

Breckland District Council

Examination of the Breckland District Local Plan (2011 – 2036) (the Plan)

Inspector's Questions on the Additional Work and related Proposed Modifications

Inspector: Jonathan Manning BSc (Hons) MA MRTPI

Programme Officer: Charlotte Brennan, Examination Office, Elizabeth House, Walpole Loke, Dereham, Norfolk, NR19 1EE

Email: programme.officer@breckland.gov.uk

Tel: 01362 656296

Matter 4 – Housing: the supply of land for housing, deliverability and viability

The trajectory

- 1.1 Why do the completions (2011/12 to 2016/17) in the new trajectory (provided in the Housing Topic Paper) not match those in the previous trajectory provided with the Council's hearing statement (CS.4A)?
- 1.2 Should sites with a resolution to grant planning permission subject to a S106 be counted towards supply? In addition and if so, should a lapse rate be applied?

Lapse rates

- 1.3 Is a lapse rate of 10% for some large sites with planning permission justified given the Council's evidence?
- 1.4 Is it justified to apply a lapse rate to only some of the large sites with planning permission? Should a lapse rate be applied to all large sites, given the Council's evidence? What effect would this have on supply?
- 1.5 Should a lapse rate be included for site allocations? What effect would this have on supply?

Windfall allowance and Policies HOU03 & HOU04

- 1.6 Is having an allowance for windfall sites and sites delivered under Policies HOU03 & HOU04 justified?
- 1.7 Is the windfall allowance of 800 dwellings (50 dpa), from within settlement boundaries, over the remainder of the Plan period justified?
- 1.8 Can similar rates of windfall development be expected in the long-term?
- 1.9 Is the assumed contribution in the trajectory from Policies HOU03 & HOU04 justified? In addition, should a lapse rate be applied?

Five year housing land supply

- 1.10 Is calculating the shortfall based on the stepped trajectory and Liverpool method justified?
- 1.11 The Council suggest that they can demonstrate a five year housing land supply without a stepped trajectory and by addressing the shortfall via the Sedgefield method? On this basis, is a stepped trajectory and the use of the Liverpool method in the Plan justified?

Sites

- 1.12 Does the evidence provided in the topic paper justify the Council's view that the Attleborough and Thetford Strategic Urban Extensions can feasibly deliver up to 250 dpa over a sustained period of time?
- 1.13 Is the trajectory of delivery for each site (Appendix A of the Housing Topic Paper), including the Plan's site allocations, justified?
- 1.14 Is it appropriate to include a contribution from not superseded Site SW1 of the Site Specific Policies and Proposals Development Plan Document?

Local service centres

- 1.15 Is the methodology for calculating the 10% growth for Local Service Centres justified?
- 1.16 Are the reductions to ensure the 15% overall target from Local Service Centres is not exceeded, proportionately applied depending on the settlement size?

Policy HOU02

- 1.17 Should Policy HOU02 reflect the trajectory in terms of lapse rates applied for large and small sites and the windfall allowance?
- 1.18 Why has the % growth column been removed from revised Policy HOU 02?
- 1.19 Why have villages without boundaries now been included in Policy HOU02?
- 1.20 The revised figures in Policy HOU02 result in the overall number of dwellings to be delivered in Dereham and Watton being over the sought target. What are the implications of this and is it justified?
- 1.21 Do the revised figures in Policy HOU02 have any implications for Policies HOU 04 and HOU 05 of the Plan, in terms of need?

Infrastructure

- 1.22 Are the projected completions in the revised trajectory based on a sound assessment of infrastructure requirements and their deliverability?
- 1.23 Does the projected increase in dwellings (as a result of recent planning permissions outside of the Plan making process) for Dereham and Watton have any significant infrastructure implications?

- 1.24 Why is the Council seeking to update the Infrastructure Delivery Plan in November 2018? Will this have any implications for the Plan?

Banham Site Assessment - LP[003]013 Land to the west of Grove Road

- 1.25 Is the assessment undertaken for the site LP[003]013 Land to the west of Grove Road and its findings robust?

Matter 7 - Other Housing Types and Related Policies

C2 Dwellings

- 1.26 Are the Council's suggested modifications to Policy HOU 09 and its supporting text justified?
- 1.27 Is a largely criteria based approach to the delivery of the identified need for C2 bed spaces justified?

Matter 8 – Housing: provision for gypsies, travellers and travelling showpeople

- 1.28 The Council's topic paper sets out that two existing private sites are suitable for expansion (within the existing site boundary) - Fayrehaven Caravan Site, Beetley (1 pitch) and Summer Meadow, Mill Road, Mattishall (1 pitch) to help meet the identified need. Is the evidence to support this assessment robust?
- 1.29 To be positively prepared, should Policy HOU08 refer to the expansion of the two sites?
- 1.30 Are changes to Policy HOU08 and its supporting text required to address the updated level of supply identified and therefore need in the topic paper?
- 1.31 Is the reliance on Policy HOU08 to deliver the identified need for pitches past 2026 justified?
- 1.32 The Council's topic paper has not sought to identify additional sites/pitches for the identified need for 2 plots for travelling show people. Is the reliance on windfall development in this regard justified?

Matter 9 – Economic Development & Matter 10 – Economic development site allocations, deliverability and viability

General Employment Areas (GEAs)

- 1.33 Is the methodology that was used in the topic paper to re-asses the boundaries of the GEAs justified?
- 1.34 Is the review of each GEA boundary and its findings robust?
- 1.35 Is the boundary for each GEA robust and are the proposed alterations to some boundaries justified?
- 1.36 Has the retail permission on Gaymer Industrial Estate, Attleborough now lapsed?
- 1.37 Is the Council's approach to not removing sites with planning permission for other uses within GEAs, until they are implemented, justified?
- 1.38 Would the suggested amendments to the GEAs have a significant impact upon the provision of employment land within the District?

Snetterton

- 1.39 Is the Snetterton GEA boundary, as now proposed in the topic paper, justified?
- 1.40 Why does the Council consider that planning permission 3PL/2008/0600/O does not require a change to the GEA boundary?
- 1.41 Is the approach to Snetterton Heath (including the proposed modifications) set out in Policy EC02 justified?
- 1.42 Is the proposed modification to support employment uses to the south of the Snetterton GEA boundary (which does not form a site allocation) justified?

Policy EC03

- 1.43 Are the Council's proposed changes to Policy EC03 and its supporting text justified?
- 1.44 To be justified, should Policy EC03 itself refer to evidence being demonstrated of appropriate marketing periods and future market

demand to justify alternative development being permitted on employment sites?

- 1.45 Should Policy EC03 also relate to employment sites not located within a GEA?
- 1.46 The Council has set out that if an application were to be submitted on a site where there is an existing employment use, but is not within a General Employment Area, this would be taken into consideration as part of the planning balance. However, how can this be the case if the employment site has no protection in the development plan?
- 1.47 The Council has also set out that it is not considered appropriate to protect all forms of employment use within the District as there may be examples where employment uses are located in areas that are not considered appropriate for employment use. Is this justified? Should this be set out in Policy?

Matter 12 – Environment

Policy ENV 01 - Green Infrastructure

- 1.48 Is Policy ENV 01 and its supporting text (as modified in the Environment Topic Paper) justified and in accordance with national policy?
- 1.49 The Government's Planning Practice Guidance (Paragraph: 029 Reference ID: 8-029-20160211) sets out that: '*Local Plans should identify the strategic location of existing and proposed green infrastructure networks...*'. Does the Plan fulfil this requirement?

Policy ENV 02 - Biodiversity

- 1.50 Is Policy ENV 02 and its supporting text (as modified in the Environment Topic Paper, Appendix 2) justified and in accordance with legislation and national policy?

Policy ENV 03 - The Brecks Protected Habitats and Species

- 1.51 Is Policy ENV 03 and its supporting text (as modified in the Environment Topic Paper) justified and in accordance with legislation and national policy?
- 1.52 Would the proposed modifications to Policy ENV 03 ensure that there would be no adverse effects (from increased recreational pressure) on the Breckland Special Protection Area?

- 1.53 Should more detail from the Statement of Common Ground with the RSPB with regard to the proposed Monitoring and Mitigation Framework be included in Policy ENV 03 for it to be effective and justified?
- 1.54 Is the suggested modification with regard to agricultural buildings within Policy ENV 03 (part b) justified?

Policy ENV 04 - Open Space, Sport and Recreation

- 1.55 Is Policy ENV 04 and its supporting text (as modified in the Environment Topic Paper) justified and in accordance with national policy?

Policy ENV 10 - Renewable Energy Development

- 1.56 Is Policy ENV 10 and its supporting text (as modified in the Environment Topic Paper) justified and in accordance with national policy?

Matter 18 – Infrastructure

Waste water treatment

- 1.57 Is the Council's revised approach, as set out in the additional work, to waste water treatment and pre-application enquiries with Anglian Water Services, justified?
- 1.58 Are the proposed modifications in this regard appropriate?