

**Appendix F – Additional representations made to the Preferred Options Consultation and officer response.**

<b>Category</b>	<b>Respondents</b>	<b>Summary of Comments</b>	<b>Officer Comments</b>	<b>Officer Recommendation</b>
<b>Object</b>				
<b>Support</b>				
<b>Comments</b>	Sarah Roberts TW Gaze	Land north of Windmill Avenue Dereham should be included as part of a preferred option for housing - 3.9 hectares (ha). The site is situated adjacent to preferred option D3 and Neatherd Moor.	This site has not been consulted on in the previous 2008 and 2009 stages and should not be considered at this late stage. Whilst the site area itself is identified as not subject of any specified nature conservation designation, the site may offer potential as suitable habitat for a number of protected species including reptiles, great crested newts and bats. The northern and eastern site boundaries are identified as lying within Flood Zone 2. Furthermore the site is located adjacent to Neatherd moor which acts as a buffer between proposed new housing and Neatherd Moor open space.	It is considered that despite the representation received that the preferred options for Dereham remain as appropriate and continued to the proposed submission document.

**Introduction**

1.1

Category	Respondents	Summary of Comments	Officer Comments	Officer Recommendation
<b>Support</b>				
<b>Object</b>				
<b>Comment</b>	Lt Col Christopher Taylor	Criticism that a Shipdham meeting was organised on the 1 <sup>st</sup> of July – the same date as the Norfolk show.	This meeting was organised by the Parish Council and was not the responsibility of the Local Planning Authority.	No further comment.
	Miss Rachael Bust – Coal Authority	No comments to make on the document	No further comments.	No further comment.
	Mr Brian Kidd	The current state of play with the RSS as a result of its revocation and the demise of EERA and EEDA.	The RRS was confirmed on the 10 <sup>th</sup> of November that, the contents therein, remain the top tier development plan for the purposes of delivering growth in the East of England. Furthermore, Breckland District Council has an adopted Core Strategy which guides the level and location of growth within the District.	Level and location of growth will remain as detailed within the adopted Core Strategy and Development and Control Policies DPD.

1.2

Category	Respondents	Summary of Comments	Officer Comments	Officer Recommendation
<b>Support</b>				
<b>Object</b>				
<b>Comment</b>	Mr Brian Kidd	What would happen to the site specifics policies and proposal LDP's etc as a result of the	If the RSS were to be abolished, Breckland has an adopted Core Strategy which	Level and location of growth will remain as detailed within the adopted Core Strategy and

		demise of the RSS?	has, through examination, endorsed the housing numbers, location and direction of growth. This document would guide the future planning of the District.	Development and Control Policies DPD.
	Mr Stephen Faulkner	Site specifics DPD needs to take in to account mineral resources, existing and proposed mineral extraction sites, waste management facilities and sewage treatment works.	Constraints and site analysis is undertaken as part of the site specifics process.	No further action.
	Mr Stephen Faulkner	County Council school sites should be included within the respective settlement boundary.	Majority of school sites are not designated as open space through the Adopted Core Strategy as a result of restricted use for school only, and its removal from the settlement boundary would provide protection from future redevelopment if that should arise. This is also consistent with the approach taken within the Preferred Options Document.	No further action.

#### 1.4

Category	Respondents	Summary of Comments	Officer Comments	Officer Recommendation
Support	Mr Brian Astley	Great Ellingham Parish Council is in agreement with the proposed settlement boundary changes	Support noted.	It is recommended that the change as set out in the Preferred Options consultation to amend the

				Great Ellingham settlement boundary is continued to the proposed Submission document.
<b>Object</b>				
<b>Comment</b>	Mr Brian Kidd	Concern on the impact of the village infrastructure as a result of the revocation of the RSS and its impact upon the Core Strategy and Development Control policies. Furthermore what will be the impact upon the Shipdham Conservation Area and access to the preferred sites?	The RSS was confirmed on the 10 <sup>th</sup> of November that, the contents therein, remain the top tier development plan for the purposes of delivering growth in the East of England. Furthermore, Breckland District Council has an adopted Core Strategy which guides the level and location of growth within the District. If the RSS were to be abolished PPS5 (Planning for the Historic Environment) is the National Policy for the protection for the Historic Environment of which Conservation Area protection is included.	Comments noted.

## 1.6

<b>Category</b>	<b>Respondents</b>	<b>Summary of Comments</b>	<b>Officer Comments</b>	<b>Officer Recommendation</b>
<b>Support</b>				
<b>Object</b>	Mrs Jean Walden	The site selected for Swanton Morley is considered inappropriate due to the access by road. At a public meeting in	Whilst the site benefits from few physical constraints, it is considered that factors such as location and proximity of	It is recommended that this site remain an alternative site within the submission document.

		Swanton Morley Gooseberry Hill was voted as the preferred site by those villagers in support of housing development. This site does not have the road access issues.	existing listed buildings, historic context in relation to the village have deemed that site SM1 within the village is preferable in terms of fewer constraints.	
<b>Comment</b>	Mr Brian Kidd	How will the role of LPAs change with the coalition government's wish to delegate more planning policy matters down to local council level, and then what will be the role of the Planning Inspectorate in either deciding on the LPDs (if they exist) or making decisions on Appeals.	The RSS was confirmed on the 10 <sup>th</sup> of November that, the contents therein, remain the top tier development plan for the purposes of delivering growth in the East of England. Furthermore, Breckland District Council has an adopted Core Strategy which guides the level and location of growth within the District. If the RSS were to be abolished and the Localism Agenda endorsed by Council Members then this may have an impact upon the future of 'planning' within the district. At present, the Local authority has an adopted Core Strategy which guides housing numbers, location and direction of growth within the District.	Comments noted.

Category	Respondents	Summary of Comments	Officer Comments	Officer Recommendation
<b>Support</b>				
<b>Object</b>	Mrs Donna Tayler	Objects to the development proposed for 250 houses to be built on the greenfields site in Dereham due to access arrangements, in particular on t Norwich Road, currently over developed, loss of outlook, spoil view of windmill.	Overall level of development proposed for Dereham is identified in the Core Strategy. Development will be expected to provide any necessary improvements to local infrastructure to enable it to occur.	The site is a key piece of brownfield land in a highly sustainable location in close proximity to Dereham Town Centre. The site provides an opportunity to make best use of brownfield land which limits the need for additional greenfield development and encroachment into the surrounding countryside.
<b>Comment</b>				Development offers opportunities for increased walking and cycling and the proposed policy reflects this.  As such, it is considered that the site should be allocated for residential development as per the preferred options document.

### 1.12

Category	Respondents	Summary of Comments	Officer Comments	Officer Recommendation
<b>Support</b>				
<b>Object</b>	Mrs Kerry Doyle	Concern that development will not increase jobs or retail space given that existing retail space is currently vacant. These should be filled first.	The adopted Core Strategy supports the reuse of vacant retail space, however, the spatial strategy looks to 2026 therefore needs to identify	No further comment.

			appropriate areas for future employment growth.	
	Mrs Jean Walden	There are currently 80 dwellings on Robertson Barracks empty. Why does Swanton Morley require an additional 50 houses?	Swanton Morley has been identified within the Adopted Core Strategy as a Local Service with a housing positive allocation. Overall level of development proposed for Swanton Morley is identified in the Core Strategy.	Overall level of development proposed for Swanton Morley is identified in the Core Strategy.
	Mrs Rebecca Rejzek on behalf of Childerhouse Lodge Farms.	The representation presents a case that Weeting should accommodate additional growth if the evidence identifies that further development can be accommodated without likely significant effect on qualifying features of the Breckland Farmland SPA. The representation further argues that the Inspectors Report on the Core Strategy has enabled an allocation in Weeting to be determined positively in such circumstances. The representation is not accompanied by any detailed research or any new empirical evidence which demonstrates that the existing evidence base is deficient or that a causal	As no additional information or evidence containing new empirical research has been received as part of the Site Specifics process it is recommended that the document is not amended further in respect of Weeting. Any review of Weeting will require new evidence which can adequately demonstrate to the satisfaction of the Local Planning Authority and statutory bodies that a clear causal mechanism has been identified and consequently successful mitigation can be implemented.	No further comment.

		<p>mechanism for lower Stone Curlew nesting attempts proximate to development has been successfully identified and therefore capable of successful mitigation. Therefore, it is not possible to recommend a positive way forward on this issue as part of this document. Notwithstanding the Stone Curlew issue, the Core Strategy was not amended to allow for a positive allocation of development at Weeting at either SS1 (the Spatial Strategy) and at CP1 (Housing) to facilitate any significant release of land. New evidence on Stone Curlews may allow for modest development in line with Policy CP14 (ie schemes of up to 5 units) and DC5 (affordable housing on exception sites) but it will not be possible to make any strategic requirement for housing at Weeting in line with adopted Policy CP1 of the Core Strategy. Therefore there is no sound basis for considering an allocation at Weeting as part of this document and Officers recommend that the issue is reconsidered as part of a review of the Core Strategy when</p>		
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		evidence on Stone Curlews is further developed. Additionally, it would be deleterious to the sustainable planning of the remainder of the District, including the much needed development of housing in the market towns and other sustainable villages, to delay the Site Specifics document to specifically address Weeting when there has been little activity or concerted effort (despite the efforts of Breckland Council) in 2010 to provide new empirical research on the causal effect between development and Stone Curlew nesting activity.		
<b>Comment</b>				

### 1.13

<b>Category</b>	<b>Respondents</b>	<b>Summary of Comments</b>	<b>Officer Comments</b>	<b>Officer Recommendation</b>
<b>Support</b>				
<b>Object</b>				
<b>Comment</b>	Mrs Margaret Synnock	Whilst favouring development in Shipdham and an increase in affordable housing, concern that the existing infrastructure will not be able to cope with the increase in traffic. An increase in traffic may cause damage to the Church walls. A weight restriction is	Highways Agency/Authority has not objected the level of growth within the village. Development will be expected to provide any necessary improvements to local infrastructure to enable it to occur. Any speed restriction	No further comments.

		suggested which would cause heavy goods vehicles to find an alternative route, and a 20mph speed limit round the church would help to make any scheme more acceptable to the majority.	would be a Highway's responsibility.	
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**1.18**

<b>Category</b>	<b>Respondents</b>	<b>Summary of Comments</b>	<b>Officer Comments</b>	<b>Officer Recommendation</b>
<b>Support</b>	Mike Jones RSPB	RSPB are pleased that the recommended sites proposed within the Preferred Options document are all situated outside of the Breckland Special Protection Area (SPA) and its associated 1,500m buffer for stone curlews. Furthermore, regards to the potential impacts on the nightjar and woodlark features of the Breckland SPA, it is noted that no recommended site allocations are located within 400m of the site. Furthermore, Habitat Regulations Assessment (HRA) - Mitigation and Avoidance - support the approach made in paragraph 7.1.4 of the HRA which states that 'should the monitoring indicate that disturbance is increasing to a point that could adversely affect integrity, access	Support noted.	Impacts upon the SPA and additional protected species within the district are covered within CP10 of the adopted Core Strategy.

		management measures will need to be set in place before that effect actually occurs'. RSPB also agree with the approach taken in the HRA, which notes that whilst no significant effect was noted on breeding success from recreational disturbance, it is possible that other recreational impacts have gone unrecorded as existing nest sites may already be distributed away from areas of high recreational disturbance.		
<b>Object</b>				
<b>Comment</b>				

1.22

<b>Category</b>	<b>Respondents</b>	<b>Summary of Comments</b>	<b>Officer Comments</b>	<b>Officer Recommendation</b>
<b>Support</b>	Mr Adam Ireland - Planning Liaison Officer Environment Agency	Breckland Site Specific Policies and Proposals DPD have both correctly applied the Sequential test in accordance with PPS25, and has appropriately used the baseline information projects undertaken by Breckland DC (such as the Strategic Flood Risk Assessment and the Water Cycle Study). The locations of growth are therefore supported.	Support noted.	Flood risk is covered in DC13 of the adopted Core Strategy.
<b>Object</b>	Mr Andrew Thomas	Concern that Windmill Avenue/Football Club site does		

		not meet all the criteria when assessing sites.		
<b>Comment</b>	Mike Jones RSPB	Greater clarity should be provided when providing the SPA buffer on the site specific policies mapping.	For the purpose of illustrating settlement boundary changes, not all layers were depicted on mapping for the site specifics. All constraints layers will be illustrated on any new proposed settlement boundary mapping for both the submission document.	All constraints layers will be illustrated on any new proposed settlement boundary mapping for both the submission document.

## Monitoring

### 5.2

Category	Respondents	Summary of Comments	Officer Comments	Officer Recommendation
<b>Support</b>				
<b>Object</b>	Mrs Theresa Hewett	The table for Shipdham states the deadline for development as 2014 and 2015? This document is supposed to cover development up to 2021 or 2026. Concern with the description/terminology of SH2 and the proposed future use of the site.	The Site Specific Policies and Preferred Options Consultation document states that development is expected to come forward in the early part of 2014. The Core Strategy does cover development up to 2026. SH2 has been removed from the submission document due to local concern for future housing. It is recommended that it may be used for open space provision.	The highways authority raised concerns about this site, stating that it should only be developed in conjunction with site SH1. The feasibility of these two applications coming forward in conjunction with each other creates further complications.  Therefore, due to the level of local objection to this site and the highways complications which have emerged, it is recommended that this site should in fact be

				<p>removed from the list of preferred options and become an alternative option.</p> <p>This site is though located within the Shipdham settlement boundary. Shipdham currently has a deficit of open space, and it is considered that this site could go some way to meeting this deficit. It is therefore recommended that this site is zoned as open space.</p>
<b>Comment</b>	Mr Tom Gilbert-Wooldridge – English Heritage	<p>With regards to Policy D1 and SM1, an indicator relating to respecting the setting of the listed maltings is welcomed, a further indicator is recommended that records whether or not the maltings are removed from the Heritage at Risk register (as a Building at Risk) as a consequence of development at Site D1.</p> <p>With regards to Policy D11, SH1 and SH2 an indicator measuring the impact of development on the character and setting of the conservation area and listed buildings should be included.</p>	The local authority does not have mechanisms in place to monitor impacts upon character and setting of conservation area.	No further comments.

**SA Framework**

Category	Respondents	Summary of Comments	Officer Comments	Officer Recommendation
<b>Support</b>				
<b>Object</b>	Mrs Theresa Hewett	Q7. Considers that too many of the preferred sites are huge swathes of land bordering the villages and several smaller sites have been disregarded.	Overall level of development and identification of service centres have been identified in the Core Strategy.	No further comment.
<b>Comment</b>				

### Gypsy and Travellers

Category	Respondents	Summary of Comments	Officer Comments	Officer Recommendation
<b>Support</b>				
<b>Object</b>	Mr Steve Staines	There is clear evidence of need for pitches located along A 47 and the speed of delivery is questioned. If there is need now then provision should be made according to that need. New Travellers form part of the Travelling Community and hence provision should be made for them in the same way as the rest of the population, and to the same timescale.	The Adopted Core Strategy identifies the need for 15 pitches for the Gypsy and Traveller community which shall be delivered through the Attleborough and Snetterton Heath Area Action Plan along the A11 corridor.	15 pitches for the Gypsy and Traveller community will be established through the Attleborough and Snetterton Heath Area Action Plan along the A11 corridor.
	Mr Steve Staines	The RSS policy H3 clearly states that beyond 2011 provision should be made for an annual 3% compound interest increase in residential pitch provision. As such it cannot be premature to	The adopted Core Strategy states at policy CP2 that provision should be focussed on the A11 corridor in the first instance to meet the requirements set out in RSS	15 pitches for the Gypsy and Traveller community will be established through the Attleborough and Snetterton Heath Area Action Plan along the A11 corridor.

		delay making plans for provision beyond 2011 (only one year away). This risks unacceptable delay in enabling the development of new sites. We believe that not making some sort of post 2011 provision risks making this planning document unsound. The policy does not state when a new GTAA will be carried out and merely states that Site Specific document is likely to be reviewed on a 3 yearly basis without indicating when a new needs assessment will be carried out.	policy H3. This is not being addressed as part of the Attleborough and Snetterton Heath Area Action Plan. There is no evidence of immediate short term need elsewhere in the District but the situation will be reviewed. At this stage, the Councils evidence indicates a likely need for a short stay stopping place on the A47 and this is best dealt with as a planning application rather than an allocation in a DPD document.	
<b>Comment</b>	Mrs Theresa Hewett	Are we still beholden to the Regional Spatial Strategy?	The RSS was confirmed on the 10 <sup>th</sup> of November that, the contents therein, remain the top tier development plan for the purposes of delivering growth in the East of England.	The RSS remains the top tier development plan for the purposes of delivering growth in the East of England.

SA

**Table 4.1 – Site Assessment Database**

Category	Respondents	Summary of Comments	Officer Comments	Officer Recommendation
<b>Strongly Agree</b>				Paragraph inserted within SA to clarify that detailed site specific appraisal questions have been
<b>Agree</b>				
<b>No Opinion</b>	Tom                      Gilbert	Consistency with Site	Comments noted.	

	Wooldridge (English Heritage)	Specific Appraisal Questions within table 4.1 Assessment Database and tables within Appendix A.		summarised/condensed within table 12.2 to enable concise site assessment.
<b>Disagree</b>				
<b>Disagree Strongly</b>				

**Table 3.13 & Table 5.14**

Category	Respondents	Summary of Comments	Officer Comments	Officer Recommendation
<b>Strongly Agree</b>				No further action required.
<b>Agree</b>	Stephen Faulkner (NCC)	Support the inclusion of historic landscape character within tables 5.13/14.	Comments noted.	
<b>No Opinion</b>				
<b>Disagree</b>				
<b>Disagree Strongly</b>				

**Paragraphs 5.59**

Category	Respondents	Summary of Comments	Officer Comments	Officer Recommendation
<b>Strongly Agree</b>				Baseline data will be updated.
<b>Agree</b>				
<b>No Opinion</b>				
<b>Disagree</b>	Stephen Faulkner (NCC), Tom Gilbert -Wooldridge (English Heritage)	Clarification of both figures for the NCC Buildings at Risk (BAR) Register and EH Heritage at Risk Register.	Comments noted.	

<b>Disagree Strongly</b>				
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**Table 5.15**

<b>Category</b>	<b>Respondents</b>	<b>Summary of Comments</b>	<b>Officer Comments</b>	<b>Officer Recommendation</b>
<b>Strongly Agree</b>				Table will be revised and updated.
<b>Agree</b>				
<b>No Opinion</b>				
<b>Disagree</b>	Stephen Faulkner (NCC)	Terminology suggestion from 'historic heritage' to 'built heritage'.	Comments noted.	
<b>Disagree Strongly</b>				

**Table 5.32**

<b>Category</b>	<b>Respondents</b>	<b>Summary of Comments</b>	<b>Officer Comments</b>	<b>Officer Recommendation</b>
<b>Strongly Agree</b>				Document will be revised as a result of Planning Policy Guidance changes.
<b>Agree</b>				
<b>No Opinion</b>				
<b>Disagree</b>	Stephen Faulkner (NCC), Tom Gilbert -Wooldridge (English Heritage)	Need to update references from PPG.15 and 16 to PPS.5.	Comments noted.	
<b>Disagree Strongly</b>				

**Table 9.1**

<b>Category</b>	<b>Respondents</b>	<b>Summary of Comments</b>	<b>Officer Comments</b>	<b>Officer Recommendation</b>
<b>Strongly Agree</b>				No further action – NNC capture Building at Risk (BAR) at District and Norfolk level. Furthermore, all 'heritage' can be considered risk, in particular Conservation Areas as
<b>Agree</b>				
<b>No Opinion</b>				
<b>Disagree</b>	Tom Gilbert -Wooldridge (English Heritage)	Objective 8 SA indicators should include areas	Comments noted.	

		within the Heritage at Risk Register.		a result of weak legislation. Furthermore, the methods of assessment of at risk are not endorsed.
<b>Disagree Strongly</b>				

**Table 10.1**

<b>Category</b>	<b>Respondents</b>	<b>Summary of Comments</b>	<b>Officer Comments</b>	<b>Officer Recommendation</b>
<b>Strongly Agree</b>				Literature review will be revised and updated.
<b>Agree</b>				
<b>No Opinion</b>				
<b>Disagree</b>	Tom Gilbert -Wooldridge (English Heritage)	Table 10.1 in Appendix B should include references to PPS5 or the European Landscape Convention.	Comments noted.	
<b>Disagree Strongly</b>				

<b>Category</b>	<b>Respondents</b>	<b>Summary of Comments</b>	<b>Officer Comments</b>	<b>Officer Recommendation</b>
<b>Strongly Agree</b>				Will revisit D1, D11, SH1, SH2 and SM1.
<b>Agree</b>				
<b>No Opinion</b>				
<b>Disagree</b>	Tom Gilbert -Wooldridge (English Heritage)	The score for objective 8 in D1, D11, SH1, SH2 and SM1 In Appendix D, should be positive/negative (+/-) to reflect the uncertainty of the development's impact depending on the final	Comments noted.	

		design.		
<b>Disagree Strongly</b>				

**Table 12.4**

<b>Category</b>	<b>Respondents</b>	<b>Summary of Comments</b>	<b>Officer Comments</b>	<b>Officer Recommendation</b>
<b>Strongly Agree</b>				No further action.
<b>Agree</b>				
<b>No Opinion</b>				
<b>Disagree</b>	Mr Chris Smith	Concerned with landscape and flood risk assessment for D7.	Comments noted.	
<b>Disagree Strongly</b>				