

BRECKLAND COUNCIL

REPORT OF PAUL CLAUSSEN, EXECUTIVE MEMBER FOR PLANNING, HEALTH & HOUSING to the CABINET: 30 NOVEMBER 2010 (Authors: David Spencer, Principal Planning Policy Officer & Phil Mileham, Senior Planning Policy Officer, Capita Symonds)

SITE SPECIFIC POLICIES & PROPOSALS DEVELOPMENT PLAN DOCUMENT 2001-2026: PROPOSED SUBMISSION DOCUMENT

1. Purpose of Report

- 1.1 This report seeks Member approval to publish and then submit the Site Specifics Policies and Proposals Document including Cabinet recommendations and those changes required to satisfy the Habitats Regulations. Publication and submission represents the last stage of document production and effectively represents the final opportunity for Breckland Council to shape the document before it is considered at an Examination in Public by a government Inspector. Following consultation earlier in 2010 on a detailed Site Specifics document, the proposed submission version of the document has been further updated for consideration by Cabinet to reflect those changes which are necessary as a result of responses received. During the preparation of the document there have been 8 public meetings of the Council's LDF Task & Finish Group and 2 meetings of Cabinet. This level of scrutiny, together with the considerable public consultation and evidence base which underpins the document, means that the Council can publish and submit a sound document which will help manage development in the market towns and rural parts Breckland for the next 15-16 years.

2. Recommendations

- It is recommended that the Cabinet:
- 2.1 **Agree to publish the Site Specific Policies and Proposals document, including any Cabinet Recommendations and amendments necessary for Appropriate Assessment, for a period of at least 6 weeks. Members further agree to submit the Site Specifics Policies and Proposals document to the Secretary of State for an Examination in Public by a Government appointed Inspector whose report will be binding on the authority unless comments received during the 6 weeks of pre-Submission publication indicate that the document is unsound and should be withdrawn. Where Minor amendments are needed following publication, Members agree that these be delegated to the Executive Member in consultation with the Leader.**

Note: In preparing this report, due regard has been had to equality of opportunity, human rights, prevention of crime and disorder, environmental and risk management considerations as appropriate. Relevant officers have been consulted in relation to any legal, financial or human resources implications and comments received are reflected in the report.

3. Information, Issues and Options

3.1 Information

- 3.1.1 To date the focus of Local Development Framework (LDF) activity has been on the Core Strategy and Development Control Policies document. This accords with national policy that requires Local Planning Authorities to prepare a Core Strategy first which other Development Plan Documents will deliver. As a consequence, the following documents in the LDF must be in broad conformity with the Core Strategy as required by Regulation 13(6) of the Local Development Document Regulations 2004.

- 3.1.2 Breckland Council now has the benefit of an adopted Core Strategy that provides the framework for finalising the Site Specific Policies and Proposals document. As set out in the Council's adopted Local Development Scheme, the Site Specific Policies and Proposals document will cover the three market towns of Dereham, Swaffham and Watton, the Local Service Centre villages and the rural settlement boundaries. Elsewhere the detail of specific sites will be addressed through Area Action Plans, namely for: Attleborough & Snetterton Heath (which will include Besthorpe, Quidenham (Eccles Road) and Snetterton), and Thetford. These Area Action Plans will incorporate parts of adjoining rural parishes but the settlement boundaries for affected parishes such as Croxton or Old Buckenham will be dealt with through the Site Specific Policies and Proposals document.
- 3.1.3 As Members will recall this authority has already undertaken two "Issues and Options" consultations on those sites submitted to the Council for consideration as part of the LDF by landowners and their agents. These consultations (Summer 2008 and Spring 2009) have presented some 852 sites, which if all were developed would deliver some 87,000 homes. Previous reports to the Council have addressed the allocations in the market towns and Local Service Centre villages for growth as part of the Core Strategy preparation process. There is no policy framework to make allocations in the rural parishes. However, there is a commitment to review settlement boundaries.
- 3.1.4 The outgoing Local Plan contained 83 rural settlement boundaries and these have in effect been rolled forward with the Core Strategy and factually updated to identify statutory biodiversity designations, flood zones, general employment areas and open spaces. The settlement boundaries were not amended as part of the Core Strategy process. The Site Specific Policies and Proposals document is required to reassess their form and function in light of latest local policies and national planning policy. There is a further opportunity to address factual errors on inset maps as part of the Site Specifics document.
- 3.1.5 In April 2010, Cabinet approved a consultation document setting out the Preferred Options for the Site Specific Policies and Proposals document. The 6 week consultation started on 17 June 2010 and finished on 30 July 2010. The consultation process included an open day for Town and Parish Councils, site notices on all preferred sites for allocation, an interactive on-line document, press notice and copy of the documentation to all statutory consultees. A total of 1775 comments were received from 926 persons or organisations during the consultation including a petition in relation to land near Dereham Windmill and a considerable number of responses in relation to Shipdham. Relatively little comment was received on the proposed settlement boundaries. Following an assessment of comments it is advised that the Council is now able to submit a final version of the Site Specifics document for independent Examination provided a number of changes are made to the preferred options document.

3.2 **Background**

- 3.2.1 The requirements of the Site Specifics Policies and Proposals document are set out in Breckland Council's adopted Core Strategy which provides a local planning framework for the District to 2026. In broad terms there was little objection to the overall planning strategy for the towns of Dereham, Swaffham and Watton and the rural villages contained in the Core Strategy. Representations were made for greater development levels in Dereham and Swaffham but due to infrastructure constraints these requests were unable to be accommodated. Additionally, arguments were made for some additional larger villages, notably Mattishall and Weeting, to accommodate an allocation of housing growth. Community concerns over growth in Mattishall and environmental constraints in Weeting meant the strategy remained unchanged.

3.2.2 Therefore the Site Specifics document will need to allocate the following levels of development to enable the Core Strategy requirements to be met.

	Net additional Homes (as of 1 st April 2009)	Net Additional Employment Land (hectares)	Retail (sqm)
Dereham	600	5-10	5,000
Swaffham	250	5	
Watton	250		
Harling	40		
Narborough	50		
Shipdham	100		
Swanton Morley	50		

Table 1. Adopted Breckland Core Strategy requirements

3.2.3 In addition to the above Core Strategy development figures it will also be incumbent on the Site Specifics document to make open space allocations where opportunities are identified and to review Core Strategy policy designations on updated Proposals Maps including settlement boundaries, retail frontages, areas of existing open space and boundaries of general employment areas. Whilst it is not a direct requirement of the adopted Core Strategy, that document included an allowance for 3,000 additional homes in the rural areas of Breckland over the period 2009-26. Some amendments to rural settlement boundaries will help deliver this allowance. However, since the adoption of the Core Strategy, Government has amended PPS3 to exclude garden land from the national definition of previously developed land. This measure is a reaction to widespread concern over the loss of gardens and resultant cramming of development. In preparing the Preferred Options document, the LDF Task & Finish Group took a number of decisions to tighten to settlement boundaries to exclude garden land in advance of the new national policy.

3.2.4 Policy CP14 of the adopted Core Strategy sets the context for the review of settlement boundaries. In particular, criteria G-J specifically deal with rural settlement boundaries. Importantly, the policy allows for the inclusion of small-scale sites (5 units) which could provide for some further growth consistent with the role of rural villages in the settlement hierarchy.

3.2.5 The Task & Finish Group have considered proposed allocations for the market towns and Local Service Centre villages where a positive level of growth was identified in the adopted Core Strategy. The group also considered revised rural settlement boundaries along with town settlement boundaries. In considering the settlement boundaries for the towns and rural areas, Officers have presented options that seek to address criteria G-J as set out in adopted policy CP14 of the Core Strategy, along with the following issues:

- (i) inconsistencies, where the settlement boundary needs to follow logical, defensible features on the ground;
- (ii) factual updating where development has occurred astride or outside of the settlement boundary
- (iii) the need to protect open areas, infrastructure and other areas which are unsuitable for intensification (including backland and some garden land); and
- (iv) the need to restrict development in areas of flood risk and environmental protection consistent with Core Strategy policies.

3.2.3 The final Site Specifics document to be submitted for Examination contains amended settlement boundaries which include the final allocations. The settlement boundaries have also been amended to include those sites where planning permission for residential development has been granted outside but adjoining existing settlement boundaries. As Members are aware Breckland Council does not currently have a five year supply of housing land and in this situation it has been required by national policy in PPS3 'Housing' to favourably consider new residential development where criteria are met. The situation has been prevalent in Harling and Watton and is now emerging in Dereham and Shipdham. In Harling a total of 65 homes have now been approved outside of the existing settlement boundary thereby negating the need to make any allocation in this Sites document. Additionally some 50 homes have been approved outside the settlement boundary of Watton. The Council is currently considering planning applications for 200 homes in Dereham and 50 in Shipdham on both preferred and unreasonable sites outside of the existing settlement boundary. The outcome of these decisions may result in the need for further factual amendments to the document prior to submission.

3.2.4 In preparing this report, it is brought to Members attention that the town settlement boundaries in the LDF will, as was the case with the outgoing Local Plan, extend into adjoining rural parishes, where the coherent urban built form continues from one parish into another. The examples include Scarning in relation to Dereham and Carbrooke, Griston, Little Cressingham and Saham Toney in relation to Watton. The section below reiterates the purpose and function of settlement boundaries. To date, the delineation of town settlement boundaries has been a contentious issue as many consider they define the extent of a settlement or parish or local administrative area and therefore by including an adjoining part of a parish within a town settlement boundary can be construed as concealing parish boundaries. The following section outlines the purpose of settlement boundaries and a detailed background paper on Settlement Boundaries is presented at Appendix B and is intended to be submitted with the Sites Specifics document to aid the Examination process.

3.3 The Purpose of Settlement Boundaries

3.3.1 This section of the Report highlights the policy framework within which the settlement boundary review process must be undertaken in order to prepare a sound document. As with the Core Strategy, the Site Specific document will ultimately be examined on its soundness including its conformity with national and local policy. The review of rural settlement boundaries cannot be taken in isolation from policy set out in National Planning Policy Statements or the sound Breckland Core Strategy document.

3.3.2 Settlement Boundaries are a policy tool which delineate in plan form coherent and established built-up areas.

3.3.3 The purpose of the settlement boundaries is to consolidate development around existing built-up communities where there is a clearly defined settlement where further development, if properly designed and constructed, would not be incongruous or intrusive because of the size of the settlement.

3.3.4 The Core Strategy and Development Control Policies Document of the LDF confirms that Settlement Boundaries remain a valid policy response in Breckland to achieve the twin objectives of focussing the majority of development towards existing settlements whilst simultaneously protecting the surrounding countryside.

3.3.5 There are no defined criteria on how to draw up settlement boundaries in National planning policy which can be used in the Local Development Framework. There are however a number of location specific policies which can be used in determining which settlements have settlement boundaries and how those boundaries are delineated. PPS1 "Sustainable Development" encourages development plans to focus new development in existing centres. It suggests that new development must be located in places where everyone can access services by foot, cycle or public transport. PPS1 also promotes the protection of the wider countryside and

landscape. In addition one of the Key Planning Objectives of the supplement to PPS1 on "Planning and Climate Change", promotes development to be located in areas which reduce the need to travel by the private car. This point is reiterated in PPS3 "Housing". PPS7 "Sustainable Development in Rural Areas" further supports these aims and states that development in open countryside, away from settlements should be strictly controlled.

- 3.3.6 In conclusion the purpose of settlement boundaries is to draw a line around those areas within the District which are an established and coherent built-up area with some form of service provision which supports the sustainability of that community. Within settlement boundaries the principle of further development will be considered favourably subject to form and character, access, biodiversity and historic environment. As a consequence those areas outside of settlement boundaries will constitute "countryside" for the purposes of planning policy and in these areas development will be strictly controlled to that which is needed to specifically support the rural areas.

3.4 Presentation of the Proposed Submission Document

- 3.4.1 The following sections set out the proposed changes from the Preferred Options document to the proposed document for submission for Examination. A summary of responses on the allocations presented in the Preferred Options document in June/July 2010 are presented in Appendix D.

Dereham

- 3.4.2 Dereham is identified in the Breckland Core Strategy as a Market Town which will see moderate levels of growth over the period to 2026. The town will provide an additional 1,971 new homes over the plan period, and approximately 5-10 hectares of new employment land and a quantum of additional retail floorspace. Of the 1,971 new homes, 1,371 already have the benefit of planning permission or have been completed. Therefore, land for an additional 600 homes will need to be allocated up to 2026.
- 3.4.3 Evidence to date suggests that there is sufficient infrastructure capacity to accommodate the proposed level of growth. The detailed Water Cycle Study states that development of the preferred sites in Dereham is constrained by the need to utilise historic sewers through the town centre which will need improving. In terms of community infrastructure, new development will have to contribute to the expansion of primary and nursery schools and primary healthcare provision will need to be slightly expanded. The provision of bus facilities in the town has been a long standing issue and the County Council as the local Transport Authority is continuing to work on a scheme which improves the continued use of the Market Place.
- 3.4.4 The town's employment areas are located in close proximity to the A47 trunk road and include the three key employment areas at Yaxham Road, Rash's Green and Dereham Business Park. These employment areas include some larger enterprises as well as a range of small to medium size enterprises, with stock of a range of ages. The Employment Land Review (2006) recognises Dereham as having good potential for economic growth in the plan period and this is reflected in the proposed allocation figures.
- 3.4.5 In addition to housing and employment allocations there is a need to allocate land for town centre uses and open space to reflect available evidence and policy requirements in the Core Strategy. Policy CP7 of the Core Strategy reflects the Council's 2007 Retail Study update in terms of additional retail floorspace requirements. However, this has been updated by a new 2010 Retail Study which identifies floorspace requirements for Dereham of 5,000sqm (net) of comparison (non-food) floorspace and 1,800sqm (net) of convenience (food) floorspace up to 2021. The proposed submission document retains Site D11 as a town centre development site including the 5,000sqm comparison floorspace. The convenience

(food) floorspace could be accommodated by extending existing provision, with the starting point being town centre locations, potentially utilising a small area of Site D11.

- 3.4.6 Dereham Town Council has been very proactive throughout the LDF process in seeking the protection and enhanced provision of green spaces throughout the town. This has culminated in the delivery of the Dereham Green Infrastructure Study which Breckland Council contributed to. Additionally, the Town Council has been responsible for taking forward survey work and site identification for a new cemetery for the town. The results of this work in terms of the Site Specifics document is the allocation of land for open space and a new cemetery to the east of the Football Club as well as the requirement to deliver enhanced areas of open space near Shillings Lane (as part of a green corridor to Etling Green) and around Dereham Windmill.
- 3.4.7 In terms of housing, the proposed submission allocations for new housing in Dereham comprise four sites, three of which are still located to the east of the town along Norwich Road. These are: land at the former Maltings on Norwich Road; land off Greenfields Road; land adjacent Windmill Avenue; and land at Shipdham Road. The proposed submission sites for employment development are at Rash's Green and land at Dereham Business Park.
- 3.4.8 A range of reasonable alternative options for housing and employment were presented as part of the preferred options consultation. From the consultation response there is now considerable doubt in relation to the highway network that land at Swanton Road and land north of the hospital are reasonable alternative sites given both highway and landscape concerns. This would leave land at Dumpling Green (site D7) as the only reasonable alternative for Examination although it should be noted that notwithstanding the supportive evidence from the site promoter there is local objections, including from Dereham Town Council, to the identification of this site.
- 3.4.9 The proposed submission allocations for housing have generated a significant number of responses through the preferred options consultation in the summer and this is provided in summary form at Appendix D. In relation to The Maltings (site D1) the response has been mixed. A number of local residents support the redevelopment of this centrally located brownfield site, however, there is some local concern and objections from other developers questioning the delivery of this site. As a consequence Capita Symonds have been working with both the Highways authority, the Council's contaminated land team and the various site promoters to further establish the delivery of this site. As a consequence the policy has been amended to reduce the level of development to 160 dwellings but does not confirm that a satisfactory point of access can be secured from Norwich Road.
- 3.4.10 The preferred options document also included land off Greenfields Road (Site D2) as an allocation for 240 homes and this has generated considerable local opposition from residents at Greenfields Road and Wheatcroft Way including concerns on traffic impact and loss of undeveloped land. The site is supported by Dereham Town Council and the Highways Authority. The proposed submission document retains the site notwithstanding the significant scale of local objections. The site is bounded on 3 sides by residential development and on its fourth side by the A47. The long term strategy for Dereham has always intended for this area to come forward and the preliminary infrastructure is already place to deliver the site. Moreover, the Highways authority has confirmed that both Greenfields Road and Wheatcroft Way were designed to serve this area and have been constructed to a standard which will enable the completion of a through route to the south of the Windmill. This through route will ultimately form the principal estate road serving just the residential development south of Norwich Road and on this basis local concern of rat-running is difficult to evidence. However, given concerns over development numbers in this location and an acknowledgement to secure a density of development which

respects its context it is proposed to reduce the allocation down to 220 new homes (equivalent to 25dph).

- 3.4.11 Elsewhere land east of Windmill Avenue (Site D3) for 200 homes remains unchanged in the submission document (although a planning application has been submitted in October 2010). To ensure housing delivery in Dereham it is proposed to introduce a small allocation on Shipdham Road (Site D6) for 50 dwellings. This was a reasonable alternative site in the preferred options consultation and the site currently contains a number of glasshouses and retail/commercial activities. This site can accommodate the balance of housing in the town as a result of lower allocation numbers on sites south of Norwich Road as well as enhancing the gateway entrance to Dereham on this main approach route.
- 3.4.12 The proposed submission document retains preferred employment sites at Rash's Green and Dereham Business Park. Capita Symonds advise that there is a risk to delivery of Rash's Green as the site owners are seeking an alternative residential use despite objections from Town Council and Highways. This site has been given careful consideration and on balance Breckland Council is advised to retain the allocation given the opportunity to access the site from Rash's Green and the proximity of unrestricted business operations on the existing employment area. Should an Inspector be minded to remove the Rash's Green site because of concerns over delivery, it is recommended that the Council's fallback position will be to release additional land (site D5 in the preferred options document) to the south of the Dereham Business Park (land to the rear of Potters Bar).
- 3.4.13 As stated elsewhere in this Report there is a need to allocate land to accommodate further retail floorspace and in accordance with national policy the starting point has to be a town centre location. Independent Retail Study work over the past 7 years on behalf of Breckland Council has consistently identified an area of land to the east of the town centre containing the Cowper Road Car Park, car sales areas, the Kwik Fit garage and the TA Centre. Consequently the area was proposed for allocation in the Preferred Options document (reference Site D11). Local objections to the redevelopment of this area were made by members of the Dereham Society who objected to the loss of a potential site for a new bus station. Neither Norfolk County Council nor Dereham Town Council objected to the site and the proposed uses. Further dialogue following the Preferred Options document has established that the focus of enhancing bus pick-up and set-down provision remains in the Market Place. Therefore, Members are recommended to retain this site as a town centre redevelopment area for Dereham.

Swaffham

- 3.4.14 Swaffham is identified in the Breckland Core Strategy as a Market Town which will see modest levels of growth over the period to 2026. The town will provide an additional 749 new homes over the remainder of the plan period, at least 5 hectares of employment land and approximately 1,000 sqm of non-food retailing. Of the 749 new homes, 499 have already have the benefit of planning permission. Therefore land for an additional 250 homes will need to be allocated.
- 3.4.15 Evidence to date suggests that there is sufficient infrastructure capacity to accommodate the proposed level of growth. The Outline Water Cycle Study states that there are no strategic sewers to the west of the town. As a result of this the study recommends that development should not go to the west of the town. It is likely that improvements will be needed to rural bus services in and around Swaffham. New development will have to contribute to the expansion of primary and nursery schools and primary healthcare will need to be slightly expanded.
- 3.4.16 The Council's preferred housing allocation for Swaffham is for a single allocation of 250 new homes to the south of the town on the Brandon Road (site reference SW.1) which would bring together the existing permitted housing development on the

former Redland Rooftiles site. This proposal received much support through the consultation process and the highways officials have confirmed that there is no objection to this site. A small number of mixed comments both for and against alternative sites around the town were received from site promoters and local residents but it is apparent from the consultation responses that some of these sites are undeliverable following concerns from Norfolk County Council as the highways department and this is set out in the accompanying Sustainability Appraisal Report and again at Appendix E of this report. The absence of any significant local or technical objection to the preferred site on Brandon Road has supported Breckland Council's position.

- 3.4.17 The town's employment areas are concentrated in the north of the town with the principal location being the Eco-Tech employment area. This employment area has good links to the A47 and the Council's Employment Land Review (2006) recognises this area as having the greatest potential for economic growth in the town. The preferred options for new employment development were identified as an extension to the existing Ecotech business park to the north of the town (referenced SW.2 and SW.3). Local concern has been expressed that existing employment land on Ecotech should come forward before any additional land is developed. This issue is recognised in the proposed policies and otherwise there has been broad support for the proposed employment areas.
- 3.4.18 In addition to housing and employment allocations, Policy CP7 of the adopted Core Strategy identifies a relatively low need for additional retail floorspace in the town. The Council's 2010 Retail Study identifies Swaffham as a mid-size Town Centre with a forecast of 1,000-1,500sqm (net) of comparison (non-food) floorspace at August 2010. Therefore it is not considered appropriate at this stage, that the Council identifies sites for town centre development given the current low level of need for additional floorspace.
- 3.4.19 Two options have been presented for public open space in the town. The first site is "The Antinghams", which is an area of pasture to the east of the town centre in private ownership. A number of rights of way criss-cross the site and it is regularly used on an informal basis. The site was conditionally offered for open space in 2008, linked to the potential for residential development on land to the east of the Manor House. Given the undeveloped character and the proximity of listed buildings it was considered at the Council's LDF Group meeting on Swaffham (14th October 2009) that the area remain open. Swaffham Town Council confirmed at this meeting that it would be interested in managing The Antinghams as open space. The second option is for an allocation at Former Hamonds Playing Field on Princes Street. This site is currently owned by the Hamonds Trust and was the playing field linked to the former Grammar School. It has over the years become an area for dog walking and informal open space. Access to the site for development cannot be satisfactorily achieved from Princes Street and the proximity of the water tower makes development of the site unlikely. Through the consultation process, the Myers Trust, which is a charitable body providing sport in the town has indicated it would like to bring forward this allocation. Both open space options have been supported by local residents although there are objections from the owner of the Antinghams who would like to see some residential development on the southern part of the site. This is not considered appropriate for the character of the area and this issue is addressed at Appendices A and D. Therefore it is recommended that the proposed submission document includes the Antinghams and the former Hamonds Playing Field (Princes Street) as open space designations.

Watton

- 3.4.18 Watton has been identified as a market town in the Core Strategy which will accommodate modest housing and employment growth arising from predominantly local need so as to reduce the volume of out commuting and the potential relocation of existing businesses. The Strategy originally required that allocations are made for

approximately 300 dwellings, although this figure has since been reduced to 252 because planning permission has been granted for 48 units outside of the settlement boundary along Norwich Road. The Core Strategy requires that sites are well integrated with the established built up area of the town in order to minimise the impact on the countryside and local wildlife, particularly Wayland Wood and the Breckland SPA.

- 3.4.19 Whilst identified as a market town, limited housing growth is being proposed in order to reflect the level of services and facilities available. Additionally, evidence indicates that there is limited potential for further economic growth in Watton and that the town mainly supports local businesses. Large scale growth runs the risk of undermining the small market town character of Watton which is derived from the historic and attractive nature of the town centre and from the varied countryside that surrounds the town. Particular concerns would accompany any growth to the west and south-west of the town because of the impact on European protected species (the Stone Curlew buffer zone).
- 3.4.20 There is sufficient infrastructure capacity to accommodate the proposed 250 new dwellings. Evidence from infrastructure studies and utility capacity work demonstrates that the proposed submission sites in Watton are deliverable. Whilst they will require localised upgrades to the utility networks, there are no critical capacity issues or insurmountable barriers to development of this scale. In addition there will be a need to upgrade primary school education provision and healthcare provision to meet the expanded population. The scale of the upgrades is incremental and involves expanding existing provision rather than new facilities. Therefore contributions from development will be sought to secure off-site provision in accordance with Policy CP5 of the Core Strategy. The existing secondary school (Wayland High) is considered to have sufficient capacity to absorb the anticipated growth in population.
- 3.4.21 The proposed submission housing allocations presented are for a new allocation to the west of Thetford Road, as well as a further housing development (linked with opening up of open space) at the former RAF Officers' Mess site on Norwich Road. A range of alternative options were presented as part of the Preferred Options consultation in Summer 2010, including sites to the south of the town, and options within and adjoining the built up area. A number of these alternative sites have now been recommended as being unreasonable following objections from Highways. Inadequate access and unacceptable highway impacts affects site W11 which has now been removed. Additionally Site W9 has also been removed following concerns about environmental impacts on Wayland Wood.
- 3.4.22 The preferred option consultation in the summer 2010 generated a number of local comments in respect of the proposed density on sites W2a (front part of the former RAF Watton Officer's Mess site, Norwich Road) and W5 (Swaffham Road) and their impact upon local character. As a consequence, the recent change in national policy (PPS3) which has removed the requirement for a minimum density and allows for local level determination and flexibility has been applied. Policy has been amended to reduce housing numbers on site W2a from 30 to 22 dwellings and a reduction from 22 to 17 dwellings on site W5. The reduction in housing numbers does not impact upon the overall housing figure for Watton as illustrated in Policy SS1 of the Core Strategy as 14 dwellings were subject to planning approval on land behind 115-121 Norwich Road in Watton under application 3PL/2009/1084/F which was approved in August 2010.
- 3.4.23 In addition to housing and employment allocations, Policy CP7 of the adopted Core Strategy identifies a relatively low need for additional retail floorspace in the town. The Council received a new retail study, which met the new national planning requirements in PPS4, in August 2010. The updated Study reaffirms that the low level of need for additional retail floorspace in Watton is such that an allocation is not required and that the low levels can be accommodated through planning applications

in the town centre to support its market town role.

- 3.4.24 The proposed submission document retains a significant area of open space to be allocated at the former RAF Officer Mess site at Portal Avenue (site reference W3).

Local Service Centre villages

- 3.4.25 The adopted Core Strategy identifies fourteen villages as Local Service Centre villages. Four of these have been identified in the Core Strategy for a positive allocation for new housing growth over the plan period however, as set out above the need to allocate land in Harling has now been superseded by recent planning permissions. The three remaining Local Service Centres with a positive allocation for growth in the document are as follows:

- Narborough (50 new homes);
- Shipdham (100 new homes); and
- Swanton Morley (50 new homes).

- 3.4.26 In summary, the preferred allocations consulted on in the summer in the four Local Service Centre villages for growth were as follows:

- Harling – Site H1 (Kenninghall Road) (which now has planning permission). Cabinet also endorsed sites H3, H4 and H5 as reasonable alternative options.
- Narborough – Site NAR,1 at Chalk Lane. Alternative options for consultation at Meadow Lane and Swaffham Road.
- Shipdham – Sites SH1 (Chapel Street), SH2 (former Thomas Bullock Playing Field) and SH3 (Park Estate). 10 alternative sites were presented in the preferred options consultation.
- Swanton Morley – Site SM4 (Rectory Road) was agreed as the preferred option. 6 alternative sites were presented in the preferred options consultation.

- 3.4.27 The proposed submission document reaffirms the proposed allocated sites in Narborough and Swanton Morley. In respect of Narborough local objections have been received from adjoining residents concerning loss of views, landscape impact and traffic. However, the consultation reaffirmed the support of the Parish Council and there is no highway objection to the site. There has been a mixed but on balance positive response to the proposed sites in Swanton Morley and it is recommended to retain Site SM4 at Rectory Road. There has been an objection from the Council's Environmental Health team to Site SM4 regarding noise from adjoining business activity. However, this objection was received outside of the consultation process and has to be carefully weighed against the scope to include noise attenuation measures within Site SM4 and the strong documented local support for the site as well as the Parish Council support. As with locations, further advice from the Highways Authority has cast considerable doubt over the ability of some sites to come forward and these have been removed from the documentation.

- 3.4.28 Shipdham was allocated the largest number of homes in the Core Strategy reflecting its service provision, location and capacity to accommodate development. The preferred options consultation was pro-actively used by the Parish Council to encourage residents to participate in the LDF process and this has been reflected in the scale of response received. On balance sites SH1 and SH3 are supported although some local concerns have been raised on the loss of an undeveloped area in relation to site SH3 and the extent of development outside of the linear form of Shipdham in relation to Site SH1. However, the largest volume of comment has been directed to site SH2, the former Thomas Bullock Playing Field.

- 3.4.29 It is unequivocal that local community responses do not wish to see the Thomas Bullock Playing Field allocated for development and for the area to be left open, ideally for public use. Concerns were raised about the loss of an open, green area, water levels and access. The Highways Authority has raised doubts about access,

particularly from Chapel Street. The Parish Council has consistently been opposed to the site and has recommended that land south of Bradenham Road (site SH4) should replace this site, which was allocated for 30 dwellings. Members are reminded that Site SH.2 is owned by Breckland Council and has a covenant restricting its development to affordable housing.

3.4.30 In assessing the comments and the likely delivery of proposed sites, it is recommended that Site SH.2 no longer be included as a preferred site and as such becomes a reasonable alternative site. It is not proposed to allocate the site for public open space given the covenant on the site. In accommodating the balance of 30 new homes, it is recommended that Site SH.1 be enlarged to incorporate some of the land to the east which was identified as reasonable alternative site SH.8. Given the current application on Site SH.3 for 15 dwellings it is recommended to allocate 85 dwellings to this site. The access will be secured from Chapel Street although a second pedestrian/cycle access will be provided to Brick Kiln Lane. The policy will allow for the redevelopment and replacement provision of retail units fronting onto Chapel Street. Cabinet is reminded that the Parish Council supports the allocation of Site SH4 south of Bradenham Road, however, landscape and highways concerns (as detailed in Appendix D) act against this option. The proposal contained in the proposed submission document for an enlarged site SH.1 is deliverable and would provide considerable environmental benefits to this part of the village.

Rural settlement boundaries

3.4.31 The preferred options for rural settlement boundaries across the District have generated relatively little comment through the consultation process compared to the previous Local Plan exercise. The comments on settlement boundaries are summarised in Appendix B to this report. In addition to the consultation responses, further meetings have been held with East Tuddenham and Garvestone Parish Councils to discuss particular local issues. Proposed settlement boundaries in Beeston, Gooderstone, Old Buckenham, Shipdham and Shropham continue to generate good levels of comment both in support and against the Council's preferred way forward.

3.4.32 On balance, it is recommended that the majority of the settlement boundaries in the preferred options consultation document will remain unchanged. However, following the consultation process and further consideration of ensuring the Council submits a document which will meet the tests of soundness set out in the report it is recommended that the following changes are made to the document:

Parish	Preferred Option Consultation 2010	Proposed Submission Recommendation
Beetley	Retain settlement boundary	Amend the settlement boundary to remove the playing field from St Mary's Primary School. This is to limit the potential for future residential development which could prejudice the ability for the school to expand to meet its own needs.
Cockley Cley	Retain settlement boundary.	Delete settlement Boundary. The village is entirely within the 1500m Stone Curlew protection buffer and further infill development is unlikely to be satisfy the Habitats Regulation Assessment requirements
Croxton	Amend settlement boundary.	CRO.6 within the Preferred Options Consultation proposed to tighten the settlement boundary to the back of the properties between 99-The Street and Tye Cottage. Subsequently a planning permission has been granted to the back of Ty Cae, therefore, it is recommended that the

		boundary is re-drawn to include this permission.
Foxley	Retain settlement boundary.	Delete settlement Boundary.
Guist	Retain settlement boundary.	Delete settlement Boundary.
Gressenhall	Amend settlement boundary.	GR.3 – Additional amendment to the settlement boundary to exclude land to the 14-16 Bittering Street. This is to limit the potential for backland development which would harm the form and character of this part of the settlement. The revision would provide consistency with the rear boundary of number 18 Bittering Street and reduce the pressures of backland development consistent with PPS3 and CP14 of the Adopted Core Strategy.
Ickburgh	Retain settlement boundary.	Delete settlement Boundary. The village is entirely within the 1500m Stone Curlew protection buffer and further infill development is unlikely to be satisfy the Habitats Regulation Assessment requirements
Little Cressingham	Retain settlement boundary	Delete settlement boundary. The village is entirely within the 1500m Stone Curlew protection buffer and further infill development is unlikely to be satisfy the Habitats Regulation Assessment requirements Conversions of existing buildings may be permissible irrespective of the absence of a settlement boundary.
Shropham	Amend settlement boundary.	SHR.3 Amend settlement boundary to subdivide the proposed change at SHR.1 to reduce the amount of developable land area and secure a scale of development consistent with local objectives and policy CP14 of the adopted Core Strategy.
Sparham	Retain settlement boundary.	Delete settlement Boundary.
Stanfield	Retain settlement boundary.	Delete settlement Boundary.
Stow Bedon	Retain settlement boundary.	Delete settlement Boundary.
Shipdham	Amend settlement boundary.	SHP.5 – Additional amendment to the settlement boundary to include site given planning approval under 3PL/2001/0221/D. This would result in a logical and defensible settlement boundary reflecting features on the ground.
Tittleshall	Retain settlement boundary.	Delete settlement Boundary.
Watton	Amend settlement boundary	WAT.16. Additional amendment to the settlement boundary. Extend settlement boundary to include land behind 115 - 125 Norwich Road in Watton. Land behind 115-121 Norwich Road received planning approval in August 2010 for 14 dwelling outside of the existing settlement boundary. This area has been included to ensure that the settlement boundary reflects existing development.

		Land behind number 123-125 is also been included to provide a logical settlement boundary that reflects features on the ground.
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Table 1: Proposed changes to the Rural Settlement Boundaries in Preferred Options document.

3.4.33 In addition to the above proposed changes, the accompanying Settlement Boundary Topic Paper at Appendix B sets out a number of factual changes which need to be made to the Inset Maps as a result of consultation responses and new evidence being made available. It is recommended that this factual update be incorporated into the document.

3.5 Other District-Wide Site Specific Issues

Gypsy & Travellers

3.5.1 It will be necessary for the Site Specific Policies and Proposals document to include a section on Gypsy and Traveller provision. Breckland has a requirement to provide 15 permanent pitches by 2011 which was originally set out in the Regional Spatial Strategy. The adopted Core Strategy Policy CP2 states that the search for permanent pitch provision to 2011 will be focussed along the A11 corridor. Recent encampments at Attleborough indicate that there is a need in the area for authorised and managed provision. This will be considered as part of the Attleborough and Snetterton Heath Area Action Plan.

3.5.2 Away from the A11 corridor, Gypsy and Traveller provision has been made on the A47. A permanent site at Swaffham Splashes provides for 23 pitches and this site attracts regular visitors who often camp at locations in the town outside of the authorised site. Additionally, there have been occasional incidences of unauthorised Gypsy and Traveller encampments in Dereham, including new age travellers. These tend to be temporary visits which nonetheless indicate that there is some need for future provision along the A47.

3.5.3 Further local Gypsy and Traveller Accommodation Assessment work will inform where the additional provision post 2011 needs to be made. Additionally, further work is required at a County level to identify where transit pitches need to be provided. Therefore it is too premature at this stage to identify the location of provision post 2011 without the appropriately robust evidence as part of this Site Specifics document. It is recommended that the proposed submission Site Specifics document does not allocate a gypsy and traveller site and that the issue is addressed as part of a review of the document when up-to-date local evidence is available.

Monitoring and Implementation Framework

3.5.4 Monitoring and review are key elements of the new planning system. The Site Specifics document will need to include a draft Monitoring and Implementation Framework (MIF) to assess the performance of policies as well as setting a framework for delivery. The MIF will also identify key infrastructure dependencies that impact upon site delivery, risks and contingencies, further detail in relation to phasing and timescales, as well as identifying the bodies responsible for delivery. The MIF will also set out the key indicators and targets against which each of the policies will be monitored against.

3.5.6 The MIF will provide the authority with the ability, through its Annual Monitoring Report (AMR), to identify areas of the plan that are 'on-track' and those areas where early review may be necessary. This is an important part of the planning systems' requirements that proposals are deliverable and flexible. The MIF is included as part of the proposed submission document at Appendix A. Members should note that the Monitoring and Implementation Framework may need to be

amended prior to the consultation to reflect those allocations that are to be taken forward subject to the decision of Cabinet.

Sustainability Appraisal

- 3.2.3 Alongside the Site Specific Policies and Proposals document, the authority has to prepare a Sustainability Appraisal Report. This Report sets out a thorough baseline of Breckland data and evidence which demonstrates what is important and/or unique in Breckland in terms of the economy, society and the environment. The Report also considers the implications of other plans, policies and programmes and where there are land use dimensions which the LDF can help deliver. This baseline has informed 17 sustainability objectives against which all reasonable options have been assessed and from which preferred options have been identified. The Sustainability Appraisal Report will be a key consideration when the document is examined and provides scope to a Government Inspector to look at the potential outcomes of alternative site and settlement boundary options where there are representations that the Council should have taken forward another option. Importantly, the Report also takes into account the legal requirement for a Strategic Environmental Assessment (SEA), which is an obligatory appraisal of the environmental effects of the plan and the need to justify those policy options that have a negative effect on the environment.
- 3.5.7 The proposed Submission document is accompanied by a Sustainability Appraisal Report (SAR). The SAR considers the social, economic and environmental impacts of the Site Specific proposals and provides an essential tool in ensuring the policies and allocations represent the most sustainable option. The SAR considers that the approach taken in the Site Specifics is the most sustainable.
- 3.5.8 The SAR will be presented as part of the proposed Submission publication; however Members are advised that due to the size of the document (>400 pages) it will only be made available electronically with a master hard copy available at the Council Offices. This approach legally meets the requirements on LDF document preparation.

Tests of Soundness

- 3.5.9 The publication of Planning Policy Statement 12 'Local Spatial Planning' (2008) introduced two new simplified tests of soundness. The Site Specifics document must be justifiable and effective. Justification of the Site Specifics document must be demonstrated by the Council in terms of providing a robust and credible evidence base, including the levels of public participation together with research / fact finding evidence supporting the choices made in the plan. Additionally justification must be provided in the Sustainability Appraisal Report (see Appendix E) that the most appropriate sites and policy options have been put forward to deliver the Council's Core Strategy when considered against the reasonable options. The extent of public consultation is detailed in paragraphs 3.2.1 – 3.2.5 above. The significant evidence base underpinning the Site Specifics document is outlined in the document and summarised in Appendix A of this report.
- 3.5.10 The second test of soundness is effectiveness which means that the Site Specifics must be deliverable, flexible and able to be monitored. The deliverability of the Site Specifics document will focus on the delivery of homes, jobs, open spaces and retail floorspace on the sites identified. Additionally, the effectiveness of the proposed settlement boundaries in protecting the rural landscape and delivering appropriate rural development will be assessed as part of the Examination process.
- 3.5.11 Capita Symonds have undertaken a soundness self-assessment in accordance with guidance from the government's Planning Advisory Service (PAS) and advice from the Planning Inspectorate (PINS). The outcome from this self-assessment is that the correct process for preparing and submitting the Site Specifics document has been followed. There are some risks to delivery on sites identified as set out

in this report but that risk has been carefully weighed against the wider advantages to the community of seeing delivery of new homes and jobs in those locations. In all cases, reasonable alternatives are available to a Government Inspector but it should be noted at this stage that the Council may have to provide additional resources to demonstrate a commitment to the successful delivery of these sites proceeding and during the Examination process, particularly in light of any responses received during the forthcoming 6 week publication period.

Habitats Regulation Assessment

- 3.5.12 In addition to Sustainability Appraisal and the other evidence base requirements, the Council has been directed by Natural England through a scoping exercise in 2008 that the Core Strategy and Development Control Policies document requires a Habitats Regulation Assessment (also known as Appropriate Assessment or AA). The Assessment is required to meet the obligations of Articles 6(3) and 6(4) of the European Habitats Directive in order to ascertain whether the strategy will have a significant effect on designated European sites. The Habitats Regulation Assessment is effectively the final check on the document and will be conducted on the final draft of the proposed submission document following consideration by this Cabinet meeting.
- 3.5.13 As Members will be aware there are significant areas of Breckland which are protected European Habitats. The principle areas are the Special Protection Areas (SPAs) for birds where sizeable tracts of Breckland farmland and forest have been protected for Stone Curlews, Nightjars and Woodlarks. Away from the Brecks, there are a number of Special Conservation Areas (SACs) which have been designated to protect particular habitats and their associated flora and fauna. These are chiefly the Norfolk Valley Fens, the River Wensum and the Waveney and Little Ouse Valley Fens. The scope of Appropriate Assessment also requires the authority to consider the impact of the strategy on European Habitats up to 20km beyond the District boundary. This includes parts of the Broads, the North Norfolk Coast and the Ouse Washes near Downham Market.
- 3.5.14 An initial Appropriate Assessment undertaken at the Preferred Options stage highlighted that the document as presented was unlikely to have significant adverse effect given that it was in accordance with the Core Strategy.
- 3.5.15 However, an initial indication is that development will only be able to take place (in habitats terms) where sufficient spare water resource is available and receiving watercourses can accommodate waste water discharge. Furthermore, a mechanism needs to be developed to ensure future increases in recreational activity do not harm protected bird species (i.e. woodlark and nightjar) in parts of the Breckland SPA. This could result in the need to secure appropriate contributions from development to undertaken further monitoring work. However, it is unlikely to result in significant amendments to the location of new allocations in the Site Specifics document.
- 3.5.16 In light of the findings of the Appropriate Assessment, mitigation measures must be put in place to remove any significant effects or likely significant effects that the plan may have on European sites. Mitigation measures include amendments made to policies to remove elements that could have an effect, or to require other actions that can eliminate any effects. The policies in this document that have an effect on European sites have been amended to ensure that the qualifying features are not harmed, as well as considering other measures that will be necessary. These mitigation measures are incorporated throughout the document where necessary.
- 3.5.17 Primary research undertaken to inform the Habitats Regulation Assessment advises that the likely significant effects on European Habitats arising from the proposed strategy and policies revolve around direct impact resulting from new built development (disturbance, loss/fragmentation of habitat, water resources) and

indirect impacts from increased recreational/tourism pressures and wider urban effects. The issue of impact on Nightjars and Woodlarks has been previously tested in the Thames Basin and Dorset Heaths where a buffer of 400metres from built development had been established. With the same species in Breckland this is a useful comparator.

Publishing and Submitting the Document

3.5.18 In April 2008, the Government produced amended Regulations governing the preparation of Local Development Documents, especially in the latter stages of document production. A diagram outlining the publication and submission process is provided at Appendix F. Under the new Regulations, local planning authorities are now required to publish the document for a period of at least 6 weeks both in paper and on-line and invite representations from key stakeholders (Regulations 27 & 28). The material to be published will include:

- the Development Plan Document (as proposed to be submitted)
- the changes to the Proposals Map (if the adoption of the development plan document would result in changes to the map)
- the Sustainability Appraisal report
- a statement setting out:
 - who was invited to be involved in the plan preparation
 - how they were invited to be involved in the plan preparation
 - a summary of the main issues raised and how they have been addressed
- any other supporting documents relevant to the preparation of the Development Plan Document.

3.5.19 It is important to distinguish that this is not a widespread public consultation but should be seen as a “final check” with those bodies which have a role in delivering and monitoring the LDF, including Town and Parish Councils. The objective is to seek representations relating to issues of soundness to be made. However, everyone who has made comments at the previous consultations will be notified and there will be a formal public notice in the Eastern Daily Press.

3.5.20 Following the 6 week publication period, the authority is required to produce a summary of the main issues raised by the representations. Any very significant issues raised by representations that go to the heart of the soundness of the plan should come to light during this summation process (Regulation 30).

3.5.21 The nature of representations received will determine the course of action that the Council takes and this is reflected in the recommendation of this report. If there are no representations which cause the authority to question whether the plan is sound then the document can be submitted to Secretary of State and subjected to examination. However, should the authority receive representations that may warrant a modification to the document then there are two courses of action. Under the new Regulations, the authority can make small focussed changes which would need to be re-appraised and consulted on before being submitted. Should the publication period draw fundamental comments which the Council considers are valid and that they go to the heart of the soundness then extensive changes may be required which would mean withdrawing the document and going back to undertake further evidence gathering and consultation.

3.5.22 Your officers advise that the lengthy progression of the LDF and considerable consultation undertaken both through the Core Strategy and Site Specifics documents has significantly reduced the risk of the plan being found fundamentally unsound at this stage. Members will recall that consultation on the preferred options earlier in 2010 drew significant support for the majority sites and settlement boundaries notwithstanding the level of comment in respect of site D2 in Dereham and site SH.2 in Shipdham.

Conclusion

- 3.5.23 The Site Specifics Policies and Proposals document as presented is a sound document that is both justified and effective. It is aligned with the wider corporate objectives of both the Council and is in conformity with the Council's adopted Core Strategy document. Like the Core Strategy, the Site Specifics is grounded in an extensive evidence base which identifies what makes Breckland the place that it is and the local distinctiveness of the environment, society and economy of the District is embraced in the Strategy. The document also addresses the issues, opportunities and challenges which the District is likely to face during the lifetime of the Core Strategy to 2026. The Breckland Core Strategy is accompanied by a comprehensive Sustainability Appraisal Report which assesses all the reasonable strategic and local policy options applicable to Breckland. The Strategy is also underpinned by a Habitats Regulation Assessment.
- 3.5.24 Publication will enable key stakeholders to assess the document and the supporting evidence and make representations on the soundness of Breckland's approach. It is not a stage at which to re-open the strategy and introduce new options but to test whether Breckland has adhered to the procedural steps and has responded appropriately to the evidence and comments from earlier consultation. As stated above the authority still has the option after publication to either go back and undertake a fundamental re-write of the Plan or undertake a more discrete review of a particular policy prior to submission. Without pre-empting the results of the publication period it is not envisaged that this will be necessary. Capita Symonds advise that the Government Inspector who will examine the document will have considerable scope to explore the evidence and test alternative options which have been presented. Members are reminded that the Inspectors Report will be binding on the authority and that there will be no further consultation after receipt of the Report.
- 3.5.25 Breckland is only the second authority in Norfolk to reach this stage of production with its Site Specifics document. Having a submitted and adopted Site Specifics document will ensure that this authority is in a position to better management new development over the next 2-5 years in a way which is responsive to local issues. The timely publication and submission of the Site Specifics document will enable the authority to retain tighter control over development proposals and the potential piecemeal approach to the release of housing land which PPS3 'Housing' currently allows for.

3.6 Summary conclusions

- 3.6.1 The proposed Submission document presented at Appendix A represents the professional advice of Capita Symonds' Breckland Planning Policy Team. The proposed submission allocations and settlement boundaries are considered to best reflect the evidence from previous consultations, consistency with the Core Strategy and as such represent the most sustainable option going forward for further consultation.
- 3.6.2 The proposed Submission document presented is intended to be a detailed and comprehensive document that enables communities, landowners and developers to understand what the 'map' for their community will look like for the next 3-5 years.

3.8 Options

- 3.3.1 Option A
Members agree that the Council publishes the Site Specific Policies and Proposals document, including Cabinet Recommendations and any amendments necessary for Appropriate Assessment, for a period of at least 6 weeks. Members further agree to submit the Site Specific Policies and Proposals document to the Secretary of State

for an Examination in Public by a Government appointed Inspector whose report will be binding on the authority unless comments received during the 6 weeks of pre-Submission publication indicate that the document is unsound and should be withdrawn.

3.3.2 Option B

Members do not agree that the Council publishes the Site Specific Policies and Proposals document, including amendments. Members further do not agree to submit the Site Specifics Policies and Proposals Document to the Secretary of State for an Examination in Public by a Government appointed Inspector.

3.4 Reasons for Recommendation(s)

3.4.1 Members are asked to approve Option A in order to allow the timely progression of a sound development framework for the market towns, Local Service Centres and villages.

4.1 Risk

4.1.1 A Risk Management questionnaire has been completed and confirms that risk has been given careful consideration, and that there are no significant risks identified associated with the information in this report.

4.2 Financial

4.2.1 This report has no financial implications.

5. Legal Implications

5.1 Statutory Instrument 2008 No. 1371 Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 sets out the procedures to which the LDF process must adhere.

6. Other Implications

- a) Equalities: None
- b) Section 17, Crime & Disorder Act 1998: None
- c) Section 40, Natural Environment & Rural Communities Act 2006: None
- d) Human Resources: None
- e) Human Rights: None
- f) Other: None

7. Alignment to Council Priorities

7.1 PPS12 deals with the Local Development Framework, including arrangements for consultation and participation. The statement will need to be taken into account throughout the production of the Local Development Framework and its components and will be relevant to the following Council priorities:

- Building Safer and Stronger Communities
- Environment
- Prosperous Communities

8. Ward/Community Affected

- 8.1 This report affects all Wards in Breckland with the exception of Wards in Thetford, Attleborough and the Snetterton Heath area as these will be the subject of separate Area Action Plans.

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Key Decision Status (Executive Decisions only):

This is a key decision as indicated on the Forward Plan.

Appendices attached to this report:

Appendix A – Proposed Submission Site Specifics Document

Appendix B – Settlement Boundaries Topic Paper

Appendix C – Updated Proposals Maps

Appendix D – Summary of comments received during the Preferred Options Consultation

Appendix E – Sustainability Appraisal Report (to be made available in electronic form only)

Appendix F – Outline diagram of the submission process