

Examination Breckland District Local Plan 2011-2016)

Written Statement Issues and Matters.

Dereham Town Council

The Town Council would like to participate at the Hearing on this Matter.

Matter 5 – Housing: the settlement hierarchy and spatial distribution.

5.5

Dereham Town Council disagrees with the proposed housing allocation for Dereham. In the Preferred Directions document (January 2016) the allocation to the non-SUE market towns was 18%, and this level of growth was acceptable by the Town Council. Yet in the Preferred Directions document (September 2016) the allocation to non-SUE market towns had grown to 30%.

The Town Council objected to this on the basis that it had not been justified and no alternative had been considered. The response from the Town Council at the time was:

The Town Council disagrees with the revised housing distribution and housing allocation.

The housing figures for Dereham have been increased because the projected delivery rates in Attleborough and Thetford are not predicted to deliver at the rate previously anticipated. Given that there is considerable economic development focus along the A11 corridor, consideration should be given to allocating the additional development along the A11 corridor rather than the north of the district where there will be less economic development activity. It is surprising that no option has been put forward, as part of the consultation, to consider locating the additional housing numbers (as a result shortfall in delivery in Attleborough and Thetford) in the service centres along the A11 corridor, so that jobs and housing growth are better balanced.

There are a number of service centres within the A11 corridor which could accommodate additional numbers such as Banham (100), Garboldisham (40), Great Ellingham (80), Harling (200), Kenninghall (60), Old Buckenham (70). Totalling 550. All these service centres have good access to the A11 as well as being in close proximity of a mainline rail network.

It is noted that the New Anglia's LEP Economic Growth Strategy is focused on the A11 corridor and based on the original housing figures for Thetford and Attleborough. No evidence has been presented to show that the LEP has any capacity to promote economic development in the North of the District.

Having a policy to deliver greater growth in the A11 corridor rather than in Dereham and Swaffham through larger developments in the service centres would be more sustainable than what is being proposed because:

- *More economic development and jobs are being created along the A11 corridor.*
- *Strategies are already in place to deliver this level of growth in this area rather than the North of the District*
- *It would take the pressure off the more productive agricultural land around Dereham. Agricultural land quality is generally much poorer in the south of District.*
- *It would not add additional pressure on Dereham transport infrastructure, at a time when a feasible mitigation scheme has not been identified.*

The Planning Authority subsequently justified the increased allocation for non-SUE market towns. This was poor decision making and was done the wrong way around; the decision should have been based on evidence and analysis rather than the analysis taking place after the decision to allocate additional housing was made.

5.12

In the interest of well worded policies,

- It is unclear how criteria 1 and 5 can both be accomplished as 1 seeks to 'fill gaps' and 5 seeks to preserve gaps?
- Criteria 5 – The word 'appropriate' should be removed. A parish council will either support or not support a proposal, including the word 'appropriate' allows the option for a developer to suggest that if 4 out of 10 councillors supported the application that this may somehow be appropriate.
- There seems to be no limit on the how many applications for 3 dwellings can be approved during the Plan period.

5.14.

It is not justified because the additional housing growth in Dereham has not been supported by additional employment land allocation - the Plan will in fact lead to a reduction in employment land (due to current employment land being allocated to residential), rendering Dereham less sustainable than it currently is.