

Dereham Town Council

Extraordinary Full Council Meeting

1st September 2026

Breckland Local Plan Reg 19 Consultation

Agenda Notes

Not all policies have been reviewed or have notes. Priority has been given to areas where the Council has shown particular interest in the past. Each set of notes is attached to the relevant policy and supporting text.

Some policies have been included without notes – these are policies which Councillors have shown interest in previously but there has not been time to give them any consideration.

Dereham site specific policies.

Swanton Road Developments

The two Swanton Road developments totalling 240 dwellings along with the site currently being built out will result in a significant accumulation of properties coming into Dereham over a level crossing onto Kings Road and Theatre Street.

It is concerning that there is no provision for a pedestrian and cycle facility on both sides of the level crossing. These are highly sustainable locations where there will be the strong desire to walk and cycle to the town centre and high schools. Safe access over the level crossing on both sides is essential.

Both these sites could be highly sustainable locations if safe and convenient walking and cycling facilities are created to the town centre and high schools. This is particularly important with Robertson Barracks potentially coming forward as a development site.

These developments will add additional pressure, through visitors, to Back Lane and the Countryside Park. Rather than contribute to GIRAMs these developments should mitigate their impact on the countryside park and county wildlife sites through improved surfacing on the PROWs.

Improvements should also be made to the other PROW adjacent to both sites.

Greater consideration should be given to neighbouring County Wildlife Sites, other habitats and corridors of wildlife movement between habitats, to ensure green corridors are protected and enhanced. If Dereham had been included in the GI Study, these would have been identified.

Where it is proposed to discharge any surface water into existing water courses, which cross the Neatherd, these should be surveyed and any rehabilitation work needed, carried out prior to occupation.

Land North of Dereham Road.

No recognition of the LCWIP - While the site is adjacent to National Cycle Route 13, there will be a strong desire to follow a more direct route to the town centre and High schools.

Land at Dumping Green.

No recognition of the LCWIP - Any cycle route will end at the level crossing on Yaxham Road. While pedestrian and cycle improvements are mentioned at (d), it is quite vague and only commits to a shared use facility along the front of the site and to local services and facilities. If an LCWIP had been developed as part of the Local Plan it would have identified key points along specific routes where the developer needs to contribute to improvements. Enabling safe and convenient cycle links to high schools should be a minimum.

Improvements to FP25 and FP25 to the east and north of the site linking to the flyover over the A47. And linking to RB38 and RB41 linking to new employment at Moorfields.

Land at Moorfields

No recognition of the LCWIP - no mention of improving cycle access to the site or linking to shared use cycle facility on Norwich Road.

There should be a cycle link created to connect with the shared use facility along Norwich Road and/or improvements to RB38, RB41 to improve connectivity for cycling to residential areas.

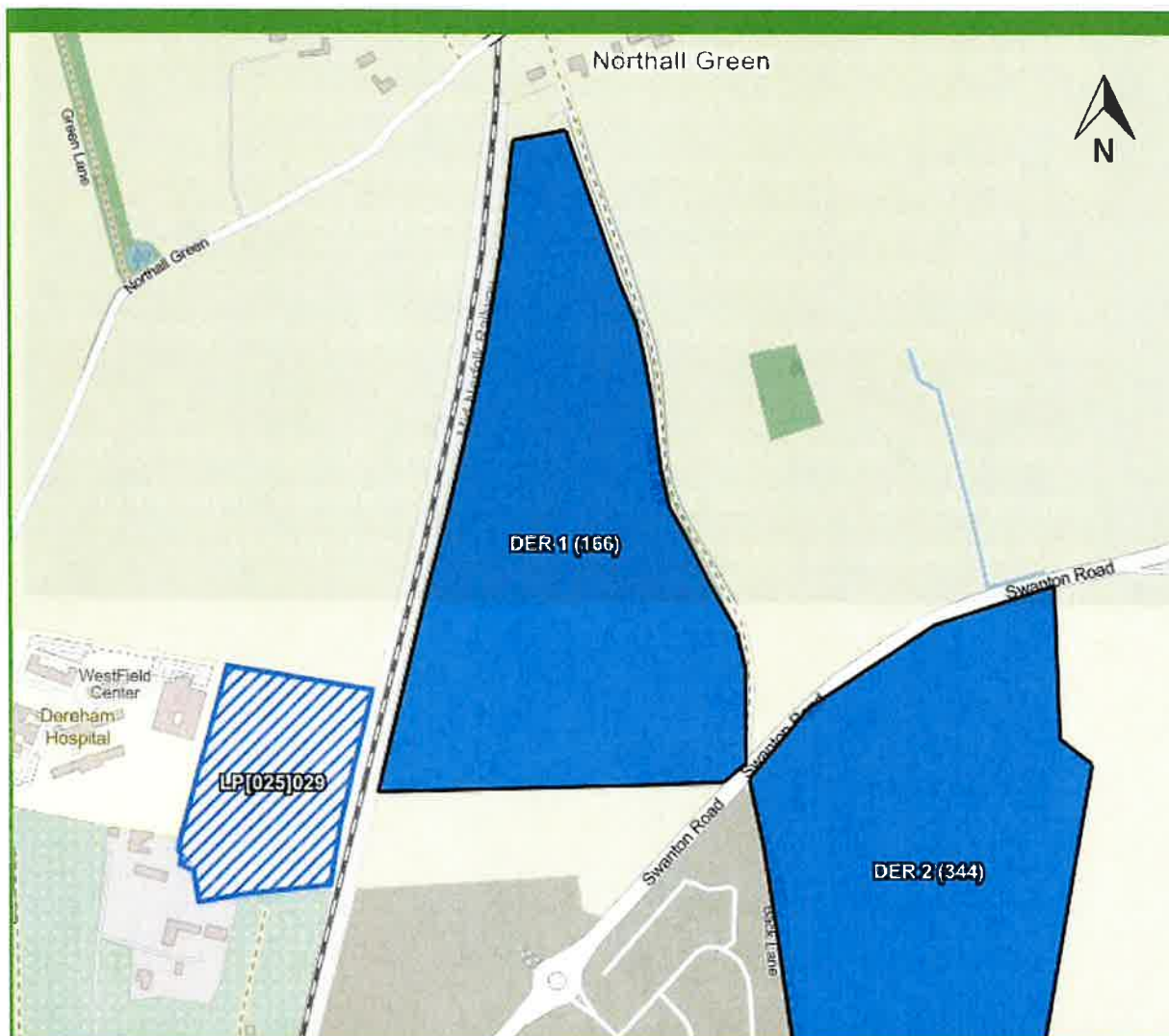
Robertson Barracks.

If this development comes forward, many of the services residents will need, such as supermarket shopping and high schools will be located in Dereham. The local plan has already identified that Dereham's highway network can not accommodate significant growth.

Without a Transport Assessment it is not possible to understand the potential impact this development could impose on Dereham. The Transport Assessment should also identify safe and convenient cycle routes between the site and Dereham High Schools, and other services

Dereham

PROPOSAL DER 1 (166): North of Swanton Road



1. Land at Land to the West of Swanton Road (DER1) (166) amounting to approximately 6 hectares, as shown on the Policies Map, is allocated for residential development. The development should provide for approximately 120 new dwellings with supporting infrastructure and facilities.
2. Proposals for this site must have regard to the following site-specific requirements:

- (a) Demonstrate a safe and acceptable vehicle, pedestrian and cycle access to Swanton Road, with vehicle access via development to the south subject to agreement by the Highways Authority;
 - (b) Incorporate any necessary off-site highway improvements to improve pedestrian and cycle access to key local services and facilities;
 - (c) Include a landscaping scheme which is sympathetic to the surrounding area including retention of existing dense and mature hedgerows within and surrounding the site where possible; and
 - (d) Include a landscape buffer and area of open space, to the north of the site.
3. In addition to the site-specific requirements, above, any major development proposals for the site should address relevant requirements of other parts of this Plan – particularly those set out in Policy SSH 01 in Chapter 12.

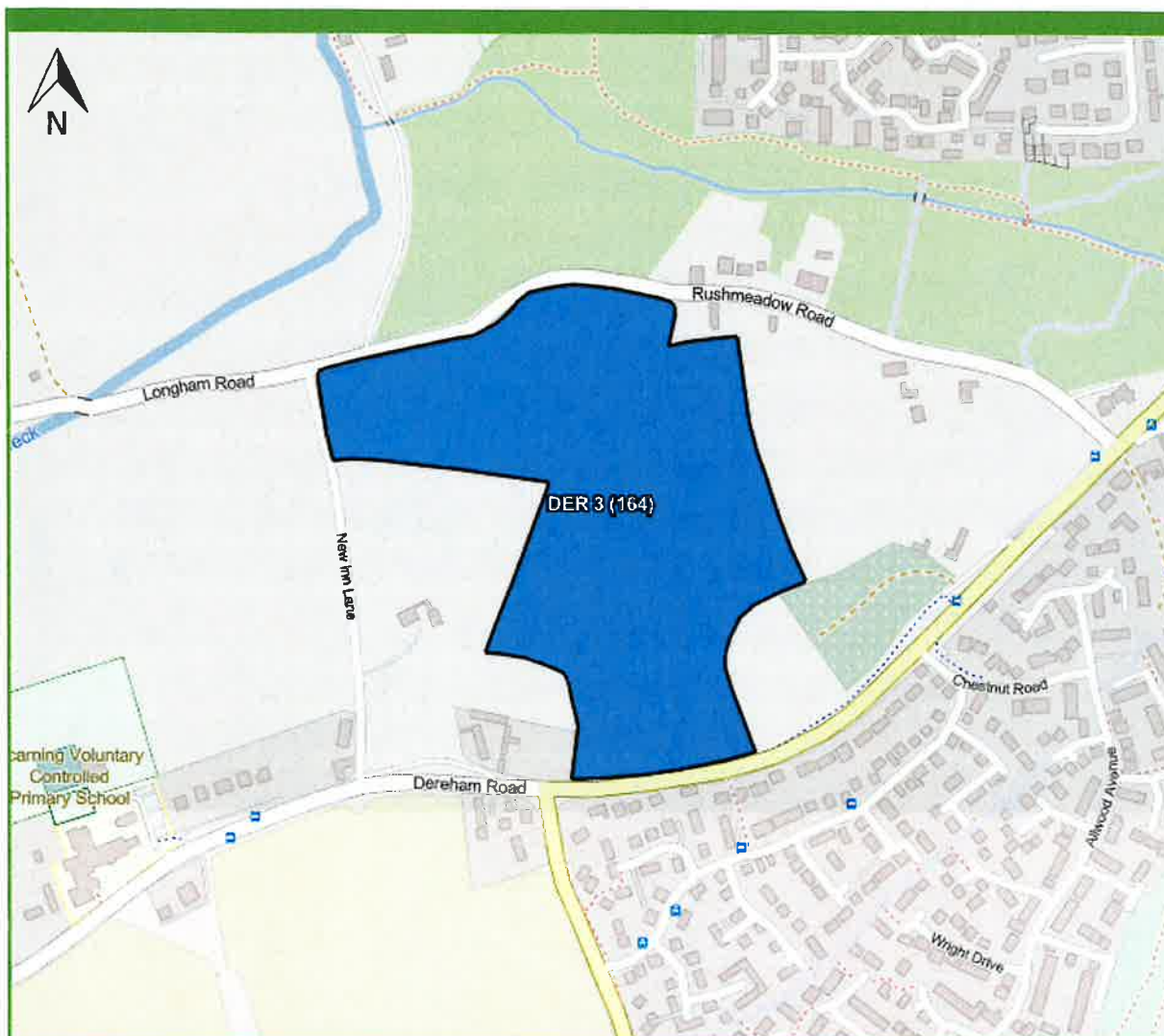
- (b) Incorporate any necessary off-site highway improvements to improve pedestrian and cycle access to key local services and facilities;
 - (c) Residential development should be steered outside the areas of surface water flood risk, where this is not possible, flood resilience and resistance measures should be implemented, including property flood resistance and resilience measures;
 - (d) Arrangements for safe access and escape will need to be provided for the 1% AEP surface water events with an appropriate allowance for climate change, considering depth, velocity, and hazard. Design and access arrangements will need to incorporate measures, so development and occupants are safe; and
 - (e) Developers should utilise SuDS with multiple benefits throughout the site, particularly in areas of predicted surface water flows.
3. A site-specific Flood Risk Assessment is required which demonstrates that users will be safe during events up to and including the 1% AEP plus climate change rainfall and fluvial events, with an appropriate allowance for climate change. This will need to show that the site is not at an increased risk of flooding in the future and that development of the site does not increase the risk of surface water flooding either on or off the site. This should be supported by detailed surface water modelling of the site.
4. In addition to the site-specific requirements, above, any major development proposals for the site should address relevant requirements of other parts of this Plan – particularly those set out in Policy SSH 01 in Chapter 12.

PROPOSAL DER 2 (344): South of Swanton Road



1. Land at Southeast of Swanton Road DER 2 (344) amounting to approximately 8.9 hectares, as shown on the Policies Map, is allocated for residential development. The development should provide for approximately 120 new dwellings with supporting infrastructure and facilities.
2. Proposals for this site must have regard to the following site-specific requirements:
 - (a) Demonstrate a safe and acceptable vehicle, pedestrian and cycle access onto the existing roundabout on Swanton Road and one other point along Swanton Road;

PROPOSAL DER 3 (164): North of Dereham Road



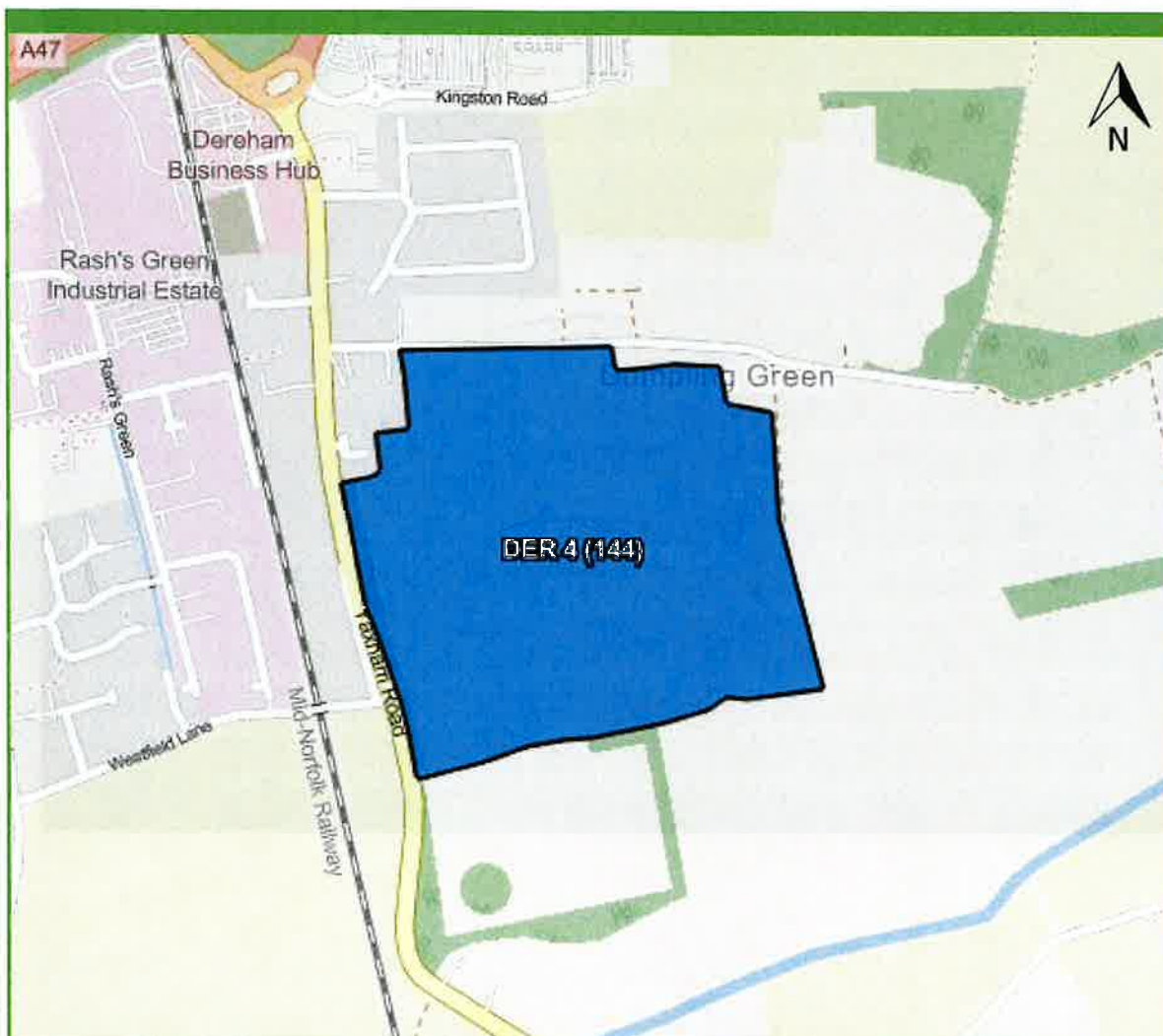
1. Land North of Dereham Road (DER 3) (164) amounting to approximately 8.6 hectares, as shown on the Policies Map, is allocated for residential development. The development should provide for approximately 100 new
2. Proposals for this site must have regard to the following site-specific requirements:
 - (a) Demonstrate a safe and acceptable vehicle, pedestrian and cycle access onto Dereham Road. Vehicular access should only be from Dereham Road; Incorporate any necessary off-site highway improvements to improve a

pedestrian and cycle access to key local services and facilities, namely Dereham town centre;

- (b) Provide an area of public open space of a quantum appropriate to the size of the development in accordance with Policy ENV 12 of this Plan in addition to the provision of suitable space for allotments;
- (c) Provide an area of public open space which provides a suitable buffer to the Waste Water Treatment Works to the north;
- (d) The safeguarding of suitable access for the maintenance of existing water supply and sewerage infrastructure; and
- (e) The site is within the consultation area for a safeguarded Water Recycling Centre (WRC), and the development must not prevent or prejudice the use of the existing safeguarded WRC unless suitable alternative provision is made, or the facility is demonstrated to no longer be required.

3. In addition to the site-specific requirements, above, any major development proposals for the site should address relevant requirements of other parts of this Plan – particularly those set out in Policy SSH 01 in Chapter 12.

PROPOSAL DER 4 (144): Dumping Green

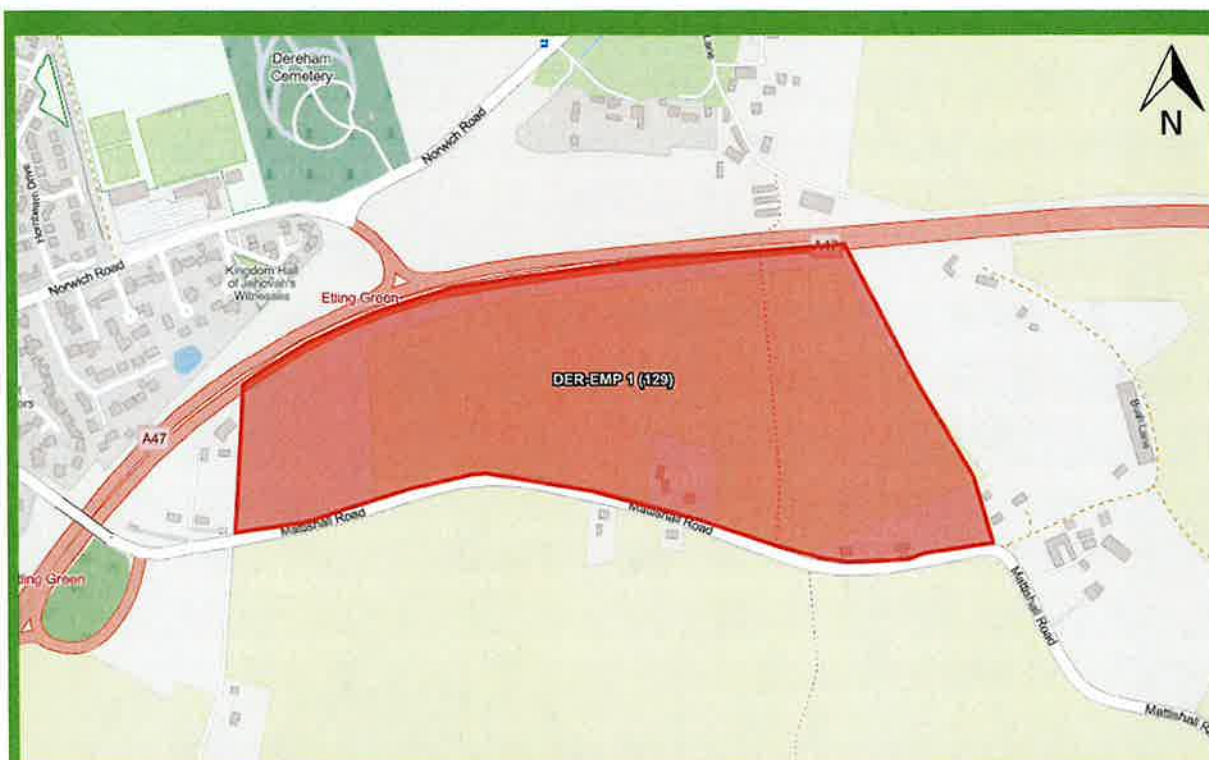


1. Land at Dumping Green (DER 4) amounting to approximately 27 hectares, as shown on the Policies Map, is allocated for residential development. The development should provide for approximately 360 new dwellings with supporting infrastructure and facilities.
2. Proposals for this site must have regard to the following site-specific requirements:
 - (a) Demonstrate a safe and acceptable vehicle, pedestrian and cycle access in two places along Yaxham Road. The primary site access should include the delivery of a new roundabout;

- (b) Incorporate any necessary off-site highway improvements to improve a pedestrian and cycle access to key local services and facilities, including shared 3m wide pedestrian/cycle facility along the site frontage;
 - (c) Provide an area of public open space which includes provision for children's play, outdoor sports and open parkland with well linked walking routes;
 - (d) Retain where possible and enhance the hedgerows and trees to the northern and western boundaries of the site;
 - (e) Provide targeted archaeological survey and systematic recording to ensure the identification, documentation, and preservation of heritage assets prior to any impact; and
 - (f) The safeguarding of suitable access for the maintenance of existing water supply and sewerage infrastructure.
3. In addition to the site-specific requirements, above, any major development proposals for the site should address relevant requirements of other parts of this Plan – particularly those set out in Policy SSH 01 in Chapter 12.

Dereham

DER-EMP 1 (129): Land at Moorfields



The site (LPR/C45/DEV/129) is located to the eastern edge of Dereham and comprises of an agricultural field adjacent to the southern boundary of the A47. It is accessed directly from the western carriageway of the A47 and from the eastern carriageway via the Mattishall Road Bridge.

The site extends to 18.34 ha. The site is flat and has no physical constraints to development. The easy access to the site from the two existing junctions on the A47 and the Mattishall Road is a clear benefit, having direct access to one of the main arterial roads into and out of the County that will further benefit following the completion of the A47 dualling

Land is allocated for a business park with high quality/high profile offices with start-up industrial units and leisure uses including a hotel (Use Class C1) and under employment uses (within Classes E(g) and B2 and B8 of the Use Classes Order) on land at Moorfields Dereham. Development will be subject to compliance with the following criteria:

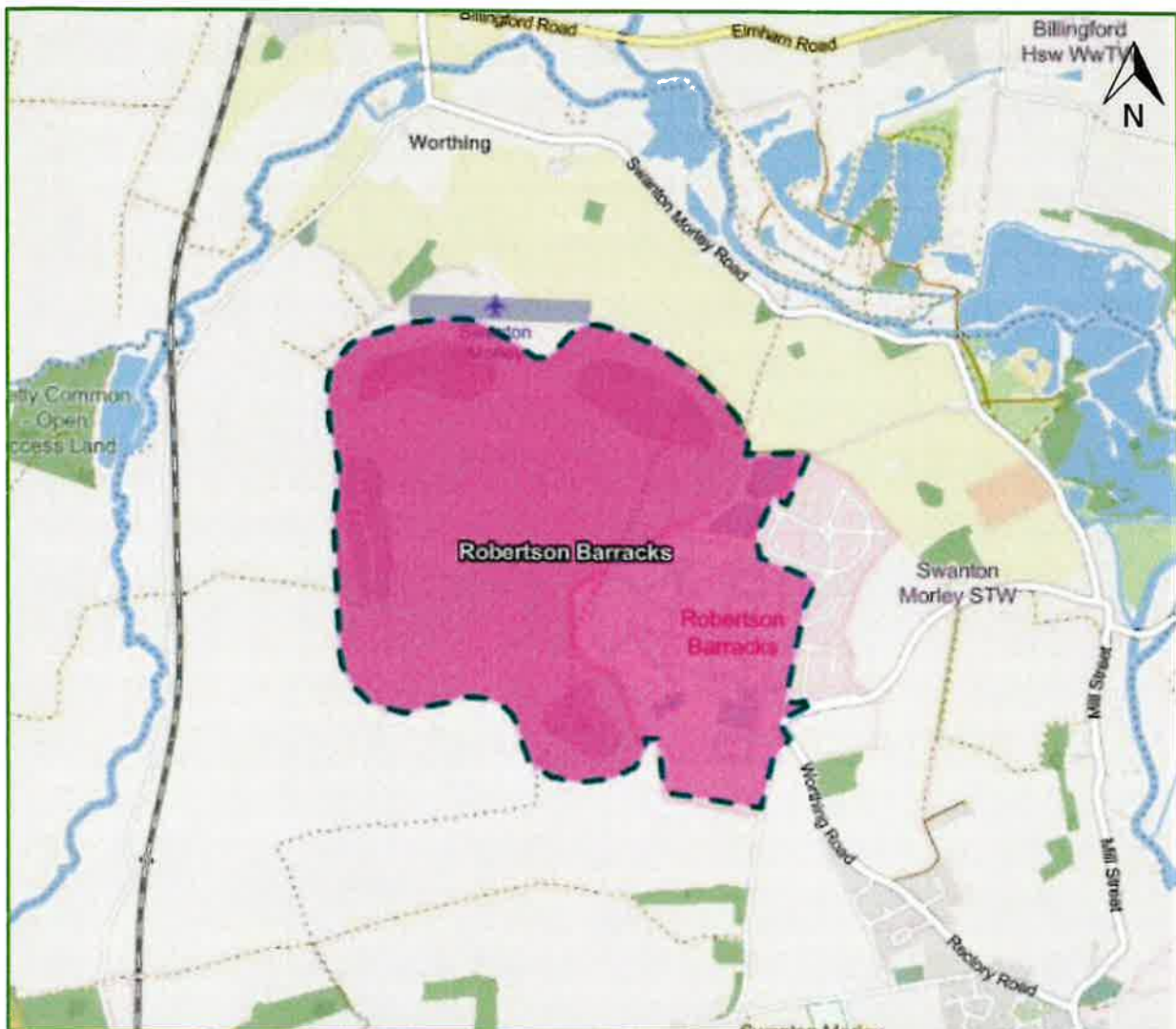
- (a) Proposals for employment development within class E(g) and B2 of the Use

Classes Order (as amended) will be preferred;

- (b) Access to the sites from 2 points off Mattishall Road with development laid out in a manner that does not preclude the potential for future development in the vicinity;
- (c) The widening of Mattishall Road to a minimum of 5.5m and new footway provision on the North side of the carriageway between the main access and the A47 overbridge to the West;
- (d) Linkages from the improved Mattishall Road to ensure the footway will link the site to existing nearby development on the edge of Dereham town centre;
- (e) Retention of an existing copse to the northeast of the site;
- (f) Proposals that minimise the impact on the landscape, having regard to the principles of Landscape Character Assessment and Breckland Design Guide to ensure design that is complementary to the surrounding area and uses;
- (g) Proposals which encourage sustainable economic development through education and skills training; and,
- (h) Proposals that integrate dual-use (e.g., grazing/biodiversity corridors) for any ground-mounted renewables will be supported. The site has good connectivity, having easy access to services and facilities in the town centre and good access to Norwich and further afield.

In addition to the site-specific requirements, above, any major development proposals for the site should address relevant requirements of other parts of this Plan – particularly those set out in Policy SSE 01 in Chapter 13.

HOU 23: Robertson Barracks



The Council considers that the Robertson Barracks site is a longer-term development opportunity – i.e. whenever the Army vacates it - and safeguards it as a potential residential-led mixed use (including employment and community uses) development site.

The Council will continue to work with the promoters of the site and key statutory undertakers to determine appropriate uses for the site, having regard to the site's opportunities and constraints and the wider impacts of any proposals.

A masterplan should be prepared and submitted to the Council either prior to or as part of the first major planning application for the redevelopment of the site.

The masterplan should include the following:

- (a) Establish a deliverable integrated access and transportation strategy which emphasises sustainable accessibility and traffic restraint and allows for the effective management and mitigation of any impact of vehicular traffic from the site onto the local highway network as well as connectivity and permeability within and between the site and beyond, including links with Swanton Morley, Dereham and the A47 and east to Norwich;
- (b) Include the provision of area wide economic and social infrastructure and services, including (but not limited to) the provision of / access to local employment opportunities, local shops and community uses, education, primary health care, water supply, Broadband and power supply;
- (c) Where feasible and appropriate, proposals to repurpose existing buildings on site to deliver housing, community or employment uses will be encouraged and supported;
- (d) A layout that incorporates the sites natural setting with rewilding, enhanced green infrastructure and public access to green space and playing fields;
- (e) Depending on the scale of development, either a site for a new primary school and early years provision of at least 2.3 hectares, or a contribution towards the expansion of Swanton Morley Primary School;
- (f) Retention and enhancement of areas / buildings of historic significance (as set out in an agreed Heritage Impact Assessment) and proposals to commemorate the military heritage of the Barracks;
- (g) A Minerals Resource Assessment – i.e. that has been produced in accordance with Appendix 10 of the Norfolk Minerals and Waste Local Plan (May 2025);
- (h) A phasing plan for the redevelopment of the site; and,
- (i) A community engagement report that explains the engagement that has taken place and how it has shaped the contents of the masterplan.

In addition to the sites specific requirements, above, any major development proposals for the site should address relevant requirements of other parts of this Plan and particularly those set out in Policy SSH 01 in Chapter 12.

Trees, Hedgerows and Development.

Where trees and hedges are retained or created they must be set out so that there is room for machinery to manage and maintain the hedges and trees. Developments should not be set out where mature trees are close to the boundary of properties or create significant shade to gardens.

Hedges other than slow growing hedges, such as yew, should not be located adjacent to footways parking areas or cycle ways. Native hedges can grow out too quickly and become a nuisance at a time when they cannot be trimmed due to nesting birds.

It is good that hedges and mature trees are given protection through the local plan due to the contribution they make to biodiversity and carbon sequestration. Consideration should also be given to the protection of top-soil. Topsoil is an important natural resource and also requires protection. According to Defra it takes 500 years to create 2cm of topsoil, it should be considered a finite resource. The biological activity and health of the topsoil contributes significantly to the sequestering of atmospheric carbon in its own right but can also increase the amount of atmospheric carbon captured by plants.

Defra has produced a [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#) which details how soils can be managed on construction site.

Lancaster University in collaboration with Lancaster City Council and Cornwall Council have produced [Local Soils Model Policy and Guide, 2025](#) which provides model planning policies along with well researched justification for the inclusion of policies to protect top soils during construction.

Incorporating a policy to ensure top soils are protected on development sites could make a significant contribution to biodiversity and carbon sequestration into the future.

the development, with mitigation measures being put in place to ensure that development works do not have a harmful impact on existing trees.

- 8.49 To ensure that tree cover and habitat is retained, it is important that both the short term and long-term impacts that a development may have on trees is evaluated at the earliest opportunity.
- 8.50 Accordingly, the Council will require that Tree Surveys, Arboricultural Impact Assessment, Tree Protection Plan and Method Statement be undertaken by a suitably qualified professional in accordance with BS5837:2012.

ENV 05: Trees, Hedgerows and Development

The retention of existing trees and hedgerows along with the provision of new trees and hedgerows including street trees within a proposal will be supported.

The planting of appropriate native or appropriate new trees, hedgerows and woodland throughout Breckland will be encouraged.

Development that harms or requires the loss of a protected tree, hedgerow or woodland will only be permitted in exceptional circumstances, i.e. where the public benefit of the development would clearly outweigh the loss or deterioration of any tree, hedgerow or woodland. In such circumstances, adequate replacement provision, taking account of size, comparable biomass and suitable native or appropriate species for the location, will be required.

Harm or loss to any natural landscape feature will not be permitted unless a landscape strategy, which would compensate for the loss or harm, is secured or where the overriding benefits arising from the development outweighs the harm.

Where a proposed development retains existing trees and hedgerows on site, or where development occurs within a tree root protection area, provision must be made – in accordance with BS5837:2012 - for their care and protection throughout the duration of the development, with mitigation measures being put in place to ensure that development works do not have a harmful impact on existing trees.

Trees and Hedgerows

- 8.43 Trees and hedgerows form an essential part of Breckland's landscape character, enhancing the aesthetics of an area, the quality of the environment and providing a habitat for a range of wildlife. Roadside trees and hedges provide visual screening and can also help to reduce noise and prove beneficial in terms of atmospheric pollution and flood mitigation. These should be retained unless there is overriding reasons for their removal.
- 8.44 For the purposes of Policy ENV 05, 'trees' and 'hedgerows' covers any preserved trees, woodland, protected hedgerows, tree within conservation areas, ancient trees and woodland, ancient and veteran trees and any other trees of category A or B as per BS5837:2012. Whilst this does exclude category C trees, the policy does not by their absence, mean they can be removed and do not carry any weight in decision making.
- 8.45 Existing natural features, where possible, should be incorporated into the landscaping scheme, which should accompany all new development proposals. Any retained trees should be identified within the landscaping design and proposals made for their long-term maintenance. There may be exceptional instances where the loss of important natural features is unavoidable, for example to enable a scheme to fulfil important objectives such as economic development or the provision of strategic housing. Where the loss of such features is demonstrably and robustly evidenced as unavoidable, adequate replacement provision should be made, preferably by native British species, e.g. two trees to replace every one that is lost.
- 8.46 Hedgerow and tree surveys should accompany any development proposals where any trees and hedgerows are likely to be affected by a new development. Further guidance can be found in the Breckland Design Guide.
- 8.47 Where development is proposed within the potential root protection area of a tree or within the immediate proximity of a hedge, proposals must be accompanied by a full tree survey compliant with BS5837:2012.
- 8.48 Where a proposed development retains existing trees and hedgerows on site provision must be made for their care and protection throughout the duration of



Open Space.

Para 8.90 – Should this be the 2025 study rather than the 2015 study?

ENV 16: Existing Open Space.

Existing 'designated' open space is protected by this policy. 'Designated' open space is identified on a policy map, but at the time of writing no policy map has been identified as part of this, consultations.

Designated open space policy will be sourced before the meeting.

Outdoor Play and sport area

This section relates to new provision.

Para 8.95. This seems like a disappointing start to the policy. Surely priority of the Council should be to ensure that the deficit in outdoor playing space does not increase and that developers provide 40sqm of outdoor playing space per person [as per the policy].

There are options for developers to reduce the amount of provision in later paragraphs without this extra help.

The 0.8ha per 1000 figure is different to the figure for play in the policy ENV17 which states 0.55ha per 1000 people for play.

[the policy would be easier to read if the units were either ha/1000 people or sqm/person, rather than using both]

Para 8.96: This seems to contradict the policy which states that "all new residential development of 10 or more dwellings will be expected to provide a contribution towards outdoor playing space equivalent to 4.00 ha per 1000 population...."

The policy seems to be allowing developments of less than 25 dwellings to opt-out of onsite provision. It is not accepted that developments of less than 25 dwellings will not provide a meaningful amount of outdoor playing space. The play area below provides a meaningful equipped play area along with green space for active play and ball games, and would be delivered with a development of 11x 3 bedroom dwellings. The context of the development is important and whether there is sufficient playing space within reasonable walking distance of the development.



Comment – If there needs to be an option for developers to provide off-site contributions where there are exceptional circumstances, then there needs to be a clear and well understood mechanism for calculating off-site contributions such that there is not a financial advantage to providing off-site contributions as opposed to onsite provision, i.e. off-site contributions should include land values. Having a mechanism for calculating off-site contributions will provide certainty to developers.

Para 8.97 – The last sentence, which allows for a different split of open space types than is detailed in the policy, should be given more prominence in the policy as often it is the Parish/Town Council that better understands local needs.

ENV 17: New Open Space, Sport & Recreation Provision.

The first paragraph states that developments of 10 or more dwellings provides a contribution towards the equivalent of 40sqm of “outdoor playing space” per person.

Breckland are relying on their Open Space Assessment (2025) to support this policy. The problem with the assessment is that it did not include informal sports provision. Alongside the Open Space Assessment Breckland also commissioned a Playing Pitch Assessment which looked at formal sports pitches, neither assessment looked at informal sports provision. According to Fields in Trust, outdoor Sports can consist of pitches, courts, greens tracks, trails and sports equipment i.e. formal competition pitches as well as informal ‘knock about’ type areas.

The policy lists types of open space, of which only 5.5sqm is “outdoor playing space” and only developments of over 200 dwellings are required to provide an area for sports, to be incorporated into the “park/amenity space” which is 14sqm per person. Sport provision is omitted because sport was not part of the Open Space Assessment 2025.

In the existing policy ENV04, developers contribute 8sqm for children’s play and 17.6sqm for outdoor sports, totalling 25.5sqm of outdoor playing space. This new policy seems therefore to reduce the amount of outdoor playing space.

It is felt that the policy would provide better quality outdoor playing space if the following were adopted:

- 17.6sqm Outdoor Sports
- 8sqm of Playing space

- 14.4sqm of park/amenity space, natural green space or allotments

The total is still 40sqm per person, but this provides a clearer requirement which would also be more beneficial for children and young people.

The requirement for only developments of over 200 dwellings to provide a contribution towards sport, makes little sense. A ball wall, cycle track, MUGA, 5 a side goals, all provide meaningful opportunities for sporting activities and can be provided in relatively small areas.

Final paragraph of the policy: arrangements should be made to maintain the open space in perpetuity, and provide a 10 year maintenance contribution where it is to be adopted by the local authority.

Protecting soil: Include the provision that open spaces should be protected from compaction by plant and machinery during the construction phase. Open space soil should be well structured, aerated and well draining.

LAPs, LEAPs and NEAPs – It would be helpful if these were more clearly defined stipulating the number of play experiences required for each type. And that a LAP be set out for play and have play as its primary purpose. LAPs are often small grass areas which are unsuitable for play and uninviting for children to use for play. A clear definition would help.

Allotments.

It is unsure where the need for allotments has been identified. All of Breckland is Parished, Parish Councils have a duty to provide allotments and there are CPO powers and borrowing powers to provide allotments.

It seems odd that the threshold for providing outdoor sports is 200 dwellings but the threshold for providing allotments is 100 dwellings.

Using the figures in the policy; a development of 100 dwellings would deliver 625sqm of allotments. Once paths and access is taken out this, it would only deliver 2 x 10 rod plots, i.e. two families out of 100. These two plots will need to be fenced, have water, power and access – this does not seem like a very economic proposition, has it been factored into the viability assessment?

Part of the justification for providing allotments is to provide food security. If there ever becomes a situation where the country is reliant on people growing their own food for food security, the areas for sport can be cultivated.

By all means create an option of allotments to be provided as part of the over all 40sqm open space provision, but leave this to the respective parish council, as the allotment authority, to decide if this is something they require rather than make this a policy requirement.

ENV 15: Loss or Removal of Heritage Assets

Where a development proposal would result in the loss of the whole or part of a heritage asset (whether designated or not):

- (a) The development will not be approved without all reasonable steps being taken to make sure that the new development will proceed after the loss has occurred, including through the use of planning conditions and planning obligations to secure the development against the loss of the asset; and,
- (b) The applicant should record and advance understanding of the significance of the asset to be lost in a manner proportionate to its importance and the potential impact upon it; and should make this evidence (and any archive generated) publicly accessible by being deposited in the Norfolk Historic Environment Record, and any archives with a local museum or other public depository.

Development proposals to remove or alter a historic statue, plaque, memorial or monument (whether listed or not) will not be supported and the feature should be retained in situ wherever possible. In any exceptional circumstance where removal is deemed appropriate, the feature should be deposited with the Norfolk Historic Environment Record – unless an alternative location is first agreed with the Council – and be supported by an explanation of the feature's historic and social context.

Open Space

- 8.85 Open space is defined in the Town and Country Planning Act (TCPA) 1990 as “*land laid out as a public garden, or used for the purposes of public recreation, or land which is a disused burial ground*”. Allotments are also included under the definition of open space. Open space should be taken to mean all open space of public value, including not just land, but also areas of water such as rivers, canals, lakes and reservoirs which offer important opportunities for sport and recreation and can also act as a visual amenity.
- 8.86 The NPPF states that policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. Assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports, and

recreational facilities in the local area. Information gained from the assessments is then used to determine what open space, sports and recreational provision is required.

- 8.87 To support the plan, an audit of open space provision within Breckland District was undertaken in 2025. The Open Space Assessment (OSA) evaluated the quantity, quality and accessibility of open space and recreational land provision in the Breckland District and recommended standards and effective mechanisms for appropriate provision to be secured to meet future needs. The assessment found that over half (57%) of the assessed sites scored below their set threshold for quality within the district.
- 8.88 In terms of place space a total of 170 play locations were identified in Breckland with a total of 11ha of space in total. The study also showed that, when assessing overall playing space in the District against Fields in Trust (FIT) guidance of 0.55 ha per 1000 population, none of Breckland's market towns have a provision greater than the guidance.
- 8.89 The Accessible Natural Green Space Standard (ANGST) requires that sites of accessible green space, of at least 2ha in size, are available per 1,000 people, based on no one living more than 300m from the nearest area of natural green space. It also recommends that no one should live more than 2km from at least one accessible site of at least 20 ha; 5 km from at least one accessible site of at least 200 ha; and 10 km from at least one accessible site of 500 ha.
- 8.90 The Breckland Open Space, Sport, and Recreation Study 2015 also recommended that:
- (a) The standard found acceptable in the open space assessment of 4.00 ha of open space (0.55ha for children's play and 0.6ha for outdoor sport) per 1,000 population should be used as a local standard for open space provision; and,
 - (b) There should be a greater focus on provision of new facilities to address quantitative deficits.
- 8.91 All new children's play and outdoor sports areas should be designed with regard to FIT and Sport England standards, to ensure the highest quality of open space area is provided.



- 8.92 In terms of outdoor sports, all dwellings in major housing areas must be within 1.2km of outdoor sports areas as recommended by FIT. Outdoor sport areas should be located near to public transport routes, have good provision for car parking and have easy access for pedestrians and cycles.
- 8.93 In terms of children's play areas, all dwellings in housing areas should be within 100m of a local area for play (LAP), 400m of a local equipped area for play (LEAP) and within 1,000m of a neighbourhood equipped area for play (NEAP), as recommended by FIT.
- 8.94 Further guidance on Open Space Design is included within the Breckland Design Guide 2024.

ENV 16: Existing Open Space

Open space designations are identified on the Policies Map.

Development that would result in the loss of existing designated open space will only be permitted if:

- (a) It can be demonstrated (through a local assessment) that there is an excess of recreational or amenity open space in the settlement and the proposed loss would not result in a shortfall during the Plan period;
- (b) Recreational facilities within the open space will be enhanced by the proposed development on an appropriate portion of the open space; or,
- (c) The community would gain greater benefit from the development providing a suitable alternative recreational or amenity open space in an equally accessible and convenient location.

Outdoor Play and Sports Area

- 8.95 With residential development, priority should be given to the provision of children's play areas since the facility is most likely to be required within an easy reach of dwellings and will be required to conform to the 0.8ha per 1,000 people standard in provision of children's play area.



- 8.96 There is a presumption that for developments comprising of 25 dwellings or more, outdoor playing space will be provided within the development site. Where provided on site, the space should:
- (a) be justified as an appropriate type to serve the needs of the development;
 - (b) be well related to and accessible from the proposed residential properties; and,
 - (c) have due regard to the relevant standards below.
- 8.97 However, it is recognised that there may be cases where the direct provision of outdoor playing space or sports areas on site is not the preferred option. It may be that on-site provision does not represent an efficient use of land in the context of the site location or that there is a deliverable opportunity to secure a more meaningful area that better serves the whole community in close proximity to the application site. It may also be the case in some instances that local need indicates a different split of open space types should be pursued / agreed than that set out in Policy ENV 17.
- 8.98 Contributions in lieu of on-site provision for sites of 25 or more dwellings will be the exception and will need to be supported by robust evidence from the applicant that on site provision is not appropriate and/or viable.
- 8.99 For sites of less than 25 dwellings, on site provision will be preferable, but may not be appropriate in all cases and proportionate evidence will be required from the applicant to demonstrate that on site provision is not appropriate. Any contribution will need to be towards a specific deliverable scheme in consultation with the relevant Parish Council and the developer contributions policy in this document. It will be secured through a Section 106 agreement.
- 8.100 Where it is not possible to accommodate onsite, negotiations will occur on a site-by-site basis to determine specific provision and financial contributions (both for delivery and on-going maintenance).
- 8.101 Where it can be established through an up-to-date Open Space Assessment that a proposal is located in a Parish assessed to have sufficient play space, provision for other forms of open space which will be informed by the findings of the Open Space Assessment (OSA) would be considered as potential to mitigate the specific impacts arising from the proposal.



8.102 In terms of calculating the occupancy levels that relate to Policies ENV 17 and ENV 18 the following levels should be used:

- (a) One Bedroom homes – 1.5 persons.
- (b) Two Bedroom homes – 2.0 persons.
- (c) Three Bedrooms homes – 2.5 persons.
- (d) Four Bedrooms homes – 3.0 persons.
- (e) Five Bedrooms homes – 3.5 or more persons.

ENV 17: New Open Space, Sport & Recreation Provision

All new residential development of 10 or more dwellings will be expected to provide a contribution towards outdoor playing space equivalent to 4.00 hectares per 1,000 population, which equates to 40m² of outdoor playing space per person.

As set out in the Open Space Assessment (2025), this 40m² is broken down to 14m² of park / amenity space, 18m² of natural space, 2.5m² of allotments and 5.5m² of children's play space. The Council will use an 'open space calculator' from its' Open Space Assessment as the minimum starting point for new open space provision.

The Open Space Assessment (2025) demonstrates the minimum expected requirements for children's play areas, based on the number of dwellings proposed for all residential developments of 25 dwellings or more.

Number of Dwellings	Minimum Requirement
25 Dwellings to 49 dwellings	Minimum of 1 Local Area for Play (LAP)
50 Dwellings and above	Minimum of 2 LAPs
And	
80 Dwellings to 199 dwellings	Minimum of 1 Local Equipped Area for Play (LEAP)
200 Dwellings and above	Minimum of 2 LEAPs
And	
400 Dwellings and above	Minimum of 1 Neighbourhood Equipped Area for Play (NEAP)

All developments of 200 or more dwellings should provide an area of outdoor sports provision within the park / amenity area(s) provided on site.

In addition to any on site provision or contributions towards off site provision, the proposal must set out an appropriate land management approach which will ensure maintenance of the space for at least the first ten years. This is likely to be secured via a legal agreement.

Allotments

8.103 In order to improve food security and sustainability within Breckland, major developments of 100 dwellings or more will be required to set aside an area of land for new allotment use. Allotments improve the well-being and quality of life of communities by providing a cheap source of good food, healthy outdoor exercise and social interaction, and enhance the biodiversity and green infrastructure in an area. They can benefit all groups, from those on limited income to those who are financially secure but take pleasure in growing their own food. By providing economic, social and environmental benefits allotments contribute towards the three core principles of sustainable development. Allotments play an important role in providing areas of green space within urban environments.

8.104 The Open Space assessment found that the District holds 52 ha. of allotment land across 49 sites. Many of the allotment sites have waiting lists, demonstrating that there is a shortfall of provision. There are no new allotments directly proposed within the Plan, but Policy ENV 18 seeks to secure the provision of allotment land on large housing allocations, where there is an identified need, to meet demand from the occupiers of new developments.

ENV 18: Provision of Allotments

Provision of land on site for use as allotment plots will be required on all developments of 100 or more dwellings at a minimum of 0.25 hectares per 1000 population generated. Prior to the land being made available, an agreement shall be reached as to the party responsible for the adoption and ongoing management of the allotment,



whether it be a town/parish Council, or management company responsible for the open space on the development.

Land for allotments must:

- (a) Have power and water made available to the edge of the site;
- (b) Have appropriate vehicular access available to the edge of the site;
- (c) Have aerated soil that has not been compacted by plant machinery; and,
- (d) Have appropriate boundary fencing / gates installed.

Local Green Space

8.105 The NPPF introduced a new designation of 'Local Green Space' as a way to provide special protection against development for green areas of particular importance to local communities. The NPPF outlines that, once designated, development on Local Green Space should only be considered appropriate in very special circumstances. Paragraph 107 of the NPPF states that the designation should only be used where the green space is:

- "(a) in reasonably close proximity to the community it serves;*
- (b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- (c) local in character and is not an extensive tract of land."*

8.106 While Local Green Space designation places strict limitations on development similar to Green Belt policies, the Council recognises that it must be managed carefully regarding the operational needs of statutory undertakers. These bodies are often exempt from standard planning restrictions when exercising permitted development rights to maintain or install infrastructure.

8.107 Breckland District Council supports Parish and Town Councils in identifying Local Green Spaces in their Neighbourhood Plans. The Policies Maps will be updated in recognition of any Local Green Spaces designated in made Neighbourhood Plans.

8.108 In addition, as part of this Plan making process, a number of responses were received seeking designation of land as Local Green Space. From these submissions



Houses of Multiple Occupation and Sub-division of Dwellings.

Para 5.135 - Summarises the issues very well, however this is not only related to multiple occupation and subdivision of dwellings, it also relates to the conversion of retail and commercial premises into dwellings.

It is not only HMOs which have the potential to negatively impact an area, it also applies where there is an over concentration of single bed accommodation.

If this policy related to single bed accommodation as well as HMOs it would better protect town centres and residential areas.

It would be beneficial if the policy were supported by a study looking at changes in subdivisions and conversions over the last (say) 10 years, particularly town centre properties.

Criteria (b) in the policy is a good start; however 10% of properties within a 50m radius may not resolve the issue the policy trying to address. The issue with single bed accommodation and HMOs is not the properties it's the number of people who live in the properties. How the policy as written, there could be 30 properties in a 50m radius, 27 of which are family homes and 3 are HMOs/or properties made up of 1 bed flats. The latter could contain 40 beds each i.e. 120 people. It would better address the problems identified, if the limits on HMOs/single bed flats is based on number of beds within a given radius, say no more that 10% of beds in a 50m radius are HMOs or properties compiling of single bed accommodation.

- (a) Physical constraints, such as those associated with small sites of less than five houses and conversion schemes, where opportunities for a range of different house types are limited;
- (b) Locational issues, such as highly accessible sites within or close to a town centre where larger homes and low/ medium densities may not be appropriate;
- (c) Sites with severe development constraints where housing mix may impact on viability;
- (d) Sites where particular house types and/ or building forms may be required in order to sustain or enhance the setting of a heritage asset;
- (e) Sites where particular house types and/ or building forms may be required in order to prevent landscape harm;
- (f) Developments in Parish or neighbourhood plan areas, where there is an up-to-date local housing needs assessment which provides a more appropriate indication of housing need; and
- (g) Developments which provide specialist accommodation as proposed under relevant policies in this Plan.

The mix of housing should take account of the prevailing character of the area by providing for a form of development which is complimentary to the local area.

Multiple Occupation and Sub-Division of Dwellings

5.135 Breckland's population has grown considerably in recent decades including increases in seasonal migrant workers. It is important that the housing needs generated by these people are met, with shared accommodation often being a preferred choice for many, for a variety of reasons. Whilst such accommodation does meet a particular housing need, it can cause difficulties where there is a high concentration in a particular area. Problems mainly occur where there is a concentration of dwellings with a rapid turnover of residents or a concentration of converted dwellings in an established residential area causing issues such as an increase in parking pressures, an increase in anti-social behaviour and crime levels and creating an imbalance in the neighbourhood. These problems are particularly acute in densely populated areas and where properties share party walls. The rental

yields that can be realised on shared accommodation can also put pressure on the ability of individual families or households to compete in the local housing market.

5.136 Houses in multiple occupation (HMO's) are an element of the housing supply that provides first time, student, temporary and sometimes long-term accommodation.

5.137 The Council acknowledges that Houses in Multiple Occupation can provide good quality, affordable accommodation but with the cost-of-living crisis and rising prices comes increased homelessness and a growing demand for low-cost housing. However, the impact of poorly managed HMO's falls on the residents in those properties, those neighbouring them, and can be quite significant involving Council and police services increasing their resources to deal with the resulting reports of poor accommodation, unsupported needs of resident placements, and waste management.

5.138 Under current planning legislation, HMOs are divided into two Use Classes, which are often referred to as 'Small' and 'Large' HMOs:

- (a) Small HMOs are houses or flats occupied by between 3 and 6 unrelated individuals who share basic amenities such as a kitchen or bathroom. These are classified as a 'C4' use within the Use Classes Order; and,
- (b) Large HMOs comprise houses or flats occupied by more than 6 unrelated individuals who share basic amenities such as a kitchen or bathroom. These are classified as Sui Generis (a use that does not fall into any use class).

5.139 Currently, single family dwellings, defined within use class C3, can change to a C4 use (a 'small' HMO) without the need for planning permission under permitted development rights. Similarly, a C4 HMO can be converted to a C3 dwelling at any time under permitted development rights. Whereas the conversion of any use other than C3 to a C4 HMO use (or the new-build development of a C4 HMO) does require planning permission. The conversion (or new build) of any property to create a Sui Generis "large" HMO requires planning permission in all cases.

5.140 Where appropriate and justified by evidence, the Council can adopt an Article 4 Direction to remove the permitted development rights that enable a C3 dwelling to be converted to a C4 "small" HMO. This would require such conversions to first apply for planning permission for the change of use. Breckland has not introduced a Direction but will keep this under review.



- 5.141 Extensive concentrations of HMO development can result in amenity issues and change the character of an area. Amenity and local character have a significant impact in on the way in which people live and experience spaces. It is important that HMO development does not result in the loss of, or impact on the character or amenity to the area as a consequence of increased traffic, noise or general disturbance. Factors which may be considered in terms of assessing amenity include privacy levels, overbearing effects, natural light and outlook, environmental effects and design. The local character of a place should help people understand a place through reinforcing its historic legacy and links to the natural and built environment. Development should therefore be sympathetically designed to the existing local character.
- 5.142 It is considered that a concentration of HMOs which would result in 10% or more of properties within a 50m radius (measured from the centre of the application site), could impact on the character of an area. As such, applications for HMOs should include an assessment of the existing concentration as per the criteria listed in the policy and provide this as part of their planning application. The Council will utilise GIS and other desktop assessment tools in assessing the information provided.
- 5.143 The 5 town centres in Breckland are highly accessible and sustainable locations which are suited to HMOs, particularly for students and young adults. However, it is important that HMO development is carefully managed in this location to ensure the viability and vitality of Town Centres, protect their unique character and maintain their core retail and leisure function. As such, applications for HMOs in these locations will also be considered in line with the criteria listed within the policy. The Council will also not support proposals for the development of HMOs that would occupy ground floor uses within the defined town centre boundaries. The Town Centre boundaries are defined on the Policies Map.
- 5.144 Any applications for HMOs must ensure that the proposed development is of a high standard and complies with the relevant design and amenity standards as set out in the Housing Act (2004), and any existing or future Policy 17, and any existing or future HMO standards developed by the Council.
- 5.145 In addition, HMOs should be sustainably located, with public transport, local services and facilities, accessible to the development by active travel. Further



information for developers and landlords of HMOs regarding development and living quality and HMO regulations is available on the Council's website

- 5.146 By requiring all planning applications for new HMOs to provide a Statement of Community Engagement and Impact Assessment, this will ensure that issues of community cohesion, integration and concerns relating to the perceived negative impacts of HMOs can be addressed and discussed with the community at an early stage. This assessment should be appropriate and proportionate to the size of the proposed development

HOU 17: Housing in Multiple Occupation

Houses in Multiple Occupation (HMOs) will be supported where the proposed development:

- (a) Does not result in the loss of, or impact on the character or amenity to the area as a consequence of increased traffic, noise or general disturbance;
- (b) Does not result in an undue concentration of HMO provision in any particular area of the District. Permission may not be granted where the proportion of HMOs (either C4 or Sui Generis) will result in HMOs representing 10% or more of properties within a 50m radius measured from the centre of the application site. The Council will also not support proposals for the development of HMOs that would occupy ground floor uses within the defined town centre boundaries.
- (c) Ensures that no two adjacent properties apart from those that are separated by a road are converted to HMOs; and
- (d) Complies with the relevant design and amenity standards as set out in the Housing Act (2004), and any existing or future HMO standards or guidance developed by the Council.

The Council will make a decision on HMO applications on a case-by-case basis and considering the factors listed above. For the development of a HMO that requires a license, the applicant should meet the Council's licensing requirements. Applications for all HMOs are required to provide a Statement of Community Engagement and Impact Assessment.

- 5.147 The sub-division of existing residential properties can improve sustainability by helping re-balance the housing stock, particularly in the countryside where there can be a shortage of smaller dwellings. Overall, whilst there is general policy of restraint in the countryside, it is recognised that sub-divisions can enable rural communities to be adaptable and more resilient to changing economic and demographic needs. In rural areas there are fewer properties available and this can make it difficult for residents to find suitable property in their local area to accommodate their changing needs. For example, if they wish to downsize, and/or accommodate the needs of other family members, sub-division is an option that avoids them having to leave the local community and its social support network.
- 5.148 For the purposes of applying the policy it cannot be presumed that all dwellings will be suitable for sub-division. It is important that all dwellings created through the sub-division of an existing dwelling should provide adequate accommodation and not compromise living standards especially where smaller units are provided. Successful sub-divisions depend on having a clear understanding of the capacity of the dwelling for change and the standard of accommodation that can be created. In this context, residential annexes permitted under Policy HOU17 are not regarded as suitable for sub-division as independent planning units.
- 5.149 It is also important that changes are capable of being accommodated into the existing landscape, without undermining or having an adverse impact on the rural character of the area, either individually or cumulatively. This will include consideration of any new access arrangements. New separate gardens with the potential for the introduction of domestic paraphernalia can also have a considerable visual impact on the local character of a rural area.
- 5.150 When considering accessible locations, significant intensification of residential uses through the creation of a large number of dwelling units, either individually or cumulatively, will be avoided within areas which lack sufficient supporting infrastructure, facilities or services or where opportunities to access them by public transport, cycling and walking are limited.



HOU 18: Sub-Division of Existing Dwellings

The sub-division of an existing dwelling of permanent construction into two or more residential units will be supported providing that the following criteria are satisfied:

- (a) It is not subject to a condition restricting its use to ancillary accommodation;
- (b) It is appropriate to the site, locality and surrounding area in terms of land use, design, size and scale;
- (c) It would not require significant extensions, including alterations and outbuildings, which would have a detrimental impact on the character and appearance of the original building or surrounding area;
- (d) Any internal or external changes do not harm the significance of a designated or non-designated heritage asset or its setting
- (e) The internal accommodation is adequate in terms of size and layout relative to the intensity of occupation envisaged and complies with residential space standards;
- (f) It does not have an adverse impact on any neighbouring residential or other uses, including in terms of privacy, outlook, daylight and sunlight and
- (g) Following sub-division, sufficient space is available for vehicular access, car parking, amenity space and facilities for refuse storage on-site in a way that does not detract from the character and appearance of the site and the area; and,
- (h) It does not have an adverse impact on the character and local distinctiveness of the rural area and its setting within the wider landscape.

Particular regard will also be had to the accessibility of the new development based around the site's location and its relationship to the Parish hierarchy including its accessibility to shops, services and facilities.



Community Facilities

Para 10.20 refers to village halls and rural shops; then in 10.21 it refers to local shops and meeting places. The loss of local services will impact any community, but in slightly different ways. Within the market towns, people are less likely to own a car. People are more likely to move to market towns to be close to services as they become older or develop disabilities.

The supporting text to the policy should be re-worded so that it refers equally to towns and rural villages or does not specify either as it is in the NPPF.

In the event that a development proposal would restrict how an existing business could operate then that development will be refused unless it can be redesigned in a manner that doesn't threaten the existing businesses operation.

Community facilities

10.20 The Local Plan aims to support thriving urban and rural communities whilst protecting the intrinsic character and beauty of the countryside. Whilst the delivery of new development - in particular housing - will be directed to the most sustainable locations in line with the development strategy. There is a need to support the parish hierarchy, rural economy and sustainable communities through the retention and development of local services and community facilities, such as village halls, schools, rural shops, and public houses.

10.21 For the purposes of this policy, community facilities are defined as:

- (a) Local shops
- (b) Meeting places
- (c) Indoor and outdoor sports venues
- (d) Recreation / play areas
- (e) Cultural buildings
- (f) EV charging/petrol filling stations
- (g) Public houses
- (h) Post Offices
- (i) Schools / Nurseries
- (j) Doctors / Dentists; and,
- (k) Places of worship.

10.22 The retention of these, and the provision of new facilities at an appropriate scale to the settlement, will be supported.

10.23 The NPPF supports economic growth in rural areas, to create jobs and prosperity, by taking a positive approach to sustainable new development.



- 10.24 It is recognised community facilities perform a valuable role in providing for daily needs in local communities across Breckland, not only by reducing the need to travel for convenience goods shopping but by helping to maintain a sense of place and uniqueness for Breckland's rural communities. The loss of a valued local community facility or service can significantly reduce a community's ability to meet its day to day needs and have an adverse impact on the wellbeing and social interaction of that community.
- 10.25 The strategic economic policy direction regarding the retail hierarchy seeks to maintain and support provision in smaller villages serving more localised rural needs by retaining essential facilities, in particular where they are the only such facility within a village. Local retail provision will be supported at a scale proportionate to the existing size and catchment but not to a level which would undermine similar provision in neighbouring villages.
- 10.26 Proposals which would result in the loss of a community facility must demonstrate that efforts have been made to retain the facility and that opportunities for conversion to alternative community uses have also been explored.
- 10.27 Supporting information should typically include:
- (a) Marketing information such as the length of time for sale and the asking price;
 - (b) Details of the level of interest generated and any offers received;
 - (c) Consultation with, and level of interest from, the local community / service providers on a possible alternative community use; and,
 - (d) Whether there is scope for the multi-use of buildings or innovative ways of combining a range of services and facilities on one site.
- 10.28 In addition, under the Localism Act 2011, local communities can propose to add facility to the local register as an Asset of Community Value.
- 10.29 Neighbourhood Plans are also well placed to highlight the valuable role of local centres and community facilities and can identify deficiencies in the provision of community facilities and help to safeguard existing ones.

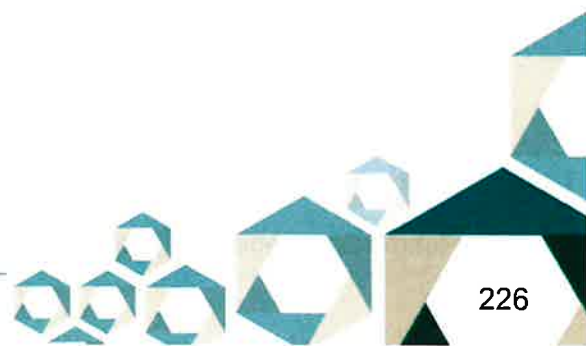


COM 04: Protecting and Enhancing Community Facilities

The creation, enhancement and expansion of community facilities will be supported where this would enhance the existing offer, benefit the local economy and be of a suitable scale and type for the location it will serve.

Proposals, including changes of use which result in the loss of local community buildings / facilities (including those most recently used for this purpose but where the use has ceased), will not be permitted unless:

- (a) it can be demonstrated that there is no local need for the facility;
- (b) that its continuing function is no longer viable following appropriate marketing for a period of at least 12 months; or,
- (c) an equivalent facility in terms of quality is provided to serve the same community in as accessible a location.



11. Infrastructure

Transport

11.1 This section sets out the Council's approach to managing car travel and its impacts on the local economy, the environment, and communities. Norfolk's fourth Local Transport Plan, sets out a range of objectives for transport and accessibility, by 2036, focused upon:

- (a) Embracing the future – maximising use of new technology;
- (b) Delivering a sustainable Norfolk – seeking to ensure new development is beneficial to Norfolk's society, environment, and economy;
- (c) Enhancing connectivity – making it as easy as possible for residents and businesses to travel from A to B in Norfolk;
- (d) Enhancing Norfolk's quality of life – Encouraging active travel to
- (e) Improve residents' health and working towards zero carbon;
- (f) Increasing accessibility – ensuring everyone has access to the facilities and services they require;
- (g) Improving transport safety – to create a network which encourages safe usage of our roads and to protect vulnerable transport users; and,
- (h) A Well Managed and Maintained Transport Network – apply new and innovative technology where it will be most effective.

11.2 The District's economy relies on high levels of out commuting and commuting to and from the District's Market Towns. This puts pressure on the road network during peak periods. 2021 census data showed over 10,000 residents travel 10-20km to their place of employment and 60% of journeys to work are undertaken by car or van. In addition, within Breckland, services such as health and education tend to also be sited within Market Towns and other key settlements. This means that significant numbers of people must travel relatively long distances to access everyday facilities, often with the added challenge of the quality and availability of public transport.

11.3 Two strategic vehicular routes run through the District. These two routes are recognised as core corridors for the East region by the Sub-Regional Transport Body as set out in the Transport East Strategy. The A11 dual carriageway connects



Green Infrastructure

Breckland Council has completed a Green Infrastructure study, but it is disappointing that Dereham was not included in that Study. While Dereham is not set to see the growth that other locations will see, there is still important habitats which require the connectivity between them, and to the wider countryside, to be maintained and enhanced.

A green Infrastructure Study for Dereham should form part of the local plan with a policy map identifying habitats and corridors which need protecting and enhancing. This is especially true with regards to the exception site policy which could permit up to 200 dwellings on the edge of Dereham.

With regards to the policy ENV02

It is unclear as to how this relates to ENV17 – Is this in addition, to ENV17? What is a 'dedicated dogs off leads area'? is it an area fenced off for just dogs? If it is an area for dogs, which cannot be controlled under normal circumstances, then can it be considered public open space within the meaning of the Open Spaces Act 1906 where general public do not have unrestricted access?

If an area is dedicated and signed as a 'dogs off leads area' it will need to ensure that it is safe for all dogs to be off a lead. Will it be for dogs with a poor recall, but generally friendly; dogs that are aggressive to other dogs; dogs that are aggressive to people? Would it be one household at a time? Who will clear up after the dogs? As things stand all open space can be a dogs off lead area, provided the dog can be kept under control. A nice idea but has not been thought through.

Wildfires

Consideration should be given to wildfires and ensuring there is a sufficient 'low fuel' buffer between any natural/semi-natural habitat/arable cropping areas and residential properties. Farmers are under no legal obligation to take reasonable precautions to prevent the spread of any fire, such precautions therefore need to be incorporated in the design of properties. Adapting to climate change should also include consideration of wildfires in addition to flooding.

Passivhaus principles and methods are encouraged where these integrate with the overall design and do not lead to potential overheating.

The use of water saving appliances and fixtures, along with systems which improve wastewater quality leaving the development, are encouraged in Breckland.

Green Infrastructure

- 8.21 The NPPF requires Local Authorities to plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. Green Infrastructure is the network of multi-functional green space, both urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. For the avoidance of doubt, the term Green Infrastructure (GI) also includes blue infrastructure, i.e. water bodies such as river corridors.
- 8.22 Green infrastructure performs many functions in meeting both social and environmental goals such as encouraging active, healthy lifestyles and helping Breckland to be resilient to more frequent occurrences of extreme weather events resulting from climate change.
- 8.23 As a predominantly rural District, Breckland has a vast Green Infrastructure network, stretching from the protected European sites, through hedgerows, chalk river streams, wetlands, trees, across farmlands, gardens and local parks.
- 8.24 The Council recognises the importance of good quality Green Infrastructure and, in partnership with other Norfolk local authorities, prepared the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy 2020 (GIRAMS). The Action Plan for the Strategy can be accessed at: [Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan](#).
- 8.25 The role of Natural England's Green Infrastructure Framework, launched in January 2023, will also be taken into consideration to inform approaches to further evidence development regarding GI in Breckland and the principles and standards to be applied to development.
- 8.26 New developments will be expected to provide opportunities to incorporate Green Infrastructure and enhance existing connectivity, recognising the intrinsic value of

the Green Infrastructure network and ensuring that the functionality of the network is not undermined as a result of development.

- 8.27 Policy ENV 02 supports the overarching aim for Green Infrastructure in Breckland to provide an integrated, multifunctional and resilient network of natural and semi-natural green spaces, which support Breckland's communities for the benefit of present and future generations.
- 8.28 The Norfolk GIRAMS study identified strategic opportunity areas for Green Infrastructure, including a River catchment restoration programme at the River Nar near Swaffham, The Wendling Beck Nature Recovery Project near Dereham and an ecological park at Lynford in Thetford Forest. Further GI improvement initiatives have come forward with the Thetford Forest Open Habitat Project, creating a network of biodiversity corridors based on the Breckland Biodiversity Audit by UEA, 2023, The Brecks Fen Edge & Rivers Landscape Partnership, working on restoring habitats along waterways, including riparian buffers and improving chalk rivers and the River Wensum Catchment Partnership, which aims to improve water quality and biodiversity within the Wensum.
- 8.29 The Norfolk Local Nature Recovery Strategy (LNRS) was adopted in 2025. It is a county-wide plan to restore and enhance habitats, connect wildlife areas, and support biodiversity in Norfolk. It can be accessed at: [Local Nature Recovery Strategy \(Norfolk\)](#).
- 8.30 There are also opportunities to improve connectivity to green areas within new development schemes. By identifying green areas in the vicinity of a development site, it is possible to consider the possibility of improving connections early on in the design process. An example could be the provision of foot paths and cycle ways through the site, connecting existing publicly accessible green spaces, or by creating small wildlife corridors such as connecting a public green to a pond or to a hedgerow and fields beyond at the boundary of a site. Guidance on these types of improvements can be found in the Breckland Design Guide.

ENV 02: Green Infrastructure

Green Infrastructure (GI) is an essential component of sustainable, healthy, attractive and climate-resilient places. Development proposals should protect, enhance and expand on the integrity, connectivity and multi-functionality of the District's GI network, as shown on the Policies Map and described in the Breckland Green Infrastructure Study.

GI must be considered at the earliest stages of the design process and form a core part of place-making strategies within all schemes.

New development should provide environmental net gains in terms of both green infrastructure and biodiversity. Proposals should demonstrate how the development would contribute towards new green infrastructure opportunities or enhance the existing green infrastructure network as part of the development. All proposals must be informed by the Breckland Design Guide, the GI Study, the guidance set out in Natural England's Green Infrastructure Framework and Standards, the Norfolk Local Nature Recovery Strategy (LNRS), the Norfolk GIRAMS (Green Infrastructure Recreation Avoidance Mitigation Scheme), relevant Neighbourhood Plans, and other relevant adopted strategies.

All new development falls within the Zone of Influence (Zoi) for multiple European designated sites identified in the Norfolk GIRAMS. It is anticipated that certain types of development are 'likely to have a significant effect' on the sensitive interest features of these European Sites due to increased recreational pressure. To mitigate this impact, a financial contribution to the Norfolk GIRAMS will be required for all qualifying development, and this must be assessed within a project-level Habitats Regulations Assessment.

For larger developments, or those close to designated sites, a financial contribution to GIRAMS alone may not be sufficient to mitigate for the recreational disturbance impacts from the proposal; in these instances, additional well-designed green infrastructure / open space of sufficient quantity and quality may also be required.

Development that results in the loss, fragmentation or deterioration of the GI network will only be supported where the public benefits clearly outweigh the harm or where

better provision is secured that aligns with the strategic needs of the wider network, as identified in the Breckland GI study.

Development which harms irreplaceable habitats (e.g. ancient woodland or chalk streams) will not be permitted unless there are wholly exceptional reasons and a suitable compensatory strategy is agreed that is in line with the Norfolk LNRS.

Significant development will not be permitted within 8 metres of a main river.

All major development proposals must demonstrate how they respond to the site's wider context, including:

- (a) Strategic and local GI linkages and nature recovery networks (as shown on the Norfolk Local Nature Recovery Strategy Local Habitats Map);
- (b) Landscape character (guided by the Breckland Landscape and Settlement Character Assessment 2023) and any distinctive local features;
- (c) Public Rights of Way, active travel routes, and existing open spaces; and,
- (d) Blue corridors (rivers, floodplains, wetlands) and opportunities for natural flood management and water quality improvements.

Development must provide GI on-site, unless clearly justified otherwise. This may include:

- (e) Green and blue corridors;
- (f) Public open space and play areas;
- (g) Recreational and active travel routes;
- (h) Increased canopy cover, where this does not conflict with the needs of the nature recovery network;
- (i) Natural SuDs features such as swales, basins, and rain gardens;
- (j) Food growing opportunities, including not only allotments but collective settings like community gardens and orchards; and / or,
- (k) Interpretative features or other elements that help to promote understanding of the GI network and help people connect with the natural environment.

On-site GI should be designed to provide multifunctional, attractive spaces of sufficient size to reduce frequent visits to designated sites and nearby greenspaces that may be close to capacity. For such larger developments, minimum provisions should include

- (l) High-quality, informal, semi-natural areas;
- (m) Circular dog-walking routes within the site and/or links to surrounding public rights of way;
- (n) Dedicated 'dogs-off-lead' areas • Signage and information leaflets to promote these areas for recreation; and,
- (o) Dog waste bins.

Major applications must be accompanied by a Green Infrastructure Plan - either standalone or incorporated within a Design and Access statement - that clearly demonstrates how the proposal will:

- p) Support the delivery of the vision and strategic objectives set out in the Breckland GI Study;
- q) Address identified gaps in provision and inequalities in access to GI (with reference to the Breckland GI study);
- r) Reflect the priorities and spatially specific actions set out in the Norfolk Local Nature Recovery Strategy (LNRS);
- s) Contribute to achieving the objectives of the Water Framework Directive (WFD) and the Anglian River Basin Management Plan (RBMP); and,
- t) Secure 30-year stewardship arrangements for all GI assets and provide evidence of funding mechanisms or endowment, where appropriate.

Biodiversity Net Gain

8.31 The Environment Act 2021 mandates a minimum 10 percent Biodiversity Net Gain (BNG) for all development, with very few exceptions. Biodiversity Net Gain is a legislative requirement, with the detail of how it is implemented set out in Regulations. BNG is calculated using the statutory metric and a BNG Plan is required that sets out how BNG will be delivered by the development. The metric



calculations under the regulations should be submitted at the planning application stage.

- 8.32 BNG is a way to contribute to the recovery of nature while developing land. It is making sure that habitat for wildlife is in a better state than it was before development. The delivery of biodiversity net gain and ecological enhancement through development, which provides more than the mandatory 10% requirement, will be favourably considered.
- 8.33 The application of the mitigation hierarchy (avoiding impacts before mitigating and as a last resort compensating impacts) should be demonstrated. The requirement to deliver biodiversity net gain (BNG) on-site will strengthen habitat avoidance on development sites.
- 8.34 The requirement for development to demonstrate BNG does not replace or diminish existing protections for habitats and species which remain in place and continue to be material considerations when determining planning applications.

ENV 03: Biodiversity Net Gain

Developments which provide significantly more than the statutory 10% Biodiversity Net Gain requirement will benefit from additional positive weight when material considerations are factored into the planning balance.

Provision in excess of the 10% will be actively encouraged wherever possible.

Protection and enhancement of the landscape

- 8.35 Breckland includes extensive tracts of the nationally and regionally significant Brecks heaths and woodland in the south and west of Breckland. The importance of these areas has been recognised in The Norfolk and Suffolk Brecks Landscape Character Assessment (2013).
- 8.36 Breckland is generally characterised by river valleys, with their associated tributary farmland rising up to the clay plateau farmland, which stretches from the Lophams in the south-east to Colkirk in the north-west. Breckland's Landscape character has been described in the Breckland Landscape Character Assessment 2007, the



In a Nutshell: The Breckland Green and Blue Infrastructure Study



Introduction

Breckland's "Commitment to a Greener Future" in the Council's Corporate Plan 2024-8 sets out a clear ambition to protect and enhance the district's distinctive landscapes, habitats and communities. Achieving this means not just conserving what exists, but planning and investing in a joined-up green and blue infrastructure network that supports nature recovery, climate resilience, health and wellbeing, and local character.

This Green and Blue Infrastructure (GBI) Study provides the evidence and framework to deliver that vision - mapping Breckland's natural assets, identifying key opportunities and needs, and showing how new development can help create a stronger, more connected network. It also highlights the partnerships, policies and funding needed to turn ambition into action.

What is GBI?



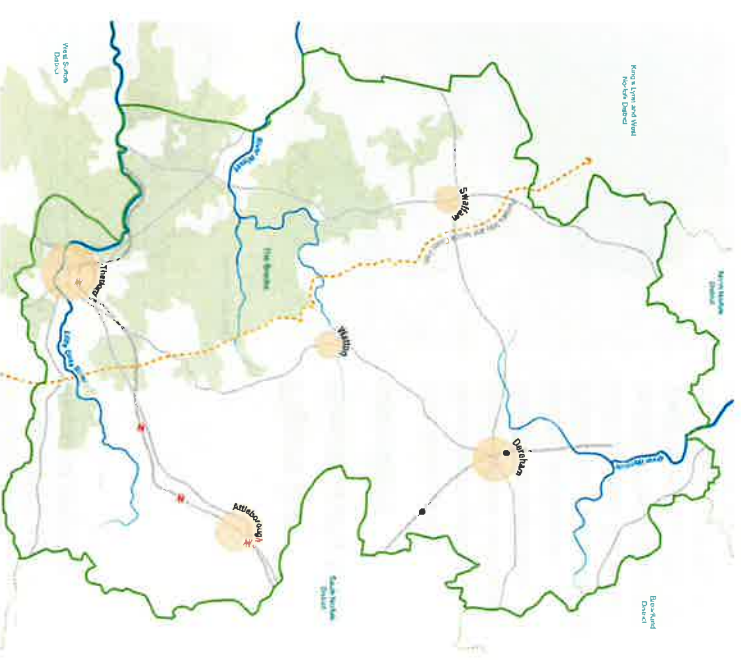
GBI is the network of natural and semi-natural spaces - from parks, woodlands, meadows and street trees to rivers, canals, wetlands and sustainable drainage features - that connect landscapes, people and places. Planned as a network, these elements deliver multiple benefits at once: they support wildlife, make walking and cycling easier and more pleasant, help manage water and urban heat and enhance the distinctiveness and vitality of towns and villages.

This study sets out the importance of viewing GBI as essential infrastructure – just as essential as other types. By investing in it strategically, Breckland District can recover nature, strengthen communities, grow its visitor economy and achieve climate resilience.

Why does Breckland need a GBI Study?

Breckland is a rural district of wide skies, heathland, farmland and chalk rivers - landscapes of exceptional ecological value but also vulnerability. The district faces major environmental challenges, including climate change, water scarcity, fragmented habitats, recreational pressures, and the need to accommodate significant growth through the emerging Local Plan (2024–2042).

This study provides the evidence base to ensure that new development strengthens rather than fragments Breckland's GBI network, identifying where investment will deliver the greatest benefits for people, nature and place, and supporting the Council's Commitment to a Greener Future.



A Vision for the Future of Breckland's GBI network

"Through the planning process and in collaboration with partners, Breckland Council will shape a connected, resilient, and inclusive green and blue infrastructure network. The network will protect and enhance Breckland's rich natural heritage and protected sites, support healthy and thriving communities and market towns, strengthen climate resilience and celebrate the District's unique landscape identity - ensuring benefits for people of all ages and background, local economies and nature for generations to come."

How is Breckland's GBI network performing today?

The GBI "themes" used for this study draw on the Benefit Principles set out in the [Natural England GBI Framework](#) - which outlines best practice for green and blue infrastructure planning across England. They help to draw out the multiple 'functions' which GBI assets play in the District:



Nature-rich Breckland

Only 5% of the district's Sites of Special Scientific Interest are in favourable condition and habitats are fragmented by intensive agriculture. GBI has a vital role in connecting and buffering designated sites, reducing recreational pressure and supporting the Norfolk Local Nature Recovery Strategy.



Active and Healthy Breckland

Access to quality green space is uneven - particularly in rural areas and around market towns such as Watton and Swaffham. Better-connected parks, woodland walks and active travel routes can deliver major health and wellbeing benefits for all ages.



Thriving and Prosperous Breckland

Market towns are facing changing retail patterns and a need for stronger local identity. Well-designed GBI - from tree-lined streets and squares to green walking routes - can drive regeneration, attract visitors and boost the local economy.



Understanding and Managing Breckland's Water Environment

Breckland's chalk rivers are globally rare and under severe pressure from nutrient pollution, modification and water scarcity. River corridor restoration and sustainable drainage will be critical to protecting these assets and mitigating flood and drought.



A Resilient and Climate-Positive Breckland

Expanding woodland and tree cover, reconnecting wetlands and designing climate-adapted green spaces will help Breckland to cope with hotter, drier summers and more intense rainfall - while strengthening its carbon sink, particular and build resilience to climate risks.

See **Chapter 3** of the full report for a SWOT-style analysis of Breckland's current GBI network across these themes.

As part of the study, GIS data was mapped to create baseline maps for each theme. Two examples of these mapped outputs are shown below:

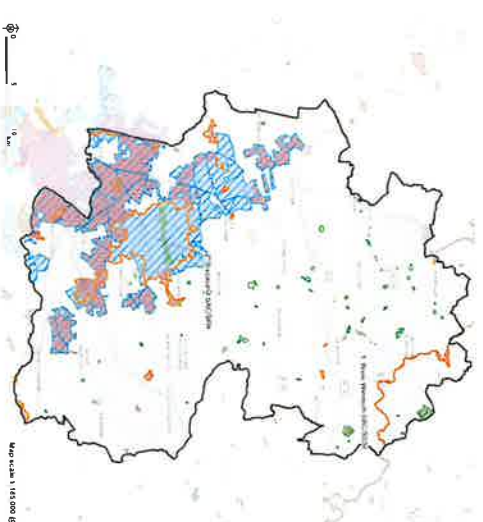


Figure 2.1:
Protected habitats in Breckland

This figure shows statutory designated sites for biodiversity in Breckland, including the River Wensum SAC and the Breckland SAC/SPA.

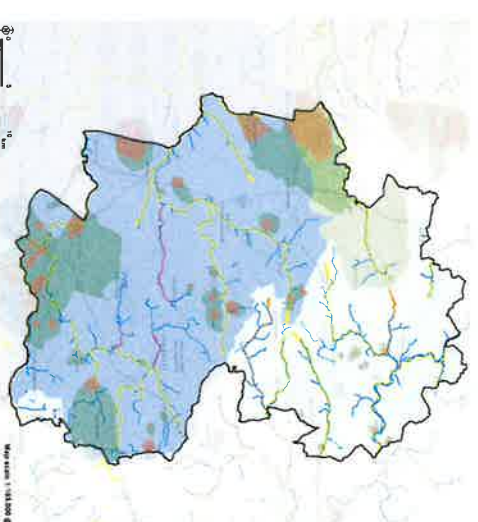


Figure 2.4:
Breckland's blue corridors

This figure shows Breckland's catchment areas (where rainwater drains into particular rivers), its Source Protection Zones (SPZs) and indicates the water quality of the District's watercourses (in line with the objectives of the Water Framework Directive).

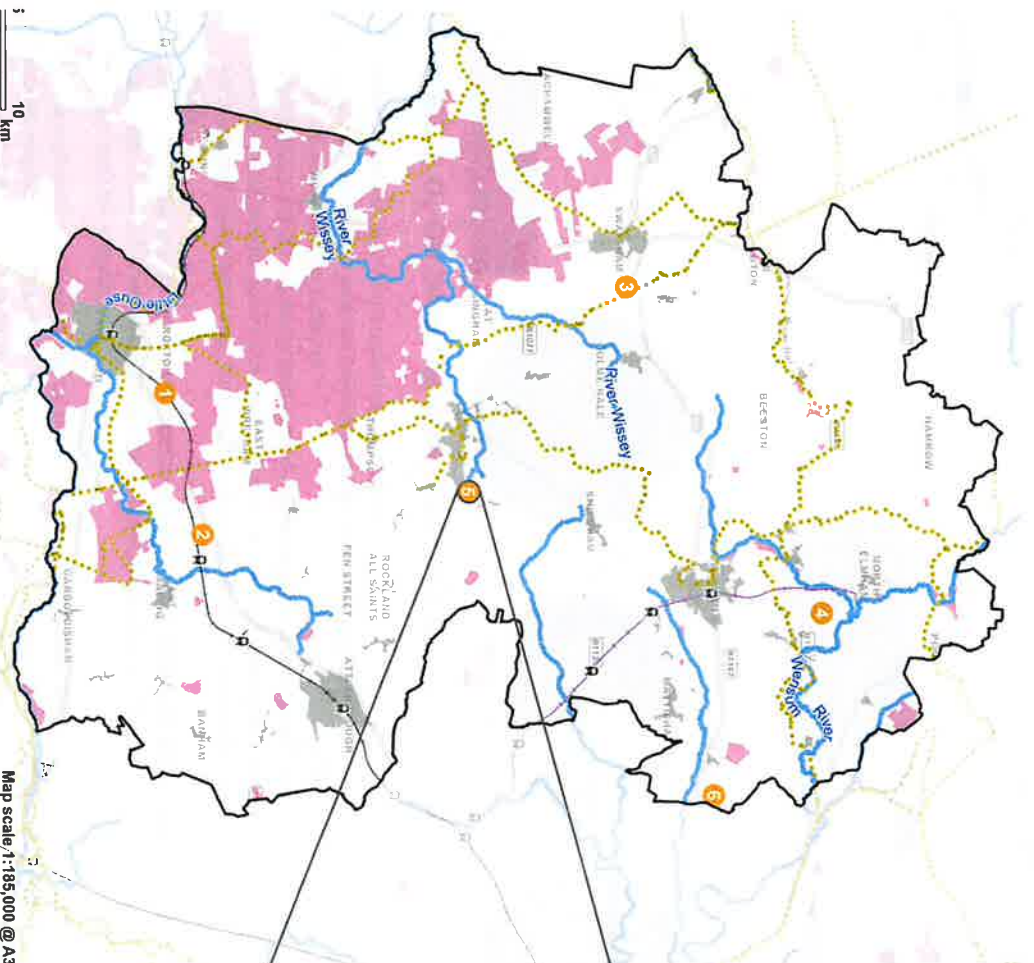
The full set of baseline maps (by GBI theme) can be found in **Chapter 3** of the full report.

Priorities for GBI enhancements in Breckland's key 'growth areas'

Planned new development in Breckland

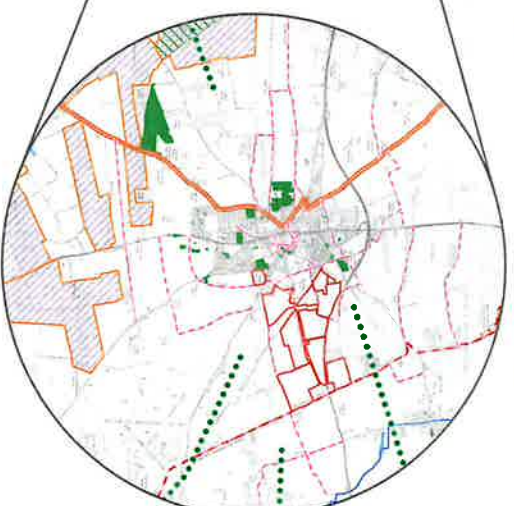
Significant new development is planned through the Local Plan, offering a once-in-a-generation opportunity to use growth to deliver a greener, healthier Breckland. To ensure this happens, the study includes **six Key Growth Area profiles**:

- 1 Thetford
- 2 Roudham / Larning
- 3 Swaffam
- 4 Swanton Morley
- 5 Watton
- 6 East Tuddenham / Hockering



Map scale: 1:185,000 @ A3

© Natural England, © Sustrans, Breckland Council OS licence: AC0000825043, © Environment Agency 2025. All rights reserved. Contains OS data © Crown Copyright and database rights 2025. Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community.



✓ This is a snapshot of the map of Watton's GBI network within the dedicated profiles for Watton. See **Chapter 5** to explore the map on the left and for full GBI profiles of each Growth Area, highlighting key challenges and

Each Growth Area profile summarises the local landscape and GBI context, the main environmental and placemaking challenges, and the most important opportunities for multifunctional GBI - such as habitat corridors, active travel links, blue-green flood resilience and high-quality public open space.

These profiles demonstrate how GBI can be embedded from the outset of masterplanning and broader multi-stakeholder initiatives to improve the GBI network locally, helping to create distinctive, sustainable places that reflect local character and landscape identity.

Delivering GBI in Breckland

Turning the vision into reality will depend on coordinated delivery and sustained investment. Breckland Council cannot deliver this alone - success will require strong collaboration between all stakeholders including, developers, neighbouring authorities, Natural England, the Environment Agency, Forestry England, Rivers Trusts, landowners, and community groups.

Key tools for delivery include:

- Embedding strong, evidence-based GBI policies in the new Local Plan.
- Securing multifunctional GBI through new development, guided by the Breckland Design Guide.
- Aligning GBI investment with emerging tools such as Biodiversity Net Gain (BNG), the Norfolk Local Nature Recovery Strategy and catchment-based water management.
- Using the Council's Infrastructure Delivery Plan (IDP) to direct developer contributions towards strategic GBI projects.
- Exploring innovative finance opportunities such as habitat banks, carbon and nutrient credit schemes and agri-environment funding.

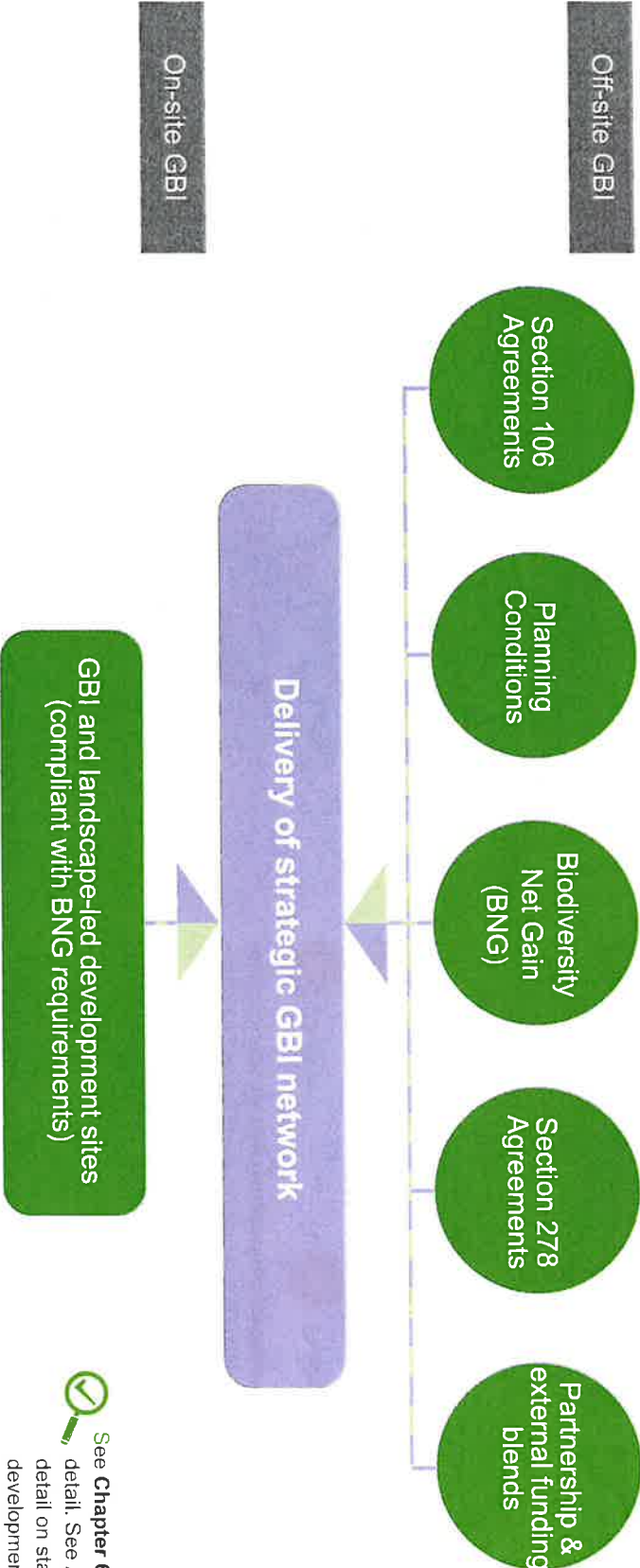
Next Steps

This study provides a robust foundation for the Local Plan Full Update (2024-2042) and for the next review of Breckland's Infrastructure Delivery Plan (IDP). It should also inform parallel strategies - including health and wellbeing, open space, and climate action - ensuring GBI is embedded across all areas of policy and delivery.

Next steps include:

- Translating strategic opportunities into deliverable project through detailed feasibility and design work.
- Prioritising "early-win" projects that demonstrate tangible benefits for communities and wildlife.
- Establishing clear governance and partnership arrangements to coordinate funding and deliver.
- Monitoring progress to ensure continuous improvement.

Overview of on and off-site delivery mechanisms for building Breckland's GBI network



See **Chapter 6** of the full report for further detail. See **Appendix A** for further detail on stakeholders involved in the development of this study.

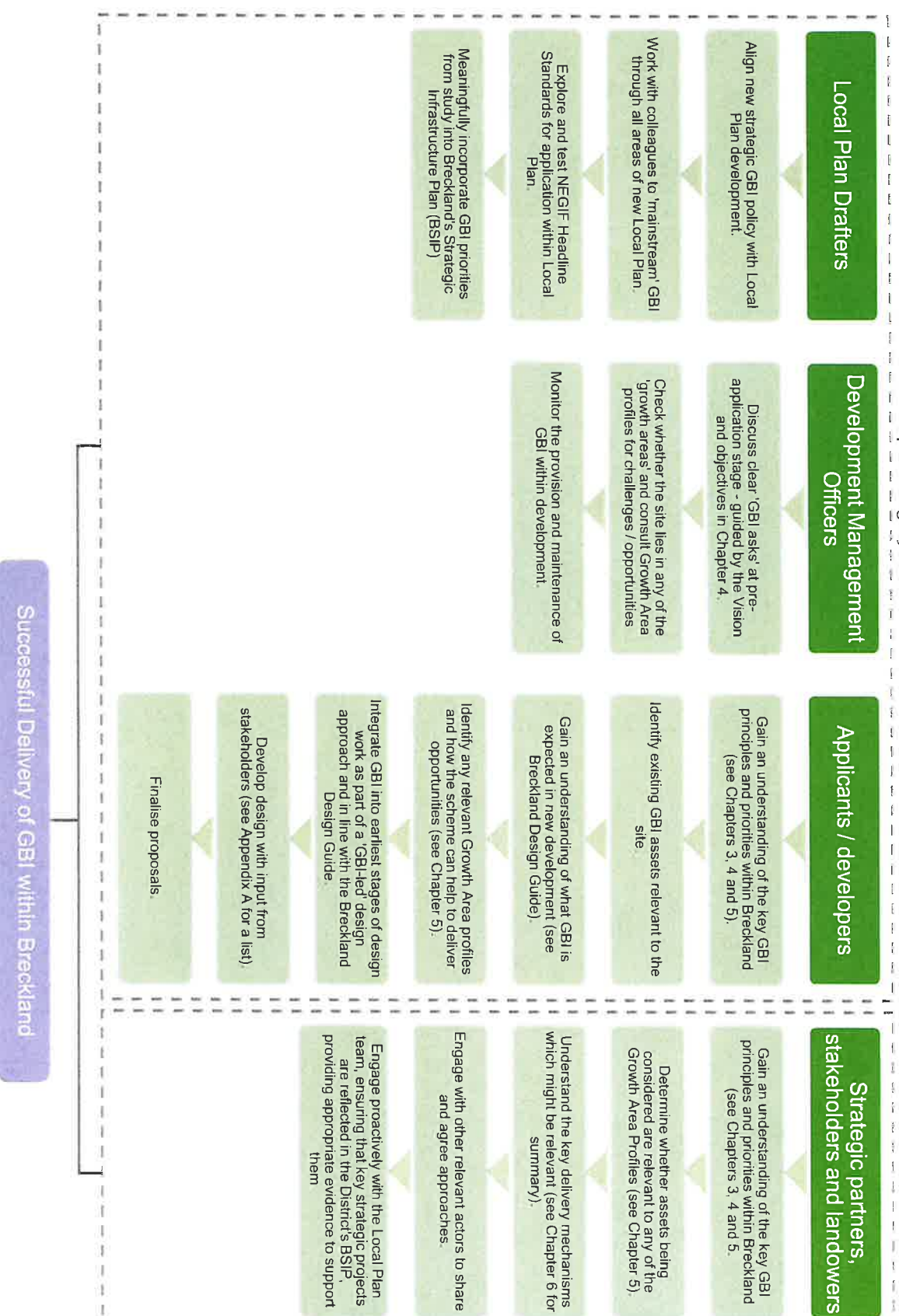
How should I use the GBI Study?

Embedding GBI delivery in the

planning system

Delivery GBI beyond the

planning system



Exception sites

Exception Sites are sites which are not sites in the plan but an allowance is made for exception sites to come forward. With the proposed local plan allocations along with the exception sites provides an additional 20% of housing over and above what is required.

An allowance has been made for windfall sites in each settlement. Dereham's allocation of windfall sites is 200 dwellings the same as the other market towns. For Dereham given the well recognised transport issues, as detailed in para 5.28 of the draft Local Plan, an additional 200 houses in Dereham feels excessive. There should be no windfall allocation for Dereham, without a Transport Assessment for demonstrating that the residual cumulative impact of the allocated housing along with the windfall allocation will not have a severe impact on the highway network.

Given that the plan overall has a 20% buffer the loss of 200 windfall sites in Dereham would only reduce this buffer to 19% which still provides an ample buffer but does not place unnecessary risk to the Dereham transport network.

The policy HOU 03 has two parts,

The first part relies heavily on the definition of what "immediately adjacent to" to the built up area. With reference to the Glossary, the following should be considered as amendments to the definition:

Settlement is not defined, there is a risk that Etling Green and Northall Green could be included as a settlement. Re-wording to read 'main settlement within a parish' would avoid such a risk.

The second part is more relaxed and permits development outside the settlement for specific housing types detailed in GEN 03. Some of these housing needs cause more concern than others notably sites for travellers and show people. HOU 21 includes the provision that **[emphasis added]**:

*"the Council will also look favourably on proposals to reconfigure, **regularise** or extend existing sites within the District*

Positive consideration to granting planning permission to unauthorised/tolerated sites where a satisfactory form of development can be established"

This feels like it is rewarding bad behaviour, Shouldn't Breckland be enforcing on unauthorised/tolerated sites rather than giving them positive consideration? Such a policy could encourage unauthorised sites being created.

HOU 08 Housing for the elderly - it is felt that two dwellings is a low threshold, this could be two bungalows for retired people. Exception sites for proper supported living accommodation, retirement complexes, nursing homes and the like seems reasonable and sensible, but allowing two properties could lead to a lot of exception sites coming forward.

The recent Etling Green Development for 4 bungalows for elderly retired people was only turned down due to its impact on the setting of the listed building.

Gen 02: Built up area

The criteria (c) for the built up area feels unnecessary and creates a significant level of uncertainty. There will be plenty of options to have exception sites adjacent to buildings without its inclusion. May be better to word "predominantly surrounded by buildings" as per criteria (a).

- 5.36 The Lead Local Flood Authority has (LLFA) has identified the following parishes as having particular concerns around flooding. Surface water and flood risk management measures should be implemented as appropriate on all proposed development across Breckland but proposals for new development in these parishes are strongly encouraged to have been subject to pre-application discussions with the LLFA and to ensure that appropriate mitigation measures are agreed and included within any planning application(s):

Banham, Besthorpe, Caston, Griston, Kenninghall, Mattishall, Mileham, Rockland All Saints, Saham Toney, Shipdham, Swanton Morley and Thompson.

Housing Trajectory

- 5.37 Policy HOU 02 demonstrates that the housing requirement of 16,560 dwellings over the Plan period can comfortably be met. Planning for almost an exact number to meet the need leaves little room for manoeuvre over the Plan period should any site not come forward as envisaged. The policies provide for a buffer of 20.4% against the minimum requirement. This provides for a sufficiently robust Plan with the flexibility to adapt to any rapid changes in circumstances.
- 5.38 The Housing Trajectory is set out in Appendix 2.

Table 5.2: Housing Trajectory

Housing Supply over Plan Period (2025 – 2043)	
Completions (2025 – 2026)	821
Commitments (April 2026)	2,690
Attleborough and Thetford SUE Commitments	3,115
Saved Allocations (April 2026)	744
New Local Plan Allocations	
Strategic Development Areas	2,700
Market Towns	6,190
Key Service Parishes	295
Primary Parishes	595
Secondary Parishes	485
Tertiary Parishes	55
Windfall Allowance	2,250
TOTAL DELIVERABLE SUPPLY	19,940

Housing Requirement (2025 – 2043)	
Housing Requirement (2025 – 2043)	16,560
Surplus of Housing Supply over the Requirement	3,380 (20.4 %)

5 Year Housing Land Supply

5.39 The Council must demonstrate that it has a five-year housing land supply on adoption. Table 5.3 below is based on the Trajectory set out in Appendix 2 of this Plan and demonstrates that the Housing Land Supply Position for Breckland on 1 April 2028 is 6.24 years. This is a healthy position that is significantly in excess of the required minimum 5 years' worth.

Table 5.3: 5 Year Housing Supply (2028/29 – 2032/33)

Housing Requirement	
5 Year Housing Requirement (2028/29 – 2032/33) (920*5)	4,600
Plus 5% Buffer (4,600 *1.05)	4,830
Housing Supply (2028/29 – 2032/33)	
Saved Allocations	265
Existing Commitments	1,250
Attleborough and Thetford SUE	925
New Allocations	
Strategic Development Areas	50
Market Towns	1,725
Key Service Parishes	135
Primary Parishes	515
Secondary Parishes	360
Tertiary Parishes	55
Windfall Allowance	750
TOTAL DELIVERABLE SUPPLY	6,030
Housing Land Supply (Years)	
Housing Land Supply (6,030/4,830) * 5	6.24 years

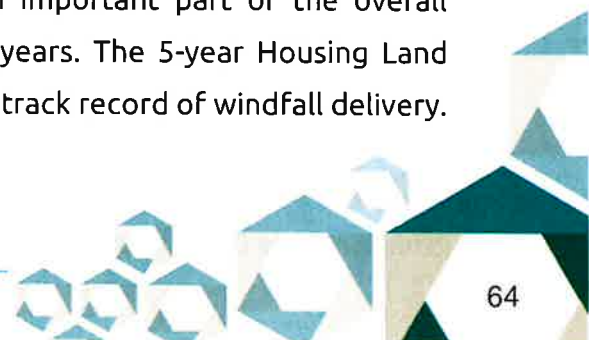
5.40 If, during the Plan Period, the Council is unable to demonstrate a Five-Year Housing Land Supply (5YHLS) it will apply a presumption in favour of sustainable development. The Council will update and publish its Five-Year Housing Land



Supply position by the 1st of October each year. If, at any time during the Plan Period, the Council is unable to demonstrate a five-year supply, the presumption in favour of sustainable development will apply and favourable consideration will be given to the release of additional sites that are consistent with the spatial strategy of this plan.

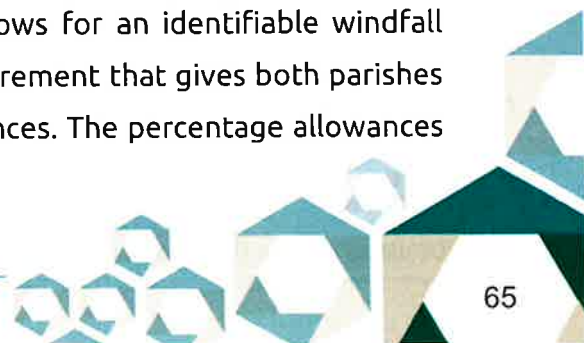
Windfall Allowance

- 5.41 The windfall allowance, which is considered a part of the anticipated supply, has been calculated on a basis consistent with NPPF & PPG. There is compelling evidence that this will provide a reliable source of supply. The allowance is realistic and has regard to historic windfall delivery rates and expected future trends.
- 5.42 Paragraph 75 of the NPPF also allows the Plan to include an allowance for windfall sites as part of anticipated supply, where there is compelling evidence that they will provide a reliable source of supply. Breckland is a largely rural District with many small villages which have grown slowly and incrementally over hundreds of years. This pattern of slow change has continued, and a number of new homes are created each year by the development and redevelopment of small sites as “windfall development”.
- 5.43 Many of the villages in Breckland are not considered suitable for medium to large scale planned development which would be allocated in the Local Plan. Development in those areas identified as countryside is restricted, but national policy generally allows for small sites and infill plots to come forward within most settlements.
- 5.44 Windfall itself is made up of a number of sources and it is important to note that such sites can come forward within settlements and from policies contained within the Plan and national policy, such as the policies that support community led planning, rural workers’ accommodation needs, affordable housing exception schemes, the reuse of buildings, allocations contained in future Neighbourhood Plans and from permitted development rights, including those around the conversion of rural buildings. There is strong evidence to show that small site windfall development will continue to form an important part of the overall housing supply in the District over the coming years. The 5-year Housing Land Supply Report shows that Breckland has a strong track record of windfall delivery.



Historical evidence as set out in the annual 5-year Housing Land Supply Report shows that over the last 15 years, the average annual windfall development on minor sites is 192 dwellings. The Council is adopting a precautionary approach to expected delivery from windfall sites of 150 dwellings per year. This equates to 2,250 additional homes from 2028. This represents a 22% reduction on past windfall delivery rates.

- 5.45 The Council considers that it is important that windfall development reflects the development strategy set out in the Plan. It is important to note that this allowance covers both Market Housing and housing to meet specialist needs including affordable housing and that to meet specialist needs as set out in Policy GEN 03.
- 5.46 Furthermore, the overall housing delivery set out in this Plan is 20% above requirement. The Council therefore considers that setting maximum limits for windfall developments is justified. It is important to note that these limits will take effect from the adoption date of the Local Plan and if and when these limits are reached, there will still be opportunity for new housing that meets locally identified specialist needs including affordable housing and that to meet identified needs for gypsies, traveller and travelling show people.
- 5.47 The windfall allowance is expressed as a maximum number of dwellings per parish. If the total number of dwellings permitted under this Policy were to be fully implemented this would equate to 2,833 dwellings. This is 26% above the 2,250 dwelling windfall allowance. It is therefore clear that setting maximum limits does not constrain the ability of the Plan to meet, and likely exceed, the windfall allowance within the Plan period. The Council therefore considers that the application of the maximum figure for each Parish is justified.
- 5.48 For the market towns the Plan sets a maximum windfall allowance of 200 dwellings across the Plan period. For the rural parishes it has been assumed that each parish will see new windfall development of housing at a level that does not exceed a specified % of the number of dwellings in the Parish from the date of adoption of the plan as set out in Table 5.4 This figure was derived from the Council tax information from 2026. A base date of 2026 is considered appropriate as this reflects the latest available information and allows for an identifiable windfall housing figure to be included in the overall requirement that gives both parishes and developers some certainty about the allowances. The percentage allowances



are also considered to be consistent with the overall development strategy as set out in the parish hierarchy. Some parishes lie within the Breckland Special Protection Area. An indicative figure has been provided for Parishes with partial coverage but any potential impact on the SPA must be carefully considered. If proposals for new housing come forward that are consistent with Policy ENV 07 and all other relevant policies in this Plan, then they could be supported up to the stated % dwelling increase. Furthermore, a number of settlements do not have clearly defined settlement form and therefore no allowance is made for these as proposals will not accord with Policy GEN 02 of this Plan.

- 5.49 The Local Plan, through providing individual parish targets, gives utility providers and other infrastructure providers greater certainty in the areas for investment. Furthermore, the 'first come first served' approach following the adoption of the Plan, will likely support the Government's objective of boosting the supply of housing in the early years of the Plan. It also supports communities that are either progressing or considering developing a neighbourhood plan, by providing new home targets in each of the parishes and giving more certainty on their requirements.

Table 5.4: Windfall allowances

Parish Name	Dwellings 2026	Windfall Increase
Market Towns (number of dwellings)		
Attleborough		200
Brandon ⁵⁶		100
Dereham		200
Swaffham		200
Thetford ⁶		200
Watton		200
Key Service Centres (10% in dwelling stock)		
Harling	1293	129
Mattishall	1374	137
Necton	1119	112
Shipdham	11104	110
Weeting ⁶	897	0

⁵ A small area of the Market Town of Brandon lies within Breckland.

⁶ Brandon, Brettenham & Kilverstone, Bridgham, Thetford (part), Cockley Cley, Croxton, Foulton, Great Cressingham, Great Hockham, Didlington, Gooderstone, Hilborough, Ickburgh, Little Cressingham, Lynford, Merton, Mundford, North Pickenham, Oxborough, Roudham & Larling,

Parish Name	Dwellings 2026	Windfall Increase
Primary Parishes (8% in dwelling stock)		
Banham	724	58
Bawdeswell	403	32
Great Ellingham	838	67
Kenninghall	481	38
Litcham	293	23
Mundford ⁶	721	58
Narborough	674	54
North Elmham	709	57
Old Buckenham	632	51
Swanton Morley	1080	86
Secondary Parishes (6% in dwelling stock)		
Ashill	748	45
Beetley	641	38
Besthorpe	351	21
Carbrooke ⁷	(250)	15
Caston	218	13
Fransham	242	15
Garboldisham	362	22
Gressenhall	479	29
Griston	426	26
Hockering	361	22
Hockham ⁶	347	21
Lyng	381	23
New Buckenham	236	14
North Lopham	324	19
Rocklands	340	20
Saham Toney	796	48
Scarning ⁸	230	14
Sporle	509	31
Yaxham	406	24
Tertiary Parishes (4% in dwelling stock)		
Beeston	252	10
Brisley	146	6

Stanford, Stow Bedon, South Pickenham, Tottington, Thompson, Weeting, Wretham. parishes lie wholly or partly within the Breckland SPA. An indicative figure has been provided for Parishes with partial coverage but any potential impact on the SPA must be carefully considered. Where a proposal that is acceptable to Natural England and that accords with all other relevant policies in this Plan it will be considered favourably up to a maximum figure in accordance with the % set out in this Policy.

⁷ Number of dwellings in Carbrooke reduced to 250 as the majority lie within Watton town

⁸ Number of dwellings in Scarning reduced to 230 as the majority lie within Dereham town

Parish Name	Dwellings 2026	Windfall Increase
Colkirk	310	12
Garvestone	333	13
Gooderstone ⁶	182	0
Great Dunham	152	6
Mileham	299	12
Quidenham	208	8
Shropham	211	8
South Lopham	191	8
Thompson ⁶	185	7
Weasenham S P	91	4
Other Parishes (3% in dwelling stock)		
Beachamwell	169	5
Billingford	112	3
Bintree	149	4
Blo Norton	130	4
Bradenham	335	10
Brettenham ⁶	191	0
Bridgham	164	5
Bylaugh ⁹	41	0
Cockley Cley ⁶	64	0
Cranwich ⁹	24	0
Cranworth	209	6
Croxton ⁶	140	4
Didlington ^{6 9}	31	0
East Tuddenham	223	7
Elsing	121	4
Foulton ⁶	198	6
Foxley	155	5
Gateley ⁹	33	0
Great Cressingham ⁶	126	0
Guist	126	4
Hardingham	128	4
Hilborough ⁶	104	0
Hoe	106	3
Holme Hale	250	8
Horningtoft	66	2
Ickburgh ⁶	132	0

⁹ Bylaugh, Cranwich, Didlington, Gateley, Kempstone, Kilverstone, Lexham, Narford, Newton, Riddlesworth, South Acre, Stanford, Twyford and Wellingham parishes contain a dispersed settlement pattern of individual farmsteads, homesteads, or small clusters of houses spread widely across a large rural area, rather than grouped into a centralised village. These scattered dwellings are separated and lack a distinct built-up area. No windfall allowance has been made.

Parish Name	Dwellings 2026	Windfall Increase
Kempstone ⁹	9	0
Kilverstone ⁹	36	0
Lexham ⁹	59	0
Little Cressingham ⁶	78	0
Little Dunham	142	4
Little Ellingham	107	3
Longham	107	3
Lynford ⁶	68	0
Merton ⁶	64	0
Narford ⁹	18	0
Newton ⁹	22	0
North Pickenham ⁶	259	8
North Tuddenham	166	5
Ovington	116	3
Oxborough ⁶	113	
Riddlesworth ⁹	69	
Roudham and Larling	140	4
Rougham ⁶	59	2
Scoulton	111	3
Snetterton	89	3
South Acre ⁹	16	
South Pickenham ⁶	52	2
Sparham	149	4
Stanfield	74	2
Stanford ^{6 9}	3	
Stow Bedon ⁶	155	5
Tittleshall	178	5
Twyford ⁹	17	
Weasenham All Saints	90	3
Wellingham ⁹	24	0
Wendling	138	4
Whinburgh	177	5
Whissonsett	255	8
Wretham ⁶	191	6
Total	2,833	

HOU 03: Windfall Development

Each Market Town Key Service, Primary, Secondary, Tertiary and Other Parish, to which this policy applies are defined in Policy GEN 01.

Development Proposals within the Built-up Area

A proposal for development on a site which is additional to those specifically identified as a commitment, saved or new allocation in this plan will be supported where it is located within a built-up area of the Town or Parish and is consistent with relevant development plan and national policies.

A proposal for development that includes Market Housing on land immediately adjacent to the built-up area may be supported where it is consistent with relevant development plan and national and in particular where:

- (a) The development is of an appropriate scale and design to the settlement and
- (b) The total windfall allowance permitted for that Town or Parish as set out in Table 5.4, from the date of the adoption of the Plan, is not exceeded and
- (c) the design contributes to preserving, and where possible enhancing, the historic nature and connectivity of communities; and
- (d) The development avoids coalescence of settlements.

Development Proposals on Land well related to the Built-up Area

A proposal for housing to meet locally identified housing needs (as set out in Policy GEN 03) on land well-related to the Built-Up Area will be supported where it is consistent with relevant development plan and national and in particular where:

- (e) The development is of an appropriate scale and design to the settlement and
- (f) The development meets identified local need as set out in Policy GEN 03 and
- (g) the design contributes to preserving, and where possible enhancing, the historic nature and connectivity of communities; and
- (h) The development avoids coalescence of settlements.

Once the limit for windfall development has been met for a particular town or Parish then only housing to meet specialist or affordable housing to meet clearly identified local need (as set out in Policy GEN 03) will be permitted in that particular town or Parish.



	visible, buried or submerged, and landscaped and planted or managed flora.
Historic Environment Record (HER)	Norfolk County Council's record of heritage assets in the County, including designated and Non-Designated Monuments, Shipwrecks and Conservation Areas.
Housing and Economic Development Needs Assessment (HEDNA)	A report commissioned by the District Council to study future housing needs and the quantity of land and floorspace required for economic development over the Plan period. It serves as crucial evidence for the development of the Local Plan.
Housing Delivery Test	Measures net additional dwellings provided in a local authority area against the homes required, using national statistics and local authority data. The Secretary of State will publish the Housing Delivery Test results for each local authority in England every November.
Immediately adjacent to	Refers to sites where at least a part of the site boundary touches the Built-Up Area of a Settlement. The site must not breach – or extend over - an existing defensible boundary, e.g. watercourse, <u>field boundary</u> or road. Farmsteads and sporadic small-scale groups of dwellings are considered as lying in the open countryside and are not classed as settlements. These, and isolated locations in the countryside, are unlikely to be considered acceptable. It excludes land with planning permission where development not yet completed or allocations where development has not been wholly completed.
Inclusive Design	Designing the built environment, including buildings and their surrounding spaces, to ensure that they can be accessed and used by everyone.
Independent Living	Also known as "extra care" is specialist affordable housing designed for older people (aged 55+) or others with mixed care

- 4.10 Whilst a criteria-based approach is less common than the identification of settlement boundaries, a well-developed and consistently implemented criteria-based policy will provide the potential to protect the character of settlements and the countryside whilst enabling development necessary to meet the area's locally identified needs.

Built-up Areas definition

- 4.11 A Built-Up Area is considered to be a distinct settlement of dwellings. Land which relates more to the group of buildings rather than to the surrounding countryside is also considered to form part of the Built-Up Area.

- 4.12 The following parishes within Breckland do not contain a distinct mass of dwellings and instead comprise a dispersed group of houses – i.e. there are no Built-Up Areas in these parishes:

Bylaugh, Cranwich, Didlington, Gateley, Kempstone, Kilverstone, Larling, Lexham, Narford, Newton, Riddlesworth, Roudham, South Acre, Stanford, Twyford and Wellingham.

- 4.13 The following built up areas lie wholly within the Brecks Special Protection Area – and as a consequence do not merit a 'housing target' and therefore policies related to Built Up Areas are not relevant:

Cockley Cley, Didlington, Gooderstone, Great Cressingham, Hilborough, Ickburgh, Little Cressingham, Merton, Oxborough and Weeting (including Brandon).

- 4.14 In all of these parishes no windfall allowance has been made.
- 4.15 The built-up areas definition is extensively used in other policies of this Plan to shape where unallocated development proposals may or may not be considered appropriate.
- 4.16 What land is and isn't within the definition of Built-Up Area is defined by Policy GEN 02. The following table provides additional guidance on how the Council will interpret some of the criteria in the Policy.



Table 4.1: Additional Guidance Associated with Policy GEN 02

Criteria in Policy GEN 02	Additional Guidance
Buildings on the edge of settlements which clearly form part of the settlement.	These must have other buildings within the Built-Up Area (or their immediate curtilage(s)) on greater than 80% of at least one of the sides and have a clearer physical and visual relationship with the Built-Up Area than any adjoining countryside.
Open space, sports and recreational facilities, allotments, caravan sites, churchyard and cemeteries which are predominantly surrounded by and integral to the Built-Up Area	Some greenfield uses such as recreational or amenity open space, churchyards, wide grass verges and allotments, can form an integral and valuable part of the built-up area and its character. These must have buildings (or their immediate curtilages) on at least 51% of each of at least two of the sides and have a clear physical and visual relationship with the built-up area than any adjoining countryside.
Undeveloped land that is allocated for new development or that has extant planning permission for new development that is yet to be fully implemented	Where development for residential, community, retail or employment use has had outstanding planning permission the principle of development has been approved. However, until the development is completed, the Built-Up Area remains unchanged.
Farmsteads, associated agricultural buildings on the edge of the Built-Up Area.	Agricultural buildings tend to relate more to the surrounding countryside when still in use for agricultural purposes. However, if the building comprises a long standing traditionally built building and is well-related in terms of scale and positioning to eligible properties with a defensible boundary it may be included where it is likely to be deemed suitable for reuse under permitted development rights.

GEN 02: Built Up Area

The Built-Up Area includes:

- a) Residential, community, retail and employment buildings which are predominantly surrounded by other buildings;
- b) Buildings on the edge of settlements which clearly form part of the settlement;
- c) Areas of open space, sports and recreational facilities, allotments, caravan sites, churchyards and cemeteries which are predominantly surrounded by and integral to the Built-Up Area.

The Built-Up Area excludes:

- d) Undeveloped land that is allocated for new development or that has extant planning permission for new development that is yet to be completed;
- e) Land where development would harm or undermine a visually important gap that contributes to the character and distinctiveness of the Built-Up Area; and,
- f) Farmsteads, associated agricultural buildings on the edge of the Built-Up Area.

4.17 Policy GEN 02 above sets out – effectively – a definition of a Built-Up Area. Policy GEN 03 sets out whether development will be permitted related to whether or not a site is within those areas, ‘immediately adjacent’ to them or ‘well related’ to them. This provides a positive policy environment for housing within and ‘immediately adjacent’ to a Built-Up Area and a more positive environment for sites that are ‘well related’ to the Built-Up Area for limited types of housing which the Council is particularly keen to encourage.

4.18 Policy HOU 03 sets out the approach to Windfall developments and puts in place a maximum housing target for each relevant parish. That Policy is particularly relevant to the use of Policy GEN 03 since it limits the number of new homes permissible in each area.



4.19 Two definitions are particularly important to the operation of Policy GEN 03. Whilst these definitions are also included in the Glossary at Appendix 1, they are also set out here:

(a) 'Immediately adjacent' refers to:

"Sites where at least a part of the site boundary touches the Built-Up Area of a Settlement. The 'immediately adjacent' site must not breach – or extend over - an existing defensible boundary, e.g. watercourse, field boundary or road."

(b) 'Well related' to refers to:

"All sites that are 'Immediately Adjacent' plus those which relate well to the Built-Up Area of settlements, but which may also be a short distance from that Settlement – rather than physically touching it – but that clearly relate better to the Settlement than the countryside. The site must not breach – or extend over - an existing defensible boundary, e.g. watercourse, field boundary or road."

GEN 03: Development and the Built-Up Area

On sites within the Market Towns, Key Service Parishes, Primary Parishes, Secondary Parishes, Tertiary Parishes and Other Parishes as defined within Policy GEN 01, development will be permitted where it is within or 'immediately adjacent' to a Built Up Area and is of an appropriate scale as set out in Policies HOU 02 and HOU 03 unless the development harms the intrinsic character and beauty of the countryside or impacts detrimentally on critical views from a public vantage point to and from listed buildings, conservation areas, scheduled monuments and / or registered parks and gardens.

The exceptions to this are proposals for:

- (a) HOU 05 – Affordable Housing Exception Sites;
- (b) HOU 06 – Community Led Development;
- (c) HOU 07 – Single Plot Exception Sites;
- (d) HOU 08 – Housing for the Elderly and Specialist Care; and / or
- (e) HOU 21 – Provision for Gypsy Travellers and Travelling Show people.

In those cases, development will be permitted where it is within or 'well related' to the Built-Up Area unless the development harms the intrinsic character and beauty of the countryside or impacts detrimentally on critical views from a public vantage point to and from listed buildings, conservation areas, scheduled monuments and / or registered parks and gardens.



HOU 08: Housing for the Elderly and Specialist Care (Two or more dwellings)

Development proposals that provide specialist housing options for older people's accommodation and others with support needs, including sheltered housing, supported housing, extra care housing and residential/nursing care homes will be supported where:

- (a) It is well related to the built form of a Market Town, a Key Service Parish, Primary Parish or Secondary Parish and the location is well served by public transport or within easy walking distance of community facilities (within 400m) such as shops, medical services, public open space, and social networks appropriate to the needs of the intended occupiers, or where this is not the case, such facilities are provided on site
- (b) The scale, form and design of the development is appropriate to the client group and in relation to the settlement where it is located;
- (c) Highway, parking, and servicing arrangements (including for emergency vehicles) are satisfactorily addressed;
- (d) Gardens and amenity space are provided and are of an appropriate size and quality.

Where outline planning permission is sought, criteria (b), (c) and (d) may be demonstrated in principle, with detailed matters secured through planning conditions and/or planning obligations at the appropriate stage.

Schemes may be acceptable on sites that are well related to the built form, providing that the scale of development should be clearly justified by evidence of need in the District; and evidence is provided which demonstrates that there are no alternative suitable available sites within or adjacent to the built form of settlements.

Proposals for specialist housing and accommodation to meet clearly evidenced needs arising from outside the District will be considered where they relate to suitable sites that are within or adjacent to the Market Towns

In order to ensure that dwellings permitted under this Policy remain for the use permitted in perpetuity planning permissions relating to such sites may include conditions which restrict permitted development rights.

Self and Custom Build Homes

5.93 Paragraph 70 of the NPPF states that Local Planning Authorities should seek opportunities to support small sites to come forward for community-led development for housing and self-build and custom build housing. For the purposes of this Local Plan the Council adopts the definition of Self Build as set out in the Housing and Planning Act 2016 as follows:

“...the building or completion by— (a) individuals, (b) associations of individuals, or (c) persons working with or for individuals or associations of individuals of houses to be occupied as homes by those individuals. But it does not include the building of a house on a plot acquired from a person who builds the house wholly or mainly to plans or specifications decided or offered by that person.”

5.94 Under section 1 of the Self Build and Custom Housebuilding Act 2015, Local Authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. They are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand. Self and custom-build properties could provide market or affordable housing.

5.95 Self and Custom Build development, an opportunity to bring choice to the housing market as well as enabling local people to design and build their own home that will meet their bespoke needs, will continue to be supported. For the purposes of Policy HOU 09, a serviced self-build plot is defined as a parcel of land with legal access to a public highway, and at least water, foul drainage and electricity supply available at the plot boundary. Serviced Self Build plots can be delivered in a number of ways, including:

- (a) Multiple individual serviced plots located within larger sites which are generally allocated in this Local Plan around the Market Towns, Key Service Parishes, Primary Parishes or Secondary Parishes

Europe. Although the site is currently closed, Breckland has recently negotiated a new lease with the owners (The Crown Estate).

HOU 21: Provision for Gypsies, Travellers and Travelling Show People

The accommodation needs for Gypsies and Travellers over the Plan period are for a minimum of 62 additional pitches. The accommodation needs for Travelling Show people over the Plan period are for a minimum of 6 additional plots.

To provide for the accommodation needs of Gypsies and Travellers and Travelling Show people the Council has allocated a single site as set out below:

- (a) Site between the Abbey Estate and the A11 Thetford (10 pitches).

In addition the following allocations are 'saved' from the 2019 Breckland Local Plan as follows:

- (c) Fairhaven Caravan Site, Beetley (1 pitch); and,
- (d) Summer Meadow Mill Road, Mattishall (1 pitch)

The Council will also look favourably on proposals to reconfigure, regularise or extensions to existing sites within the District.

Positive consideration to granting planning permission to unauthorised/ tolerated sites where a satisfactory form of development can be established.

The provision of pitches and plots on new sites will be supported, having regard to the Gypsy and Traveller Accommodation Needs Assessment where:

- (e) The site is located in flood zone 1 or exceptionally in flood zone 2 and is otherwise suitable for residential development and the associated necessary (primarily physical) infrastructure requirements will be made available as part of the development proposal;
- (f) The site will have safe access to the highway and will not result in any unacceptable impact on the capacity and environment of the highway network;
- (g) The site is in a sustainable location and in reasonable proximity to relevant services and facilities, including sustainable transport linkages (cycle and walking routes) connecting the new sites to local services, facilities and amenities;

- (h) The ability to achieve neighbourliness can be demonstrated in relation to the living conditions of current or future residents of the site and its interaction with its neighbours and neighbourhood;
- (i) The site is sensitive to local character and does not have an adverse visual impact on the character and appearance of the surrounding landscape or to areas of historic interest; and,
- (j) Arrangements are put in place and included in an appropriately detailed management plan, to ensure the proper management of the site in line with the above policy requirements.

Plots for Travelling Show people should also be of a sufficient size to enable the storage, repair, and maintenance of equipment. Preference will be given to brownfield locations and those that can readily be serviced. Transit sites should be in close proximity to the main established travelling routes in the area.

Sites that have unrestricted planning permission for Gypsy and Traveller or Travelling Show people use are safeguarded for this use.

Proposals that would result in a reduction of the number of pitches within the District will be refused unless a suitable replacement is found, or the need no longer exists.

Re-use of Agricultural Buildings in the Countryside

5.184 Breckland has a rich heritage of traditional rural buildings, many of which are no longer suitable for their original purpose but may be suitable for alternative uses. The re-use of good quality existing buildings, including traditional barns and more modern structures, for a range of uses offers the potential to support the sustainability of rural communities and secure the future of traditional rural buildings that contribute positively to the local distinctiveness of the area. Outside of the exemptions set out within class Q, the conversion of agricultural buildings to residential use in rural areas will be strictly controlled.

5.185 This policy relates to the re-use and replacement of non-residential buildings in the countryside, such as barns and other agricultural buildings. The conversion of agricultural buildings to dwelling houses is permitted development, subject to a number of criteria. There are limits to the number of dwellings that can be

Transport and Sustainable Transport.

Para 11.10 the Local Cycling and Walking Infrastructure Plan (LCWIP) is mentioned and was published and adopted by Norfolk County Council. To be robust and for the plan to deliver significant improvements, the LCWIP should be more closely aligned with policy INF 01.

Developments should provide access to existing routes and future routes identified in the LCWIP. The Highways Authority should also be in a position to secure off-site contributions to improvements identified as being needed within the LCWIP.

Policy INF01 states that *"the Council will work in partnership with the local highway authority..... to promote a safe, efficient and convenient sustainable transport system.."*

This is future tense i.e. the LPA will be working in the future to deliver sustainable transport system. The NPPF states that:

TR1: Vision-led approach to planning for transport

1. Sustainable transport should be considered from the earliest stages of plan-making, so that it is reflected in the vision for the plan area and its specific proposals, and forms an integral part of a plan's strategy for creating well-designed, sustainable, inclusive and popular places.

Breckland Council should have already engaged with the Highway Authority and developed the LCWIP so that it is integral to the specific proposals within the Plan. the Plan is not compliant with the NPPF with regards to this policy.

A vision led approach might identify that congestion in Dereham is largely focused around school-run times, a vision which focused on making walking and cycling to school safe and convenient could divert significant traffic off the roads and result in more active and healthier young people. The LCWIP would identify routes and specific project where developers need to make off-site contributions to help deliver the outcome of children cycling to schools and reducing impact on the road network.

11. Infrastructure

Transport

- 11.1 This section sets out the Council's approach to managing car travel and its impacts on the local economy, the environment, and communities. Norfolk's fourth Local Transport Plan, sets out a range of objectives for transport and accessibility, by 2036, focused upon:
- (a) Embracing the future – maximising use of new technology;
 - (b) Delivering a sustainable Norfolk – seeking to ensure new development is beneficial to Norfolk's society, environment, and economy;
 - (c) Enhancing connectivity – making it as easy as possible for residents and businesses to travel from A to B in Norfolk;
 - (d) Enhancing Norfolk's quality of life – Encouraging active travel to
 - (e) Improve residents' health and working towards zero carbon;
 - (f) Increasing accessibility – ensuring everyone has access to the facilities and services they require;
 - (g) Improving transport safety – to create a network which encourages safe usage of our roads and to protect vulnerable transport users; and,
 - (h) A Well Managed and Maintained Transport Network – apply new and innovative technology where it will be most effective.
- 11.2 The District's economy relies on high levels of out commuting and commuting to and from the District's Market Towns. This puts pressure on the road network during peak periods. 2021 census data showed over 10,000 residents travel 10-20km to their place of employment and 60% of journeys to work are undertaken by car or van. In addition, within Breckland, services such as health and education tend to also be sited within Market Towns and other key settlements. This means that significant numbers of people must travel relatively long distances to access everyday facilities, often with the added challenge of the quality and availability of public transport.
- 11.3 Two strategic vehicular routes run through the District. These two routes are recognised as core corridors for the East region by the Sub-Regional Transport Body as set out in the Transport East Strategy. The A11 dual carriageway connects



Norwich with Cambridge via the strategic growth areas of Attleborough, Thetford and Snetterton Employment Area.

- 11.4 The A47 runs west to east from Birmingham to Lowestoft connecting Swaffham and Dereham. At present, it is not fully dualled. The A47 Alliance comprises local authorities, local enterprise partnerships (LEP's), the business community, MPs and stakeholders stretching from Lowestoft to Peterborough. This body has presented a clear business case and lobbied Central Government to commit funding for improvements to the A47. In 2024 National Highways began work on dualling the A47 from North Tuddenham to Easton. This scheme will complete the dualling of the route between Dereham and Norwich enhancing connectivity for the north of Breckland.
- 11.5 Strategic road improvements must not come at the expense of environmental quality and significantly must not result in an adverse impact to the integrity of Breckland SPA, unless it can be demonstrated that there are Imperative Reasons of Overriding Public Interest (IROPI) in accordance with the Habitats Directive. Early evidence gathering in relation to the SPA interest is required for any proposed strategic transport improvements which impact on The Brecks. Road improvements should not be promoted within 200m of Breckland SAC and within 1,500m of Breckland SPA unless IROPI can be demonstrated.
- 11.6 Public transport services in the District are principally by bus. Bus services focus on linking the District's Market Towns with shopping and employment destinations at Norwich, King's Lynn, and Bury St. Edmunds. Infrequent services link rural areas with Market Towns, principally on market days. The Norfolk County Council Breckland Movement Plan (Dec 2021) does highlight that accessibility levels are lowest across Breckland compared with the wider county. This is one of the reasons why a digitised Demand Responsive Transport solution is being developed in this area as part of the Rural Mobility Fund. Breckland does have a lower than Norfolk average share of journeys made by bus - 1.28% compared to 4.75%.
- 11.7 Reducing reliance on the private car and promoting active lifestyles are mutually beneficial aims which can be achieved by supporting sustainable travel options. However, it should be recognised that for some communities, public transport, walking and cycling are not realistic options and therefore travel by car will remain an essential option for many people living in Breckland.

- 11.8 Recognising that there is a need to manage the increase in car travel, the Council is aiming to encourage a reduction in car use, particularly for shorter local journeys. Additionally, to assist in reducing the need for longer distance travel, the Council will focus on retaining rural employment and local facilities in smaller settlements and encouraging home working. The Norfolk County Council Bus Service Improvement Plan (BSIP) shows that whilst the proportion of journeys made by bus is below the County average, journeys undertaken by bicycle are higher and walking makes up 20% of journeys in Breckland compared to the Norfolk average of 11.5%.
- 11.9 Sustainable transport policy INF 01 therefore seeks to widen the choice of travel opportunities using public transport, walking, and cycling. Parking standards are likely to be reviewed over time, in accordance with contemporaneous Norfolk County Council Highways policy and guidance.
- 11.10 In February 2024 Norfolk County Council published a Countywide Local Cycling and Walking Infrastructure Plan that identifies indicative improvements and active travel routes for a number of key towns and villages in Breckland including Attleborough, Dereham, Thetford, Swaffham and Watton.
- 11.11 The Plan highlights the following cycling trails within the District: Peddars Way; Little Ouse Path; Nar Valley Way; Wensum Way; and Angles Way.
- 11.12 When considering the opportunities to encourage walking and cycling within the District, it is also necessary to consider the perceptions of safety. Studies have shown that the perceptions of safety in relation to both walking and cycling can result in people choosing to make journeys by the private car.
- 11.13 Sustrans, a leading charity that supports people to travel on foot and by bicycle, promotes a number of circulars within Breckland including: The Thetford Circular; The Swaffham Loop; and Route 13, which runs from Fakenham to London and passes through the Market Towns of Dereham and Watton and also connects the District to the north Norfolk coast.
- 11.14 To encourage the use of low and zero emission vehicles to support improvements in air quality, the Council will be working in partnership with Norfolk County Council to achieve the appropriate provision of electric vehicle charging points, particularly for large scale housing, retail, and commercial developments.

- 11.15 Rail links in Breckland are limited to the South of the District; there are 5 train stations, situated in Thetford, Attleborough, East Harling, Eccles Road and Brandon, which lies just within the District on the border with West Suffolk. The stations at East Harling and Eccles Road are small and have limited service, with Eccles being a request only stop.
- 11.16 Attleborough and Thetford stations are both on the Breckland Line, which links Norwich to the East and Cambridge to the West, and connects Breckland to the wider rail network at Cambridge, allowing for travel both North and South, including direct trains to London, which provides opportunity for people to benefit from a more rural lifestyle, without compromising on economic opportunity.
- 11.17 Whilst there are limited opportunities to improve rail links within the District without significant investment, making use of the existing rail infrastructure and the opportunities it brings remains essential for maximising sustainable transport usage.

INF 01: Sustainable Transport Requirements

The Council will work in partnership with the Local Highway Authority and all bodies responsible for transport to promote a safe, efficient, and convenient sustainable transport system. In order to achieve this, development proposals must;

- (a) Give flexibility in providing opportunities for all practicable travel modes for all potential users;
- (b) Promote improved access to, and interchange between, all modes of transport to key settlements and town centres;
- (c) Reduce, where possible, the need to travel by private car in towns and villages and increasing the proportion of shorter journeys made on foot or cycle;
- (d) Encourage walking and cycling by creating new routes, and improving links to existing routes and provide new facilities to adequately accommodate cyclists and pedestrians where necessary;
- (e) Integrate satisfactorily into existing transport networks;
- (f) Mitigate impacts from either the development itself, or from the cumulative effects of development on the local or strategic highway networks, through the

provision of, or contributions towards, any relevant transport improvement deemed to be necessary, including those secured by legal agreement;

- (g) Protect, and where possible enhance, access to public rights of way;
- (h) Provide safe, suitable, and convenient access for all users, including appropriate parking and servicing provision in terms of amount, design, and layout in accordance with Local Highway Authority requirements; and,
- (i) Avoid creating inappropriate or incompatible traffic levels and avoid compromising highway safety.

Additionally, proposals will be considered favourably that:

- (j) Are located so as to ensure wherever possible, sustainable modes of transport are accessible and provision is made for improved public transport; or,
- (k) Support improvements to road and rail connections both within the District and to the wider area.

Flood Risk & Surface Water Drainage

11.18 All new development should be located so as to minimise flood risk resulting from that development and cumulatively from other developments in the vicinity. The policy approach is to steer development towards areas of low flood risk considering all sources of flood risk and impacts of climate change.

11.19 Flood risk across Breckland is not as widespread compared to many areas of Norfolk. Flooding most commonly occurs adjacent to rivers and other watercourses or in low-lying areas. However, it can also occur elsewhere, such as via surface water flooding, groundwater flooding caused by springs, or where buildings or other structures affect the natural drainage of the land. Evidence on flood risk is contained within the latest Strategic Flood Risk Assessment (SFRA).

11.20 Norfolk County Council is the Lead Local Flood Authority (LLFA) and is responsible for advising on local flood risk and surface water flooding and the uptake of sustainable drainage systems, as well as being tasked with advising on drainage for new major development. Internal Drainage Boards should also be engaged /

consulted on relevant proposals and in some instances their consent may be required.

- 11.21 The Water Cycle Study, SFRA and any subsequent Surface Water Management Plan(s) will inform the level of detail required to accompany planning applications in any designated groundwater protection zones and/or critical drainage catchments, or other areas where there is evidence that there is likely to be an increased risk of surface water flooding (e.g. as a result of specific topography with catchment areas feeding into identified flood-vulnerable areas).
- 11.22 Policy INF03 requires surface water drainage issues to be addressed in planning applications to ensure that such issues and associated flood risk are considered and to ensure that the visual impact of drainage measures is considered in the assessment of new development.
- 11.23 The use of soft landscaping and permeable surface materials should be maximised. On-site rainwater storage, such as ponds and basins, will be required unless the developer can provide justification to demonstrate that this would not be practicable or feasible within the constraints or configuration of the site and would compromise wider regeneration objectives. Regard, within the design of any features, should be had to any known archaeological features on the site.
- 11.24 All applications should reflect best practice within the NPPF, the PPG and the most recent guidance document from the Lead Local Flood Authority (LLFA).

INF 02: Flood Risk & Surface Water Drainage

All new development will:

- (a) Be located to minimise the risk of flooding, mitigating any such risk through design, and implementing sustainable drainage (SuDs) principles;
- (b) Incorporate appropriate sustainable surface water drainage mitigation measures to minimise its own risk of flooding and to ensure there is no increase in flood risk to other areas; and,
- (c) Not result in any loss of floodplain storage and, wherever practicable, provide a net gain in floodplain storage.

Developers will be required to show that the proposed development would:

Telecommunications

- 11.42 Modern and effective telecommunications systems are essential for the continued development of the economy, and the planning system has an important role in facilitating the improvement and expansion of the telecommunications network. However, whilst there are considerable economic and social benefits associated with the development of telecommunications infrastructure, it is important that such developments do not have significant adverse impacts on amenity or environmental quality. Therefore, the Council will seek to ensure that acceptable provision can be made for telecommunications development, whilst ensuring that any adverse impacts associated with development are minimised.
- 11.43 The visual impact of telecommunications development is a particularly important consideration. When seeking approval for the installation of new telecommunications equipment, applicants will be expected to demonstrate that they have taken all reasonable measures to minimise the visual impact of the proposed development on the local environment. In particular, the design and siting of installations should be informed by the context of the wider locality, including the careful consideration of the height, scale, siting, colours, and materials to be used. Installations should also be sited where they would not impede roadside visibility splays and sight lines. Any building-mounted installation should also be sensitively designed so that the architectural quality and character of the building is not compromised.
- 11.44 The provision of suitable broadband infrastructure is an important factor in attracting investment to the District and facilitating home working. The need for Superfast broadband is a key issue for Breckland and more widely Norfolk. Therefore, proposals to improve broadband speeds and coverage will be encouraged and supported. To date, Better Broadband for Norfolk (BBfN) has seen access to Superfast broadband delivered to over 200,000 premises, increasing coverage from 42% in summer 2013, to over 97% of Norfolk's properties at the end of 2023.
- 11.45 New development should ensure that it has considered any need and demand resulting from the development and taken proactive steps in engaging with service and infrastructure providers to ensure that there is high-speed fibre broadband connectivity or mobile internet coverage in the development.



renewable energy generation purposes (see Chapter 12). The Policy below (INF 04) sets a positive framework within which any renewable energy generation proposals would be assessed.

- 11.41 Breckland Council encourages early pre-application engagement on all renewable energy projects to optimise project assessment and delivery. Heritage Impact Assessments and Landscape and Visual Impact Assessments may be required to be submitted as part of any planning application. Applications should include visualisations showing the relationship to heritage assets and settings. Viewpoints should be agreed in consultation with interested parties.

INF 03: Renewable Energy Development

The Council supports proposals for new renewable energy and low carbon development, subject to consideration of the impact of the development and whether it can be made acceptable. Proposals will be considered having regard to the extent to which there are / is:

- (a) Adverse impacts on the local landscape, townscape or designated and non-designated heritage assets and their settings;
- (b) Adverse effects on residential amenity by virtue of outlook / overbearing impact, traffic generation, noise, vibration, overshadowing, glare, or any other associated detrimental emissions, during construction, operation, and decommissioning;
- (c) Adverse effects on flood risk and surface water run-off;
- (d) Irreversible loss of Best and Most Versatile Agricultural Land and the ability for agricultural use of the land to persist throughout the life of the development;
- (e) Impacts that would compromise, restrict or otherwise degrade the operational capability of safeguarded Ministry of Defence sites;
- (f) Cumulative impacts of renewable energy development on an area; and / or,
- (g) Adverse impacts upon designated wildlife sites; nature conservation interests; and / or biodiversity.

Proposals will be permitted where the impact is, or can be made, acceptable.

information to accompany planning applications for anaerobic digestion projects can be a key cause of delay in determining a planning application.

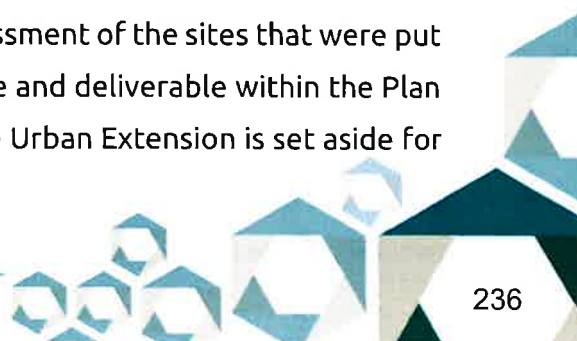
- 11.37 Where an anaerobic digestion proposal is regarded as a waste treatment facility it will be a 'County Matter' and any planning application will be determined by Norfolk County Council as the Waste Planning Authority in accordance with the policies in the Minerals and Waste Local Plan.

Wind Energy Development

- 11.38 In recent years, new wind energy development in Norfolk has been driven by the favourable conditions off-shore, and the potential for larger turbines to produce higher amounts of energy. Within Breckland, a sub-station has been constructed near Necton, to enable the energy generated from off-shore wind farms to connect to the National Grid.

Renewable Energy Environmental Concerns

- 11.39 In relation to all renewable or low carbon energy development the Planning Practice Guidance states that the need for renewable or low carbon energy does not automatically override environmental protections; cumulative impacts require particular attention, especially the increasing impact that large scale solar farms can have on landscape and local amenity as the number of solar arrays in an area increases. Local topography is an important factor in assessing whether large scale solar farms could have a damaging effect on landscape and recognise that the impact can be as great in predominately flat landscapes as in hilly or mountainous areas; also, that great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting. Overarching National Policy Statement for Energy (EN-1) sets out the clear need for environmental requirements, minimising impacts and achieving environmental enhancements.
- 11.40 The Council undertook a 'Call for Sites' for Renewable Energy Generation in March 2025. 7 sites were put forward at that time. Having reviewed the information submitted, the Council is not proposing to allocate specific sites for renewable energy generation at this time. The Council's assessment of the sites that were put forward concluded that none were clearly suitable and deliverable within the Plan period. A part of the Kingsfleet Grove Sustainable Urban Extension is set aside for



the context of the Council's Landscape Character Assessment and Settlement Fringe Study.

- 11.32 Whilst large scale ground-mounted PV solar farms developments can have a negative impact on the rural environment, particularly in undulating landscapes, the visual impact of a well-planned and well-screened solar farm can be properly addressed within the landscape if planned sensitively.
- 11.33 Large-scale ground-mounted solar proposals should avoid Best and Most Versatile (BMV) land (ALC Grades 1–3a). Applications affecting BMV must submit up-to-date ALC mapping and clear justification, demonstrating avoidance/minimisation and why lower grade/brownfield alternatives are not suitable.
- 11.34 Where multiple solar proposals are brought forward in close proximity, applicants must provide a cumulative impact assessment and demonstrate collaboration (e.g. coordinated construction programmes, shared haul routes/cable corridors, and harmonised screening) to minimise landscape and community effects.

Anaerobic Digestion Planning Considerations

- 11.35 Anaerobic digestion (AD) is a natural process in which micro-organisms break down the organic matter found in wet biomass waste (such as sewage sludge, animal manure and slurry and waste food) in the absence of oxygen, to produce biogas (mainly a mixture of around 60% methane and 40% carbon dioxide) and digestate (a nitrogen rich fertiliser). The National Non-Food Crops Centre (NNFCC) runs the Government's Anaerobic Digestion Portal (<https://www.biogas-info.co.uk>) – a gateway to information on anaerobic digestion, biogas and digestate. Anaerobic Digestion proposals are regarded as waste treatment facilities, where feedstock is classified as waste under relevant legislation and so relevant related national and county best practice guidance and policies will apply.
- 11.36 Anaerobic Digestion proposals raise a number of planning issues including visual and landscape impacts arising from industrial scale plant / buildings, location concerns (in sustainability terms relative to the source of biomass and where relevant combined heat and power (CHP), electricity and/or gas grid connection), potential odour impacts, air emissions, noise impacts, protection of the water environment and traffic impacts. Failure to supply adequate environmental

ground source heating. All of these technologies and methods of construction have a role to play in meeting Government targets and providing positive outcomes for the District. The Council will therefore support and encourage the generation of energy from renewable sources. These will be permitted unless there are unacceptable site specific or other impacts that are not outweighed by wider environmental, social, economic and / or other benefits.

Solar Photovoltaic Farm Planning Considerations

- 11.28 As a rural District, Breckland is particularly suited to solar farms. The Government's Solar Roadmap was published in 2024 with the aim of creating a comprehensive plan to increase solar deployment nationwide to 45-47GW by 2030.
- 11.29 Whilst large scale facilities provide an opportunity for greater energy production (as well as potential enhancement to biodiversity), it is also important that they are carefully planned and screened to ensure any amenity and visual impacts are minimised. The NPPF states that applicants for energy development should not have to demonstrate the overall need for renewable or low carbon energy and that applications should be approved if their impacts are (or can be made) acceptable.
- 11.30 The Government's Planning Practice Guidance (PPG) on renewable and low carbon energy sets out a set of planning considerations at a national level to assess the impact of large-scale ground-mounted solar photovoltaic farms. National Policy Statement for Renewable Energy Infrastructure (EN-3) also sets out factors influencing site selection and design, technical consideration, impacts and mitigations. Development proposals should have regard to the PPG and EN-3, in addition to this local policy on renewable energy in order to ensure the proposal is acceptable and can be supported by the Council. Key planning considerations include the quality of agricultural land, the visual and landscape impact, the effect on landscape of glint and glare and on neighbouring uses and aircraft safety, the impact of security infrastructure such as lights and fencing and the impact on the setting of heritage assets.
- 11.31 The Council will favourably consider opportunities for biodiversity enhancements around arrays, the potential for complete restoration of the land and appropriate mitigation such as landscape buffers (trees and hedgerows) where compatible in



- (d) Not increase greenfield run off rates and vulnerability of the site, or the wider catchment, to flooding from surface water runoff from existing or future water flows;
- (e) Maximise the use of on-site rainwater storage methods and, where practically achievable, living walls and / or roofs;
- (f) Wherever practicable, reduce the risk of surface water flooding in the surrounding area adjacent to the development and have a positive impact on aquifer recharge; and
- (g) Address potential impact of infiltration upon groundwater Source Protection Zones and/or Critical Drainage Catchments. These must be minimised through the installation of infiltration and attenuation measures to dispose of surface water in accordance with sustainable drainage system (SuDS) principles.

In line with the sequential test, areas of functional floodplain should be protected from development. Where possible, through proposals for redevelopment, opportunities to reinstate areas of functional flood plain should be taken (e.g. reducing building footprints or relocating to lower flood risk zones).

Consideration should be given to assessing opportunities to undertake river restoration and enhancement as part of a development to make space for water.

Renewable Energy

11.25 The NPPF supports the transition to a low carbon future and encourages the use of renewable resources, including the development of renewable energy. National policy supports and encourages the development of renewable energy sources.

11.26 Renewable energy is central to the economic, social, and environmental dimensions of sustainable development. In meeting the challenge and to help increase the use and supply of renewable and low carbon energy, the Council recognises the need for a positive strategy to promote renewable energy generation, whilst ensuring that the adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts.

11.27 There are many sources of renewable energy, from solar, wind, and biomass through to energy efficient installations such as combined heat and power and

consulted on relevant proposals and in some instances their consent may be required.

- 11.21 The Water Cycle Study, SFRA and any subsequent Surface Water Management Plan(s) will inform the level of detail required to accompany planning applications in any designated groundwater protection zones and/or critical drainage catchments, or other areas where there is evidence that there is likely to be an increased risk of surface water flooding (e.g. as a result of specific topography with catchment areas feeding into identified flood-vulnerable areas).
- 11.22 Policy INF03 requires surface water drainage issues to be addressed in planning applications to ensure that such issues and associated flood risk are considered and to ensure that the visual impact of drainage measures is considered in the assessment of new development.
- 11.23 The use of soft landscaping and permeable surface materials should be maximised. On-site rainwater storage, such as ponds and basins, will be required unless the developer can provide justification to demonstrate that this would not be practicable or feasible within the constraints or configuration of the site and would compromise wider regeneration objectives. Regard, within the design of any features, should be had to any known archaeological features on the site.
- 11.24 All applications should reflect best practice within the NPPF, the PPG and the most recent guidance document from the Lead Local Flood Authority (LLFA).

INF 02: Flood Risk & Surface Water Drainage

All new development will:

- (a) Be located to minimise the risk of flooding, mitigating any such risk through design, and implementing sustainable drainage (SuDs) principles;
- (b) Incorporate appropriate sustainable surface water drainage mitigation measures to minimise its own risk of flooding and to ensure there is no increase in flood risk to other areas; and,
- (c) Not result in any loss of floodplain storage and, wherever practicable, provide a net gain in floodplain storage.

Developers will be required to show that the proposed development would:

provision of, or contributions towards, any relevant transport improvement deemed to be necessary, including those secured by legal agreement;

- (g) Protect, and where possible enhance, access to public rights of way;
- (h) Provide safe, suitable, and convenient access for all users, including appropriate parking and servicing provision in terms of amount, design, and layout in accordance with Local Highway Authority requirements; and,
- (i) Avoid creating inappropriate or incompatible traffic levels and avoid compromising highway safety.

Additionally, proposals will be considered favourably that:

- (j) Are located so as to ensure wherever possible, sustainable modes of transport are accessible and provision is made for improved public transport; or,
- (k) Support improvements to road and rail connections both within the District and to the wider area.

Flood Risk & Surface Water Drainage

11.18 All new development should be located so as to minimise flood risk resulting from that development and cumulatively from other developments in the vicinity. The policy approach is to steer development towards areas of low flood risk considering all sources of flood risk and impacts of climate change.

11.19 Flood risk across Breckland is not as widespread compared to many areas of Norfolk. Flooding most commonly occurs adjacent to rivers and other watercourses or in low-lying areas. However, it can also occur elsewhere, such as via surface water flooding, groundwater flooding caused by springs, or where buildings or other structures affect the natural drainage of the land. Evidence on flood risk is contained within the latest Strategic Flood Risk Assessment (SFRA).

11.20 Norfolk County Council is the Lead Local Flood Authority (LLFA) and is responsible for advising on local flood risk and surface water flooding and the uptake of sustainable drainage systems, as well as being tasked with advising on drainage for new major development. Internal Drainage Boards should also be engaged /

- 11.15 Rail links in Breckland are limited to the South of the District; there are 5 train stations, situated in Thetford, Attleborough, East Harling, Eccles Road and Brandon, which lies just within the District on the border with West Suffolk. The stations at East Harling and Eccles Road are small and have limited service, with Eccles being a request only stop.
- 11.16 Attleborough and Thetford stations are both on the Breckland Line, which links Norwich to the East and Cambridge to the West, and connects Breckland to the wider rail network at Cambridge, allowing for travel both North and South, including direct trains to London, which provides opportunity for people to benefit from a more rural lifestyle, without compromising on economic opportunity.
- 11.17 Whilst there are limited opportunities to improve rail links within the District without significant investment, making use of the existing rail infrastructure and the opportunities it brings remains essential for maximising sustainable transport usage.

INF 01: Sustainable Transport Requirements

The Council will work in partnership with the Local Highway Authority and all bodies responsible for transport to promote a safe, efficient, and convenient sustainable transport system. In order to achieve this, development proposals must;

- (a) Give flexibility in providing opportunities for all practicable travel modes for all potential users;
- (b) Promote improved access to, and interchange between, all modes of transport to key settlements and town centres;
- (c) Reduce, where possible, the need to travel by private car in towns and villages and increasing the proportion of shorter journeys made on foot or cycle;
- (d) Encourage walking and cycling by creating new routes, and improving links to existing routes and provide new facilities to adequately accommodate cyclists and pedestrians where necessary;
- (e) Integrate satisfactorily into existing transport networks;
- (f) Mitigate impacts from either the development itself, or from the cumulative effects of development on the local or strategic highway networks, through the

- 11.8 Recognising that there is a need to manage the increase in car travel, the Council is aiming to encourage a reduction in car use, particularly for shorter local journeys. Additionally, to assist in reducing the need for longer distance travel, the Council will focus on retaining rural employment and local facilities in smaller settlements and encouraging home working. The Norfolk County Council Bus Service Improvement Plan (BSIP) shows that whilst the proportion of journeys made by bus is below the County average, journeys undertaken by bicycle are higher and walking makes up 20% of journeys in Breckland compared to the Norfolk average of 11.5%.
- 11.9 Sustainable transport policy INF 01 therefore seeks to widen the choice of travel opportunities using public transport, walking, and cycling. Parking standards are likely to be reviewed over time, in accordance with contemporaneous Norfolk County Council Highways policy and guidance.
- 11.10 In February 2024 Norfolk County Council published a Countywide Local Cycling and Walking Infrastructure Plan that identifies indicative improvements and active travel routes for a number of key towns and villages in Breckland including Attleborough, Dereham, Thetford, Swaffham and Watton.
- 11.11 The Plan highlights the following cycling trails within the District: Peddars Way; Little Ouse Path; Nar Valley Way; Wensum Way; and Angles Way.
- 11.12 When considering the opportunities to encourage walking and cycling within the District, it is also necessary to consider the perceptions of safety. Studies have shown that the perceptions of safety in relation to both walking and cycling can result in people choosing to make journeys by the private car.
- 11.13 Sustrans, a leading charity that supports people to travel on foot and by bicycle, promotes a number of circulars within Breckland including: The Thetford Circular; The Swaffham Loop; and Route 13, which runs from Fakenham to London and passes through the Market Towns of Dereham and Watton and also connects the District to the north Norfolk coast.
- 11.14 To encourage the use of low and zero emission vehicles to support improvements in air quality, the Council will be working in partnership with Norfolk County Council to achieve the appropriate provision of electric vehicle charging points, particularly for large scale housing, retail, and commercial developments.

- Norwich with Cambridge via the strategic growth areas of Attleborough, Thetford and Snetterton Employment Area.
- 11.4 The A47 runs west to east from Birmingham to Lowestoft connecting Swaffham and Dereham. At present, it is not fully dualled. The A47 Alliance comprises local authorities, local enterprise partnerships (LEP's), the business community, MPs and stakeholders stretching from Lowestoft to Peterborough. This body has presented a clear business case and lobbied Central Government to commit funding for improvements to the A47. In 2024 National Highways began work on dualling the A47 from North Tuddenham to Easton. This scheme will complete the dualling of the route between Dereham and Norwich enhancing connectivity for the north of Breckland.
- 11.5 Strategic road improvements must not come at the expense of environmental quality and significantly must not result in an adverse impact to the integrity of Breckland SPA, unless it can be demonstrated that there are Imperative Reasons of Overriding Public Interest (IROPI) in accordance with the Habitats Directive. Early evidence gathering in relation to the SPA interest is required for any proposed strategic transport improvements which impact on The Brecks. Road improvements should not be promoted within 200m of Breckland SAC and within 1,500m of Breckland SPA unless IROPI can be demonstrated.
- 11.6 Public transport services in the District are principally by bus. Bus services focus on linking the District's Market Towns with shopping and employment destinations at Norwich, King's Lynn, and Bury St. Edmunds. Infrequent services link rural areas with Market Towns, principally on market days. The Norfolk County Council Breckland Movement Plan (Dec 2021) does highlight that accessibility levels are lowest across Breckland compared with the wider county. This is one of the reasons why a digitised Demand Responsive Transport solution is being developed in this area as part of the Rural Mobility Fund. Breckland does have a lower than Norfolk average share of journeys made by bus - 1.28% compared to 4.75%.
- 11.7 Reducing reliance on the private car and promoting active lifestyles are mutually beneficial aims which can be achieved by supporting sustainable travel options. However, it should be recognised that for some communities, public transport, walking and cycling are not realistic options and therefore travel by car will remain an essential option for many people living in Breckland.



11. Infrastructure

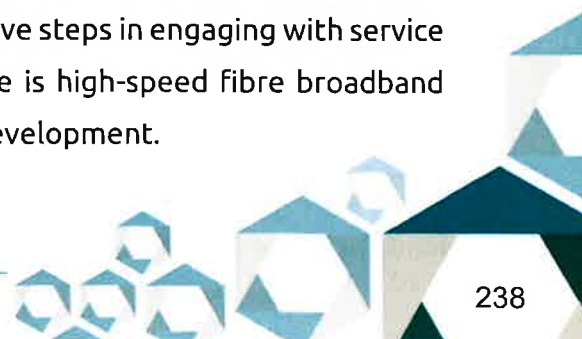
Transport

- 11.1 This section sets out the Council's approach to managing car travel and its impacts on the local economy, the environment, and communities. Norfolk's Fourth Local Transport Plan, sets out a range of objectives for transport and accessibility, by 2036, focused upon:
- (a) Embracing the future – maximising use of new technology;
 - (b) Delivering a sustainable Norfolk – seeking to ensure new development is beneficial to Norfolk's society, environment, and economy;
 - (c) Enhancing connectivity – making it as easy as possible for residents and businesses to travel from A to B in Norfolk;
 - (d) Enhancing Norfolk's quality of life – Encouraging active travel to
 - (e) Improve residents' health and working towards zero carbon;
 - (f) Increasing accessibility – ensuring everyone has access to the facilities and services they require;
 - (g) Improving transport safety – to create a network which encourages safe usage of our roads and to protect vulnerable transport users; and,
 - (h) A Well Managed and Maintained Transport Network – apply new and innovative technology where it will be most effective.
- 11.2 The District's economy relies on high levels of out commuting and commuting to and from the District's Market Towns. This puts pressure on the road network during peak periods. 2021 census data showed over 10,000 residents travel 10-20km to their place of employment and 60% of journeys to work are undertaken by car or van. In addition, within Breckland, services such as health and education tend to also be sited within Market Towns and other key settlements. This means that significant numbers of people must travel relatively long distances to access everyday facilities, often with the added challenge of the quality and availability of public transport.
- 11.3 Two strategic vehicular routes run through the District. These two routes are recognised as core corridors for the East region by the Sub-Regional Transport Body as set out in the Transport East Strategy. The A11 dual carriageway connects



Telecommunications

- 11.42 Modern and effective telecommunications systems are essential for the continued development of the economy, and the planning system has an important role in facilitating the improvement and expansion of the telecommunications network. However, whilst there are considerable economic and social benefits associated with the development of telecommunications infrastructure, it is important that such developments do not have significant adverse impacts on amenity or environmental quality. Therefore, the Council will seek to ensure that acceptable provision can be made for telecommunications development, whilst ensuring that any adverse impacts associated with development are minimised.
- 11.43 The visual impact of telecommunications development is a particularly important consideration. When seeking approval for the installation of new telecommunications equipment, applicants will be expected to demonstrate that they have taken all reasonable measures to minimise the visual impact of the proposed development on the local environment. In particular, the design and siting of installations should be informed by the context of the wider locality, including the careful consideration of the height, scale, siting, colours, and materials to be used. Installations should also be sited where they would not impede roadside visibility splays and sight lines. Any building-mounted installation should also be sensitively designed so that the architectural quality and character of the building is not compromised.
- 11.44 The provision of suitable broadband infrastructure is an important factor in attracting investment to the District and facilitating home working. The need for Superfast broadband is a key issue for Breckland and more widely Norfolk. Therefore, proposals to improve broadband speeds and coverage will be encouraged and supported. To date, Better Broadband for Norfolk (BBfN) has seen access to Superfast broadband delivered to over 200,000 premises, increasing coverage from 42% in summer 2013, to over 97% of Norfolk's properties at the end of 2023.
- 11.45 New development should ensure that it has considered any need and demand resulting from the development and taken proactive steps in engaging with service and infrastructure providers to ensure that there is high-speed fibre broadband connectivity or mobile internet coverage in the development.



renewable energy generation purposes (see Chapter 12). The Policy below (INF 04) sets a positive framework within which any renewable energy generation proposals would be assessed.

- 11.41 Breckland Council encourages early pre-application engagement on all renewable energy projects to optimise project assessment and delivery. Heritage Impact Assessments and Landscape and Visual Impact Assessments may be required to be submitted as part of any planning application. Applications should include visualisations showing the relationship to heritage assets and settings. Viewpoints should be agreed in consultation with interested parties.

INF 03: Renewable Energy Development

The Council supports proposals for new renewable energy and low carbon development, subject to consideration of the impact of the development and whether it can be made acceptable. Proposals will be considered having regard to the extent to which there are / is:

- (a) Adverse impacts on the local landscape, townscape or designated and non-designated heritage assets and their settings;
- (b) Adverse effects on residential amenity by virtue of outlook / overbearing impact, traffic generation, noise, vibration, overshadowing, glare, or any other associated detrimental emissions, during construction, operation, and decommissioning;
- (c) Adverse effects on flood risk and surface water run-off;
- (d) Irreversible loss of Best and Most Versatile Agricultural Land and the ability for agricultural use of the land to persist throughout the life of the development;
- (e) Impacts that would compromise, restrict or otherwise degrade the operational capability of safeguarded Ministry of Defence sites;
- (f) Cumulative impacts of renewable energy development on an area; and / or,
- (g) Adverse impacts upon designated wildlife sites; nature conservation interests; and / or biodiversity.

Proposals will be permitted where the impact is, or can be made, acceptable.

information to accompany planning applications for anaerobic digestion projects can be a key cause of delay in determining a planning application.

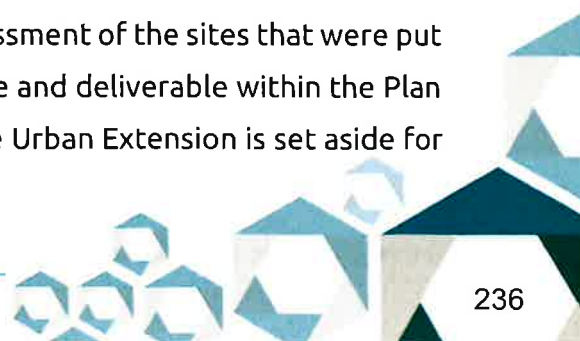
- 11.37 Where an anaerobic digestion proposal is regarded as a waste treatment facility it will be a 'County Matter' and any planning application will be determined by Norfolk County Council as the Waste Planning Authority in accordance with the policies in the Minerals and Waste Local Plan.

Wind Energy Development

- 11.38 In recent years, new wind energy development in Norfolk has been driven by the favourable conditions off-shore, and the potential for larger turbines to produce higher amounts of energy. Within Breckland, a sub-station has been constructed near Necton, to enable the energy generated from off-shore wind farms to connect to the National Grid.

Renewable Energy Environmental Concerns

- 11.39 In relation to all renewable or low carbon energy development the Planning Practice Guidance states that the need for renewable or low carbon energy does not automatically override environmental protections; cumulative impacts require particular attention, especially the increasing impact that large scale solar farms can have on landscape and local amenity as the number of solar arrays in an area increases. Local topography is an important factor in assessing whether large scale solar farms could have a damaging effect on landscape and recognise that the impact can be as great in predominately flat landscapes as in hilly or mountainous areas; also, that great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting. Overarching National Policy Statement for Energy (EN-1) sets out the clear need for environmental requirements, minimising impacts and achieving environmental enhancements.
- 11.40 The Council undertook a 'Call for Sites' for Renewable Energy Generation in March 2025. 7 sites were put forward at that time. Having reviewed the information submitted, the Council is not proposing to allocate specific sites for renewable energy generation at this time. The Council's assessment of the sites that were put forward concluded that none were clearly suitable and deliverable within the Plan period. A part of the Kingsfleet Grove Sustainable Urban Extension is set aside for



the context of the Council's Landscape Character Assessment and Settlement Fringe Study.

- 11.32 Whilst large scale ground-mounted PV solar farms developments can have a negative impact on the rural environment, particularly in undulating landscapes, the visual impact of a well-planned and well-screened solar farm can be properly addressed within the landscape if planned sensitively.
- 11.33 Large-scale ground-mounted solar proposals should avoid Best and Most Versatile (BMV) land (ALC Grades 1–3a). Applications affecting BMV must submit up-to-date ALC mapping and clear justification, demonstrating avoidance/minimisation and why lower grade/brownfield alternatives are not suitable.
- 11.34 Where multiple solar proposals are brought forward in close proximity, applicants must provide a cumulative impact assessment and demonstrate collaboration (e.g. coordinated construction programmes, shared haul routes/cable corridors, and harmonised screening) to minimise landscape and community effects.

Anaerobic Digestion Planning Considerations

- 11.35 Anaerobic digestion (AD) is a natural process in which micro-organisms break down the organic matter found in wet biomass waste (such as sewage sludge, animal manure and slurry and waste food) in the absence of oxygen, to produce biogas (mainly a mixture of around 60% methane and 40% carbon dioxide) and digestate (a nitrogen rich fertiliser). The National Non-Food Crops Centre (NNFCC) runs the Government's Anaerobic Digestion Portal (<https://www.biogas-info.co.uk>) – a gateway to information on anaerobic digestion, biogas and digestate. Anaerobic Digestion proposals are regarded as waste treatment facilities, where feedstock is classified as waste under relevant legislation and so relevant related national and county best practice guidance and policies will apply.
- 11.36 Anaerobic Digestion proposals raise a number of planning issues including visual and landscape impacts arising from industrial scale plant / buildings, location concerns (in sustainability terms relative to the source of biomass and where relevant combined heat and power (CHP), electricity and/or gas grid connection), potential odour impacts, air emissions, noise impacts, protection of the water environment and traffic impacts. Failure to supply adequate environmental

ground source heating. All of these technologies and methods of construction have a role to play in meeting Government targets and providing positive outcomes for the District. The Council will therefore support and encourage the generation of energy from renewable sources. These will be permitted unless there are unacceptable site specific or other impacts that are not outweighed by wider environmental, social, economic and / or other benefits.

Solar Photovoltaic Farm Planning Considerations

- 11.28 As a rural District, Breckland is particularly suited to solar farms. The Government's Solar Roadmap was published in 2024 with the aim of creating a comprehensive plan to increase solar deployment nationwide to 45-47GW by 2030.
- 11.29 Whilst large scale facilities provide an opportunity for greater energy production (as well as potential enhancement to biodiversity), it is also important that they are carefully planned and screened to ensure any amenity and visual impacts are minimised. The NPPF states that applicants for energy development should not have to demonstrate the overall need for renewable or low carbon energy and that applications should be approved if their impacts are (or can be made) acceptable.
- 11.30 The Government's Planning Practice Guidance (PPG) on renewable and low carbon energy sets out a set of planning considerations at a national level to assess the impact of large-scale ground-mounted solar photovoltaic farms. National Policy Statement for Renewable Energy Infrastructure (EN-3) also sets out factors influencing site selection and design, technical consideration, impacts and mitigations. Development proposals should have regard to the PPG and EN-3, in addition to this local policy on renewable energy in order to ensure the proposal is acceptable and can be supported by the Council. Key planning considerations include the quality of agricultural land, the visual and landscape impact, the effect on landscape of glint and glare and on neighbouring uses and aircraft safety, the impact of security infrastructure such as lights and fencing and the impact on the setting of heritage assets.
- 11.31 The Council will favourably consider opportunities for biodiversity enhancements around arrays, the potential for complete restoration of the land and appropriate mitigation such as landscape buffers (trees and hedgerows) where compatible in



- (d) Not increase greenfield run off rates and vulnerability of the site, or the wider catchment, to flooding from surface water runoff from existing or future water flows;
- (e) Maximise the use of on-site rainwater storage methods and, where practically achievable, living walls and / or roofs;
- (f) Wherever practicable, reduce the risk of surface water flooding in the surrounding area adjacent to the development and have a positive impact on aquifer recharge; and
- (g) Address potential impact of infiltration upon groundwater Source Protection Zones and/or Critical Drainage Catchments. These must be minimised through the installation of infiltration and attenuation measures to dispose of surface water in accordance with sustainable drainage system (SuDS) principles.

In line with the sequential test, areas of functional floodplain should be protected from development. Where possible, through proposals for redevelopment, opportunities to reinstate areas of functional flood plain should be taken (e.g. reducing building footprints or relocating to lower flood risk zones).

Consideration should be given to assessing opportunities to undertake river restoration and enhancement as part of a development to make space for water.

Renewable Energy

11.25 The NPPF supports the transition to a low carbon future and encourages the use of renewable resources, including the development of renewable energy. National policy supports and encourages the development of renewable energy sources.

11.26 Renewable energy is central to the economic, social, and environmental dimensions of sustainable development. In meeting the challenge and to help increase the use and supply of renewable and low carbon energy, the Council recognises the need for a positive strategy to promote renewable energy generation, whilst ensuring that the adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts.

11.27 There are many sources of renewable energy, from solar, wind, and biomass through to energy efficient installations such as combined heat and power and