

Breckland Local Plan Examination

Matter 13:

Housing: the basis for the housing allocations and the settlement boundaries

**Breckland District Council
Hearing Statement**

March 2018



13.1: Have all sites put forward for allocation been considered through the SA, along with all reasonable alternatives? Is the SA based on appropriate criteria and is it robust?

1. Since 2013, 680 sites have been submitted for assessment through the Local Plan site selection process. The starting point for the site selection process is the sustainability appraisal of sites. All submitted sites (including all reasonable alternatives) have been subject to a sustainability appraisal. The sustainability appraisals are included in the examination library (LP/S/3, LP/S/11 and LP/S/13)
2. The site selection process (incorporating a sustainability appraisal) lead to a number of sites being put forward as preferred allocations and reasonable alternatives in the Breckland Local Plan Preferred Site Options and Settlement Boundaries September 2016 document (LP/S/12). As set out within the planning practice guidance, sustainability appraisal is an iterative process informing the development of the Local Plan (Paragraph: 001 Reference ID: 11-001-20140306 Following the regulation 18 consultations further assessment has occurred which has lead to 34 sites being allocated in the Breckland Local Plan Pre-Submission Publication (LP/S/1).
3. It is the Council's view that the SA is based on appropriate criteria and is suitably robust. A sustainability appraisal scoping report was carried out in 2013 (LP/S/5). The consultation was carried out in accordance with the SEA regulations¹ and included the statutory bodies; Natural England, the Environment Agency and Historic England. The first 17 of the objectives included in the Sustainability Appraisal were consulted on in 2013. Two further objectives were included as a result of the consultation to the topic of "Economic Activity." There are 19 objectives in total which cover social, environmental and economical elements. The first three objectives are under the SEA/SA Topic "Land, water and Soil Resources." Objectives 4, 5 and 6 are under the topic "Climate change and air pollution." Objectives 7 and 8 are under the topic "Biodiversity." Objectives 9 and 10 are under the topic of "Cultural heritage and landscape." Objectives 11, 12 and 13 are under the topic of "Population and human health." Objectives 14, 15 and 16 are under the topic of "Inclusive communities." Objectives 17, 18 and 19 are under the topic of "Economic Activity." These objectives can be found on pages 23-27 of the Sustainability Appraisal (LP/S/3).

¹ The Environmental Assessment of Plans and Programmes 2004

4. Appendix 4 (pages 34-193) of the Breckland Local Plan: Approach to the Selection of Sites topic paper (LP/H/4) lists all sites in Market Towns and some neighbouring settlements put forward for selection. For each site, this table provides a “Summary of Site Assessment.” A similar list in the same format can be found in Appendix 5 (pages 89-193) for Local Service Centres. This assesses all aspects of the site and gives a score based on the Sustainability Appraisal Objectives. These objectives can be found in the Breckland Local Plan Pre-Submission Sustainability Appraisal (LP/S/3). Each objective is tabulated in Section 15 Sustainability Appraisal Objectives (pages 405-410). It also explains how each is scored. Each site given in Appendix 4 has been given a score against the objectives which act as criteria.

13.2 Have all the sites been chosen using a robust site selection methodology?

5. The site selection methodology can be found in the Breckland Local Plan: Approach to the Selection of Sites topic paper (L/H/4) on pages 6-17. Section 3.3 on page 6 demonstrates what the topic paper sets out in relation to the methodological approach. In addition to this section, a Methodology Flow Chart can be found in Appendix 3 (page 33) of the topic paper. The methodology has been developed with full regard to the requirements of the government policy and practice guidance included in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). As stated in paragraph 157 of the NPPF, Local Plans should “allocate sites to promoted development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate” and “identify land where development would be inappropriate, for instance because of its environmental or historic significance.” In order to meet the requirements of the NPPF, the Council have developed a robust site selection methodology in order to properly assess site suitability.
6. The methodology is set out in 5 stages. Stage 1 is “Site Selection” where there is an initial identification of potential sites. These sites may have been identified in the Site Specific Policies and Proposals document (LP/D/2) adopted in 2012, the Strategic Housing Land Availability Assessment (SHLAA) (LP/H/5) from 2014 or from the call for sites undertaken in 2013, 2014 and 2015. Stage 2 is “Sustainability Appraisal” where a Sustainability Appraisal (SA) is completed for each of the sites submitted that passed stage 1. Stage 3 is “Site Assessments” where each site was subject to a detailed assessment including a site visit. Stage 4 is “Consultee Feedback” where statutory consultees such as Norfolk County Council Highways and Historic England,

and members of the public, were given the opportunity to provide comments and raise issues on every site. This included the regulation 18 consultations. Stage 5 is “Site Specific Issues” where a Sequential test was undertaken to look at all of the preferred and alternative sites within the emerging Local Plan with regards to the Strategic Flood Risk Assessment (SFRA) (LP/E/6), a Historical Characterisation Study (LP/E/4) was conducted and a Habitats Regulation Assessment (HRA) (LP/S/4) was carried out. The findings of these studies were used to update the SA and exclude sites or inform site specific policy where relevant.

7. It is the Council's belief that the above methodology represents a suitably robust approach to site selection.

13.3 Overall, do the proposed allocations reflect the outcomes of the SA and testing of reasonable alternatives through the site selection methodology?

8. A table can be found from pages 417 to 485 (residential), pages 486 to 503 (employment) and pages 504 to 505 (retail) in document LP/S/3, the Breckland Local Plan Pre-submission Sustainability Appraisal, which lists each of the sites that were submitted (by parish) and appraises them. There is an overall summary for each parish.
9. These tables compare the proposed allocations with the reasonable alternatives and the other sites that were submitted. This demonstrates that the proposed allocations reflect the outcomes of the Sustainability Appraisal whilst also giving consideration to other sites that have been submitted. Each site submitted has been assessed in accordance to the Site Selection Methodology.
10. Using the methodology, the Council have been able to determine that the allocated sites scored the best out of all of the sites submitted and assessed. Further information on all of the individual allocations and the results of the SA can be seen in response to issue 14.14.