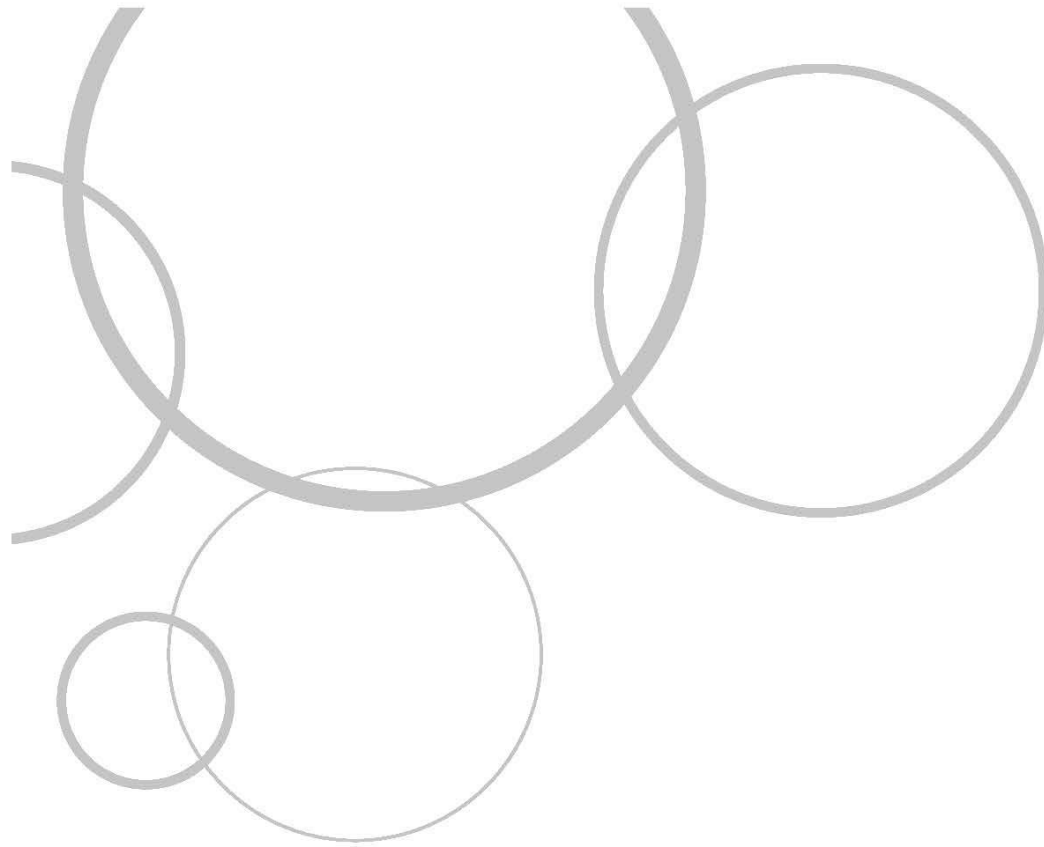




report

Response to the Breckland Draft Local Plan – Full Update Preferred Options (Regulation 18)

Palgrave Ltd



Prepared by:	Graham Bloomfield BA (Hons) MA MRTPI Land & Planning Partner
--------------	---

**Prepared by
Sequence (UK) Limited**

**Sequence (UK) Limited
William H Brown
3 Market Square
Dereham
NR19 2AW**

**Tel: 07876816318
Email: graham.bloomfield@williamhbrown.co.uk**

Sequence (UK) Limited disclaims any responsibility to the client and others in respect of matters outside the scope of this report. This report has been prepared with reasonable skill, care and diligence. This report is confidential to the client and Sequence (UK) Limited accepts no responsibility of whatsoever nature to third parties to whom this report or any part thereof is made known. Any such party relies upon the report at their own risk.

CONTENTS	PAGE
1.0 Introduction and Background.....	4
2.0 Regulation 18 Representations.....	5

1.0 INTRODUCTION AND BACKGROUND

- 1.1 This statement has been prepared by Sequence (UK) Ltd ('Sequence') on behalf of Palgrave Ltd and comprises representations to the Breckland Council Draft Local Plan – Full Update Preferred Options Regulation 18 Consultation ('Regulation 18 Consultation').
- 1.2 Sequence has previously made representations to this Local Plan process on behalf of Palgrave Ltd submitting 5 parcels of land to the east and north-east of Swaffham into the Breckland Call for Sites in April 2025. This proposed residential-led development on 4 of those parcels with commercial development proposed on the 5th parcel on the northern side of the A47.
- 1.3 With the sites having passed Stage 1 Assessment, Sequence submitted representations to the Stage 2 Assessment to demonstrate the sites are suitable, viable, deliverable and achievable.
- 1.4 As part of that work, proving layouts were prepared for 3 of the 4 parcels promoted for residential development, including a composite drawing, together with a Highways and Access Appraisal. These have been re-submitted with these representations as summarised below:
- Site Layout – Parcel 1 (drawing no. LNSSW-IWD-XX-XX-DR-A-2000);
 - Site Layout – Parcel 2 (drawing no. LNSSW-IWD-XX-XX-DR-A-2001);
 - Site Layout – Parcel 3 (drawing no. LNSSW-IWD-XX-XX-DR-A-2002);
 - Site Layout Composite Parcels 1, 2 & 3 (drawing no. LNSSW-IWD-XX-XX-DR-2003); and
 - Highways and Access Appraisal.
- 1.5 The current Preferred Options Plan allocates the 4 parcels (now referenced as sites 072-075 respectively) for residential development of approximately 1700 new homes, together with commercial development on the 13 hectare (ha) parcel 5 (now site 076). This response to the Regulation 18 Consultation is prepared in that context.

2.0 REGULATION 18 REPRESENTATIONS

2.1 The following sets out representations to the Regulation 18 consultation. These are set out under relevant headings beginning with the proposed strategic allocations at Swaffham and then considering proposed development management policies as relevant to Palgrave Ltd.

Swaffham

2.2 Palgrave Ltd welcomes the draft allocations of their land east of Swaffham which can be summarised as follows:

- Swaffham SUE (072): North of Norwich Road (West);
- Swaffham SUE (073): North of Norwich Road (East);
- Swaffham SUE (074): South of Norwich Road (West);
- Swaffham SUE (075): South of Norwich Road (East); and
- Swaffham SWA-EMP1: Land north of the A47 Swaffham (076).

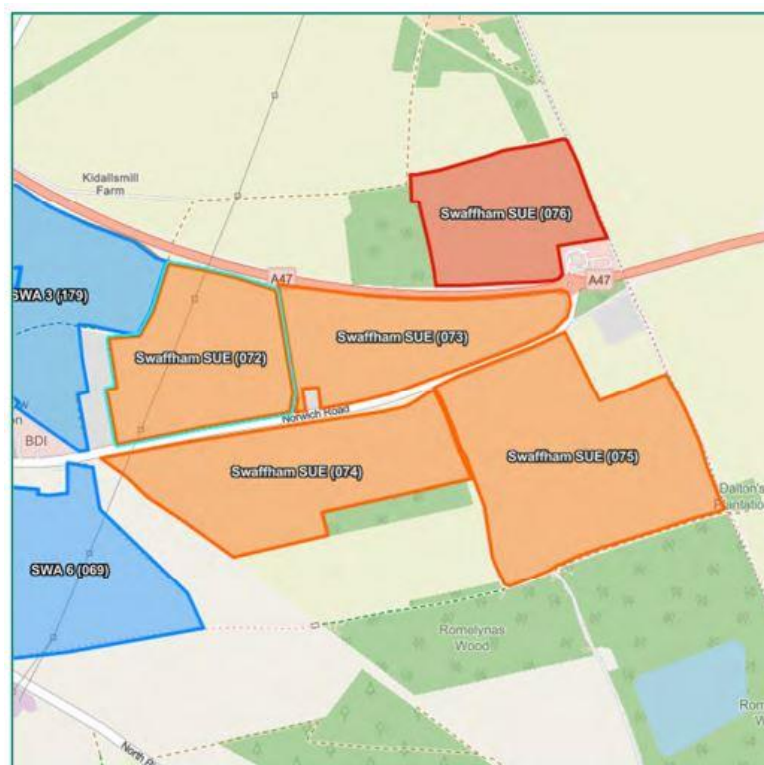


Figure 1: Strategic Allocations east of Swaffham (source Breckland Council)

2.3 Palgrave Ltd also welcome the positive meetings and collaboration to date between their representatives Sequence and Planning Policy Officers at Breckland Council subsequent to

the draft allocations being published. The intention going forward is to continue to engage and work collaboratively with Breckland Council and other stakeholders and it is recognised that will see refinement to the current policies and allocations for strategic development east of Swaffham, particularly to reflect infrastructure and good placemaking requirements, as further technical work is undertaken. This will also include engagement with local stakeholders and representatives of the neighbouring allocations to the west.

Swaffham SUE (072): North of Norwich Road (West)

2.4 Palgrave Ltd **SUPPORT** the proposed allocation for approximately 400 new homes under the above policy. In line with the positive discussions with Planning Policy Officers set out above, Palgrave would agree that a masterplan across sites 072, 73, 074 and 075 would be a sensible approach and that moving forward to future stages of the Local Plan, it may be more appropriate to have a single policy for the strategic development of approximately 1700 homes at East Swaffham.

2.5 Palgrave Ltd otherwise has no objection or proposed revisions to the wording of the policy and aspirations set out in parts a-f at this stage. It is recognised that the current relatively broad policy wording will be subject to further refinement moving forward.

Swaffham SUE (073): North of Norwich Road (East)

2.6 Palgrave Ltd **SUPPORT** the proposed allocation for approximately 300 new homes under the above policy. It is recognised that the broad nature of the policies have a high degree of consistency and accordingly the comments at paragraphs 2.4 and 2.5 above in relation to site 072 are also relevant here and, in addition, equally applicable in relation to sites 074 and 075 below.

Swaffham SUE (074): South of Norwich Road (West)

2.7 Palgrave Ltd **SUPPORT** the proposed allocation for approximately 500 new homes under the above policy.

Swaffham SUE (075): South of Norwich Road (East)

2.8 Palgrave Ltd **SUPPORT** the proposed allocation for approximately 500 new homes under the above policy.

Swaffham SWA-EMP1: Land north of the A47 Swaffham (076)

- 2.9 Palgrave Ltd **SUPPORT** the allocation of this approximately 13ha site for commercial uses in support of the above residential allocations. As set out above at this Regulation 18 stage the draft allocations are relatively broad in their scope and will be subject to refinement going forward from positive collaborative working between Palgrave Ltd, Breckland Council and other stakeholders.
- 2.10 In that spirit, Sequence does not wish to propose any significant revisions to the policy as currently drafted at this stage. However, whilst recognising that the ‘will be preferred’ reference under part a of the policy does give some scope for flexibility, Sequence would suggest that part a of the policy could be broadened across Class E and to also include B8 uses. As set out above Sequence is happy to work collaboratively with the Council going forward and utilising the commercial specialists with the wider Sequence group to refine the policy approach as proposals are developed further.
- 2.11 In summary therefore, Palgrave Ltd **SUPPORT** the proposed allocations under references 072, 073, 074, 075 and 076 respectively and look forward to working collaboratively with Breckland Council and other stakeholders through the Local Plan process and ultimately on delivery of the development proposed.

Development Management Policies

NP1: Neighbourhood Plan

- 2.12 Palgrave Ltd **SUPPORT** Policy NP1 and in particular the policy wording that Neighbourhood Plans “cannot propose less development than that set out in this Local Plan.”

GEN02: Parish Hierarchy and Spatial Development Strategy

- 2.13 Palgrave Ltd is in broad **SUPPORT** of the hierarchy and strategy set out in Policy GEN02 and welcomes both the recognition of Swaffham as a Market Town at the top of the settlement hierarchy and the recognition of the role that the Sustainable Urban Extension at Swaffham will have in meeting the Council’s housing requirements.

GEN03: Built Form

- 2.14 Palgrave Ltd **SUPPORT** the more flexible approach proposed under Policy GEN03 to the definition of the built-up area and recognise this will see a move away from the Development/Settlement Boundary approach of the current and previous Breckland Local

Plans.

GEN04: Development and the Built Form

- 2.15 Together with Policy GEN03, Policy GEN04 permits a flexible approach to development immediately adjacent to the built form of a settlement which is welcomed by Palgrave Ltd and this policy is also **SUPPPORTED**.

HOU01: Breckland's Housing Requirement

- 2.16 The requirement under Policy HOU01 to deliver at least 17,388 new homes including a 5% buffer is **SUPPORTED**.

HOU02: Distribution of Housing Development

- 2.17 Palgrave Ltd **SUPPORT** Policy HOU02 and the recognition of the role that Swaffham, including the Swaffham SUE will have in meeting a significant proportion of Breckland Council's housing requirement.

HOU03: Windfall Housing Policy

- 2.18 Palgrave Ltd **SUPPORT** the Windfall Housing Policy under Policy HOU03 that will work in conjunction with policies GEN03 and GEN04.

HOU04: Large Housing Sites Development Principles

- 2.19 Palgrave Ltd would question whether the requirements set out under Policy HOU04 are required within a separate individual policy or whether the elements set out within it may be better applied to the policies for individual large allocations.

HOU06: Small Scale Housing Development in Other Parishes

- 2.20 Palgrave Ltd **SUPPORT** this policy in line with the approach set out in Policy HOU02.

HOU23: Re-use of Agricultural Buildings in the Countryside

- 2.21 Palgrave Ltd broadly **SUPPORT** the provisions of Policy HOU23 to allow the conversion of former agricultural buildings. It is noted that the policy wording allows for the conversion to "residential and commercial use", and as drafted does not give a preference to one use over the other. Further the policy does not require commercial uses to be discounted before residential use can be considered, which is welcomed. However, it is noted that the supporting text states that "re-use for economic development purposes will usually be preferable, but residential conversions may be more appropriate in some locations, and for

some types of building.”

- 2.22 It is considered that the supporting text potentially provides confusion, contradicting the policy wording itself which would suggest residential and commercial use are equally acceptable. Particularly in the context of Class Q, Palgrave Ltd would suggest that this is the most appropriate approach and therefore the Council should look to refine the supporting text to the policy to reflect this. We would be happy to discuss further with Planning Policy Officers.

EMP01: Economic Growth Strategy

- 2.23 Palgrave Ltd **SUPPORT** the broad aspirations of Policy EMP01 to support economic development, particularly in the context of their allocation north of the A47 to the north-east of Swaffham.

EMP02: Employment Land Provision

- 2.24 Palgrave Ltd **SUPPORT** this policy and welcome the recognition of the allocation of their 13ha of land for employment development north of the A47.

EMP07: Employment Development Outside Existing and Allocated Employment Sites – Sustaining a Prosperous Rural Economy

- 2.25 Palgrave Ltd **SUPPORT** the flexible approach to development to support the rural economy as set out within Policy EMP07.

EC05: Farm Diversification

- 2.26 Palgrave Ltd **SUPPORT** the broad provisions of Policy EC05 to support proposals for farm diversification.

ENV05: Trees, Hedgerows and Development

- 2.27 Whilst recognising the broad aspirations to retain trees and hedgerows within development, Palgrave Ltd would question whether the particular reference to category A & B trees or hedgerows and justification for their removal is both too prescriptive and too restrictive to be included within planning policy.
- 2.28 Palgrave Ltd otherwise has no further comments to make on the draft Development Management Policies at this stage.

