

Breckland Local Plan Full Update Regulation 18 Preferred Options: Consultation Representations

Project:	GHOC 1 (109) – West of Watton Road, Hockham	Reference:	GHOC 1 / 109
Client:	Great Hockham Estate	Date:	December 2025

1.0 Introduction

- 1.1 On behalf of our client and the landowner, the Great Hockham Estate, we wish to continue to support the site west of Watton Road, Hockham, for allocation for residential development. Our client considers that the site is deliverable and would make a valuable contribution to the housing land supply requirements within the Plan period.
- 1.2 This representation is submitted as part of the 2025 Regulation 18 Stage (Preferred Options) Consultation on Breckland's new Local Plan, in support of the site referenced in the site assessments as 109 for "West of Watton Road, Hockham". The site is also referred to in the Preferred Options Report as proposed allocation site GHOC1 (109): West of Watton Road.
- 1.3 The landowner strongly supports the identification of the site as a proposed allocated site for approximately 80 dwellings. Our client agrees entirely with the principle of the site being identified for allocation and wishes to provide further support and clarity in response to this consultation.
- 1.4 This representation aims to provide further detail relating to the site opportunities set out in the proposed allocation policy and responds to the Phase 2 Site Assessments that forms part of the evidence base for the Regulation 18 Preferred Options stage of the Local Plan Full Update. This representation also provides continued validation that the site is available and deliverable.

2.0 Site Opportunities

- 2.1 The site was originally promoted for a mixed-use development on an area measuring approximately 4.67 hectares on land immediately to the west of Watton Road. The site is immediately adjacent to the currently adopted settlement boundary of Hockham and would form a logical extension to the village.
- 2.2 The site is located in a sustainable location, on the edge of a village with excellent accessibility to the existing services and facilities, as well as public transportation links commensurate with the scale of the settlement. The site itself is adjacent to existing residential development, 70 metres to the Primary School, 220 metres to a bus stop with connections to nearby higher order settlements, 450 metres to the local pub and 600 metres to the village hall.
- 2.3 As per previous submissions, we continue to consider that Hockham is in need of a village shop to complement the existing services available in the village. Hockham has been identified as a Secondary Parish in the proposed Settlement Hierarchy Methodology. As well as the support to existing services that would arise from the addition of new housing, we understand that the addition of a village shop

would further support the services already identified to maintain Hockham's status within this settlement category. This proposed allocation will provide the opportunity and the conditions necessary for the delivery of a shop within the village.

- 2.4 Accordingly, the landowner fully supports the inclusion of this site as a preferred allocation for approximately 80 homes in the new Local Plan to support sustainable, well-designed growth within the village. We agree entirely with the proposed allocation policy criteria and welcome the opportunity to provide the necessary local infrastructure and community benefits envisaged by the draft Local Plan. To demonstrate this, the table below sets out how a future proposed development is capable of complying with each element of the allocation policy GHOC 1 (109):

Policy Requirement	Confirmation of Compliance
a) Deliver a village shop	A location for a small shop has been identified on a concept plan near the site entrance on Watton Road, designed to complement existing services and enhance village vitality.
b) Provide public open space with children's play and sports equipment proportionate to scale (Policy ENV 12)	The concept plan includes a central area of open space with a fully accessible children's play area and space for informal recreation, proportionate to the scale of development.
c) High-quality design reflecting the Breckland Design Guide	The future detailed design will incorporate a landscape-led approach with permeable street patterns, active frontages, and integration of green infrastructure, consistent with the Breckland Design Guide principles.
d) Safe and acceptable vehicle access	A new adoptable access from Watton Road is achievable without third-party land, with visibility splays meeting NCC standards.
e) Off-site highway improvements for pedestrian and cycle access to key services	The scheme will deliver footway extensions along Watton Road to link the site with existing village facilities, improving pedestrian safety and connectivity.
f) Facilities and improvements to bus stops and public transport provision	Opportunities exist to upgrade nearby bus stops and provide shelters or real-time information boards, subject to agreement with NCC and operators.
g) Wildlife mitigation and Biodiversity Net Gain	The existing site and scale of proposed development provides ample scope for on-site habitat creation and enhancement. A future scheme will deliver mandatory BNG in accordance with the new Local Plan policies and the statutory provisions.

h) Adequate capacity in sewage treatment works and foul sewerage network; water quality compliance	Detailed capacity checks will be undertaken at the stage of a planning submission. There are currently no known constraints to connection.
i) Sufficient utility provision (power and water)	The site adjoins existing development with mains services available. No abnormal constraints have been identified to date.
j) Minimum 25% affordable housing with 90/10 tenure split	At least 25% affordable housing will be delivered, with a 90/10 split between rented and low-cost home ownership, as demonstrated in the July 2025 submission.
k) 25% homes to M4(2) standard and 5% to M4(3) standard	The proving layout allows for integration of accessible and adaptable homes in accordance with Building Regulations standards.
l) Public open space quantum appropriate to size of development (Policy ENV 12)	The proving layout demonstrates how the site is capable of accommodating multiple areas of open space, including a central green and smaller incidental spaces, meeting policy requirements for size and function.

2.5 In addition to meeting these criteria, the proposal will deliver a mix of both market and affordable homes informed by the HEDNA (May 2024), including smaller units and bungalows to address identified local needs and in accordance with proposed policies HOU18 and HOU21.

2.6 The Estate remains committed to ongoing engagement with the Parish Council and stakeholders to ensure the development supports community aspirations and complements existing facilities.

3.0 Site Assessment

3.1 The Council's Phase 2 Site Assessment concluded that the site performs well in a village context against the agreed methodology. Our previous submissions have considered various elements of the site against the Council's own site assessment in detail. The updated review below validates those findings and sets out how identified considerations can be addressed through detailed design.

Broad Accessibility

3.2 The Council's assessment recorded an overall Amber ranking for accessibility, which is typical for Secondary Parishes and reflects the village scale. We agree with this conclusion, however, we consider delivery of this site provides opportunities for accessibility improvements.

3.3 The site fronts an adopted highway, and a new adoptable standard access from Watton Road is achievable without third-party land, with limited hedgerow removal confined to the frontage for visibility splays. Recent development opposite has already established the principle of new accesses and footway provision along Watton Road and our earlier representations identified opportunities

to extend footways to link directly to the village amenities to the south, thereby strengthening pedestrian safety and connectivity for day-to-day needs.

- 3.4 Based on the foregoing, access to the site is entirely achievable and provides sustainable opportunities for improvements to accessibility in the village. In addition, any existing site constraints have the ability to be appropriately mitigated.

Heritage

- 3.5 The Council's assessment notes no immediate proximity to designated heritage assets that would preclude development.
- 3.6 On this basis, and consistent with our earlier submissions, any potential effects on the setting of nearby assets can be mitigated through sensitive design alongside the boundary of the site with the Conservation Area, guided by a site-specific heritage assessment at application stage.

Natural Environment

- 3.7 The site is an arable field with boundary hedgerows and intermittent trees. As future development intends to retain as much of the existing field boundaries as possible, save for those necessary for access, the impact on existing high value habitats is expected to be minimal and would be assessed in detail through necessary ecological surveys at the time of application.
- 3.8 As previously recorded, the Breckland Forest SSSI and Breckland SPA lie in the wider context (with the SPA noted at approximately 295 metres), placing the site within the 1.5km SPA buffer such that an HRA will be required at application stage. Effects are expected to relate principally to recreational pressure rather than direct habitat loss, and can be addressed via appropriate mitigation secured through a Habitat Regulations Assessment and Appropriate Assessment.
- 3.9 The proving layout provides ample scope for biodiversity enhancements on site. It is fully recognised that mandatory Biodiversity Net Gain (BNG) will be required in accordance with the statutory provisions, including the BNG Hierarchy. There are ample opportunities on this site for on-site habitat creation and enhancement within open spaces, landscape corridors and boundary features.

Water Management and Flood Risk

- 3.10 The Council's assessment confirms the site lies in Flood Zone 1, with no identified fluvial risk on-site. This has been reviewed against the latest Environment Agency Flood Maps which confirms there are no insurmountable existing surface water drainage issues.
- 3.11 Our supplementary submission at Call for Sites Stage set out a strategy for multi-functional SuDS within the three areas of public open space identified in the proving layout, supplemented by swales and permeable paving where appropriate. This design approach ensures attenuation at greenfield

run-off rates and avoids off-site impacts. A site-specific FRA and SuDS strategy will be prepared at application stage in consultation with the LLFA

- 3.12 In relation to foul water connections, the landowner has no reason to believe that there are any capacity issues associated with connection to the existing Anglian Water foul sewer. Accordingly, there is no evidence to suggest that capacity issues should be a reason to prevent development on this site.
- 3.13 It is also important to note that this site is not within the nutrient neutrality catchment for both foul and surface water.

Landscape and Design

- 3.14 The Council's assessment recognises the site's contained relationship to the settlement, with existing development opposite and adjacent.
- 3.15 Our concept plan illustrates a landscape-led layout with lower-density edges, retained and enhanced boundary planting, and active frontages to Watton Road. A central, overlooked area of public open space and an accessible play facility provide a strong focal point, while a new pedestrian link to the public right of way on the western boundary improves permeability and access to the countryside. These measures reinforce local distinctiveness and limit landscape effects.

Assessment Conclusion

- 3.16 Overall, we consider the Council's Phase 2 site assessment findings to be sound in the context of a Secondary Parish and readily addressed through reasonable design, access works and ecological mitigation. The draft proposed allocation policy provides the necessary mechanisms for these matters to be secured at application stage.

4.0 Deliverability Statement

- 4.1 The following section provides the Estate's statement on deliverability. It repeats the commitments provided in previous submissions during the promotion of this site.
- 4.2 The definition of a site being 'deliverable', for the purposes of sites for housing, is set out in Annex 2 of the National Planning Policy Framework (2023). In order to meet the standard being considered deliverable, sites should be suitable, available and achievable. The site is assessed against these three tests below.

Suitable

- 4.3 As concluded through the previous Phase 2 Site Assessment, in accordance with the agreed methodology, the site is considered suitable for the proposed development. The suitability is further justified by the assessment carried out above.

Available

- 4.4 The site outlined is entirely owned by the Great Hockham Estate and is registered under a single Title. The landowner supports this representation to make the land available for the stipulated development within the Plan period. The landowner remains committed to the view that a development of approximately 80 dwellings with a village shop could realistically be delivered early in the Plan period, and most likely within five years.
- 4.5 There are no known legal constraints in respect of the land that would restrict future development for these purposes.

Achievable and Viable

- 4.6 In order to be achievable, there must be a realistic prospect that development will be delivered on the site. As established above, there are no known physical, legal or planning constraints that would prevent development of this site.
- 4.1 It is recognised that some minor highways improvements are likely to be required to make the development achievable in accordance with the proposed allocation wording. The landowner supports these requirements.
- 4.2 It is acknowledged that any development would be expected to provide affordable housing equating to 25% of the total number of dwellings, including 10% of the total number of dwellings being delivered for affordable home ownership units. The landowner recognises this requirement and based on the site investigations conducted to date, considers it achievable in respect of viability.
- 4.3 Based on the above, should the site receive an allocation for the level of development promoted, the scheme could reasonably be delivered aligned with the following trajectory:
- Year 1: Adoption of Local Plan allocation policy and submission of a full planning application
 - Year 2: Determination of planning application, mobilisation on site and start on site
 - Year 3: Completion of first circa. 21 homes
 - Year 4: Completion of circa. 30 homes
 - Year 5: Completion of circa. 30 homes

- 4.4 The landowner has a clear desire, as evidenced through the preparation of this representation, to ensure that the full site potential envisioned is achieved in line with the aims and objections of the Draft Local Plan.

5.0 Conclusion

- 5.1 The site is well related to the existing settlement and provides a logical, sustainable extension to the village.
- 5.2 The updated allocation for approximately 80 dwellings is an appropriate reflection of site capacity and will enable a high-quality scheme that meets housing needs, delivers affordable homes, strengthens pedestrian connectivity to the school and services, and supports village vitality.
- 5.3 There are no material planning considerations that would restrict delivery, and the allocation is fully deliverable within the Plan period.
- 5.4 In conclusion, the site is suitable, available and achievable, and should continue to be allocated within the new Breckland Local Plan as GHOC1: West of Watton Road, Hockham.