

Examination of the Breckland Local Plan 2011 -2036, Matter 5, Yaxham

1. **The Parish of Yaxham - Statement with reference to Matter 5 – Housing: the settlement hierarchy**, and particularly 5.2 and 5.11, and the issue of whether the parish/settlements of Yaxham should remain as proposed as Rural Settlements, in line with the “made” Yaxham Neighbourhood Plan.
 - 1.1. This is a supplementary statement following the submissions by Yaxham Parish Council and Yaxham Neighbourhood Plan Working Group, dated 2nd October 2017, in response to Breckland’s Proposed Local Plan Pre-Submission Publication and Consultation.
 - 1.2. To reiterate, Yaxham Parish endorses Policy Gen 03 and is quite content with Yaxham’s designation within this as having rural settlements with and without settlement boundaries, and reject the self-serving arguments to the contrary promoted by others. In addition, we support Policy HOU 04 and HOU 05 as they affect our settlements.

2. **Background to Yaxham Neighbourhood Plan – the first in Breckland – “made” 22nd June 2017**
 - 2.1. Yaxham Neighbourhood Plan went to Referendum on 5th May 2017 and achieved a parish turnout of 58% and a 92% YES vote in favour of the policies within the Plan. Over half, 53%, of the electorate voted “Yes”. County elections held on the same day only achieved a 35% vote.
 - 2.2. Throughout the Neighbourhood Plan consultations since 2015 it has been clear that parishioners wish the community to remain small and rural. Appropriate small-scale organic growth was understood and supported as critical to maintaining a vibrant community, but not large-scale urban extensions. All the following comments are grounded in the consultation process, which we have continued post Referendum through newsletters, social media and a major community consultation event on 25th November 2017. Yaxham residents have shown a continuing commitment to the Neighbourhood Plan as a living document.
 - 2.3. In the development of the Neighbourhood Plan, the arguments and policies set out, as a result of the continuing consultation, were tested with and by the community and robustly challenged by Breckland, seriously considered by the Independent Examiner who dismissed the arguments set out at the time. Despite this, the same arguments about Yaxham’s status in the settlement hierarchy are now repeated in their Local Plan submissions, by Cllr Dimoglou, Lanpro Services and Glavenhill Strategic Land (No 9) Ltd (Lanpro and Glavenhill are legally separate, but share directors).
 - 2.4. Explicitly the Neighbourhood Plan states at Paragraph 6.3: “Yaxham with its lack of services and three separate settlements should remain as rural settlements and that it does not “satisfy all five qualifying criteria” required by Breckland Council for its designation to be “elevated” to being a LSC”. This was integral to the resounding Neighbourhood Plan referendum vote.

3. **Background to Lanpro/Glavenhill**
 - 3.1. Lanpro/Glavenhill has speculatively bought 24 ha of agricultural land between Yaxham and Clint Green (halving the strategic Gap set out in the Neighbourhood Plan Policy STR1 (see Attachment 1, and Attachment 2 outlined in blue) which Breckland estimates capacity for some 332 new dwellings; almost doubling the size of the Parish, and increasing Yaxham settlement by 150%. Chris Leeming, Lanpro’s MD, however says “the expansion of... villages... this must not lead to excessive sprawl and bolt-on estates that are poorly related to the main settlement.” *Eastern Daily Press, 20th March 2018, p18, commenting on the Greater Norwich Local Plan Examination.* But this is exactly what Lanpro/Glavenhill appear to be trying to do to Yaxham.
 - 3.2. Lanpro/Glavenhill are currently appealing the first 1.3 ha application site, outlined in red on Attachment 2. Yaxham fears that this is, but the first step in the destruction of parish as its residents know it with the eventual development of the whole 24ha. Lanpro already view

Examination of the Breckland Local Plan 2011 -2036, Matter 5, Yaxham

Yaxham as a suburb of Dereham and saw the community gain from this massive development as being the re-development of the Dereham Hockey Club ground (submission to Neighbourhood Plan Regulation 14 consultation), but un-validated by Dereham Hockey Club. Lanpro says on its website that they are “heavily involved in land promotion projects including large urban extensions to existing settlements”. This is what lies behind their attacks on Yaxham’s status and on the Neighbourhood Plan ever since they bought their 24ha on 4th May 2016 for £500,000, and an overage agreement in the event of planning permission.

4. Background to Yaxham Parish

4.1. The Parish of Yaxham abuts the southern boundary of the market town of Dereham. The closest settlement boundaries between the two are around 1k apart. The Parish comprises some 360 dwellings which are distributed across three settlements and individual farmsteads. The settlements are: Yaxham, 204 dwellings, Clint Green 100, Brakefield Green 6, and the balance as predominantly individual farmsteads. In Breckland’s current Development Plan Core Strategy, Policy SS1, these settlements are in the fourth tier of the settlement hierarchy as “small rural settlements”: Yaxham and Clint Green with settlement boundaries, and Brakefield Green without a settlement boundary.

4.2. In terms of built form the three settlements are clearly separate entities. Yaxham and Clint Green are over 1km apart, whilst Brakefield Green is 2.5-3km from Yaxham and Clint Green to the south. All the roads between Dereham and Yaxham, and between the parish’s settlements are subject to the national speed limit, which is indicative of a rural setting and acts to reduce the likelihood of anyone walking or cycling between them.

4.3. The separate nature of the settlements of Yaxham and Clint Green was reflected in a key Neighbourhood Plan policy, Strategic Planning Policy STR1 “The Gaps between the Settlements”, which seeks to avoid coalescence recognising:

“the physical and... visual separation of... Yaxham and Clint Green will only be permitted where the harm would clearly be outweighed by the benefits of the development.”

The Neighbourhood Plan Independent Examiner’s Report (7th March 2017) recognised:

“clear support for the statement that Yaxham and Clint Green are two distinct settlements.” (Paragraph 72) and that *“The sense of space and access to the countryside is important ... I can therefore understand the aspiration to maintain the separate identity of the two settlements of Yaxham and Clint Green...”* (Paragraph 73)

This was the basis that the Examiner confirmed STR1 as meeting the “basic conditions” test.

5. “Local Service Centre” versus “rural settlements”

5.1. The Parish of Yaxham was not designated a Local Service Centre (“LSC”) in 2009 as it had insufficient services and its settlements have significantly less than 1,000 residents each or in aggregate. Since then the parish has seen a marked reduction in local services – losing its two public houses; post office; a shop, and now also the primary school in the parish is full, with no facility or appetite to expand. At the same time organic growth has continued within the parish with 23 new dwellings in the period April 2011-March 2015.

5.2. In the preparation for the emerging Local Plan, Breckland published various topic papers in 2015 including settlement hierarchy and LSC designation. This was the first time that Yaxham was proposed to be a LSC. As we have demonstrated to Breckland’s Local Plan Working Group (“LPWG”) the proposal was based on erroneous, inaccurate and out of date information (even placing Yaxham on the wrong river). As a result the LPWG recognised that the aggregation of services across a number of separate settlements was inappropriate and removed Yaxham from

Examination of the Breckland Local Plan 2011 -2036, Matter 5, Yaxham

the list of those parishes newly proposed to be LSCs. Yaxham therefore has never been an LSC and it is completely untrue to state that “Yaxham has been de-designated as a LSC”.

- 5.3. In terms of access to services, the emerging Local Plan identifies LSCs as those villages where they satisfy all of the following 5 services: primary school; shop/post office; community facilities; public transport and employment opportunities. The services and facilities from the designated settlement boundary/village core should only be considered to be available where they are within a recognised acceptable walking distance (which is generally accepted to be 800m, as used in Breckland’s Sustainability Appraisal and in the 2016 Local Plan consultations).
- 5.4. The table below seeks to illustrate: how many of the LSC criteria each of the settlements might meet; how these may be viewed in aggregate across the parish; and the failure of many these services to be within 1,200m, let-alone 800m, of the residents of much of the parish.

Service criteria	Parish of Yaxham Settlements			Shared
	Yaxham	Clint Green	Brakefield Green	
Post office/ Shop	No. The shop at Yaxham Waters Holiday Park, 200m north of Yaxham, closed at the end of 2017 with no apparent plans to re-open. It is 2km from Clint Green.	No. The very small shop, closed in 2015 and has not re-opened, although offered for sale in 2017. It is over 1,200m from Yaxham.	No	No
Primary school	No	Yes. BUT is full with no room for expansion. 1.2-2km from homes in Yaxham settlement. So no household in Yaxham settlement is within 1,200m .	No	Yes. BUT is full with no room for expansion.
Community facilities	Yes. Café at Yaxham Waters Holiday Park 200m north of Yaxham and 2km from Clint Green. The village hall in Yaxham is 1.5km from Clint Green boundary. Both over 1,200m to Clint Green boundary.	No	No	Yes, the facilities in Yaxham, plus an Indian Restaurant between Yaxham & Clint Green. BUT , no pub or GP surgery. Only the Indian Restaurant is within 1,200m of Clint Green.
Public transport	Yes Hourly, BUT daytime only	Yes. Hourly, BUT daytime only	No	Yes, BUT limited
Employment opportunities	Very Limited opportunities. Most businesses are sole traders. Yaxham Waters Holiday Park has some full-time staff, but has also just had redundancies.	Very Limited. Only the primary school has more than a couple of full-time staff (6), but since it cannot expand this will remain limited.	No , now RG Maintenance Services has relocated to: Cranworth. IP25 7SX	Very Limited. With very few businesses with more than a couple of full-time staff.

Examination of the Breckland Local Plan 2011 -2036, Matter 5, Yaxham

5.5. On a “literal”, rather than a practical basis therefore:

- Yaxham Settlement meets 2 LSC criteria (or 3 if Employment *opportunities* are a “yes”)
- Clint Green settlement meets 2 LSC criteria (or 3 if Employment *opportunities* are a “yes”)
- Brakefield Green settlement meets none of the criteria – now that RGM is moving out
- Combined the parish meets 3 LSC criteria (or 4 if Employment *opportunities* are a “yes”).

5.6. Individually therefore none of the settlements has the 5 services. Even combined across the settlements the parish does not qualify for LSC status as they do not have all 5 services and none of these “services” meet the reasonable walking test for much of the Parish of 800m, or even 1,200m in many cases. And even where the services exist they are minimal or highly constrained, such as the school which is full and the site is so constrained it cannot expand – especially after the probate sale of a neighbouring plot (to Cllr Dimoglou). Bearing in mind the purpose of the LSC designation is to define and identify what is considered to be a sustainable community, based on access to services, that can sustainably support significant new development, then the Yaxham Parish settlements have to be considered separately as the gaps between them are greater than the acceptable walking distance. The settlements of Yaxham, Clint Green and Brakefield Green therefore do not work/function as a single entity in this regard. The distances between Yaxham and Clint Green and the key services was illustrated by Breckland Officers’ presentation to Breckland’s LPWG in February 2017 – see Attachment 3.

5.7. In Summary:

- Yaxham, Clint Green and Brakefield Green are separate from each other visually/geographically, and practically because of the distances/gaps between them; and
- They are separate from each other functionally from a sustainability perspective because the respective facilities of one are not available to the other by means of walking.
- Taken individually, they each qualify for the status of rural village, but certainly not for LSC designation.

6. Current & Future Development

6.1. Add to this there is current permitted development of up to 52 additional dwellings. Most of these are in or adjacent to the settlement of Yaxham. The parish has only some 360 dwellings, and the settlement of Yaxham only 204 dwellings. 52 new dwellings represents a further 14% increase in the Parish and a 25% increase in the settlement of Yaxham, and there will continue to be the 5-7 “windfall” new dwellings each year we have seen over the past 15-20 years. Emerging Local Plan policy HOU 04 also provides for new development beyond the settlement boundaries of Yaxham and Clint Green, and policy HOU 05 enables new development in rural settlements without settlement boundaries such as Brakefield Green.

7. Conclusion

7.1. In Yaxham’s view, as confirmed in the Neighbourhood Plan referendum and subsequent consultation, it should not be an LSC, as Breckland has accepted, because its settlements are too far apart. In addition its primary school is full from its own catchment area, cannot expand and is over 1,200m from most of the children of the parish, there is no shop or post office, and little employment opportunities to sustain future development. Significant additional development is therefore not sustainable within the terms of the current and emerging Breckland Local Plans and the NPPF. On all these points, Yaxham believes it does not have the services to sustain significant additional development over and above the currently permitted development.

7.2. In addition, we note that the much larger villages of Saham Toney and Mundford that are LSC’s under the current Development Plan Core Strategy, Policy SS1, have now been de-designated as

Examination of the Breckland Local Plan 2011 -2036, Matter 5, Yaxham

LSCs. We offer no opinion as to whether they should or should not be designated as LSC's. However, with twice the population or more, many more services, facilities, and employment, and with schools that can expand, we submit that if there was a queue of villages to be considered as LSCs then these two would be significantly ahead of Yaxham.

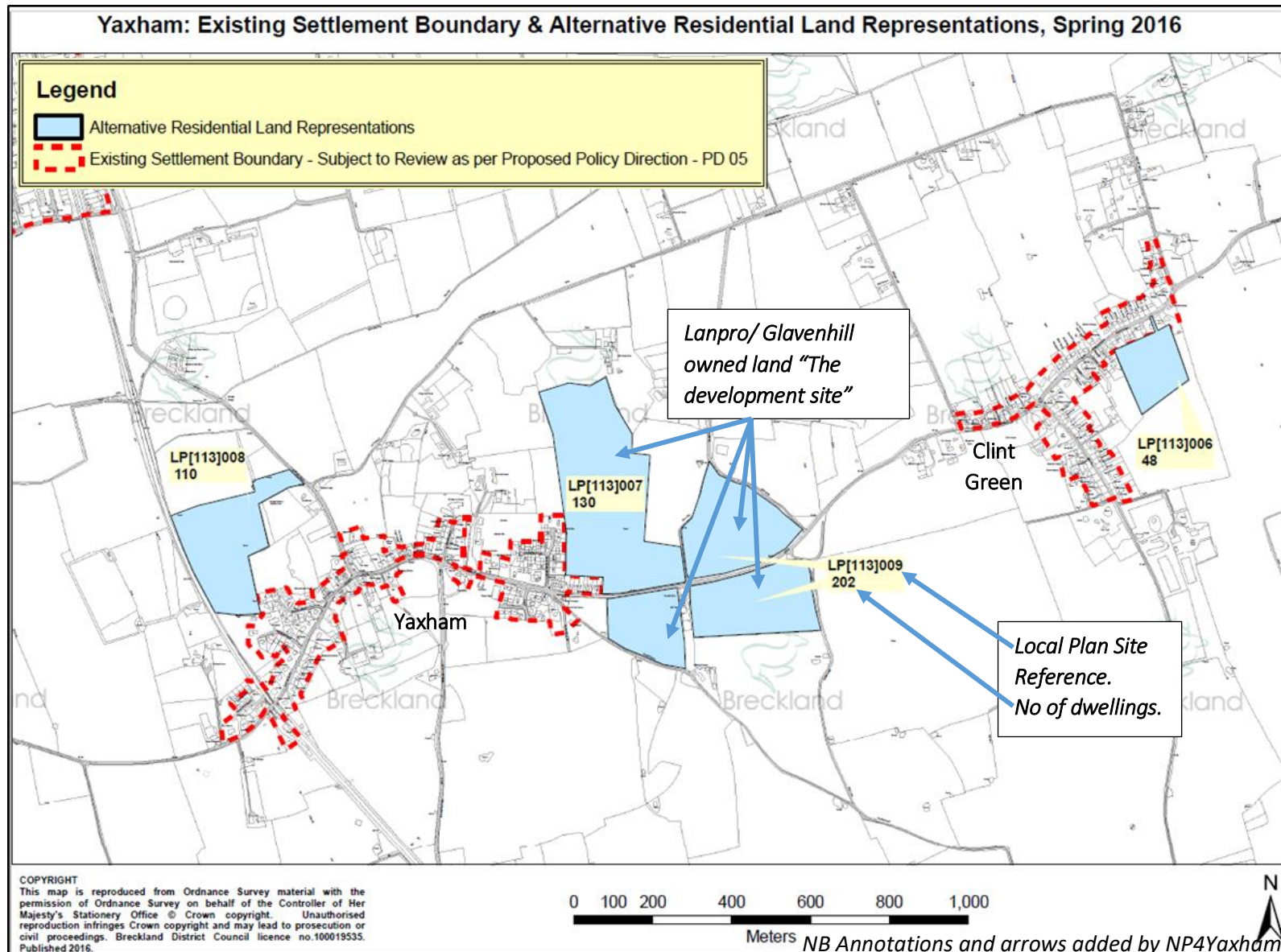
- 7.3. Yaxham Parish Council endorsed the parishioners wish for their village to remain small and rural, but with organic growth continuing throughout the lifetime of the Yaxham Neighbourhood Plan.

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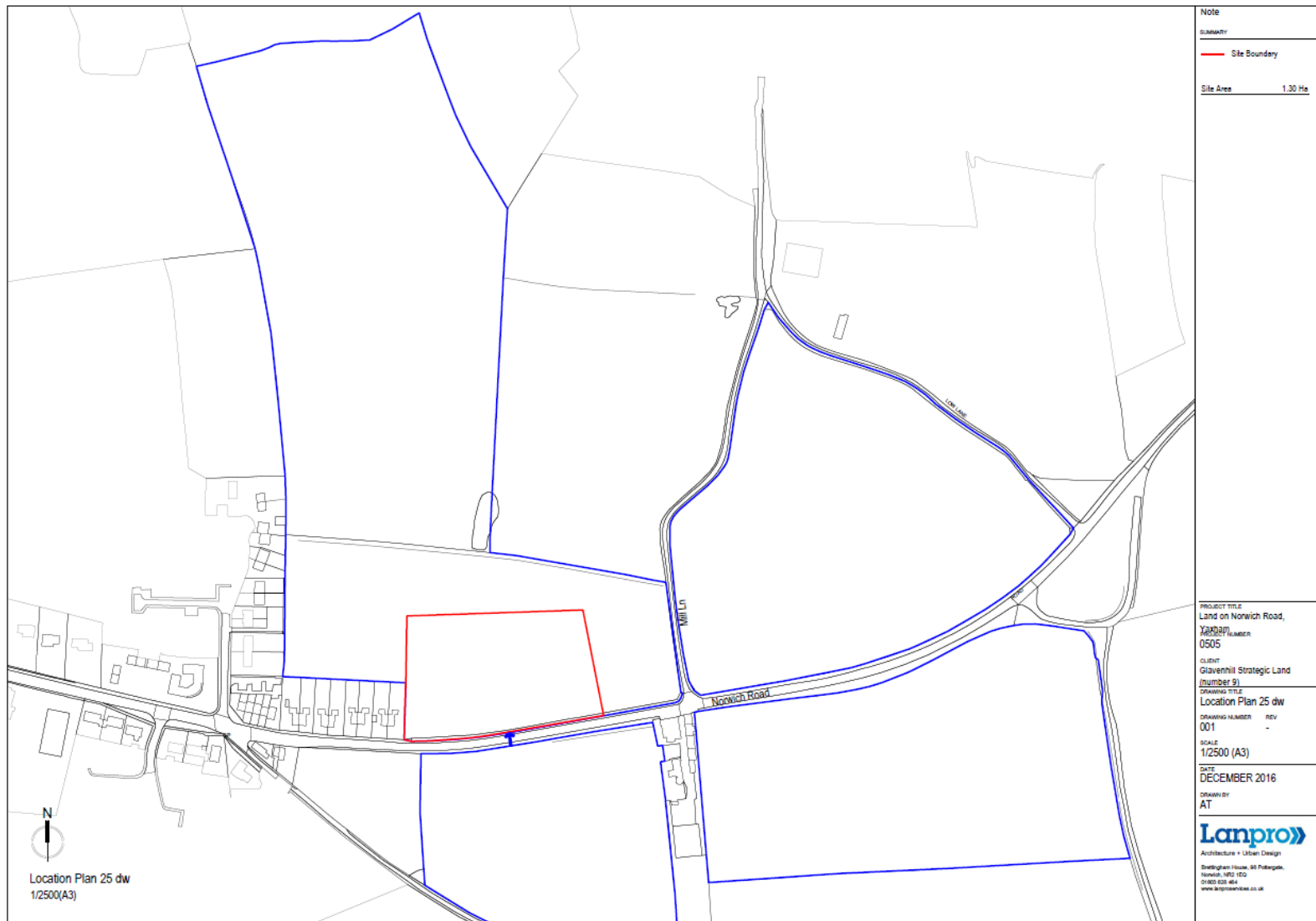
Examination of the Breckland Local Plan 2011 -2036, Matter 5, Yaxham

Attachment 1 Breckland Council's Local Plan Consultation Additional Site Map



Examination of the Breckland Local Plan 2011 -2036, Matter 5, Yaxham

Attachment 2 Lanpro/Glavenhill's appealed site in red and their landholding in blue



Examination of the Breckland Local Plan 2011 -2036, Matter 5, Yaxham

Attachment 3 Breckland Council Officers' Map (February 2017) showing the distance of the shop (now closed) and the school from each other.

