



Breckland Local Plan Review Local Development Scheme

May 2020

1. Introduction

Background

- 1.1 The government requires local planning authorities to prepare a Local Development Scheme (LDS). The LDS is a five year project plan and this version covers the period 2020-2025. The purpose of a LDS includes setting out the timetable for the delivery of Council produced planning policy documents. These are often referred to as Development Plan Documents or Local Plans. During the period 2020-2024, the Council intends to produce a review of the Breckland Local Plan (November 2019). The Local Plan Review (LPR), as this document will be known, will affect the whole of Breckland District.
- 1.2 This LDS contains a timetable for the delivery of the LPR to inform local people and stakeholders of the key milestones in its production.
- 1.3 This LDS was approved by Cabinet on xx xx 2020 and came into effect on the same day. This iteration of the LDS supersedes previous versions of the LDS and covers the period 2020-2025.

2. The Existing Development Plan

- 2.1 Development Plans are an important part of the English planning system and are needed to guide the local decision making process for land uses and development proposals.
- 2.2 At March 2020, the Development Plan for Breckland comprised
 - ***Breckland Local Plan and associated Policies Map (November 2019)***
- 2.3 Breckland District Council adopted the Breckland Local Plan on November 28th 2019 to replace the suite of plans produced as part of the Local Development Framework process and is now in the process of undertaking a Local Plan review. The Local Plan sets out the framework for development within the District until 2036. It includes a spatial vision, objectives and key policies. It also includes an associated 'Policies Map' that sets out the geographical extent of key designations and site specific proposals set out in the local plan.

Further information on the Local Plan can be found at the following link:

<https://www.breckland.gov.uk/adoption>

- ***Core Strategy and Development Control Policies (2009) (Saved policies)***
- ***Thetford Area Action Plan (2012) (Saved policies)***

Further information on these plans can be found at the following link:

<https://www.breckland.gov.uk/previous-local-plan>

- ***Attleborough Neighbourhood Plan 2016-2036 (January 2018)***
- ***Croxton, Brettenham and Kilverstone Neighbourhood Plan 2017-2036 (January 2019)***
- ***Mattishall Neighbourhood Plan 2017 – 2036 (November 2017)***
- ***Swaffham Neighbourhood Plan 2016 - 2036 (May 2019)***
- ***Swanton Morley Neighbourhood Plan 2016 - 2036 (December 2019)***
- ***Yaxham Neighbourhood Plan 2016 – 2036 (June 2017)***

2.4 The Localism Act (2011) provides the opportunity for communities to prepare Neighbourhood Plans to guide further development that they may wish to see in their communities. Neighbourhood Plans, once adopted, form part of the Development Plan for the area and are used in the determination of Planning Applications. Neighbourhood Plans¹ are prepared by Town and Parish Councils to address key local priorities. Their key milestones are specific to each document. The regulations do not require neighbourhood plans to be included within the LDS.

2.5 Neighbourhood Development Plans are prepared by Parish Councils and the plans are subject to consultation, independent examination and referendum. The plans must be in general conformity with the strategic policies of the adopted local plan, and should have regard to any emerging Local Plan.

2.6 A neighbourhood area has to be designated for a Neighbourhood Development Plan to be produced. In total, 13 Parish Councils (1 joint with 3 parishes) have designated Neighbourhood Areas. To date, 6 Neighbourhood Plans have been made and the remaining 7 are at various stages of preparation.

Further information on these neighbourhood plans can be found at the following link:

<https://www.breckland.gov.uk/article/4284/Neighbourhood-Plans>

- ***Norfolk Minerals and Waste Local Plan 2013-2030 (July 2016)***

2.7 The adopted Norfolk Minerals and Waste Development Framework contains the following three minerals and waste planning policy documents and a policies map. These documents contain policies for use in making decisions on planning applications for mineral extraction and associated development and waste management facilities, and in the selection of specific site allocations in Norfolk:

- Core Strategy and Minerals and Waste Development Management Policies Development Plan Document 2010-2026 (adopted September 2011)
 - Minerals Site Specific Allocations Development Plan Document (DPD) (adopted October 2013, amendments adopted December 2017)
 - Waste Site Specific Allocations Development Plan Document (DPD) (adopted October 2013)
-

- Revised PDF policies map and the revised interactive policies map which includes the Site Specific Allocations and an interactive map of Mineral Safeguarding Areas.

Further information on these neighbourhood plans can be found at the following link:

<https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/minerals-and-waste-planning-policies/adopted-policy-documents>

- 2.8 The County Council is preparing a Norfolk Minerals and Waste Local Plan Review, to consolidate the three adopted plans into one Local Plan, ensure that the policies within them remain up-to-date and to extend the plan period to the end of 2036.

Further information on these neighbourhood plans can be found at the following link:

<https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/minerals-and-waste-planning-policies/norfolk-minerals-and-waste-local-plan-review>

Other Planning Documents

- 2.9 In addition to the above components of the Development Plan, there are other key planning documents that the Council can produce. These include:

- Supplementary Planning Documents – these set out further information, interpretation or clarification regarding existing planning policies and are produced and adopted by the Council in accordance with government requirements
- Planning policy guidance – these set out further information, interpretation or clarification regarding existing planning policies but have not been produced to meet government Supplementary Planning Document requirements
- Statement of Community Involvement – a procedural document that sets out the methods for consultation and engagement with the public and stakeholders. This includes consultation and engagement during the production of Local Plans, the production of Neighbourhood Development Plans, and the Development Management process.
- Authority Monitoring Reports – a procedural document, produced on an annual basis that monitors performance against the Local Plan.

- 2.10 In Breckland the Planning Team are currently preparing supplementary planning documents on Affordable Housing (in conjunction with the Council's Housing Team), Developer Contributions and Design.

- 2.11 The Council also prepares two additional documents: a Statement of Community Involvement detailing how people will be involved in the planning

system; and a Monitoring Report that considers how effectively the Local Plan policies are being implemented.

3 Key Issue in the LDS

Local Plan Review

- 3.1 The Local Plan was found sound following independent examination and was adopted by Full Council on 28 November 2019. The Plan contains Policy INF 03. This requires an immediate review of the local plan covering 4 key areas.
- 3.2 The Policy states:

Policy INF 03: Local Plan Policy Review

The Council will undertake an immediate partial review of the Plan, with regard to the following matters

- **Policy HOU 01 Development Requirements (minimum): To consider housing need and the subsequent strategy for meeting the identified need.**
- **Policy HOU 08 Gypsy and Travellers: To consider the needs of nontravelling gypsy and travellers and identify suitable provision to meet such a need.**
- **Policy HOU 10 Technical Design Standards for New Homes: To consider the accessibility of homes standards.**
- **Policy EC 01 Economic Development: To consider the effect of the dualling of the A47 on the Plan's economic strategy.**

The partial review of the Plan will be submitted for examination 3 years after the date of adoption of this Plan or by November 2022, whichever is soonest. In the event that the review is not submitted for examination by this time, then the Council's policies that relate to the supply of housing, economic development and gypsy and travellers will be deemed to be out-of-date.

- 3.3 The Council is also required under the NPPF to review its Local Plan every five years from adoption. The Council is committed to producing an up to date high quality review of the Local Plan that addresses all of these requirements, that is consistent with the NPPF as well as one that incorporates key elements of both national policy and local priorities. These include the development of policies to achieve sustainable development and to ensure that climate change mitigation and adaptation are core objectives integrated across the whole Plan and setting local carbon targets that assists Government in progressing towards zero carbon targets. To this end the Council is engaging with the Planning Advisory Service (PAS) that is co-ordinating the work of a number of local authorities to come together and work with experienced local plan professionals to receive advice on reviewing, updating and progressing plans through to adoption.

3.4 The Council has therefore resolved to undertake a full review of the Plan within the 5 year timescale (November 2024).

4. Local Plan Structure and Timetable for Preparation

Local Plan Structure

4.1 The production of the new Local Plan will follow the full statutory processes, including the preparation of a Sustainability Appraisal, public participation and other regulatory requirements. The Local Plan will be subject to Examination by an independent Inspector.

4.2 The documents that Breckland Council proposes to prepare are as follows:

- (1) The new Local Plan,
- (2) Policies Maps,
- (3) Given the need to prepare a Local Plan review, it will be necessary to review the Statement of Community Involvement in its entirety to set out how communities in these areas of change and development will be able to participate at both the strategic as well as consultation during the decision making process.
- (4) The Council monitors the availability of housing land on an annual basis. The Council publishes an annual 5 Year Housing Land Statement in accordance with the requirements of the NPPF. This identifies that currently there is a 5 year supply of housing land up to October 2020. The Council will then undertake work in order to update the position.

Progress on the preparation of the Local Plan Review

4.3 Appendix 1 sets out the timetable for the preparation of the Local Plan Review.

5. Key risks

5.1 There are some key risks involved in preparing the new Local Plan. Some risks are within the 'control' of the Council but others are not. These could affect the timetable to a greater or lesser extent. The Council will monitor this LDS and prepare revisions where appropriate.

5.2 The key risks are as follows:

Securing a timely housing requirement and completion of subsequent Strategic Housing Market Assessment

5.3 The current Local Plan included a locally derived housing target based on evidence from the Central Norfolk Strategic Housing Market Assessment. In February 2019, the Government adopted and rolled out a new 'standard method' for calculating the minimum housing need for every local authority in the UK. The main reasons for this change was to seek to ensure that the

national target of delivering 300,000 houses per year was achieved and to simplify and rationalise the approach towards determining housing need for local areas.

- 5.4 The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply.
- 5.5 The National Planning Policy Framework expects strategic policy-making authorities to follow the standard method in this guidance for assessing local housing need.
- 5.6 The 2014 based requirement for Breckland was 681 dwellings per annum. The more recent 2016 based figure rose to 770 dwellings per annum. However, the standard methodology, based on the 2016 household projection figures, showed that overall need in England was significantly lower, at 212,000, than the Government's stated desire to provide 300,000 new houses every year. As a consequence, the Government has committed to revise the standard method as follows:

In the short-term, the 2014 data will provide the demographic baseline for assessment of local housing need; otherwise, the current method remains unaltered. In the long-term, a review of the formula will be undertaken to identify a new method, to be completed prior to release of the 2018-based household projections in 2020.

- 5.7 The Government remains committed to delivering 300,000 new houses each year, it is therefore possible that the review could result in a higher housing figure for Breckland than that set out under the 2014 base. It is therefore very important to note that this 681 figure may change as the review of the Plan progresses and this could have implications for the evidence base underpinning the Plan, the consequent development strategy, including the numbers of new housing allocations that may be required.
- 5.8 It is not yet known what the implications will be on the housing requirement for Breckland or when the review, and new figure, will be completed.

Agreeing a viable and deliverable Development Strategy with appropriate Council and community consultation that accommodates any new housing requirement and that also delivers a 5 year housing land supply

- 5.9 The extended Plan period (to 2041) and likely increase in the annual housing need figure will require the new Plan to make additional allocations for both housing and employment uses. In addition the National Planning Policy Framework (2019) requires plans to allocate smaller sites.
- 5.10 The Council will need to consider, agree upon and consult on an appropriate development strategy covering both the urban and rural areas.

Changes to national Planning Policy / Planning White Paper (uncertain as to when and implications) and new considerations for the Plan

- 5.11 The Government is proposing reforms to the planning system in 2020. This was heralded in Planning for the Future (March 2020) that sets out the Government's plans for housing and planning following the announcements in the 2020 Budget. It is unclear as to when these reforms will be published, what implications they will have for the preparation of local plans, and what, if any, transitional arrangements may be put in place.
- 5.12 A further consideration that the Government may consider is the planning implications of the recent Covid 19 outbreak and how these may be brought forward into plan making. .
- 5.13 For example, the Government / Council could consider revising its current policy of centralising the location of development to the most sustainable locations as the decentralisation of services and reducing density could be a way to combat disease spread, though this is contrary to sustainable transport and climate-change related goals.
- 5.14 The Plan could also consider leaving small parcels of land available, in case temporary medical facilities or housing need to be set up or promote more local food production through the greater provision of allotments.
- 5.15 The Government introduced new measures to allow, for example bars and restaurants which had to close, to operate as takeaways. Given that the High Street is likely to suffer this year this could be extended to enable shops or cafes to reopen as "touch down" space or to broaden the range of services on offer. It is likely that the forced increase in online shopping could lead to a further reduction in demand for traditional high street retail units. That space will need to be repurposed – perhaps including leisure and experience-led uses; further online shopping collection points and other uses are likely to emerge as technology drives societal changes.
- 5.16 This could, for example, be combined with an increase in permitted development rights to demolish office and industrial buildings for new residential blocks. These could be introduced to help rebuild the economy.
- 5.17 The realisation among businesses and employees alike that most traditionally office-based jobs can be done from home will likely lead to more people working some or all of the working week from home (or indeed anywhere), which will likely have positive outcomes for air quality and the environment. As work patterns change, this could lead to a downturn in demand for traditional office space and a need to repurpose much of that space. Coupled with this there is likely to be an increase in demand for casual "touch down" space and conference/video conference rooms, most likely in residential areas rather than town centres. The design of new housing may also change to include studies and family workspaces as well as an increase in residential extensions and curtilage buildings to be used as garden offices.

- 5.18 During the lockdown people got more used to video conferencing, making it less likely that they will feel the need to travel long distances for meetings. Taken together, with more home working this may well lead to a significant reduction in both road and rail travel, leading in turn to reductions in CO2 emissions etc. and a reduction in demand for additional transport infrastructure.
- 5.19 The increased use of broadband use might require a faster rollout of the 5G network to facilitate better connectivity and home-working. Permitted development rights for masts and tech may be relaxed to enable faster and better deployment.
- 5.20 Energy usage changes as a result of many more people working from home could increase pressure on the Government to subsidise green energy measures within the home such as the previously disbanded feed in tariffs. New strategic renewable energy projects could be considered to improve resilience
- 5.21 Further changes to National Planning Policy, including some or all of the above, could give rise to a need to review or amend the timetable. The previous planning system was amended on several occasions which altered the formal stages of document preparation.

Duty to Co-operate / securing statements of common ground with key external stakeholders in developing the Plan (Utilities / NCC /Statutory consultees)

- 5.22 The Council is reliant on close dialogue and co-operation with and from key stakeholders. Timely discussions and agreement with these organisations cannot be guaranteed and responses could result in a need for revisions to the development strategy.

Staff Resources and Project Management

- 5.23 Breckland Council has strong corporate commitment to the adoption of a new Local Plan, and the importance of this work is recognised and supported across the authority. The Plan will be produced by the Council's Planning Service, with the work being led by the Planning Policy team. The service is supported by the specialist technical skills and knowledge of other teams, including Housing, Environmental Protection and Regeneration. Staff turnover, the national lack of qualified planners and increasing need for staff to specialise all pose medium risks to the timetable if one or more members of the team were to leave the team. The loss of staff with significant local knowledge may take time to replace. Therefore, staff retention and replacement are priorities for the service and this aspect will be managed to ensure that the timetable for the Local Plan is not put at risk. As the Council's planning service is delivered by Capita, there is potential scope to use resources elsewhere within the company to minimise this element of risk should it arise.

- 5.24 The Council will seek to use its processes of community involvement and engagement and its Duty to Cooperate activities and organisations to help inform and develop the plan, making effective use of intelligence and resources. This will include the preparation of Statements of Common Ground in relation to strategic cross border planning matters. Officers will hold early discussions with neighbouring local planning authorities and other statutory organisations regarding the preparation of Statements of Common Ground. The plan will be supported by a comprehensive evidence base, including housing, employment, retail, transport, heritage, infrastructure, viability and the natural environment.
- 5.25 The Council has established management and reporting structures to support the delivery of the local plan, including the use of briefings and reporting to senior managers and members throughout the plan preparation process. Risk management is integral to reporting and monitoring. The Planning Service regularly reviews work streams on the local plan, to take account of new legislation and significant changes in the local context. There is a dedicated member working group supporting the production of the local plan.

Availability of the LDS

- 5.26 The Council is required by the regulations to make the LDS available to the public. Copies are available for inspection at the Council's offices in Dereham. The LDS is also available to view on the Planning Policy pages of the Council's website [www.breckland.gov.uk].

Appendix 1: Timetable

Table 1: Local Plan Review timetable		
Coverage: District Wide		
Governance: Local Plan Working Group / Cabinet / Full Council		
	Stage	Date
Evidence gathering and refinement	Commencement of Preparation	January 2020
	Scoping of the Plan and Sustainability Appraisal Scoping Report Consultation	January 2020 – July 2020
	Prepare local development scheme	
	Prepare and consult on Statement of Community Involvement	
	Prepare Communications Strategy	
	Issues and Options preparation and council approval (Regulation 18)	April 2020 – September 2020
	Issues and Options consultation (Regulation 18)	October 2020
	Preferred Options and draft Plan preparation and Council approval (Regulation 18)	January 2021 – November 2021
	Preferred options and draft Plan consultation (Regulation 18)	January 2022
	Publication Draft preparation and Council approval (Regulation 19)	May 2022 – December 2022
	Publication Draft consultation (Regulation 19)	February 2023
	Publication Draft Council approval for Submission (Regulation 19)	August 2023
	Submission for examination (Regulation 22)	December 2023
	Examination (Regulations 23, 24)	June 2024
Adoption (Regulation 26)	November 2024	