is located adjacent to the Beetley settlement boundary, and subject to meeting other planning criteria, would be in conformity with the criteria set out within policy HOU04. The policy is limited to 5 dwellings in order to reflect the position of these villages within the district wide settlement hierarchy. Whilst these villages retain some services and facilities to support growth larger scale development would not be sought in these areas as there would be implications on their ability to achieve sustainable development as set out within the NPPF.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 974399 Full Name Mr George Hayes
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Beetley Settlement Boundary Number Map .2
 Chapter Number 11

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

We support the plan for Beetley to keep the current settlement boundary as proposed. We believe this would maintain the current rural nature of the village and that any change would adversely impact on the open countryside. In particular the trees and bushes along the Fakenham Road would be fundamentally affected by any further development.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1131105	Full Name	Nicol Perryman	Organisation Details	c/o Savills Great Hockham Estate
Agent ID	1131089	Agent Name	Miss Nicol Perryman	Agent Organisation	Planner Ingleton Wood LLP

Comment Details

Title	Hockham Settlement Boundary	Number	Map .7
Chapter Number	11		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

On behalf of the Great Hockham Estate, we do not agree with the proposed approach to the settlement boundary for Hockham for reasons outlined as part of the Estates response to Policy HOU 04 and at Regulation 18 consultation (see attached). It is evident that a certain level of growth will be required in Hockham during the Plan period. As currently proposed, the settlement boundary for Hockham has not been revised to accommodate any land to accommodate the forecast growth. As it stands, future growth is to be accommodated through, amongst other things, developments of up to 5 units in locations adjacent to the settlement boundary, in accordance with Policy HOU 04. For the reasons outlined

in our response to Policy HOU 04, it is considered that a more co-ordinated and sustainable approach to development would be to identify specific sites to enable the location of future development to be controlled and managed. It is noted, by virtue of the Preferred Settlement Boundary presented by Hockham Parish Council at the Regulation 18 consultation, that the Parish Council support this approach. The Councils lack of consideration of the Parish Councils views is considered contrary to paragraph 155 of the NPPF. On this basis, we would recommend that the following two areas of land are incorporated into the settlement boundary for Hockham to promote land for sustainable and co-ordinated development for the benefit of this community. The revised settlement boundary is detailed on the attached plan " Hockham " Proposed Settlement Boundary. 1. Land to the North of Wretham Road The revision of the settlement boundary to include the site, which was, in part, supported by the Parish Council at the Regulation 18 consultation, would represent a logical extension to the village. The site is immediately adjacent to Wretham Road, providing ease of access to both the village and the A1075. It is square in shape and extends approximately 120 metres north of Wretham Road and 130 metres west of the existing settlement boundary. The site is well screened from public vantage points by mature landscaping, meaning that it has the potential to be accommodated with limited visual impact. The vegetation to the west of the site would also create a clear and defensible boundary for the village. The suitability of the site was considered by the Council in the Strategic Housing Land Availability Addendum (SHLAA) (2015). The assessment, which also included land to the north, stated that This site is well related to existing services and facilities within Great Hockham. In addition the site is not within a groundwater source protection zone and it is not on a designated site and although it sits on grade 4 agricultural land, this is not the most versatile. The SHLAA identified the site as a Reasonable Alternative. In summary, the extension of the settlement boundary to include the suggested site, as shown on the attached Hockham " Proposed Settlement Boundary, provides an opportunity to accommodate forecast growth in Hockham in a co-ordinated manner that will help ensure services and facilities remain viable. The site is available for development now, offers a suitable location and would be delivered within 5 years; it can therefore be considered to be deliverable in the context of the NPPF. The suggested amendment to the settlement boundary is, in general, in line with that put forward by the Parish Council, albeit, it has been extended slightly to the north to provide a continuous boundary with the settlement boundary to the east. 2. Manor Farm As drafted the

Local Plan Pre-Submission - Comments and Response Schedule

settlement boundary for Hockham straddles Manor Farm, which is located to the south of Vicarage Road. It is recommended that the settlement boundary is revised to ensure that it follows features on the ground and is, therefore, logical. This is an approach which the Council has adopted in other rural settlements, such as Gressenhall. The approach would also be consistent with policy PD05A, as drafted, in that it will constitute the infilling and rounding off of the settlement boundary, whilst also potentially facilitating the appropriate re-use of rural buildings; buildings which could, in principle, be converted to residential use under permitted development rights.

Breckland Council Response

Officer Response

Hockham does not contain the level of services and facilities to be designated as a Local Service Centre and therefore does not have a housing target or allocation. The overall approach for the Rural Areas (of which Hockham would be included) is restrictive of development outside of the settlement boundaries, albeit some growth would be allowed subject to the criteria based policy of HOU04, one of which would be to provide a community benefit.

The representation makes reference to paragraph 155 of NPPF which talks about early and meaningful engagement with neighbourhoods and local organisations. Significant engagement has occurred over the course of the plan. Furthermore Policy HOU04 does not preclude the parish council preparing a neighbourhood plan.

Potential amendment to the plan

No amendments proposed

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1133331	Full Name	Lexham Estate	Organisation Details	Lexham Estate
Agent ID	1032227	Agent Name	Ms Lydia Voyias	Agent Organisation	Savills (UK) Ltd

Comment Details

Title	Litcham Settlement Boundary.	Number	Map 3.10
Chapter Number	11		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Support is given to paragraph 3.255 which identifies Litcham as a Local Service Centre. This is justified by the supporting Breckland Local Service Centre Topic Paper (July 2017). Support is also given to the identification of 10% growth, equivalent to 27 new dwellings, over the plan period. Whilst it is acknowledged at paragraph 3.255 that there are 3 dwelling commitments and 2 dwelling completions, there is a residual requirement for a minimum of 22 dwellings to be delivered up to 2036. The draft proposals map does not allocate any land for residential development throughout the plan period. The Lexham Estate has submitted a number of sites to the Council to consider as possible locations for

Local Plan Pre-Submission - Comments and Response Schedule

allocation including: Land West of Pound Lane (LP[054]005 A) Land north of the B1145 (East) (LP[054]005 B) Land between Pound Lane and Back Lane (LP[054]006)

The Councils supporting Site Selection Topic Paper Breckland Local Plan: Approach to the Selection of Sites (August 2017) states that Norfolk County Council Highways commented on each of these sites as follows: Land West of Pound Lane (LP[054]005 A) - Not suitable for allocation as Pound Lane is unsuitable to cater for additional traffic and the local road network is narrow and inadequate. The Highway Authority would object to this site being in the Local Plan. Land north of the B1145 (East) (LP[054]005 B) " Access looks unachievable onto the B1145 and that the Highway Authority would object to the site being in the Local Plan. Land between Pound Lane and Back Lane (LP[054]006) " The site is not suitable for allocation as the local road network is narrow and inadequate. The Highway Authority would object to this site being in the Local Plan. It is clear that despite being identified as a Local Service Centre, the local Highway Authority considers the existing local road network at Litcham to act as a constraint to development. The Estate is promoting its land West of Pound Lane having regard to the above comments. In such a context , we enclose a report dated March 2017 Access Review (Addendum) prepared by Create Consulting Engineers. The Councils plan is contained at the very end of that report. This report considers the impact of development of approximately 20 dwellings with possible car park expansion for the adjacent Primary School and a Community Centre to benefit the wider community. We would confirm that a more accurate plan promoting development at its preferred location at Land West of Pound Lane is shown on plan CAPL 362887/A6/001/LV/B which is enclosed with this representation. Regarding the Access Review (Addendum) prepared by Create Consulting Engineers, the report concludes that there is a technically achievable solution from a highways perspective in respect to this land West of Pound Lane. Safe and Secure Access " Drawing 1134/03/002 illustrates that it is possible to achieve a safe and secure access at the site in the form of a T-Junction. The requisite visibility splays for an estimated speed of 37 miles per hour can be achieved in reference to Manual for Streets 1 & 2. The inclusion of an overspill car park at the site offers an opportunity to reduce on street parking along this section of Pound Lane. Potential Traffic Generation and Traffic Impact " It is explained at paragraph 3.9 that ...additional traffic generation arising from the proposed residential development are modest and would amount to less than 15 two-way vehicle trips in the morning and evening peak hours of activity . Paragraph 3.10 continues This level of additional

Local Plan Pre-Submission - Comments and Response Schedule

traffic is not considered to give rise to any significant impact upon the highway road network. Mitigation Paragraph 3.10 proposes that this section of Pound Lane could become designated as Access Only by means of a formal Traffic Regulation Order. In doing so, this should avoid development-generated traffic impacting on this section of road and therefore, motorised traffic between the Site and the village centre would be assigned via the more substantial section of Pound Lane and Butt Lane. It is acknowledged at paragraph 3.11 that Development-generated traffic would, therefore, impact to at least some degree on the existing Butt Lane/Church Street junction. Consequently, measures are proposed at this junction in connection with development scheme to improve visibility to/from the minor arm and attenuate traffic speed on the main road approaches (as shown on drawing 1134/03/003). Conclusion The local Highway Authority should have no significant concerns with respect to the proposed allocation for residential development at Pound Lane, Litcham coming forward as part of the emerging Local Plan. The Estates preferred location is shown edged in red on the attached plan CAPL 362887/A6/001/LV/BW . It is therefore requested that the Proposals Map for Litcham be amended to include that land as a housing allocation as identified on enclosed plan CAPL 362887/A6/001/LV/BW together with relevant text within the Plan.

Breckland Council Response

Officer Response

Norfolk County Council object to sites LP[054]005A and LP[054]005B. NCC stated that site LP[054]005A is "Not suitable for allocation. Pound Lane unsuitable to cater for additional traffic. The local road network is narrow and inadequate. The Highway Authority would object to this site in being in the local plan". In regards to site LP[005]005B, NCC stated that "Access looks unachievable onto the B1145. The Highway Authority would object to this site in being in the local plan. Reviewed evidence submitted by Create and there continues to be sustained objection. The recorded vehicle speeds do not accord with Manual for Streets and the proposed visibility splays are inadequate. In light of the recorded speeds visibility splays of 2.4m x 120 would be required. In addition to substandard visibility the existing footway provision along B1145 is limited in width and not adequate to cater for further development."

Furthermore, the Historic Characterisation Study, in regards to site LP[054]005B, stated that "Development proposals must demonstrate that a full analysis of the immediate and wider context of the site has been undertaken so as to inform an appropriate design response. The site is in a prominent location within Litcham, Lexham Road forms a gateway into the village. The elevation of the site is higher than the surrounding landscape therefore impacting upon the setting of designated heritage assets. It is therefore recommended that the site is not allocated for residential development within the Local Plan."

It is therefore considered that the sites proposed have fundamental constraints that cannot be overcome through policy. These sites are not, therefore, considered to be appropriate for allocation through the Local Plan.

Local Plan Pre-Submission - Comments and Response Schedule

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1129859	Full Name		Organisation Details	Breckland Bridge Ltd
Agent ID	1126421	Agent Name	Mrs Sarah Hornbrook	Agent Organisation	Associate Planner Ingleton Wood

Comment Details

Title	Litcham Settlement Boundary.	Number	Map 3.10
Chapter Number	11		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? Yes

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

On behalf of Breckland Bridge Limited, we support the identification of Litcham as a Local Service Centre that will accommodate 22 residential units. It is evident from the text relating to Litcham at Paragraph 3.256 that the village provides a range of services which justifies its designation as a Local Service Centre. The village is therefore a sustainable location for modest growth. Accordingly, this aspect of the Local Plan is considered sound as it has been positively prepared. However, notwithstanding an extensive Call for Sites process, the Local Plan does not allocate a site to accommodate the identified housing growth. The Councils strategy is to accommodate the identified growth through the application of Policy HOU 03

which facilitates residential development in locations such as Litcham, subject to the satisfaction of criteria relating to: proximity to Settlement Boundary, number of units in relation to forecast housing growth, design and prevention of coalescence of settlements. The approach to accommodating forecast growth in Litcham is considered unsound given that a reasonable alternative exists. More specifically, whilst Paragraph 3.258 of the draft Local Plan states that no suitable sites have been identified. Land at Wellingham Road (Site Reference LP(054)002) is a site which is deliverable and capable of accommodating the identified 22 units, whilst providing substantial community benefits. This site, which extends to circa 1.7 ha, is immediately adjacent to the existing Settlement Boundary, and as well as providing a logical extension to Litcham, is capable of accommodating the forecast housing growth for the village. In addition, due to the site being surrounded on two sides by existing residential development, it is possible for the site to, in principle, be developed to ensure that it would have limited impact on the landscape or heritage assets of the village and the surrounding area. Furthermore, this site would not result in the coalescence of settlements. The site has previously been discounted by the Council on the basis that it would give rise to severe highways constraints. However, as detailed in the representation submitted to the Preferred Site Options and Settlement Boundary Stage consultation, work undertaken by Richard Jackson Consulting Engineers demonstrated that highways constraints at the site are not severe and do not preclude development and delivery of this site for housing. The work undertaken by Richard Jackson has been updated for the purposes of this representation and to reflect the proposed development of the site for approximately 22 dwellings. The work, which is attached to this representation, demonstrates that in terms of vehicular access, accessibility to services and other modes of transport, the site is entirely acceptable. The work also details how new pedestrian facilities and minor road widening can be provided within the locality to ensure appropriate access to the local highway network is facilitated. These works, which have been costed and are considered viable as part of the development, would provide community benefits, particularly the provision of a footpath from Weasenhams Road to the primary school. Based on the foregoing, it is evident both that the site is capable of satisfying the criteria detailed in Policy HOU 03 by which future proposals for development in Litcham would be assessed and that it would not give rise to severe highways constraints. Representations demonstrating that the site is suitable, available and viable, and therefore deliverable in accordance with the NPPF definition, have been submitted to the Council at both the Preferred

Local Plan Pre-Submission - Comments and Response Schedule

Direction Stage (January “ February 2016) and the Preferred Site Options and Settlement Boundaries Stage (September to October 2016). For ease of reference, copies of those representations submitted in October are attached. It is, therefore, suggested that that to ensure that the Local Plan is justified, effective and provides certainty in terms of the delivery of housing requirements during the Plan period, the site is allocated for residential development. The Pre-Submission Local Plan Policies Map for Litcham identifies this site as Open Space. Notwithstanding previous consultation documents, this is the first time that the site has been identified for Open Space. It is understood that the allocation is a result of the Councils 2015 Open Space Assessment in which the site is identified as natural / semi-natural green space. The primary purpose of such space is wildlife conservation, biodiversity and environmental education and awareness, and informal recreation. However, the site does not currently perform any of these functions. The site has limited wildlife value, being managed by Breckland Council on a regular basis, and its only recreational use is for dog walking. It is, therefore, considered that the proposed allocation of this site as Open Space is not justified. Notwithstanding the above, an opportunity exists to revise the Settlement Boundary as shown on Map 3.10 and allocate the site for both Open Space and residential development, which will satisfy the identified need for both uses. In terms of the former, the Councils 2015 Open Space Assessment states that there is no childrens play space or sports/recreation provision within the village “ a significant deficit. Given that the site extends to 1.7 hectares, the opportunity exists to develop approximately half of the site for residential development, with the remainder providing open space to meet the clear need for recreational facilities in the locality. An indicative plan detailing how the site could be developed is attached to this representation. As a result, the development would provide a significant benefit to the local community. This is recognised in previous representations submitted by the Parish Council (Comment ID: 145 and 305). In summary, the amendments proposed would ensure that the Local Plan is sound. The allocation of the site for part residential / part open space and the extension of the Settlement Boundary as shown on Map 3.10, would mean that Litcham is capable of delivering its identified housing growth, whilst also providing infrastructure requirements, notably childrens play space and highway improvements, for which there is a clear identified need.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Norfolk County Council Highways stated that site LP[054]002 is "Not suitable for allocation. The local road network is narrow (there are passing bays) and inadequate (Butt Lane). There is no footway on Wellington Road or Weasenham Road. To provide a footway is likely to be out of scale with the allocation. The Highway Authority would object to this site in being in the local plan".

Whilst the site is within close proximity to Litcham School it is distant from main settlement of Litcham and the other services and facilities contained within.

The 2015 Open Space Assessment provides up to date evidence for open space needs. It is considered that the site is already being maintained as 'amenity green space' and this supported in the representation.

The site is considered to be situated within an unsuitable location for further development, would have a detrimental impact upon the highway network and is already being maintained as 'amenity green space'.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Saham Toney Settlement Boundary	Number	Map .13
Chapter Number	11		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	Yes	2 - Do you consider the Pre-Submission Publication to be unound	No	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	No	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	The settlement boundary differs from that at the previous stages.		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Saham Toney Parish Council considers the proposed settlement boundary to be the most appropriate and fully supports it. It is however noted that a small part of the Watton boundary is shown at the bottom right of map 13 and for total clarity should be removed from this map.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Support noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID 1130821 Full Name Mr Pablo Dimoglou
 Agent ID Agent Name

Organisation Details
 Agent Organisation

Comment Details

Title Yaxham Settlement Boundary Number Map .17
 Chapter Number 11

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4 - Is the plan positively prepared?	Yes
5 - Is the plan justified?	Yes	6 - Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10 - Have you raised this at Issues and Options?	No	11 - If you have not raised this issue before please state why	As District Councillor, I did raise issues at the Local Plan Working Group meetings but was unable to comment for much of the proceedings due to having declared a personal interest		

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The settlement boundary for Yaxham Parish is too restrictive, being basically drawn around what built form already exists. This does not provide opportunity to meet the needs of local people. Further, the settlement boundary does not a granted outline planning permission 3PL/2014/0820/O for the construction of homes at the end of Elm Close which seems slightly bizarre. This should be amended.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Policy HOU 04 allows for small scale development adjacent to existing settlement boundaries. Comment noted.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	963732	Full Name	Mr Christopher Blow	Organisation Details	Parish Council Neighbourhood Plan Work Gro
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title		Number	Table .1
Chapter Number	12		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	No	4- Is the plan positively prepared?	No
5- Is the plan justified?	No	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	No	8 - Have you raised this at Preferred Site Options consultation?	No
9 - Have you raised this at Preferred Directions ?	No	10- Have you raised this at Issues and Options?	No	11- If you have not raised this issue before please state why	This is a new appendix.		
Do you wish to appear at the Examination in Public?		No					

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

The codes used to categorise the class of development proposal in Table 1 have not been defined and have not been found in the public domain. A key explaining the codes should be added to allow full review of the table.

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Comment noted. The Use Class Order is in the public domain.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a

Local Plan Pre-Submission - Comments and Response Schedule

Conultee Details

Person ID	1136480	Full Name	Katie Parsons	Organisation Details	Historic Environment Planning Adviser Histori
Agent ID		Agent Name		Agent Organisation	

Comment Details

Title	Glossary	Number	13
Chapter Number	13		

Reasons for Objection

1 - Do you consider the Pre-Submission Publication to be Sound	No	2 - Do you consider the Pre-Submission Publication to be unound	Yes	3 - Is the plan legally compliant?	Yes	4- Is the plan positively prepared?	Yes
5- Is the plan justified?	Yes	6- Is the plan effective?	Yes	7 - Is the plan consistent with national policy?	Yes	8 - Have you raised this at Preferred Site Options consultation?	Yes
9 - Have you raised this at Preferred Directions ?	Yes	10- Have you raised this at Issues and Options?	Yes	11- If you have not raised this issue before please state why			

Do you wish to appear at the Examination in Public? No

Representation

14 - If you feel that the plan is sound, please tell us why

13- If you feel the plan is unsound, please tell us why

Glossary We are pleased to see that a glossary has been provided. Glossaries should include consistent definitions for all heritage assets mentioned in the local plan. The glossary at present is missing definitions for: Scheduled Monuments Registered Parks and Gardens Designated heritage assets Non-designated heritage assets / Local Heritage Assets / Locally Listed Heritage Assets / Locally Listed Buildings

Breckland Council Response

Local Plan Pre-Submission - Comments and Response Schedule

Officer Response

Definitions for designated heritage assets such as Scheduled Monuments are defined in legislation and are not specific to the Local Plan. Designated and non-designated heritage assets are explained in the supporting text of the policy.

Potential amendment to the plan

No amendments proposed.

Amendment ID

n/a