

## Breckland local Plan Examination Matter 14 - 6<sup>th</sup> June 2018

Dear Mr Manning (Local Plan Examiner),

### **Re: Breckland Local Plan – Dereham Site LP[025]030**

As mentioned in my Email to Ms Brennan (programme Officer), I did not submit all the maps to the pre-submission consultation as these were submitted at the previous two consultations. I was not aware that these comments/documents would be deleted by Breckland Officers and only a summary provided to you. I hereby provide the following information.

Site LP[025]030 is located on the very southern boundary of Dereham with Yaxham and Westfield with the river Tud marking the boundary. The land is currently in a higher level environmental scheme for the habitat it provides along the this beautiful area of Tud valley. The land also slopes naturally towards the Tud, the river then passes through Badley Moor SSSI (SAC) a short distance downstream. My concern is any polluted run-off from development would compromise the SSSI downstream (part of which I own). Despite these risks the river Tud has not been mentioned anywhere in the assessment considerations at all, this and Badley Moor SAC had even been removed from the consultation maps, the maps at the drop-in events didn't have these features included either. I raised these concerns with officers at the events and with Councillors at local plan meetings but have not received an explanation.

I do not believe the public have received the full information on this site to make an informed opinion. However, this site has received the most negative comments out of the Dereham sites, with many including their concern with the Tud and flooding. Breckland has **not** included these comments in their summary to you.

On the basis of the above I consider this site **not** to be sound and should **not** be included in the local plan.

It should also be noted that Breckland Planning Committee refused the application for 391 minimum houses on the site earlier this year.

Have attached the following numbered items:

1. Email to Ms Brennan.
2. LP[025]030 consultation considerations.
3. Dereham site map with river Tud and Badley Moor SSSI marked in by myself.
4. LP[025]030 receiving the most comments against.
5. Consultation Statement – comments not included on river Tud or Badley Moor SSSI.
6. Layered map of Dereham's key features was only produced for final consultation but had to be found on Breckland website elsewhere.

Yours sincerely,

Programme Officer <Programme.Officer@breckland.gov.uk>  
To: 'Mark Mendham'  
16 Apr at 11:42  
Dear Mr Mendham

The issues you have raised would of been dealt with by the Council's Planning Policy Team, please see their response to me below.

You would still be able to see comments from the Pre-Submission Publication on the portal but you wouldn't be able to see anything on there that is over a year old for example the Preferred Sites and Settlement Boundaries responses as they are removed.

Link to Pre Submission Publication <http://consult.breckland.gov.uk/portal> for the full responses submitted with attachments or you could look at the responses in the evidence base <https://www.breckland.gov.uk/article/7343/Evidence-Base-Submission-Documents->

Therefore, I suggest you bring the additional information along to the hearing session and it will be down to the Inspector to decide if he will accept it or not. Please note 3 hard copies would be required if accepted on the day.

Regards

Charlotte Brennan

**Charlotte Brennan**  
**Programme Officer**

DDI: 01362 656296  
Email: [programme.officer@breckland.gov.uk](mailto:programme.officer@breckland.gov.uk)  
Elizabeth House, Walpole Loke, Dereham, Norfolk, NR19 1EE

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**From:** Mark Mendham [mailto:']  
**Sent:** 16 April 2018 08:04  
**To:** Programme Officer  
**Subject:** Re: RE: Breckland Local Plan Examination

Dear Ms Brennan,

As I added attachments to my previous consultation comments, I didn't know I had to attach these again to my pre-submission comment or that Breckland would not include public comments on the river Tud in their summary of comments. Why have the previous comments been removed from Local Plan portal, how can I access them please?

Kind regards,

Mark Mendham



## LP[025]030: Preferred Residential Allocation - Land to the east of Shipdham Road

Figure 5.6 Preferred Residential Allocation LP[025]030

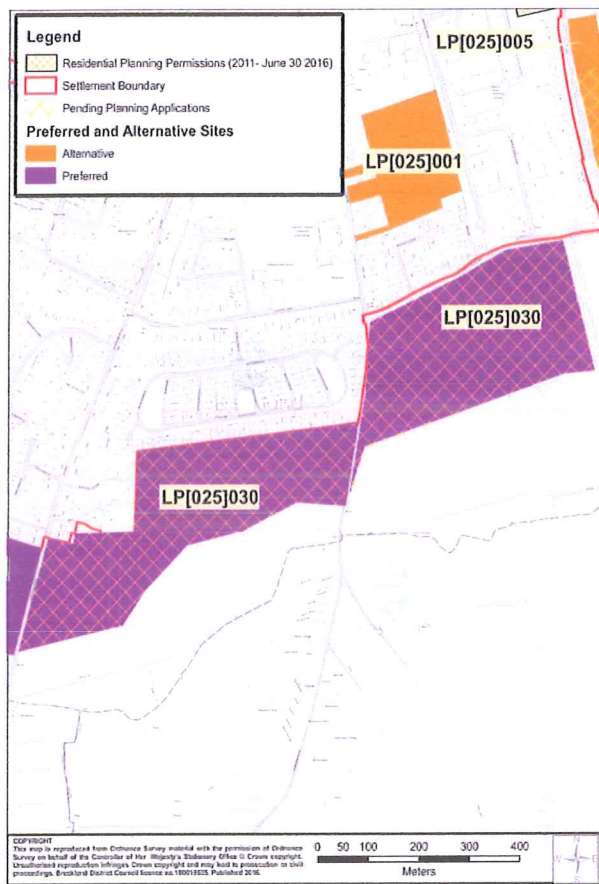


Figure 5.6 Preferred Residential Allocation LP[025]030 (Popup full image)

### LP[025]030 Key Development Considerations

- Add Comments
- View Comments (0)
- The site is proposed as a preferred allocation for 290 dwellings
- The principle access to the site will be from Shipdham Road
- An access link should be provided from Shipdham Road to Yaxham Road
- Appropriate landscaping to the south of the development
- On-site open space should be secured through the application
- Development should contribute towards required highways improvements in Dereham having regard to the Dereham Transport Study

5.25 This site is currently the subject of a planning application. The site is being promoted for 291 dwellings alongside green infrastructure improvements. This is a greenfield site which is classified as grade 3 agricultural land. The site is located at the southern extent of the town. Access to this site can be achieved from both Westfield Road and Shipdham Road, however within the planning application, access would be achieved from Shipdham Road.

5.26 The northern boundary of the site is onto Boyd Avenue and there is little screening between the properties and the site. The settlement fringe landscape character assessment classifies this site as predominantly falling within the Old Hall Tributary Farmland character area which has a moderate sensitivity to change. Shipdham Road is considered to be a key gateway into the town, and the development of this site would need to have regard to this. There is a further gateway into the town on the Whinburgh Road.

5.27 This site is well related to the Rashes Green General Employment Area, it is also well related to Toftwood Infant and Junior School. There are bus stops at the northern edge of the site. The town centre is however approximately 1.7 km from the site.

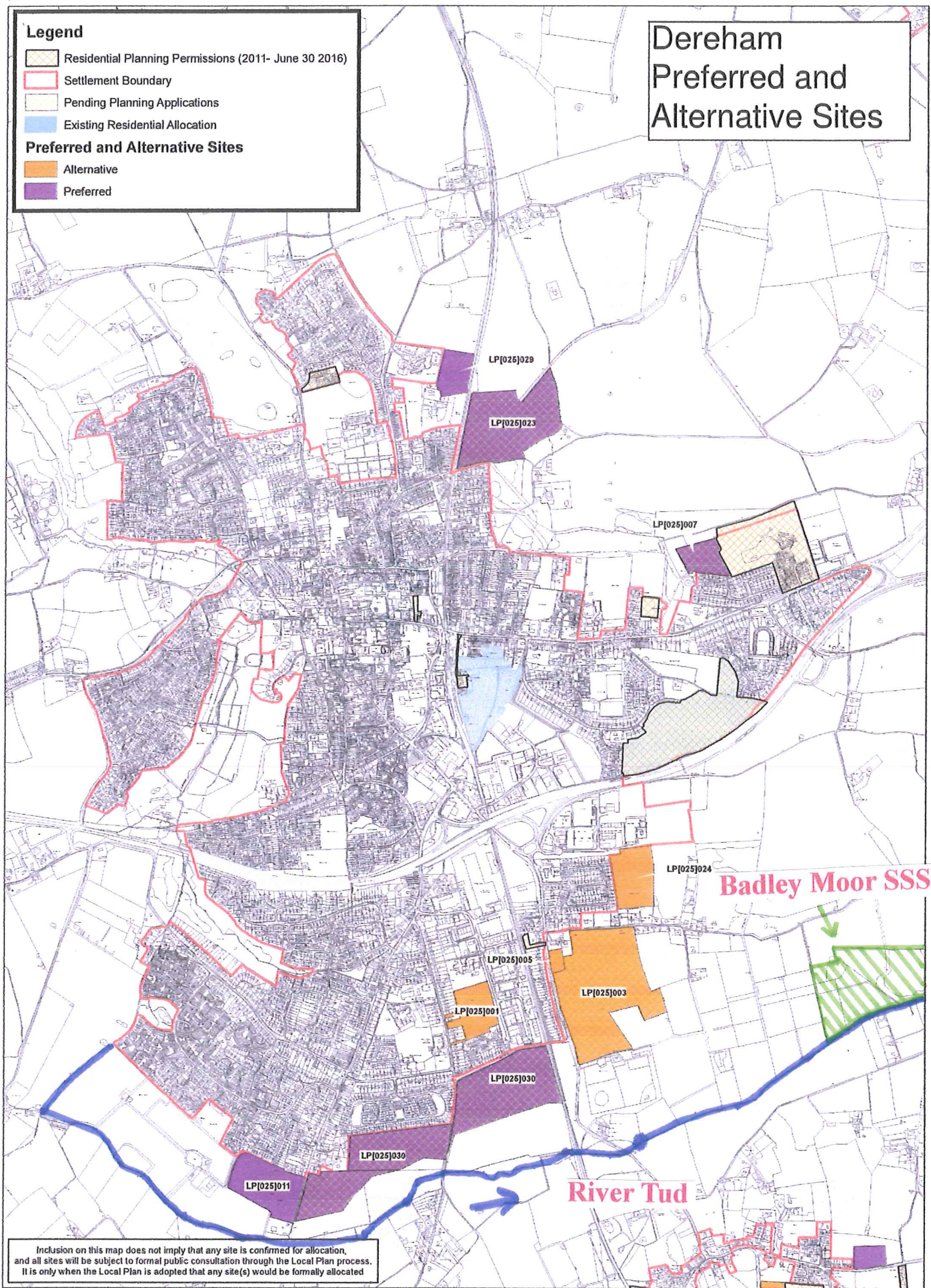
5.28 Due to the size of the site, it would be expected to provide on-site open space.

5.29 No fundamental constraints to the deliverability of the site have been identified through the site assessment

### Legend

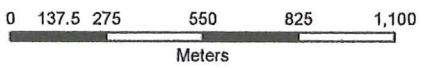
-  Residential Planning Permissions (2011- June 30 2016)
-  Settlement Boundary
-  Pending Planning Applications
-  Existing Residential Allocation
- Preferred and Alternative Sites**
-  Alternative
-  Preferred

# Dereham Preferred and Alternative Sites



Inclusion on this map does not imply that any site is confirmed for allocation, and all sites will be subject to formal public consultation through the Local Plan process. It is only when the Local Plan is adopted that any site(s) would be formally allocated

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LP[025]007: Land to the west of Etling View	60
LP[025]011: Land to the west of Shipdham Road	130
LP[025]023: Land off Swanton Road	210
LP[025]029: Land to the rear of Dereham Hospital	60
LP[025]030: Land to the east of Shipdham Road	290
<b>Total</b>	<b>750</b>

6.2 Three of these sites (LP[025]007, LP[025]023, and LP[025]030) are currently the subject of live planning applications, which are being determined through the development management process. Sites LP[025]011 and LP[025]029 are not the subject of planning applications at the present time. During the consultation 138 comments were received on the Dereham sites from 61 consultees. The greatest number of comments were received against site LP[025]030, which is recommended for 290 dwellings. Through the consultation no statutory agency objections were received to the preferred sites which would bring into question their deliverability or suitability through the Local Plan.

6.3 Since the consultation occurred a further site for 48 dwellings off Greenfields Road in Dereham has received a decision to grant planning permission subject to a legal agreement. With existing commitments this would lead to an increase in the total number of dwellings by 62 dwellings and creating a total allocation of 812. It would therefore be possible to reduce the allocation in Dereham by 60 dwellings and still meet the proposed housing target for the town. Any decision for the removal of a site should be on the basis of the sustainability appraisal, ensuring that the most sustainable and deliverable sites remain within the Local Plan to support the towns growth.

## 7. OPTIONS

7.1 There are three options available:

- Option 1 – Accept the development strategy approach towards Dereham as the basis of preparing the final iteration of the Local Plan (development levels and sites)
- Option 2 – Accept the development strategy support the approach towards Dereham as the basis of preparing the final iteration of the Local Plan (development levels and sites), and also recommend to Cabinet that:
  - The Council work with the Town Council and Norfolk County Council outside the Local Plan process to undertake additional transport modelling to inform mitigations for existing and potential future pressures not related to development.
  - The Council work with the Town Council to develop its long term vision and aspirations for Dereham beyond the current proposed Local Plan.
- Option 3 – Reject the development strategy

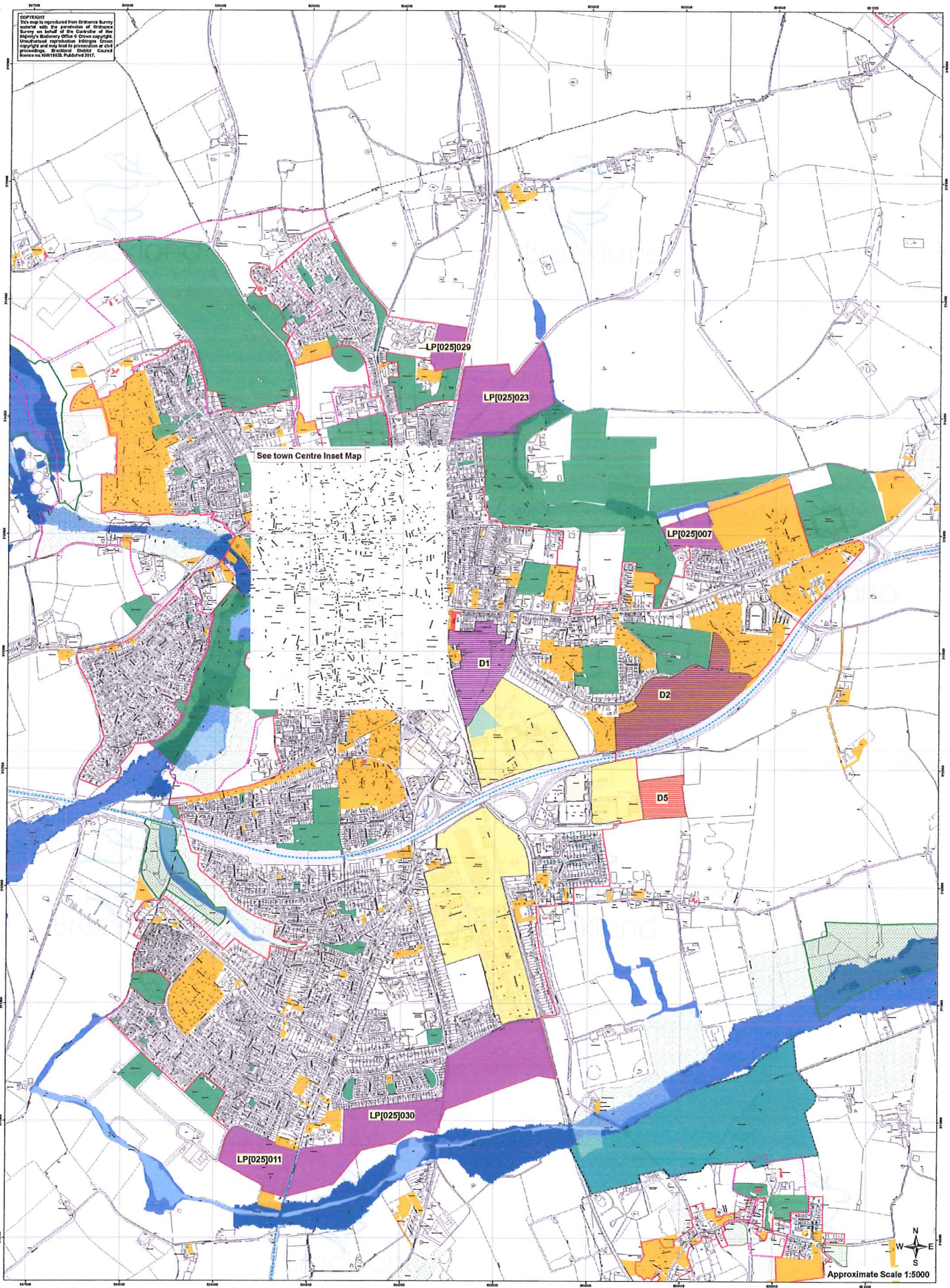
## 8. REASONS FOR RECOMMENDATION(S)

8.1 It is recommended that Members endorse option 1 or 2 to accept the development strategy as this is necessary and most appropriate basis to progress the Local Plan. Having an up to date Local Plan is important to ensuring and maintaining a five year land supply and to shaping the District. The government has clearly indicated that it expects Council's to have an up to date Local Plan.

## Breckland Local Plan Consultation Statement Appendices






































Settlement	Comment
Dereham	<p><b>Total: 138 Comments by 61 consultees</b></p> <p>Proposed sites generated significant levels of responses. Issues raised included infrastructure capacity, level of housing proposed for the town and the Dereham transport study.</p>
Swaffham	<p><b>Total: 32 comments from 12 consultees</b></p> <p>A number of comments have raised concern regarding infrastructure provision within the town.</p>
Watton	<p><b>Total: 33 Comments from 22 consultees</b></p> <p>Representations have included that the lack of further allocations to be unsound. Watton is a sustainable location for development, and the council should review the housing target for the town. Other representations have also raised concern infrastructure provision within the town.</p>
Ashill	<p><b>Total: 11 comments by 5 consultees</b></p> <p>Parish council would like to see other sites designated as the preferred option. Only one public comment was received.</p>
Banham	<p><b>Total: 9 comments from 4 consultees</b></p> <p>Limited comments were received on the preferred, alternative and unreasonable sites within Banham. Historic England have raised concerns regarding the assessment for the preferred site.</p>
Bawdeswell	<p><b>Total: 17 consultees made 31 comments</b></p> <p>10 objections to designation of Bawdeswell as a Local Service Centre including Parish Council, 1 support</p>
Garboldisham	<p><b>Total: 66 comments from 36 consultees</b></p> <p>Representations object to the designation of the village as a Local Service Centre</p>
Great Ellingham	<p><b>Total: 28 comments from 11 consultees</b></p> <p>Representations are predominantly from statutory consultees. Specific comments relating to the alternative option which has been allowed at appeal.</p>
Harling	<p><b>Total: 19 comments from 10 consultees</b></p> <p>Parish Council agree with the site assessments. Additional comments received on the unreasonable sites.</p>
Hockering	<p><b>Total: 13 comments were received from 7 consultees</b></p>

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


Approximate Scale 1:5000



## Legend

	Settlement Boundary		Special Area of Conservation (SAC)
	Allocation		Ramsar
	Attleborough Strategic Urban Extension		Historic Parks & Gardens
	Primary Frontage		Scheduled Monument
	Secondary Frontage		Ancient Woodlands
	Primary Shopping Area		Site of Archaeological & Historical Interest
	Town Centre		Site of Special Scientific Interest (SSSI)
	Saved Employment Allocation		Roadside Nature Reserve
	Saved Residential Allocation		County Wildlife Site
	Saved Retail Allocation		Regionally Important Geological Site (RIGS)
	Attleborough Proposed Link Road		Local Nature Reserve
	Listed Buildings		National Nature Reserve
	Conservation Area		Flood Zone 2
	SPA Stone Curlew 1500m Primary Buffer		Flood Zone 3a
	SPA Stone Curlew 1500m Secondary Buffer		Flood Zone 3b
	General Employment Area		Corridor of Movement
	Sites with Planning Permission for Housing		Parish
	Open Space		District
	Special Protection Area (SPA)		

## Thetford Area Action Plan Specific Policies

	Thetford Urban Extension		TAAP Boundary
	Walking and Cycling Crossing to be Improved		Walking and Cycling Network
	A11 Junction Improvements (TH28)		BTO Loop Implementable now
	Joe Blunt's Lane (TH11)		Croxton Loop Implementable now
	Bus interchange (TH6)		Croxton Loop Priority
	Reserved Site for New Railway Station (TH27)		Northern Loop Implementable Now
	Thetford Railway Station (TH7)		Northern Loop Priority
	Train Station Parking Area of Search (TH7)		Southern Loop Implementable Now
	Existing buildings in the Thetford Urban Extension (TH23)		Southern Loop Priority
	Locally Distinctive features of the Landscape (TH21)		Thetford Forest Loop Implementable Now
	Green Roof Area (TH20)		Thetford Forest Loop Priority
	Area of Main Archaeological Interest (TH18)		
	Improvements to Local Road Network (TH29)		

## Yaxham Neighbourhood Plan Policies

	Yaxham Neighbourhood Plan ENV 3 - Green Infrastructure Local Green Space
	Yaxham Neighbourhood Plan STR1 - The Gaps Between Settlements



Mann, James <James.Mann@capita.co.uk>

To: r

11 NOV 2016 at 09:04

Good morning Mark,

Thank you for sending me your comments directly. We will respond to all comments made through the Local Plan consultation process and the points you raise will be looked at in further detail as we move forward in the process.

Kind regards,

James

**James Mann BA (Hons) MSc**  
**Planning Policy Officer**

Breckland Council *working in partnership with* CAPITA

Tel: 01362 656873 DDI: 01362 656290

Email: [james.mann@capita.co.uk](mailto:james.mann@capita.co.uk)

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

**Commercial in Confidence**

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**From:** Mark Mendham

**Sent:** 28 October 2016 09:41

**To:** Mann, James

**Subject:** Re: Local Plan - Toftwood site LP[025]030

Hi James,

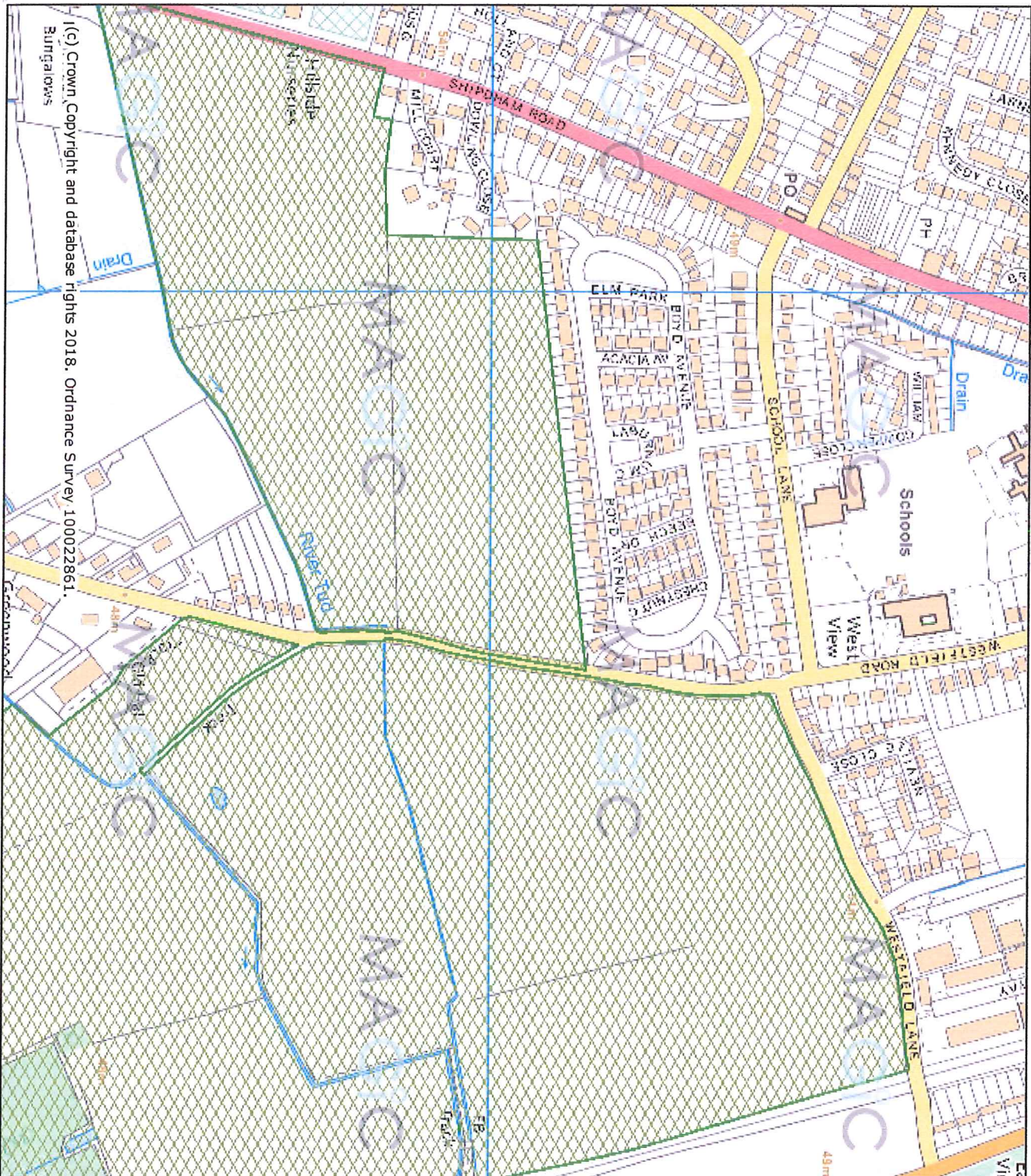
Further to my discussion with you at the Memorial Hall with my alarm at Toftwood site LP[025]030 being a preferred site. I have submitted various comments on the Breckland portal, but would like to provide the following points to you directly.

1. This site sits next to the River Tud, which is not marked on the latest maps.
2. Badley Moor SAC and SSSI is only a short distance downstream.
3. This land is naturally wet, the Lanpro application requires swales and ponds between the housing. How can open water be safe?
4. There is no public open space to the south of site, Lanpro application states this will be grazed with cattle. Actually there will be very little open space for the public.








I do urge you to look at this site again, as it would be a disaster if accepted. Please see attached maps.

Kind regards,

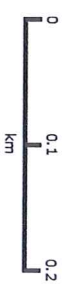
Mark Mendham



### Legend

-  Environmental Stewardship Agreements (England)
-  Entry Level plus Higher Level Stewardship
-  Entry Level Stewardship
-  Higher Level Stewardship
-  Organic Entry Level plus Stewardship
-  Organic Entry Level Stewardship
-  Higher Level Stewardship

Projection = OSGRB36  
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 ymin = 310300  
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 ymax = 311700



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