

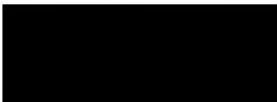
BRECKLAND LOCAL PLAN PREFERRED OPTIONS (REGULATION 18) REPRESENTATION ON BEHALF OF DE MERKE ESTATES (REF. 178)



Quality Assurance

Site name:	Land off New Sporle Road, Swaffham
Client name:	De Merke Estates
Type of report:	Regulation 18 Representation

Prepared by:	Katie Leeder BSc Hons Isabella Taylor MSc
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Signed	 
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Date	09 December 2025
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Reviewed by:	Iain Hill BSc Hons DipTP MRTPI
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Signed	
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Date	10 December 2025
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EMERGING BRECKLAND DISTRICT COUNCIL: REGULATION 18 CONSULTATION (MAY 2023), PREPARED BY STANTEC ON BEHALF OF DE MERKE ESTATES

Appendix 2

APPENDIX 2 EMAIL FROM ORBIT HOMES 15 DECEMBER 2025

1.0 Introduction

- 1.1 This Representation has been prepared by Bidwells LLP on behalf of De Merke Estates in response to Breckland Council's Preferred Options (Regulation 18) consultation on their Draft Local Plan – Full Update (October 2025).
- 1.2 De Merke Estates are promoting Land off New Sporle Road, Swaffham. As detailed later in this document, the site previously benefitted from two outline planning permissions, both granted in 2015: 3PL/2014/9358/O (Phase 1) and 3PL/2014/1346/O (Phase 2) for residential development of approximately 147 dwellings in total. However, the permissions were not implemented and have now lapsed. However, the permissions were still live when the Adopted Local Plan was being prepared; therefore, the site was recognised as a 'Site with Planning Permission for Housing' and was included within the Settlement Boundary for Swaffham within the Adopted Local Plan.
- 1.3 The site was previously put forward as a suitable location for residential development through the Call for Sites (Housing Sites Submissions) consultation in April-December 2022. De Merke Estates submitted a representation in support of the site in May 2023 during the Issues and Options consultation; this has been included as Appendix 1 of this Representation.
- 1.4 The site was included as a Preferred Allocation in Breckland Council's Preferred Options Draft Local Plan (Regulation 18) in June 2024 under Proposal SWA 1 for the development for approximately 130 dwellings.
- 1.5 Notwithstanding this, Breckland Council's Regulation 18 Draft Local Plan (October 2025) has not included the site as a proposed allocation, but proposes it as an Alternative Option in their Phase 2 Assessments (ref. 178). The Phase 2 Site Assessments concluded that the site was not allocated on the basis that the Council has identified sufficient sites, which are considered to be preferable options, to meet their housing needs. No technical reasons are identified as to why the site should not be developed for residential development.
- 1.6 The Representation provides comments on the Regulation 18 Draft Local Plan and supporting Phase 2 Assessments and evidence base in so far as they relate to the Site, and provides further evidence as to why the site is a suitable location for development and shown be allocated in the Draft Local Plan.

2.0 Comments on Regulation 18 Draft Local Plan, Site Reference: 178

- 2.1 The proposals for Land off New Sporle Road as an 'Alternative' site, not included within Preferred Options, is not supported by De Merke Estates. As set out in previous representations made by De Merke Estates, the site is entirely deliverable, and capable of making a valuable contribution towards satisfying the Council's housing needs during the early stages of the Plan period.

Comments on Housing Distribution & Delivery (Policy HOU2)

- 2.2 It is recognised that the Council are required to significantly increase their housing delivery to meet the mandatory housing requirement of a minimum 17,388 new homes, including 5% buffer, during the plan period (2024-2042). The Development Strategy proposed within the Draft Local Plan (Policy HOU 02) seeks to accommodate 12,792 (75.7%) of the total housing needs within the Strategic Development Areas (SDAs) and Market Towns, including existing and proposed Sustainable Urban Extensions (SUEs). Of this figure, approximately 13% will be delivered in the Strategic Development Areas and 17% will be delivered through the new SUEs in the market towns of Swaffham, Thetford and Watton. Accordingly, there is a significant reliance on these sites / allocations to meet the housing need during the plan period.
- 2.3 Work undertaken by Lichfield (March [2024](#)) states that sites of over 1,000 units take an average of 5 years to secure detailed consent, with a further 1.3-1.6 years for the first homes to be delivered. Furthermore, site-specific considerations need to be factored into the forecast of delivery rates, including infrastructure, availability and the absorption rate of the area. The Housing Trajectory includes as Appendix 2 of the Draft Local Plan details that the SDAs will start delivering homes by 2032/33. Based on the Local Development Scheme published in March 2025, the Draft Local Plan is not expected to be Adopted until late 2027; therefore, it is very ambitious to assume that the SDAs will be delivering by 2032. Similarly, with regard to the SUEs, the Housing Trajectory states that these sites will be delivered by 2028/29; therefore, based on the evidence from Lichfield above, this trajectory is too ambitious.
- 2.4 On this basis, there has to be considerable doubt as to whether the proposed Development Strategy will meet the mandatory housing requirement during the plan period; therefore, we strongly recommend that the Council identify additional sites to ensure their housing need is met. When considering additional sites, the Council should give strong consideration to sites that are of a size that are capable of delivering quickly, in comparison to the SDAs and SUEs. Based on a review of delivery rates in Breckland in recent years, including the evidence base used to support the adopted Local Plan, we strongly suggest that the additional sites to be identified to meet the housing requirement range between 75 and 400 homes. This will ensure that the Council's Development Strategy as a more diversified range of deliverable sites, that ensures the Housing Trajectory is realistic and meets the identified housing need for the plan period.
- 2.5 Based on the foregoing it is evident that the Council will be required to identify additional sites. The Land off New Sporle Road, as detailed below, is considered to be entirely deliverable in accordance with the tests in the National Planning Policy Framework. Furthermore, given the size of the site and as set out within previous representation and the previous draft allocation (June 2024), the site is capable of delivering at least 130 dwellings, which is in the range established above of sites that

have delivered during the current plan period.(As detailed below, there is, in principle, potential to deliver significantly more homes on the site at a density that is entirely appropriate for the location.

- 2.6 Furthermore, it is unclear as to why land to the east of Swaffham, more specifically the Swaffham SUE, has been allocated, when land, such as this site, is within the adopted Settlement Boundary, is within closer proximity to the existing services and facilities, and has previously obtained planning permission for residential development has not been allocated.

Confirmation of Delivery

- 2.7 As detailed above, in accordance with the National Planning Policy Framework (NPPF) glossary definition of ‘deliverable’, the site represents a suitable location for housing development, is available now and there is a realistic prospect that housing will be delivered on site within 5 years. These points are addressed in further detail below.

Suitable

- 2.8 The site comprises approximately 8 hectares of agricultural land. The site previously benefited from two Outline Planning Permissions for residential development: one for the development of approximately 55 dwellings, forming Phase 1 of the development (ref. 3PL/2014/9358/O); one for residential development of the remainder of the site (Phase 2) for approximately 92 dwellings (ref. 3PL/2014/1346/O). However, it is understood that the approved dwelling mix was unsupported by the market conditions at the time and no applications for Approval of Reserved Matters were submitted; the consents subsequently lapsed. Notwithstanding this, the principle of development in this location has been previously supported and therefore, it is considered a suitable location for development. A fact further recognised by the site’s location within the defined Settlement Boundary where, in principle, residential development is accepted. At the time the Adopted Local Plan was adopted, the site still had extant planning permissions; and is therefore, recognised as a ‘Site with Planning Permission for Housing’ within the Adopted Local Plan.
- 2.9 The site is located on the northern edge of Swaffham which is designated as a ‘Market Town’ in the Adopted (2023) and draft Local Plan, a designation which reflects the town’s suitability as a location for housing growth given the range of services/facilities available which includes several schools, supermarkets, medical centres, leisure and recreational facilities, and community uses.
- 2.10 As demonstrated by the previous planning permissions, the site represents a logical extension to the town and is located within the existing settlement boundary. The site is bounded by the A47 to the north, Sporle Road and the former railway line to the east, and Tumbler Hill Road development to the south. Also, south of the site are two sites identified for residential development, one with planning permission (ref. 3PL/2023/0154/F); both are proposed to be brought forward as ‘saved housing allocations’ within the Draft Local Plan. The site is not protected by any national or statutory designation and lies between an open field/urban boundary and the A47 trunk road. Given the sustainable location and adjacent allocated sites, it is considered that the site would be a logical infill that would balance out the built form in the immediate area.
- 2.11 As demonstrated by the previous planning permissions on the site, safe vehicular access to the site can be achieved from New Sporle Road with a priority-controlled T-junction, and that the existing surrounding transport infrastructure would be able to accommodate the anticipated vehicle trips from the development.

- 2.12 The site is easily accessible by sustainable modes of transport. New Sporle Road provides a well maintained and lit footway along the western side of the carriageway. The footway connects with the pedestrian infrastructure to the west of the site at the Castleacre Road/New Sporle Road/A47 slip junction and on Castleacre Road itself, enabling the town centre to be easily accessible by foot. Swaffham is well served by public transport, with frequent services into Swaffham Town Centre, Norwich, Peterborough, King's Lynn, Dereham, and the settlements in-between. The site itself has excellent access to these services with several bus stops within 400 meters of the site, the nearest being the Green Way bus stop along Castleacre Road.
- 2.13 The entirety of the site is located within Flood Zone 1, indicating a low risk of flooding from rivers or the sea. The majority of the site is at 'very low' risk of surface water flooding, apart from small parts of the site near it's boundary with New Sporle Road and the allotments which is at 'low' to 'high' risk surface water flooding; however, given the small portion of the site that would be impacted it is considered that this could reasonably be mitigated through careful design.
- 2.14 There are no nature designations within the site, with the closest internationally designated site approximately 3km south-west of the site: the Breckland Special Protection Area (SPA). As the Site is beyond 1.5km from the SPA, the site is outside the Stone Curlew buffer associated with the SPA. Phase 1 and 2 Habitat Surveys were undertaken and submitted in support of the previous planning applications on the site; whilst suitable habitats on site for roosting bats were found, no other evidence of protected species was found, and with the recommended mitigation measures and enhancements implemented, there was no reason why development could come forward on the site. There are no Tree Preservation Orders within, or adjacent to, the site, and it will be possible to retain the trees and hedges along the boundaries in the most part, other than where removal is necessary to facilitate safe and convenient vehicular access. A scheme to deliver mandatory 10% Biodiversity Net Gain can likely be provided on site.
- 2.15 The site is not located within or in close proximity to the Swaffham Conservation Areas nor are there any Listed Buildings on the site or within the immediate vicinity. As such, it is considered that any development on the site would not cause any harm to heritage assets.
- 2.16 Given the site's long history of agricultural use, it is envisaged that the risk of contamination is low. A Contaminated Land Report with Farm Risk Review was prepared and submitted in support of the previous planning applications; it concluded that there is no evidence to suggest the site has been significantly polluted by past activities but recommends further environmental investigations to support proposals for residential development. Any planning application would be accompanied by the necessary Preliminary Risk Assessment and, if required, Quantitative Risk Assessment, and any mitigation required is expected to be standard.
- 2.17 In light of the above, it is considered that the site is entirely suitable for residential development of the scale envisaged.

Available

- 2.18 The site is currently in agricultural use, and De Merke Estates are the sole landowner of the site. De Merke Estates are currently in advanced discussions with a prospective developer, Orbit Homes, to bring forward a planning application for residential development on the site; this enables the site to be brought forward for development without delay. As detailed in the email attached as

Appendix 2, Orbit Homes are seeking to bring forward a planning application for approximately 200 affordable homes on the site in the near future

- 2.19 Orbit Homes are a non-profit organisation and housebuilder who have a proven track record of delivering high quality, affordable homes and sustainable communities. Orbit homes are currently delivering a development known as Mill View in Dereham for approximately 250 dwellings. In addition to this, Orbit Homes has delivered a development known as Avalon Place in Easton for approximately 72 dwellings.
- 2.20 There are no tenancies, covenants or other restrictions that would prevent the site from being delivered.
- 2.21 As requested by the council we have set out below the anticipated delivery trajectory:

YEARS	NUMBER OF DWELLINGS
2027 – 2032	200
2033 – 2038	
2039 – 2042	
After 2042	
Total	200

Viable

- 2.22 As demonstrated by the previous planning permissions on site, development of the Site is viable. The proposed development is also considered viable in the context of the draft Local Plan, subject to the changes that have been sought by representations submitted on behalf of De Merke Estates in respect of other policies.
- 2.23 Further evidence on viability can be provided on a strictly private and confidential basis, should this be deemed necessary at subsequent stages of the process.

Summary

- 2.24 Based on the foregoing, it is evident that the Council will require additional sites to meet their housing need, particularly for the first 5 years of the plan period. As outlined in this representation, this site represents a highly suitable location for residential development, given that the site has previously been granted planning permission for residential development, is within the adopted Settlement Boundary for Swaffham and is within close proximity to existing services and facilities.
- 2.25 This representation has also demonstrated, through the interest from Orbit Homes, that the site is available to be brought forward for development without delay, and previous planning permissions have demonstrated that the site is viable. On this basis, in accordance with the definitions within the National Planning Policy Framework, the site is entirely deliverable and should be allocated for residential development.

- 2.26 Furthermore, the site would represent sustainable development as defined by the National Planning Policy Framework. Swaffham as a Market Town is a sustainable location for growth and the foregoing text demonstrates the suitability of this specific site for housing development.
- 2.27 Economically, development here in the period to 2042 would help sustain the town and its services and facilities, and is within easy reach of key employment locations. The development would also generate construction jobs with associated benefits for the local economy during the build period
- 2.28 Socially, the development would provide a mix of dwelling types, sizes and tenures to meet local needs. The site would benefit from good access to services within the centre of Swaffham.
- 2.29 Environmentally, the site is not subject to any designations. It is at low risk of flooding and can be developed without harm to the nearby heritage assets, nor wider landscape views of the town. Development in this location would help safeguard other, more sensitive, locations.
- 2.30 Should the site not be allocated within the Draft Local Plan, the Council should make it clear that it is adjacent to the Built Form where, in principle, residential development is acceptable, as set out in Policies GEN 03 and GEN 04.

APPENDIX 1

EMERGING BRECKLAND DISTRICT COUNCIL: REGULATION 18 CONSULTATION (MAY 2023), PREPARED BY STANTEC ON BEHALF OF DE MERKE ESTATES

Emerging Breckland District Council Local Plan: Regulation 18 Consultation

Prepared on behalf of De Merke Estates

May 2023

**Emerging Breckland District Council Local Plan:
Regulation 18 Consultation**

Prepared on behalf of De Merke Estates

Project Ref:	35072/A5/P1/AL/SO	35072/A5/P1/AL/SO
Status:	Draft	Final
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Date:	May 2023	May 2023
Prepared by:	Alex Lloyd	Alex Lloyd
Checked by:	Lyndon Gill	Lyndon Gill
Authorised by:	Lyndon Gill	Lyndon Gill

Barton Willmore, now Stantec
3rd Floor
50/60 Station Road
Cambridge
CB1 2JH

Tel: 01223 882000

Ref: 35072/A5/P1/AL/SO
File Ref: 35072/P1/LPR/AL
Date: May 2023

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- Appendix 7 – Site 4 Illustrative Layout Plan, Transport Technical Note, Flood Risk and Drainage
Technical Note and Ecological Technical Note
- Appendix 8 – Site 4 Option 2 Illustrative Site Layout

1.0 INTRODUCTION

1.1 This document has been prepared by Barton Willmore LLP, now Stantec, on behalf of De Merke Estates (the 'Promoter') in response to the Regulation 18 Breckland District Council consultation, which runs until 19 May 2023.

1.2 This representation relates specifically to the following Sites:

- 1) Site 1 - Land at Turbine Way, Swaffham;
- 2) Site 2 - Land off New Sporle Road, Swaffham;
- 3) Site 3 - Land West of Sporle Road, Swaffham; and
- 4) Site 4 - Land East of Sporle Road, Swaffham.

1.3 Please refer to **Appendix 1**, which contains a Site Plan of each.

1.4 De Merke Estates owns Sites 1-4 in their entirety.

1.5 In respect of Site 4 'Land East of Sporle Road', De Merke Estates is in discussions with surrounding landowners regarding the purchase of further land off Sporle Road (shown in **Appendix 2**). These representations focus on De Merke's Estates' landholdings only, however, pay regard to the wider opportunity surrounding Site 4 'Land East of Sporle Road'.

1.6 These representations are accompanied by the following documents:

- Appendix 3: Site 1 Layout Plan
- Appendix 4: Site 2 Layout Plans
- Appendix 5: Site 3 Layout Plan
- Appendix 6: Site 3 Off Site Highways Works
- Appendix 7: Site 4 Illustrative Layout Plan, Transport Technical Note, Flood Risk and Drainage Technical Note and Ecological Technical Note
- Appendix 8: Site 4 Option 2 Illustrative Layout Plan

1.7 The structure of this document is as follows:

- Section 2: Housing Need in Breckland
- Section 3: Distribution of Housing Need and Opportunity for Growth at Swaffham
- Section 4: De Merke Estates' Sites:
 - a) Site 1 - Land at Turbine Way

- b) Site 2 - Land off New Sporle Road
- c) Site 3 - Land West of Sporle Road
- d) Site 4 - Land East of Sporle Road

- Section 5: General Comments on the Local Plan Consultation Paper
- Section 6: Summary

1.8 The UK Government is currently consulting on a proposed approach to updating the National Planning Policy Framework (NPPF). As set out in Chapter 9 of the Levelling-up and Regeneration Bill: Reforms to National Planning Policy document 'it is critical that work should continue on plans before the new system is in place' and in setting out timelines for preparing local plans the respective local authorities will have until 30 June 2025 to submit these for Independent Examination under the existing legal framework.

1.9 It is noted that the proposed approach reconfirms the Government's commitment to deliver 300,000 homes annually by the mid-2020s and does not propose changes to the standard method for calculating local housing need.

2.0 HOUSING NEED IN BRECKLAND

Council's Proposed Approach

- 2.1 In this initial consultation paper, the Council does not set out the preferred approach to calculating housing need for the Plan period (2021-2046). It does, however, state that it will be adopting the 'standard methodology', confirming an alternative model for calculating housing need is not appropriate within the district (para 4.5), in accordance with paragraph 61 of the National Planning Policy Framework ('NPPF') 2021.
- 2.2 Breckland District Council recognises that the government's standard method (the 2014 based minimum housing requirement) indicates a starting point for annual housing need of 672 dwellings per annum (dpa) for the updated Plan (current target 612 dwellings).
- 2.3 The consultation paper realises it could be appropriate to plan for higher housing need figures in certain circumstances, including where there are funded growth strategies, planned strategic infrastructure improvements, or where agreements are in place to take on unmet need from neighbouring authorities.
- 2.4 Although the Council does not consider these apply to the district, the consultation paper identifies a significant affordable housing need across Breckland, and the need to consider the consequences of minimum housing need figures on affordable housing delivery.
- 2.5 Paragraph 31 of the NPPF (2021) states:
- "The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals."**
- 2.6 For local plans to be found 'sound' they will be required to meet the tests of soundness as set out at Paragraph 35 of the NPPF and need to be 'demonstrably consistent with national policy', 'effective', 'justified' and 'positively prepared'.
- 2.7 We understand the Council has commissioned a Housing and Economic Development Needs Assessment ('HEDNA'), however, this has yet to be published. To date, no evidence has been published to support the emerging Local Plan in respect of housing.

Housing Supply

- 2.8 Before considering the housing need and crucially the nature of the housing need in Breckland, we consider the importance of clarifying the Council's housing supply and capacity to meet the homes needed in the area.
- 2.9 The 2021 Housing Delivery Test results, published January 2022, confirm Breckland District Council delivered 1,891 new homes in the period 2018/2019 – 2020/2021 (120 percent delivery). Therefore, none of the measures applicable to local authorities who under deliver currently apply to Breckland. The 2022 delivery test results have yet to be published.
- 2.10 In the Council's 'Statement of Five-Year Housing Land Supply', published August 2022, Breckland identifies an under-delivery of housing when assessed against the target across the Plan period. Since 2011, a total of 6,058 dwellings have been completed compared to the requirement of 6,732 (based on 612 dpa). This has led to a shortfall of 651 units.
- 2.11 The Council therefore identifies a requirement for the next 5-year period of 3,711 dwellings (3,060 + 651). Given the Council achieved 120 percent delivery, as set out in the 2021 Housing Delivery Tests Results, it proposes a 5 percent buffer only, setting a target of 3,897 for the next five years (779 dpa). On this basis, the Council claims it has a 5.6 year housing land supply.
- 2.12 However, the Council received a letter dated 16 March 2022 from Natural England concerning nutrient pollution in the protected habitats of the River Wensum Special Area of Conservation and the Broads Special Area of Conservation and Ramsar site. The letter advised that new development within, or draining into, the catchment of these habitats comprising overnight accommodation, or any development not involving overnight accommodation, but which may have non-sewerage water quality implications, has the potential to cause adverse impacts with regard to nutrient pollution. Such development includes new housing. The Council has advised that whilst it assesses the implications of these matters, it cannot lawfully conclude that development within the catchment of the River Wensum or the Broads Special Area of Conservation and Ramsar site will not have an adverse effect. Therefore, until these matters are resolved, the Council will not grant planning permission for developments, including new homes, within the affected catchments.
- 2.13 In a letter dated 21 July 2022 the Chief Planning Officer confirmed that there will be revisions made to planning guidance to reflect that sites affected by nutrient pollution

forming part of housing land supply calculations are capable of being considered deliverable for the purposes of housing land supply calculations, subject to relevant evidence to demonstrate deliverability. It will be for decision takers to make judgements about impacts on delivery timescales for individual schemes in line with the National Planning Policy Framework. We note the Council's 'Statement of Five-Year Housing Land Supply' has included sites falling within the catchment area of the River Wensum Special Area of Conservation and the Broads Special Area of Conservation and Ramsar site. Any such site should be rigorously tested to ascertain its deliverability, and assessed on a cumulative basis to ensure appropriate mitigation is viable, and that it would not impact on housing delivery, which is of national importance. Accordingly, we encourage the Council to focus growth on locations outside of the catchment of the River Wensum and the Broads Special Area of Conservation and Ramsar site in the first instance, and only allocate such sites where deliverability and viability can be clearly demonstrated.

- 2.14 In that context, and to support our assertion, whilst the 'Statement of Five-Year Housing Land Supply' can reference sites as deliverable, in reality a large proportion of those sites cannot secure planning permission until the nitrate matter is resolved, which will inevitably impact on delivery rates. The 2022 Housing Delivery Test and Council's 'Statement of Five-Year Housing Land Supply' have yet to be published. The impact on housing delivery has therefore yet to be quantified.
- 2.15 Accordingly, to maintain deliverability and a 5 year supply of housing, the Council will need to focus further growth on deliverable housing sites outside of the River Wensum and Broads catchment areas, to ensure a consistent supply of new homes within the district. The distribution of proposed housing land and the wider growth strategy for the district should reflect this.

Minimum Housing Requirement

- 2.16 The standard method identifies the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply and makes an adjustment based on the affordability of the area. Based on the 2022 affordability ratios published in March 2023, the minimum housing need figure for Breckland currently represents 661 units per year. This does not, however, take into consideration affordable housing need, housing to support economic growth and other matters. In addition, it does not take into account potential shortfalls in delivery, resulting from the ongoing nitrate issue and appropriate buffer to be applied, as per para 74 of the NPPF (2021).

Affordable Housing Requirement

- 2.17 National Planning Practice Guidance ('NPPG') states:

“Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.”

Paragraph: 010 Reference ID: 2a-010-20201216

“[t]he total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.”

Paragraph: 024 Reference ID: 2a-024-20190220

- 2.18 In the consultation paper, Breckland District Council makes reference to “a significant affordable housing need across Breckland” (para 4.4).
- 2.19 We note the Council has commissioned a HEDNA, however, this has yet to be published. The previous Strategic Housing Market Assessment ('SHMA'), dated 2017, was prepared across the entire Central Norfolk HMA, covering the following local authorities: Norwich, Broadland, South Norfolk, Breckland and North Norfolk. This Study identified a significant affordable housing need within Breckland Council (the highest in the housing market area). Of note, it highlighted a significant increase in the numbers in reasonable preference categories in Breckland between 2015 and 2016, and those on the housing waiting list, when compared to other authorities within the housing market area ('HMA') (circa 3,398). At the time the SHMA report was published, the Study identified a need to provide 17,450 additional affordable homes over the period 2015-36 (an average of 830 dwellings per year). It was considered this would provide for the current unmet needs for affordable housing in addition to the projected future growth in affordable housing need. The study went on to identify an individual district target of 35.7% for Breckland, equivalent to 220 dwellings per year (Local Plan paragraph 3.38).

- 2.20 Based on the 'Statement of Five-Year Housing Land Supply' (2022), from 2014/15 to 2021/22, we understand that the Council has delivered 5,002 net additional homes within the district. Based on sites delivering 25 percent affordable housing (as per Policy HOU 07 of the adopted Plan), this would equate to approximately 156 affordable units per annum, a significant shortfall when considered against the district target of 220 affordable dwellings per annum. This justifies moving away from the minimum requirement as defined through the standard method, and to ensure the housing target for Breckland as a whole is adjusted upwards to address the unmet affordable housing need, as well as the increased annual requirement beyond.

Economic Based Housing Need

- 2.21 To date, the Council has not published any evidence base in respect of approximate levels of future job growth upon which to base assessments for housing need. The HEDNA has been commissioned, but not completed. Evidence must consider the interdependence of the economy, demographic change and housing at a local level. We reemphasise the need to consider the standard method figure as a minimum requirement only, to be increased to ensure housing need for all demographics, affordable requirements, and economic aspirations are met within the district. The analysis above highlights the need for upward adjustments to the standard method to address previous under-supply of affordable housing, as well as the need to account for the adjusted affordable housing needs informed by the HEDNA.
- 2.22 The Policy Exchange released a publication entitled 'Homes for Growth' in early 2023. This report identified a key driver of the UK's weak economic performance is the chronic shortage in housing supply. Demand for new housing has increased consistently, through population growth and through the shrinking size of households. However, housing supply has failed to meet rising demand for a prolonged period. The housing shortage is having a negative impact on the UK economy. The paper proposes a comprehensive plan to boost housing supply including embarking on a programme to significantly expand social housing building, to positively impact the economy. Expanding social house building can only be achieved if higher housing targets are set, clearly justifying upwardly adjusting the minimum standard methodology figure in Breckland to ensure the economic effects are not negative.

Housing Need and Supply Summary

- 2.23 In summary, we consider the housing need position to be as follows:

- 1) The Council has advised it will be using the standard methodology as a starting point in respect of housing figures, however, has not yet published any evidence base to inform figures moving forward. We agree with this position, but the standard method is only a 'starting point' to be adjusted upwards for the reasons below.
- 2) Based on affordable housing need and past delivery, there exists an exceptional need for affordable housing in the district, which we consider justifies exceeding the standard methodology requirement in the emerging Local Plan.
- 3) The more housing provided the more affordable housing is provided, and Breckland District Council's affordable housing need is the highest of all the authorities falling within the Central Norfolk HMA (as set out in Figure 56 of the Central Norfolk Strategic Housing Market Assessment, 2017).
- 4) The impact of the nutrient pollutant matter on housing delivery justifies exceeding the standard methodology requirement, further, with the application of an appropriate buffer, as well as overprovision and planned growth within areas of land that fall outside of the catchment of the River Wensum or the Broads Special Area of Conservation and Ramsar site. This is the only way to ensure a consistent supply of new homes to improve access to the housing market.
- 5) The standard methodology figure should be increased to reflect findings of the ongoing economic needs study to ensure housing delivery, including affordable housing, supports the economic aspirations of the district.

2.24 In this context, it remains the case that Breckland District Council needs to be aiming above the minimum local housing requirement to address needs in full. Unforeseen events will always unfold when it comes to delivering specific sites which cause delays and, in some instances, no delivery at all (as the ongoing nitrate pollutant issue has demonstrated). As emphasised by the current embargo on the granting of planning permission on land that falls within the catchment of the River Wensum or the Broads Special Area of Conservation and Ramsar site, the Council should plan for the fact that not every allocated housing site will be delivered and therefore overprovide in relation to the identification of housing land in local plans to provide any chance of delivering the required numbers and improving the accessibility of the housing market to all.

3.0 DISTRIBUTION OF HOUSING NEED AND OPPORTUNITY FOR GROWTH AT SWAFFHAM

- 3.1 Swaffham is currently identified as a 'market town' in the settlement hierarchy in the adopted Local Plan (2019), alongside Dereham and Watton (Policy GEN03), beneath Thetford and Attleborough, the identified 'key settlements'. The draft consultation paper queries whether this settlement hierarchy should be carried forward in the emerging Local Plan.
- 3.2 This section sets out national planning guidance in respect of where new development should be focused. It then considers Swaffham Neighbourhood Plan aspirations, the services and facilities available within Swaffham, employment opportunities, accessibility, how these provisions compare to other identified market towns and why Swaffham is suitable to accommodate further growth in the emerging local plan.

National Planning Guidance

- 3.3 National planning guidance requires:

"a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being"

National Planning Policy Framework, Para 8

"all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects"

National Planning Policy Framework, Para 11(a)

“support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities”

National Planning Policy Framework Para 106(a)

Swaffham Neighbourhood Plan

- 3.4 The Swaffham Neighbourhood Plan was adopted in May 2019. The vision for the town is:

“By 2036 Swaffham will be a well-connected and flourishing market town, whilst preserving its distinctive and attractive character. To meet the growing needs of the town and the rural hinterland, it will have a range of high quality homes, new employment opportunities, essential public services and appropriate infrastructure. Growth of the town will respect the natural environment, heritage, character and green credentials. Swaffham will be a sustainable place where people want to live, work and visit.”

- 3.5 Key objectives focus on providing a sustainable range of housing types for a vibrant mixed community, and encourage and support new and existing businesses, to generate employment opportunities within Swaffham.

Services and Facilities within Swaffham

- 3.6 The town of Swaffham has a range of amenities, including, but not limited to, Primary and Secondary Schools, healthcare facilities, sports facilities, community facilities, supermarkets, hotels, alongside a range of shops, restaurants and cafes.
- 3.7 Education provisions include Sacred Heart Catholic Primary School, which includes Little Pedlars Nursery within its grounds (located off Sporle Road), the Heartwood Primary School located off White Cross Road, Church of England Junior School located off Brandon Road and the Nicholas Hammond Academy, located in south Swaffham. In addition to education provisions, within Swaffham are various nursery offerings also, including: Teeni Icení's Day Nursery, Little Pedlars Nursery and Swaffham Preschool Playgroup.

- 3.8 Three GP practices exist within Swaffham, including Manor Farm Medical Centre off Mangate Street, the Campingland Surgery off Campingland and the Plowright Medical Centre off Jack Boddy Way. In addition, the Swaffham Community Hospital is located off Sporle Road. The town also boasts a dentist surgery, Mr J Holmes and Associates, off Pightle.
- 3.9 With regard to sports facilities, Swaffham Leisure Centre is located along Brandon Road, Swaffham Rugby Club to the east of the town, with Swaffham Town Football Club and Swaffham Cricket Club located to the west side of the town.
- 3.10 Within the centre of Swaffham are a range of community facilities including a library and four churches: Swaffham Baptist Church, St Peter & St Paul Church, Swaffham Methodist Church and Fountain of Life Church. There are three pharmacies including: Boots, Universal and Well. The town is also home to various pubs including: The Station Bar, The Greyhound, The Red Lion, The Horse and Groom and The White Hart. A range of restaurants and cafes are also available within the town centre.
- 3.11 In respect of shops, the town has a range of supermarkets including Waitrose, Tesco, Asda, the Organic Food Federation and Iceland. A range of smaller corner shops are also available with Swaffham, including McColl's. We are aware other large supermarket providers are keen to locate within the town also.
- 3.12 Swaffham as a location is therefore well established from a services and facilities perspective and could accommodate significant growth within the district.

Employment Opportunities

- 3.13 Within Swaffham are various employment offerings, including a significant 'Employment Area' (as defined in the adopted Proposals Map, published 2019) within the north west of the town. A range of businesses are located within this area including Tesco, Waitrose, building material suppliers, motor suppliers and various manufacturing business. This area is set to expand further, with a planning application for use classes E(g) (ii) [R&D] and (iii) [Light Industrial], Class B2 and B8 [Storage] (application reference 3PL/2022/0412/H) on land off Turbine Way (Site 1 being promoted as part of these of representations), currently being determined by the Council. Within the western section of the identified 'Employment Area' is a large parcel of land yet to be subject to a planning application. In addition to the significant 'Employment Area' to the north west, there are various employment offerings within the town centre itself, including small scale office space, shops, restaurants, cafes and other services and facilities.

3.14 In terms of future opportunities, the A47 provides a key trunk road through Norfolk to the Midlands and the east coast ('energy coast'). National Highways has committed £300m to improve the A47 at six locations, four of which in Norfolk. One of these locations is North Tuddenham to Easton, just 20 mins east of Swaffham. We understand a Development Consent Orders ('DCOs') have been submitted in relation to the various improvement areas, one of which has already been approved (Thickthorn A47/A11 junction). As well as committed improvements, the 'A47 Alliance', which brings together the business community, Chambers of Commerce, local authorities, MPs and other organisations, has further aspirations for the A47, including the full dualling of the A47. Whilst such objectives may be longer term in nature, it sets out the intention for growth within the region. Such improvements will create significant economic opportunities at settlements along the A47, including Swaffham.

3.15 National guidance recognises the interdependencies between housing growth and employment opportunities. NPPF para 93 states:

"Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services."

3.16 Furthermore, Paragraph 8 of the NPPF requires sufficient land of the right types is available in the right places to support growth, innovation and improved productivity, and by identifying and coordinating the provision of infrastructure.

3.17 Locating employment and housing in a coordinated manner near key infrastructure, would promote sustainable forms of growth within the district, in accordance with national planning guidance. Swaffham provides the ideal location to achieve coordinated, sustainable growth.

Accessibility

3.18 Swaffham is located off the A47, one of two key trunk roads within the district, providing links to the Midlands and the Energy Coast. In addition, the A1065 runs to the east of Swaffham, linking the town to the A148 to the north and A11 to the south (a key trunk road running through Norfolk). From a highway perspective, the town is considered easily accessible.

3.19 Active travel routes run through Swaffham. Various bus routes run through the town including the Swaffham Town Service Bus Route (Swaffham Circular). In addition, Excel run a service throughout Swaffham, providing links to Dereham, Norwich City Centre,

King's Lynn, Easton and Bendish. Swaffham also has community car share schemes and a 'Dial-a-bus' service provided by West Norfolk Community Transport Project. These provisions ensure Swaffham is easily accessible by sustainable modes of transport within the town itself, and to neighbouring settlements, making it an ideal location to focus future growth.

- 3.20 On this basis, Swaffham is highly accessible, and should be positively considered as a sustainable location to accommodate further growth within the district.

Comparison against Dereham and Watton and key settlements

- 3.21 In comparison with other identified 'market towns', notably Dereham and Watton, Swaffham is better suited to accommodate further housing and employment growth, to meet the future needs of the district.
- 3.22 Watton is located in a less accessible location, away from the trunk roads within the district, off the A1075 and B1108. Within Watton are fewer services and facilities including just one dentist and doctors, two primary schools (Wayland Junior Academy and Watton Westfield Infant and Nursery), and one secondary school (Wayland Academy). From an employment perspective, the town has two identified 'Employment Areas', however, given its location away from trunk roads within the district, we would envisage a smaller level of employment growth here. Although Watton falls outside the Broads and River Wensum catchments and therefore unaffected by nitrate pollutant matters, the smaller scale nature of the settlement, and services, facilities and employment opportunities available, suggests it is suitable for smaller scale growth than that which could be accommodated within Swaffham.
- 3.23 Dereham is situated just off the A47 and A1075. Whilst there is a train station within Dereham, we understand National Rail services do not operate from this location, meaning it is no more accessible than other centres. From an education and healthcare perspective, Dereham has a considerable level of services and facilities available including 7 primary schools, two secondary schools, two dentists and three GP practices. However, Dereham falls within the Broads and River Wensum Catchment Areas. Whilst we understand the Council can still identify sites within these catchment areas as 'deliverable', the reality is, sites identified for development will be impacted by the ongoing nitrate matters. Focus should be given to ensuring a consistent supply of housing and employment development. Towns such as Swaffham, which have deliverable sites available now, should therefore be considered as more appropriate for growth in the hierarchy over Dereham.

- 3.24 Whilst Thetford is recognised as a larger centre, the only key difference between Swaffham and the identified 'key settlement' of Attleborough is the presence of a railway station. Both Thetford and Attleborough are subject to strategic urban extensions. There is no reason why Swaffham should not be subject to similar levels of growth to Attleborough based on its provision of services, particularly given the scale/form of development proposed at Thetford and Attleborough, has a considerable lead in time, given the infrastructure requirements. It is therefore critical that Breckland considers growth in other suitable locations within the district, from which it is clear Swaffham is best to accommodate as opposed to Dereham or Watton. By directing growth to locations such as Swaffham, as well as/complementary to the planned strategic growth already planned at Thetford and Attleborough will ensure a consistent supply of new homes and employment floorspace within Breckland, addressing housing needs across the district.

Summary of Swaffham

- 3.25 We consider Swaffham to be a key location to accommodate strategic growth during the existing and emerging Plan period. It is considered that Swaffham should sit only below Thetford in terms of a settlement hierarchy used to direct growth, and in particular it would be a more sustainable location for growth than either Watton or Dereham. In summary:
1. Swaffham as a town is well located within the district, just off the key trunk road of the A47, which will benefit from committed improvements, opening up the accessibility of the town further.
 2. The town benefits from sustainable transport links including an established bus network, with a circular service within Swaffham and links to settlements across the region, as well as a 'Dial-a-bus' service and community car share schemes.
 3. In comparison to other 'market towns' such as Watton, Swaffham has a substantial range of amenities, including, but not limited to, Primary and Secondary Schools, healthcare facilities, sports facilities, community facilities, supermarkets, hotels, alongside a range of shops, restaurants and café, and is therefore well established from a services and facilities perspective, and could accommodate significant growth in a sustainable manner within the district.
 4. The identified 'Employment Area' to the north west of the town is set to expand with planning applications (including application 3PL/2022/0412/H relating to 'Site 1 - Land off Turbine Way') currently being determined by the local authority.
 5. The substantial, committed A47 improvements will increase the town's appeal further as a key employment and housing location within the district.

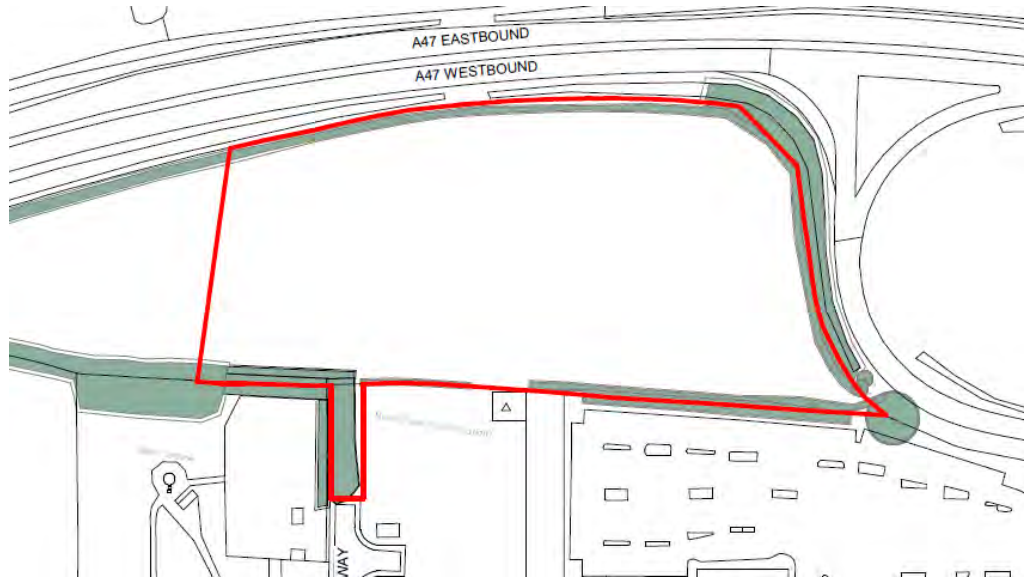
6. Swaffham falls outside of the Broads and River Wensum catchment areas and is therefore unaffected by the nitrate pollutant issue, which has halted development in affected areas, including Dereham.
7. The nature of the sites and availability of sites within Swaffham would allow development to come forward in a timely manner, to compliment the larger strategic urban extensions planned in Thetford and Attleborough, which require significant infrastructure provisions.

3.26 In this context, we urge the Council to re-consider the settlement hierarchy, with only Thetford identified above Swaffham. The scale of development already planned at Attleborough is considered to limit how deliverable further growth there would be, making a clear justification for Swaffham to be considered the next best location for further growth, and for it to be established as the preferred 'market town' for housing and employment growth within the district, in the emerging Local Plan.

3.27 We identify in the next chapter of this report, locations within Swaffham that are suitable and available to accommodate that growth.

4.0 SITE 1 - LAND OFF TURBINE WAY, SWAFFHAM

- 4.1 The Promoter owns land off Turbine Way as shown in the plan enclosed at **Appendix 1**, hereafter referred to as 'Site 1', and set out below:

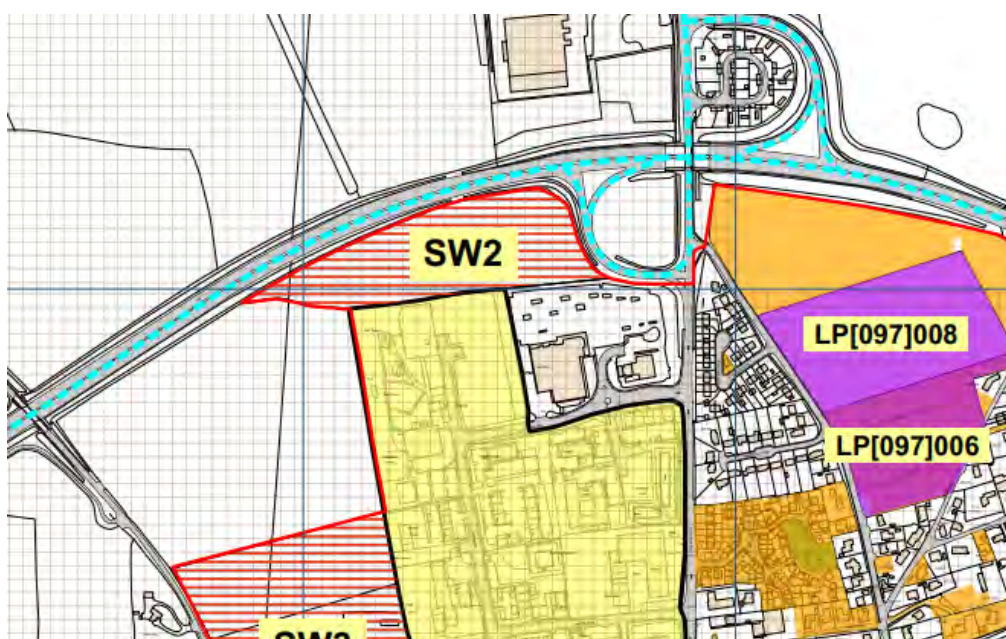


- 4.2 Site 1 comprises of approx. 2.4 hectares of arable agricultural land, located to the immediate north of the established Eco-Tech employment area, accessed off Turbine Way. The employment estate comprises medium and large-scale industrial/commercial/warehouse buildings in a range of Class E, B2 and B8 uses as well as retail and local amenity/community provision. The area boasts good links to the A47 and the rest of the built-up area of Swaffham.
- 4.3 Site 1 is not located in, or within close proximity to a conservation area. There are no listed buildings on or within close proximity to the Site.
- 4.4 The Employment Land Review (2006) recognises the area in which the Site falls as having the greatest potential for economic growth in the town. Breckland Council's 'Site Specific Policies and Proposals' (2012) allocated Site 1 within 'SW2 Land to the North of the Eco Tech Centre'. Policy SW2 stated:

“Land amounting to approximately 3 hectares is allocated for employment development. The development will provide a mix of B class units only. Development will be subject to compliance with adopted Core Strategy policies and: a. access provided only

from the Eco-Tech Employment Area; b. provision of landscape buffer between the development and the A47 trunk road; c. development will not commence until vacant, developable land in the existing Eco-Tech centre has been developed.”

- 4.5 This allocation was saved in the Local Plan adopted in 2019. Site 1 also falls within the defined settlement boundary of Swaffham. Please find the relevant Local Plan Proposals Map extract below showing the SW2 allocation:



Plan Policy Map Extract

- 4.6 The principle of employment development on Site 1 is clearly established from a planning policy perspective.
- 4.7 In accordance with the 'Employment Area' allocation in the adopted Local Plan (2019), a hybrid planning application was submitted in respect of Site 1 in April 2022 (reference 3PL/2022/0412/H). The application seeks full planning permission for the construction of buildings for 'research and development', 'light industrial', general industrial, storage or trade counter uses – UCO Classes: E(g) (ii) /(iii) B2 and B8 – at the western end; and outline planning permission for the remaining (eastern end of the) Site for flexible employment development. Whilst the proposals are for employment development, they safeguard access to land immediately west, presently owned by Swaffham Parish Council, but, we understand, being acquired by Breckland Council, to develop a local indoor leisure

facility for Swaffham. Please find the proposed layout plan within **Appendix 3** of these representations.

- 4.8 Whilst the planning application is still to be determined, the principle of employment development in this location has been accepted by Officers, and the minor details are currently being considered. The planning application has been submitted with a suite of technical documents which assess Site 1's suitability for employment development. These are accessible on the Council's planning data base under the application reference number 3PL/2022/0412/H. Below we summarise key technical study findings.

Transport

- 4.9 The submitted Transport Assessment states:
- a. Site 1 is accessible by sustainable modes of transport, particularly by walking and cycling. The Site is compliant with the local and national policy objectives and a large proportion of staff will be able to access Site 1 without necessarily needing access to a car. In addition, there are regular bus services available in a short walk from the Site which could be utilised by staff and visitors to access local and regional destinations.
 - b. There is nothing to suggest that the proposed development will have a detrimental impact on road safety in the vicinity of the Site.
 - c. It is not anticipated that the number of development trips associated with the proposals would result in a material impact on the operation of the local highway network.
 - d. Access can be delivered directly off Turbine Way.
 - e. Swept path analysis has been undertaken to demonstrate that Site 1 can be serviced by an HGV in a suitable manner.
- 4.10 The Assessment concludes there are no transport reasons why planning application 3PL/2022/0412/H should not be approved.

Ground Conditions

- 4.11 The submitted Ground Conditions Assessment concludes:
- a. The chemical contamination analysis revealed that Site 1 is free of significant contamination, with the majority of the determinants tested for revealing

concentrations, falling either below the levels of detection or below their respective assessment criteria for a commercial / industrial end use.

- b. The geotechnical laboratory analysis concluded that the strata beneath Site 1 can be regarded as uncontaminated for the proposed commercial/ light industrial end use.
- c. It is considered that Site 1 will not pose a significant risk to groundwater/ environmental receptors.
- d. Geo-remediation of Site 1 is not required.

4.12 The Assessment identifies no technical reason why Site 1 could not come forward for employment development.

Flood Risk and Drainage

4.13 The Flood Risk and Drainage Report concludes:

- a. The Site is located within Flood Zone 1 on the Environment Agency (EA) 'Flood Map for Planning (Rivers and Sea)' – an area considered to have the lowest probability of fluvial and tidal flooding.
- b. The risk of flooding from all sources has been assessed and the flood risk to the Site is considered to be low and acceptable.
- c. A feasible method of surface water discharge; discharging to the ground via soakaway is the most practical solution, and attenuation storage will be required to discharge surface water to the ground.
- d. Foul flows can be discharged to the foul sewer under Turbine Way.
- e. Given the minimum level of 72.39 m AOD in the south-east, a pumped connection would be required to connect to the foul sewer under Turbine Way.

4.14 Finally, the report identifies no flood risk or drainage issues that preclude employment development coming forward on Site 1.

Ecology

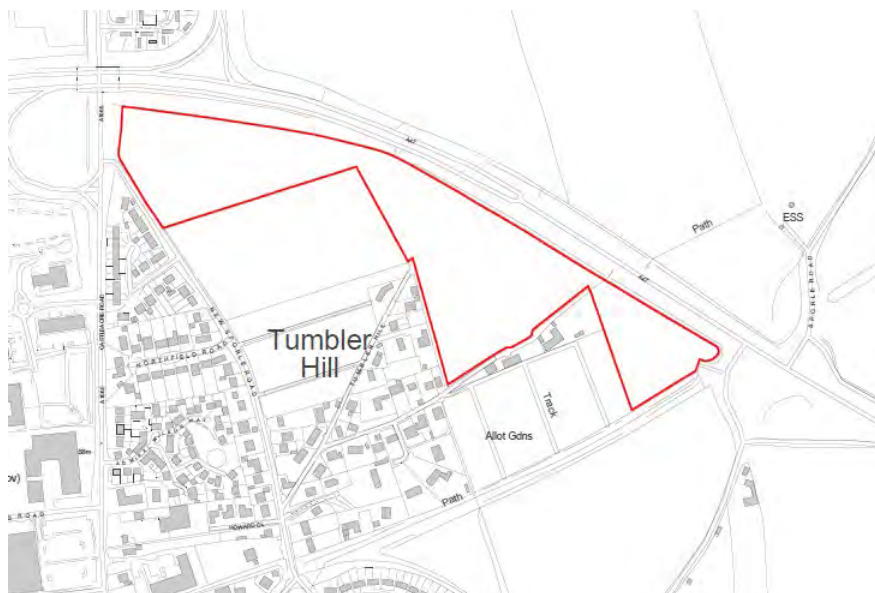
4.15 The submitted Ecological Appraisal concluded that the potential for protected species or habitats to be present on Site 1 and impacted by the proposals to be low, however, recommended a few additional surveys at the appropriate time of year to confirm this is the case. The Appraisal found no issues that should prevent Site 1 coming forward for employment.

Summary

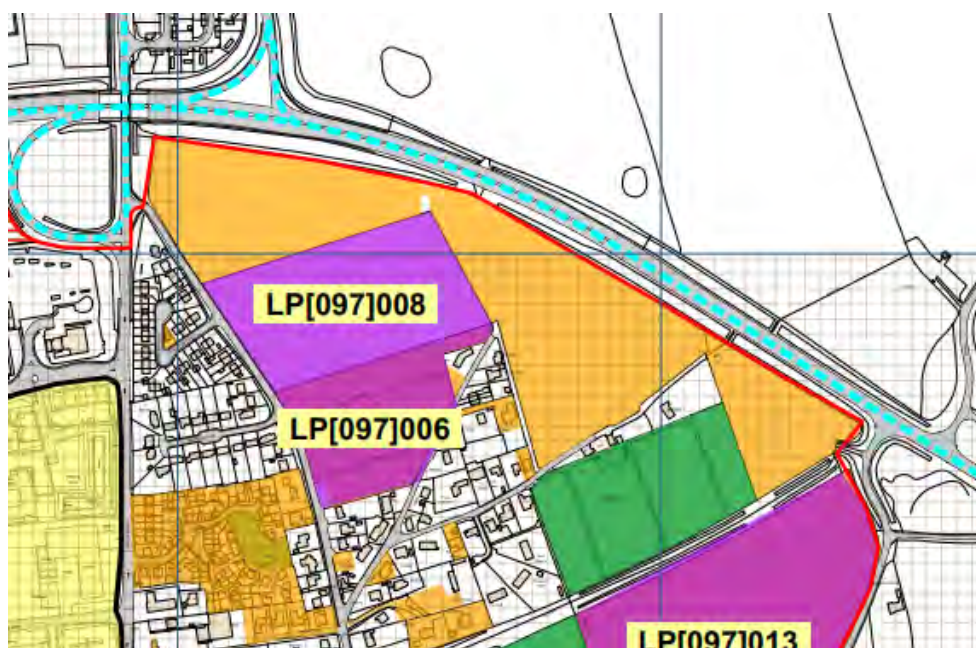
- 4.16 Given the principle of employment development on Site 1 is clearly established from a planning policy perspective, and a planning application has come forward for employment uses, which shows no technical reason why this could not be achieved, we urge the Council to reallocate Site 1 as 'Employment Land' within the emerging Local Plan and support the potential for a Leisure facility on the land to the immediate west. This will facilitate further economic growth and employment opportunities within Swaffham to the benefit of its existing and future residents. It will further enhance the sustainability of Swaffham as a market town that can accommodate future sustainable growth. The provision of a leisure facility would also enhance that position further.
- 4.17 Policy drafting should allow for flexibility, to allow the Site to respond to the changing employment market. Drafting should be agreed between parties and reflect the ongoing discussions taking place in respect of application 3PL/2022/0412/H.

5.0 SITE 2 - LAND OFF NEW SPORLE ROAD

- 5.1 The Promoter owns land off New Sporle Road as shown in the plan enclosed at **Appendix 1**, hereafter referred to as 'Site 2', and set out below.



- 5.2 The Site comprises of approx. 7.98 hectares and is split into three triangular shape parcels accessed from New Sporle Road. Site 2 is bounded by the A47 to the north, Sporle Road and the redundant railway line to the east and Tumbler Hill Road development to the south. The Site is not protected by any national or statutory designation and lies between an open field/ urban boundary and the A47 trunk road. Site 2 is not located in, or within close proximity to a conservation area. There are no listed buildings on or within close proximity to the Site.
- 5.3 In the adopted Local Plan (2019), Site 2 was identified as a 'Site with planning permission for Housing'. Site 2 also falls within the defined settlement boundary of Swaffham. Please find the relevant Local Plan Proposals Map extract below:



Plan Policy Map Extract

5.4 The existing allocation refers to the following planning permissions:

- 1) Outline planning permission (3PL/2014/9358/O) for residential development with access from New Sporle Road (circa 55 dwellings), secured 14 October 2015 (Phase 1); and
- 2) Outline planning permission (3PL/2014/1346/O) for residential development with access from New Sporle Road (circa 92 dwellings), secured 3 December 2015 (Phase 2).

5.5 The approved access scheme comprised a new priority controlled T-junction off New Sporle Road. Phase 2 would link into the spine road through Phase 1. Please find the proposed site layout plans within **Appendix 4** of these representations. The market conditions were unsupportive of the form and mix of development approved, therefore reserved matters were not submitted. However, a developer has now been identified to take the Site forward. A planning application will be prepared, which could facilitate delivery within the first 5 years of the Plan.

5.6 The character of north east Swaffham is set to change. In proximity to Site 2, also off Sporle Road are two sites subject to further planning applications for residential development. Please find a summary of these applications below:

Reference	Address		Description	Decision
3PL/2023/0154/F	Land off New Sporle Road		Residential development with associated access, parking, landscaping and surface water attenuation (New Sporle Road Phase 1) (51 affordable homes)	Pending
3PL/2023/0110/F	Land off New Sporle Road		Erection of 7 dwellings with associated access and parking (Phase 2)	Pending

5.7 Given the existing allocation of Site 2 and it's planning history, we consider the principle of residential development on Site 2 is clearly established from a planning policy and development management perspective. Furthermore, having considered surrounding planning applications coming forward within east Swaffham, we believe Site 2 would be one of the next logical parcels to be released for residential development.

5.8 The planning permissions previously secured on Site 2 (3PL/2014/9358/O and 3PL/2014/1346/O) were submitted with various technical documents, which demonstrated Site 2's suitability for residential development. These are accessible on the Council's planning data base under the application reference numbers. Below we have summarised key technical report findings.

Landscape

- 5.9 The Landscape Assessment concluded that the condition and quality of the open areas on the edge of settlement in this location is eroded by the proximity of the A47. The area inside the A47 is considered to have an enclosed character due to the raised and wooded A47 embankment. The landscape character is further degraded, in landscape setting terms, by the large area of allotments situated between Tumbler Hill Road and Sporle Road. The hard backdrop of the A47 provides a recognisable and firm line for the northern edge of Swaffham and allowing development of these additional fields simply confirms and consolidates what has essentially become the urban boundary.

Transport

- 5.10 The submitted Transport Assessment concluded that Site 2 is easily accessible by sustainable modes of transport. New Sporle Road provides a well maintained and lit footway along the western side of the carriageway. The footway connects with the pedestrian infrastructure to the west of Site 2, at the Castleacre Road/ New Sporle Road/ A47 Slip junction and on Castleacre Road itself, providing links on foot that are clearly within walking distance of the centre of Swaffham. There is a footway on the eastern side of Castleacre Road. Pedestrians travelling to and from the south are required to cross Castleacre Road via a pedestrian refuge. To the south of Site 2 the footway on the western side of New Sporle Road continues south, also providing pedestrian access to the centre of Swaffham. There is a Public Right of Way (PRoW), designated FP64a, which passes through Site 2. This PRoW increases the permeability of Site 2 by providing links with surrounding PRoW and infrastructure. Several bus services stop within 400 metres of Site 2, on Castleacre Road and Green Way. Combined, these provide regular services northbound and southbound.
- 5.11 From a highway perspective, the planning permissions secured access off a new priority-controlled T-junction off New Sporle Road. The development would link with the surrounding sustainable transport infrastructure via the proposed access and the existing public rights of way which cross the Site would be retained. Having considered the vehicle trips associated with the proposed development and junction capacity, it was concluded that they would operate comfortably within capacity. The impact of the proposed development on the A47 was also examined and it was concluded that any additional vehicles using the A47, as a result of the proposed development, would fall comfortably within the daily variance of vehicle numbers on the A47 and hence would not have a material impact. The Transport Assessment therefore concluded that the redevelopment of Site 2 for residential was acceptable from a transport and highways perspective.

Flood Risk and Drainage

- 5.12 Flood Risk Assessments were submitted as part of each application. These considered the impact of the proposed development on the existing floodplain storage at this location, and of the risk of storm water contribution from the development exacerbating downstream flooding. As set out in these reports, and according to the Environment Agency's map, Site 2 in its entirety falls within Flood Zone 1 and is therefore not considered to be at risk from fluvial flooding. Other sources of flooding have similarly been assessed and found to pose no threat to development on Site 2. It was considered that the proposals did not affect flood storage within the floodplain and the peak surface water runoff could be fully contained within Site 2. It was concluded from this assessment that the level of risk of flooding to and from the proposed development would be of an acceptable level, confirming Site 2's suitability for residential development.

Ecology

- 5.13 A Phase I and II Habitat Survey was submitted in support of the two planning applications for Site 2. The Surveys confirmed that the Breckland Forest SSSI and Breckland SPA and ESA sites within 5km of the Site, would not be impacted by any proposed development of this Site. It also stated Site 2 was not intrinsically linked with the habitats described and the species notified are unlikely to use the Site due to its distance from the designated sites, the enclosed nature of the Site and the proximity to major roads and town.
- 5.14 The Survey identified arable, hedgerow, scrub and tree habitat types, suitable for bats, badgers, nesting bird species, Great Crested Newts and reptiles. Whilst roosting bats are likely to be present in area, and evidence of badgers was found, no other protected species were found on Site 2. Whilst Site 2 boundaries offered suitable foraging, commuting and hibernation habitats for Great Crested Newts and reptiles, it was concluded that the fields did not due to their arable nature.
- 5.15 Through various enhancements and mitigate measures, the Appraisal set out no reason why Site 2 could not come forward for residential development.

Evolving Proposals

- 5.16 Since the determination of planning applications 3PL/2014/9358/O and 3PL/2014/1346/O, further work has been ongoing in respect of a new planning application for residential development on Site 2. High level discussions have taken place with Breckland District Council and Norfolk County Council in respect of the principle of residential development, access into the Site, including a direct access off Castle Acre Road and a realigned New Sporle Road, and drainage strategy. Based on more recent technical work undertaken, we consider Site 2 has capacity to accommodate circa 160 residential units. The intention is to submit a planning application on Site 2 in the near future.
- 5.17 Of note, the Promoter has also been in discussions with a major supermarket provider who are interested in bringing forward part of the western parcel of Site 2 for retail. Whilst such discussions are at an early stage, we welcome further dialogue with Breckland on this matter.

Summary

- 5.18 Site 2 is available and deliverable now, it is in a sustainable location within walking distance of the facilities offered by Swaffham Town Centre, and benefits from access to regular bus services (within 400m). The Site is unaffected by the nitrate pollutant matter. It has no technical constraints as demonstrated in technical reports submitted as part of previously approved planning applications. The principle of residential development has previously been established through the grant of planning permission and more recently undertaken technical work to support a new residential planning application re-affirms that. Accordingly, we urge Breckland Council to reallocate Site 2 as a housing/mixed use site in the emerging Local Plan, with capacity to deliver circa 160 units and retail facilities subject to meeting impact and sequential tests. Policy drafting should be agreed between parties.

6.0 SITE 3 – LAND WEST OF SPORLE ROAD

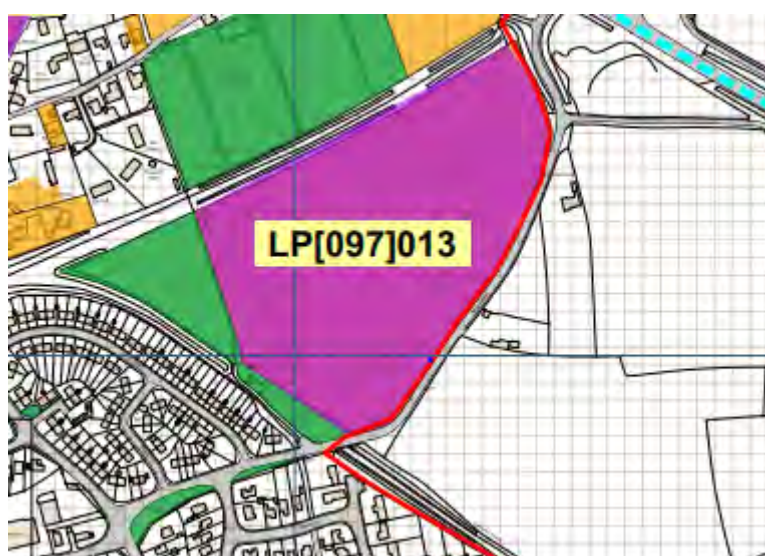
- 6.1 The Promoter also owns land west of Sporle Road, hereafter referred to as 'Site 3'. Please find the Site boundary below, and in **Appendix 1**.



- 6.2 Site 3 is located to the east of Swaffham, enclosed within and to the south of the A47. The Site comprises a parcel of undeveloped Grade 3 agricultural land that extends to approximately 6 hectares. Informal access to the Site is from Sporle Road, which runs adjacent to the eastern boundary. Site 3 is not located in, or within close proximity to a conservation area. There are no Listed Buildings on or within close proximity to the Site. The nearest statutory Listed Building is Manor House (Grade II*) which is located approximately 500m south.
- 6.3 The surrounding area is characterised by two parcels of land designated as open space: an area adjacent to the north of the Site used for allotments; and adjacent to the western Site boundary is Orford Road playground, which comprises an equipped children's play area (southern half) and an informal area for outdoor sports (northern half). Monks Path (Swaffham FP37) runs in parallel to the boundary within Orford Road playground. The path connects to the Old Railway Line to the north of Site 3, forming a popular route for

dog walkers. Further north and immediately east of Site 3 is an area of flat agricultural land. Sporle Road runs along the eastern boundary and connects to the town centre of Swaffham. Running perpendicular to the northern corner of Site 3 is the A47. East of Sporle Road is one dwelling which faces onto the Site. Further south and west of Site 3 are residential developments, which are predominantly 1-2 storeys, some of which have rear gardens facing on to the Site.

- 6.4 Within the adopted Local Plan (2019), Site 3 is allocated as a housing site (LP/097/013) and falls within the defined settlement boundary of Swaffham. Please find an extract of the Local Plan Proposals Map below:



Plan Policy Map Extract

- 6.5 In January 2017, an outline planning application submitted on behalf of the Promoter for residential development was approved (reference 3PL/2015/1155/O). The proposed development included indicative plans showing up to 130 dwellings, with all matters reserved except access. The decision was made on 3 January 2017; however, the market conditions were unsupportive of the form and mix of development approved, therefore reserved matters were not submitted. The consent is therefore understood to have expired. A new planning application, as detailed below, is pending approval. Please find the proposed site layout plan within **Appendix 5** of these representations.
- 6.6 In the Swaffham Neighbourhood Plan (2019), it confirms that 1,612 new dwellings are required within Swaffham up to 2031, with 1,007 having already been completed or are committed and a further 605 dwellings proposed. Of note, the Neighbourhood Plan

identifies Site 3 as one of the key sites to deliver new homes to address the outstanding 605 unit need up to 2036 (page 18).

- 6.7 The principle of residential development on Site 3 is clearly established from both a planning policy and development management perspective.
- 6.8 As set out previously, land to the east of Swaffham is subject to various planning applications. Please find a summary of these below:

Reference	Address	Description	Decision
3PL/2023/0154/F	Land off New Sporle Road	Residential development with associated access, parking, landscaping and surface water attenuation (New Sporle Road Phase 1) (51 affordable homes)	Pending
3PL/2023/0110/F	Land off New Sporle Road	Erection of 7 dwellings with associated access and parking (Phase 2)	Pending

- 6.9 As previously highlighted, the Promoter's Site 2 'Land off New Sporle Road' also secured outline planning permissions for circa 150 units (application references 3PL/2014/0358/O and 3PL/2014/1346/O). These planning permissions have since lapsed, however, a new application for residential development will come forward on Site 2 shortly.
- 6.10 Together, these planning applications will create growth to the east of the town, as it continues to naturally expand around the existing town centre towards the A47, which provides a recognisable and firm line for the northern edge of Swaffham and will essentially become the settlement boundary.
- 6.11 In accordance with Site 3's allocation in the adopted Local Plan (2019) and Swaffham Neighbourhood Plan (2019), a full planning application was submitted for 150 dwellings, together with associated highway, infrastructure and landscaping works (application reference 3PL/2023/0441/F) in April 2023. Please refer to **Appendix 5** for the proposed layout plan. The principal elements of the development on Site 3 include:

- 1) 150 dwellings, of which 60 (40%) are affordable;

- 2) 0.68 hectares of on-site open space provision;
- 3) Two points of vehicular access from Sporle Road;
- 4) Pedestrian links to existing footpaths;
- 5) Highway works to Sporle Road;
- 6) Drainage infrastructure to include Sustainable Drainage Systems (SuDS);
- 7) Landscaping; and
- 8) Improvements to off-site outdoor sport facilities and play space within Swaffham, including enhancements to Orford Road playground.

6.12 Whilst the planning application is still to be determined, the Applicant, Crocus Homes, engaged with key stakeholders through the pre-application process, namely: Breckland District Council and Norfolk County Council. The design of the proposals reflects discussions had with Officers. The planning application has been submitted with a suite of technical documents (which are accessible from the Council's website under application reference 3PL/2023/0441/F) which assess Site 3's suitability for residential development. Below we summarise key technical study findings.

Heritage

- 6.13 The submitted Heritage Assessment concludes that there are no scheduled monuments, listed buildings, registered parks and gardens or conservation areas within or adjacent to the proposed development area. Therefore, the proposed residential development of Site 3 will have no impact upon any designated heritage assets or their settings.
- 6.14 Regarding non-designated heritage assets, a geophysical survey of Site 3 commissioned by Crocus Homes indicated that the archaeological potential of the proposed development area is low. However, the possibility remains for previously unrecorded archaeological features and deposits to be present, which could be adversely affected by the proposed residential development of Site 3.
- 6.15 To mitigate any potential archaeological impact, the Heritage Assessment recommends further archaeological fieldwork to characterise the presence, nature, depth and character of any archaeological deposits or features which might survive on the site. Given the low archaeological potential of Site 3, it is considered appropriate for the required archaeological works to be secured by a planning condition placed on any consent granted. This is consistent with the approach to archaeological evaluation taken under the previous planning consent 3PL/2015/1155/O granted in January 2017.

- 6.16 The Heritage Assessment identifies no reason why Site 3 should not come forward for residential development.

Transport

- 6.17 To unlock Sporle Road for further development, the proposals include significant highway improvements which have been prepared in consultation with Norfolk County Council Highways Team. The proposals include widening Sporle Road to 6 metres, and a footpath and pedestrian crossing that connects Site 3 along Sporle Road with the Bridleway to Sporle towards the north-east. The road widening will extend up to the junction with the A47. The current speed limit of 60mph along Sporle Road will be reduced to 30mph, with 30mph speed limit signs at the boundary of the site to create a gateway feature. Please refer to **Appendix 6** for the proposed highways scheme.
- 6.18 The scheme includes proposals to extend the Swaffham Circular bus route through the loop road of the proposed development. A bus stop will be located on the loop road near the central infiltration basin and provision will be made for a bus shelter in this location; these have been provisionally agreed with NCC Highways. Two priority T-junctions will connect Site 3 to Sporle Road.
- 6.19 New footpaths are proposed along the western boundary to link the proposed development with the existing Orford Road play area and Monks Path, which in turn connects to the disused railway line, currently a well-used footpath to the north of Site 3.
- 6.20 The Transport Assessment concludes that following a review of both existing and predicted traffic flows in the area local to Site 3, the impact of the proposed development is considered likely to be relatively small. A review of the PIA data for the highway network in the vicinity of Site 3 shows no accident clusters or blackspots which are likely to be exacerbated by the development proposals.
- 6.21 The Transport Assessment concludes that the potential impact of development would not be severe, that the development proposals take account of and accord with guidance from Norfolk County Council Highways, and that there are no inherent capacity or safety concerns in the local area to take into account. There are therefore no highways issues which preclude Site 3 coming forward for residential development.

Flood Risk and Drainage

- 6.22 The submitted Flood Risk and Drainage Strategy concludes that from examination of site levels and by reference to Environment Agency flood zone mapping, it is demonstrated that Site 3 is situated in Flood Zone 1. There is therefore a low probability flood zone with a less than 1 in 1000 annual probability of flooding. Site 3 is therefore at 'low' risk of flooding from rivers and the sea.
- 6.23 The Strategy has considered all flood risk sources and considers the risk of flooding to be 'low' or 'very low' for Site 3.
- 6.24 From information obtained from BGS mapping and site investigation, ground conditions with good drainage characteristics have been identified on Site.
- 6.25 A sustainable approach to surface water run-off is proposed using soakaways, infiltration basins & permeable surfaces for the private roads, driveways & parking spaces, and filter strips & filter drains for the highway.
- 6.26 The Strategy concludes that the proposed drainage scheme complies with the requirements of planning policy and provides a sustainable approach to surface water management, providing water quantity, water quality and amenity / biodiversity benefits to the development.
- 6.27 There is therefore no flood risk or drainage constraint, preventing Site 3 coming forward for residential development.

Ecology

- 6.28 In August 2022 a Preliminary Ecological Appraisal (PEA) was produced by Temple, comprising a Phase 1 Habitat Survey, a protected species assessment and an ecological evaluation of Site 3.
- 6.29 The Assessment concluded Site 3 is not subject to any statutory nature conservation designations. No nationally important statutory sites are located within 2km of the Site. The closest statutory site is Breckland Forest Site of Special Scientific Interest (SSSI) 3.4km south-west of the Site. A number of internationally designated sites are located within a 15km radius of the proposed development Site, include the following: Breckland Special Protection Area (SPA) and Special Area of Conservation (SAC) and Norfolk Valley Fens SAC. Habitats present are considered of importance within the immediate vicinity of

Site 3 only but may assume higher importance where they support protected and/or notable species.

- 1) Roosting Bats – One tree, T16 a mature oak tree within hedgerow along the south-eastern boundary, was identified as having high bat roost potential.
- 2) Foraging Bats – It was recommended that a sensitive lighting scheme is implemented along boundary features, suitable for foraging or commuting bats.
- 3) Great Crested Newts – there are no aquatic habitats on Site, with the nearest waterbody c. 230m west of the Site. Terrestrial habitats suitable to support great crested newts include arable field margins, dense scrub and hedgerow bases. Due to a low chance of great crested newts being present on Site a precautionary approach was proposed to minimise impacts on great crested newts.
- 4) Breeding birds - habitats present, notably the arable field margins, hedgerows, scrub and trees, offer opportunities for nest building and appropriate mitigation with regards to habitat clearance will be required.
- 5) Reptiles – habitats suitable to support reptiles, such as arable field margins, dense scrub and hedgerow bases, are present on the Site and appropriate measures to minimise impacts on reptiles are recommended.

6.30 In October 2022, further bat surveys were conducted by Temple for the one mature oak tree (T16) identified in the PEA as having bat roost potential. The surveys concluded no bat roosts were recorded.

6.31 A Shadow Habitats Regulations Assessment (SHRA) has been prepared by Temple in support of the application for Site 3. The SHRA assessed the potential impacts imposed on the Breckland Special Protection Area and Breckland Special Area of Conservation and habitat suitability as a result of the proposed development. The report set out an appropriate mitigation strategy to mitigate against potential 'in-combination' impacts upon designated sites. These recommendations have, where possible, been incorporated into the Landscape Strategy submitted as part of this application and include enhancing footpath network from the proposed development; provision of dog waste bins; and, in line with Norfolk GIRAMS, a payment of £185.93 per dwelling will be made to further offset any recreational pressure on nearby designated sites. The SHRA concluded that with the above referenced mitigation measures in place, the proposed development is likely to have no adverse effect on site integrity. The Assessment recommends that there is no need for further ecological survey work.

Ground Conditions

- 6.32 A Phase 1 Desk Study was undertaken in May 2022 to establish the current condition of Site 3. The report concluded that due to the current and historic use of Site 3, it is unlikely there is any significant contamination and, therefore, human end-users are at low risk from exposure to contaminated soils. Furthermore, the report concluded that significant leachable or mobile contamination, concrete-aggressive contaminants, organic contamination to plastic pipes are all unlikely. In addition, no ground gas sources were found; therefore, there is a low risk of gas migration.
- 6.33 Further groundwater level monitoring was conducted to confirm existing groundwater levels were acceptable.
- 6.34 From a ground conditions perspective, there is no technical reason why the Site could not accommodate residential development.

Summary

- 6.35 Site 3 is currently allocated as a housing site in the adopted Local Plan (2019), and previously secured planning permission for 130 new homes in 2017 (application reference 3PL/2015/1155/O). In the adopted Swaffham Neighbourhood Plan, Site 3 is relied upon for future housing delivery. A new full planning application for 150 new homes was submitted in April 2023 (reference 3PL/2023/0441/F). This application has been prepared in consultation with key statutory consultees including Breckland and Norfolk County Council. Site 3 has no technical constraints as demonstrated in technical reports submitted as part of the previously approved planning application, nor identified in recent technical work undertaken to support the planning application submitted in April 2023. Accordingly, we urge Breckland Council to reallocate Site 3 as a housing site in the emerging Local Plan, with capacity to deliver circa 150 units. Drafting should be agreed between parties and reflect the recently submitted planning application 3PL/2023/0441/F.

7.0 SITE 4 - LAND EAST OF SPORLE ROAD

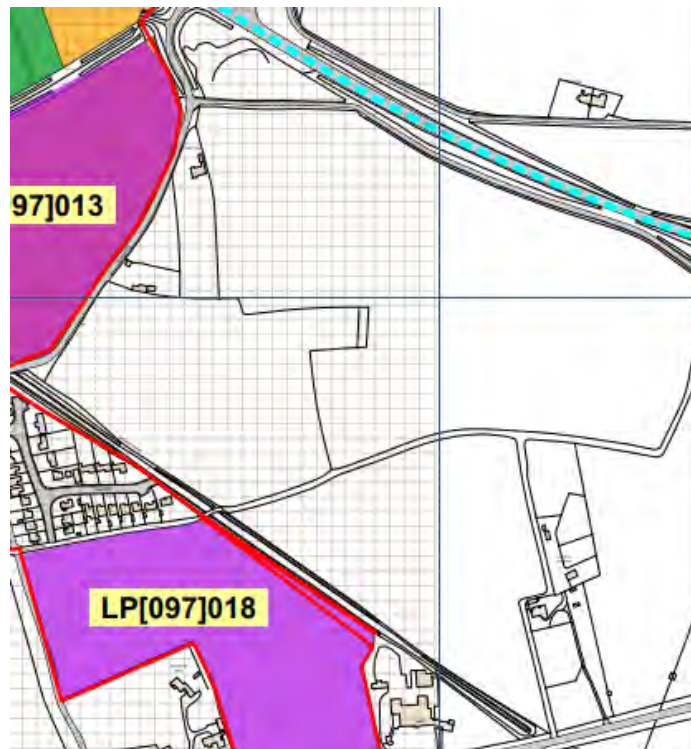
- 7.1 The Promoter also owns land 'East of Sporle Road', hereafter referred to as 'Site 4'. Please find a site location plan below and in **Appendix 1**.



- 7.2 Site 4 is located to the east of Swaffham and comprises approximately 18.74 hectares.
- 7.3 The Site currently has an agricultural use and is divided into two parcels segregated by Long Lane (a byway). Access to the Site is from Sporle Road from the north west, which connects to the town centre of Swaffham. To the north of Site 4 is an existing byway, and beyond this the A47. To the east is agricultural land, a small, wooded area and Green House Lane. To the south is Norwich Road, which again provides direct access into Swaffham town centre. Finally, along the western Site boundary is a dismantled railway embankment. The Site is bound by hedgerows and trees. Site 4 is not located in, or within close proximity to a conservation area. There are no listed buildings on or within close proximity to Site 4. The Site has no relevant planning history. Given the agricultural use of the Site, it is likely it has a relatively low biodiversity value.
- 7.4 The surrounding area is characterised by agricultural land subject to planning applications and/ or existing housing allocations in the adopted Local Plan (2019), and recently completed residential development. Immediately north of Site 4, along Sporle Road, is the Promoters Site 3 'Land West of Sporle Road'. This parcel of land is subject to a housing allocation (LP[097]013) in the Local Plan and has secured planning permission in the past

for circa 130 units (application reference 3PL/2015/1155/)). Furthermore, in April 2023, a new full planning application was submitted on 'Land West of Sporle Road' for circa 150 units (application reference 3PL/2023/0441/F). To the south west of Site 4, on the adjacent side of the dismantled railway is housing allocation LP[097]018, which secured outline planning permission in 2018 for circa 165 units (application reference 3PL/2015/0550/O). This has since been built out. Further to the north, further planning applications have been submitted for residential development within the east of Swaffham including 3PL/2023/0154/F and 3PL/2023/0110/F, which are currently being determined by the Council. The Promoter's Site 2 'Land off New Sporle Road', also considered within these representations, previously secured residential planning permission for circa 150 units (application references 3PL/2014/1346/O and 3PL/2014/0358/O) and will be subject to a new planning application in the near future. This area of Swaffham is therefore undergoing significant change/ expansion as it delivers new homes, services and facilities. The expansion of Swaffham to the east has redefined the settlement edge. The A47 boundary has become the new defined urban edge of Swaffham to the north and east.

- 7.5 Within the adopted Local Plan (2019), Site 4 is unallocated and currently falls outside the defined settlement boundary of Swaffham. Please find an extract of the Local Plan Proposals Map below:



Plan Policy Map Extract

- 7.6 The Site is not identified in the Swaffham Neighbourhood Plan (2019) as an allocated Site. However, the Neighbourhood Plan states *“it is preferable to have development to the west or east of the centre rather than spreading south and potentially north. A distance of less than 2km has commonly been used as the maximum reasonable walking distance, and offers the greatest potential to replace short car trips”* (Paragraph 6.1.7). This is set out in the Community Aspiration on page 19 of the Plan. Paragraph 38 of the NPPF states that, *“where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties”*. Site 4 is located to the east of Swaffham, less than 2km from the town centre, with direct links into the centre via Sporle Road and Norwich Road.
- 7.7 When considered in the context of surrounding sites coming forward, the A47 comprising the new urban edge, the objectives of the Neighbourhood Plan and Site 4’s location in proximity to the existing town centre, this parcel of land clearly provides the next logical release of land for residential development within Swaffham, which can assist in delivery on the additional housing need identified in the district.
- 7.8 Site 4 was first promoted through the ‘Call for Sites’ exercise in May 2022. Since this submission, the Promoter has instructed a technical consultant team to consider development opportunities on Site. Please find enclosed at **Appendix 7** the following information to support the promotion of Site 4 for residential development:
1. Site Layout Plan prepared by WT Design.
 2. Transport Note prepared by Rossi Long.
 3. Drainage and Flood Risk Note prepared by Rossi Long.
 4. Ecological Note prepared by Temple.

Opportunity

- 7.9 Initial investigations show that Site 4 could accommodate circa 250 dwellings, as illustrated on the submitted Site Layout Plan (reference 398-23-SK001 P2). Areas of public open space and play would be provided. Where appropriate, connections would be made to existing public rights of way to ensure maximum levels of connectivity for residents. Vehicular access is proposed off both Sporle Road and Norwich Road. Drainage has also been considered, with initial site layouts including proposed attenuation areas and SUDs along the spine road. In respect of ecology, key features have been considered. Existing hedgerows and trees have been designed into the proposals and significant landscape

buffers are proposed around the periphery of the Site, so as to provide a future, naturally obvious and defensible settlement boundary for Swaffham. Any proposals would seek to achieve at least 10 percent net biodiversity gain and can readily be accommodate on the Site. Any development on Site 4 would be phased over a period of time to ensure that a balanced and sustainable community would be delivered from the earliest phases, supported by the necessary infrastructure.

- 7.10 Below we consider each discipline and provide a summary of the technical notes found at **Appendix 7.**

Transport

- 7.11 Rossi Long has prepared a Transport Note on Site 4. The note concludes that Site 4 benefits from an accessible location, immediately east of Swaffham town centre. The Site is adjacent to an area of existing residential dwellings close to local services and facilities, including a primary school within close walking and cycling distance. The majority of people's daily needs/activities are within 2.0km of Site 4, and there are excellent opportunities for people to utilise sustainable travel modes and internalise trips within Swaffham. The Site is in proximity to schools, meaning more trips to/ from the schools can be achieved via sustainable modes, given the Site's easily accessible location. The Site is also located within walking distance of nearby bus stops, providing frequent services to nearby towns and villages.
- 7.12 The note refers to the Promoter intentions to work with Norfolk County Council Public Transport Department to assist in the diversion of the existing bus service route on New Sporle Road, and to provide new bus stop facilities within the Site to allow for pick up / set down of passengers. As part of any proposals, footway facilities would be provided from within Site 4 to the proposed entrances, and then on to connect with existing public footway facilities. This, along with crossing facilities (such as dropped-kerbs and tactile paving) would provide a safe, convenient connection for both new and existing residents to access the facilities/services located to the south-west within Swaffham town centre.
- 7.13 In respect of proposed vehicular access points, the Transport note confirms that these would be taken from both the existing field access to the north-west of the Site on to Sporle Road, and also from Norwich Road to the south of the site, - via new Priority T-junctions.

- 7.14 The note concludes that Site 4 would also benefit from the proposed highways works as set out in application 3PL/2023/0441/F (found in **Appendix 6** of these representations). Proposed improvements include:
- a. The carriageway of Sporle Road will be widened to 6m and a 2m footpath provided;
 - b. A change in speed limit will be promoted from the existing 60mph to 30mph along Sporle Road;
 - c. The carriageway of Sporle Road will be narrowed through the section with the existing bridge abutment to allow for the provision of the 2m wide pedestrian footway on the northern side;
 - d. Links into the existing pedestrian infrastructure along Sporle Road.
- 7.15 Car and cycle parking provisions on Site 4 would be in accordance with Norfolk County Council's latest 'Parking Standards for Norfolk 2022' document.
- 7.16 A full Transport Assessment would be prepared to support any planning application for development on Site 4, demonstrating its sustainable location and how it complies with the NPPF sustainable objectives. The Transport Assessment would fully consider travel by all modes including, where possible, measures to promote travel by sustainable modes. Additionally, a Travel Plan would be prepared to support the sustainability of the Site.
- 7.17 In summary, Site 4 is well located adjacent to the town centre of Swaffham and provides an opportunity to deliver new housing in a sustainable, accessible location. There are no transport constraints which would preclude the Site coming forward for residential development.

Flood Risk and Drainage

- 7.18 The Promoter has instructed Rossi Long to prepare a Technical Note on Flood Risk and Drainage. In summary, the note concludes that Site 4 is situated in Flood Zone 1 and is at 'low' risk of fluvial flooding and generally 'very low' risk of surface water flooding, except for both eastern and western boundaries. In these flood risk corridors, development should be avoided, and existing ground levels maintained. The illustrative layout plan has taken this advice into consideration and has set back development from these boundaries.
- 7.19 The note states that a surface water drainage strategy using ground infiltration of run-off may be feasible on Site 4. Should ground infiltration not be feasible, a viable alternative comprising off-site discharge to watercourse would be required. For this

solution attenuation storage would need to be provided to limit the off-site discharge to the equivalent 'greenfield' run-off rate.

- 7.20 The technical note has identified no constraint in respect of drainage and flood matters, which would prevent the Site coming forward for residential development.

Ecology

- 7.21 Temple has been instructed to prepare an initial Ecology Note on Site 4. The note concludes that Site 4 is not subject to statutory designation for nature conservation purposes. It does not appear to be under any form of Countryside or Environmental Stewardship agreement. The Site does not contain any Priority Habitats. No ancient woodland is present on Site or in close proximity to it. The nearest listed Priority Habitats are a parcel of traditional orchard c. 228m to the west of the Site on the opposite side of Sporle Road, and a parcel of deciduous woodland c. 484m to the north-east on the far side of the A47.
- 7.22 Various statutory designation sites lie within 10km of the Site, including a number of SSSIs, some of which underpin internationally designated SPAs and SACs. The Site lies within the Impact Risk Zones for several of these, including:
- a. The Breckland Special Protection Area ('SPA') (lies 2.46km north of the Site), which is underpinned by Breckland Forest Site of Special Scientific Interest (SSSI).
 - b. Breckland Farmland SSSI (lies 4.24km south of the Site), which also underpins Breckland SPA;
 - c. Norfolk Valley Fens Special Area of Conservation (SAC) (lies 6.76km to the south of the Site), underpinned by Great Cressingham Fen SSSI;
 - d. Breckland SAC lies 7.46km to the south, underpinned by Field Barn Heaths, Hilborough SSSI.
- 7.23 Owing to the sensitivities of the Breckland SPA ground-nesting bird populations to development and recreational disturbance, local planning policy dictates species-specific buffers around the SPA within which it is presumed development with the potential to adversely affect these species will not be permitted. These are set out in ENV03 of the Breckland Local Plan and are typically 1.5km for stone-curlew and 400m for woodlark and nightjar. The Site therefore falls outside of these buffer zones.
- 7.24 The Site does, however, lie within an area identified within the Plan as supporting habitat potentially suitable for stone curlew and which may be functionally linked to the SPA. As

such, consideration of any impacts arising from the proposals on the stone-curlew interest of Breckland SPA would be expected, however, based on a recent consultation response from Natural England for proposals 'West of Sporle Road' (Site 3), significant effects specifically on stone-curlew are not anticipated.

- 7.25 A further consideration for design layout and subsequent Habitat Regulations Assessment will be the provision of on-site green infrastructure (GI) and/or financial contributions to ensure adverse effects on internationally designated sites from increased recreational pressure. This will be taken into consideration, in developing proposals moving forward.
- 7.26 The following surveys are recommended moving forward:
- a. Preliminary Ecological Appraisal (PEA) to include data search from Norfolk Biodiversity Information Service (NBIS) for protected and otherwise notable species and non-statutory designated sites, and a habitat condition assessment to inform subsequent biodiversity net gain assessment;
 - b. Ground level roost assessment of trees to assess suitability to support roosting bats, and to inform the need for further survey such as climbed (aerial) inspection and emergence/re-entry surveys;
 - c. Activity surveys (transects) and static surveys (automated detectors) for bats to determine value of Site for foraging and commuting purposes;
 - d. Reptile surveys;
 - e. Badger survey;
 - f. Breeding bird surveys.
- 7.27 Any scheme on Site would seek to achieve a minimum 10% Biodiversity Net Gain through the proposals and a formal net gain assessment will be undertaken to inform this. It is envisaged that existing habitats of higher biodiversity value, such as the hedgerows and tree-lines, will be retained and incorporated into the masterplan with a suitable buffer around them to ensure dark corridors for light sensitive species such as bats. Most habitat loss will therefore be of lower value habitat such as the arable farmland.
- 7.28 Temple concludes that potential constraints outlined above, whilst requiring further work to characterise to ensure compliance with the relevant legislation and planning policy in due course, are unlikely to preclude the Site coming forward for residential development from an ecological perspective.
- 7.29 Our representations focus on the Promoters land holdings; however, De Merke Estates are in discussions with adjacent landowners regarding the purchase of an additional parcel

of land off Sporle Road, immediately adjacent to Site 4. This additional land equates to 1.13 hectares and is shown on the site plan below, also found at **Appendix 2**.



- 7.30 Whilst discussions are at an early stage, the Promoter is exploring the wider opportunity ('Option 2'), of a residential led scheme across this parcel and Site 4. Please find a proposed site layout at **Appendix 8**. In total, Option 2 could deliver circa 275 residential units.

Summary

- 7.31 In summary, Site 4 benefits from an accessible location, immediately east of Swaffham town centre. The Site is adjacent to an area of existing residential dwellings close to local services and facilities.
- 7.32 The east of Swaffham is undergoing significant change/ expansion as it delivers new homes, services and facilities within the district. The expansion of Swaffham has redefined the settlement edge in this location, with the A47 boundary becoming the new defined edge to the north and east. When considered in this context, Site 4 would be the next logical land to come forward for development, as part of a wider planned for comprehensive development of east Swaffham that alongside Sites 2, and 3 highlighted

above could support circa 500-585 new homes and meet additional needs in a sustainable location within a defined market town.

- 7.33 The Site offers an opportunity to deliver a range of new homes tailored to local needs, in a sustainable, accessible location, immediately east of Swaffham town centre, in accordance with the Neighbourhood Plan aspirations.
- 7.34 Having instructed various technical studies, including transport, flood risk and drainage and ecology, no constraint has been identified which would preclude the Site coming forward for residential development.
- 7.35 An initial site layout has been prepared which concludes the Promoters landholdings could deliver circa 250 new homes. Furthermore, there is a wider opportunity ('Option 2'), which could achieve circa 275 new homes.
- 7.36 On this basis, we urge the Council to allocate Site 4 and the adjacent parcel of land ('Option 2') for residential development in the emerging Local Plan. Drafting should be agreed between parties.

8.0 RESPONSE TO LOCAL PLAN CONSULTATION QUESTIONS

- 8.1 In this Section we consider relevant questions set out in the Regulation 18 Consultation Paper and provide the Promoter's responses.

Question 3: As a minimum do you think the Local Plan Update should plan for Breckland's full objectively assessed housing needs based upon the most up to date Standard Methodology published by MHCLG (672 per annum) or do you think there are any issues affecting housing growth in Breckland that may justify a higher figure for example, to support any identified strategic infrastructure, greater levels of affordable housing or an opportunity to maximise economic growth?

- 8.2 Within Chapter 2 of these representations, we have considered Breckland Council's housing need in detail. Based on assessment, the Council should be aiming above the minimum housing need to address needs in full.
- 8.3 The district has the highest need for affordable housing within the identified HMA, as set out in the SHMA (2017). Based on the 'Statement of Five-Year Housing Land Supply' (2022), from 2014/15 to 2021/22, we understand that the Council has delivered 5,002 net additional homes within the district. Based on sites delivering 25 percent affordable housing (as per Policy HOU 07 of the adopted Plan), this would equate to approximately 156 affordable units per annum, a significant shortfall when considered against the target of 220 affordable dwellings per annum. This justifies increasing provisions above the minimum requirement as defined through the standard method, to address the unmet affordable housing need and projections moving forward.
- 8.4 Moreover, the district has been subject to a moratorium on residential development within the River Wensum and Broads catchment areas, in response to the ongoing nitrate pollutant issue. Whilst the latest Housing Delivery Test Results (2022), do not reflect the extent to which this has affected housing delivery, this will have had a detrimental impact on housing supply. In this context, we strongly believe the Council needs to aim above the minimum local housing need to address housing needs in full. Unforeseen events will always unfold when it comes to delivering specific sites which cause delays and, in some instances, no delivery at all. The Council should plan for the fact that not every allocated housing site will be delivered and therefore overprovide in relation to the identification of housing land in local plans. The Promoter's Site 2, Site 3 and Site 4 are all available and deliverable. There are no technical constraints on these Sites, as demonstrated in

technical work, which would prohibit them coming forward for residential development. We urge the Council to allocate these for housing development to ensure local needs are met.

- 8.5 Finally, we consider the standard methodology figure should be increased to reflect findings of the ongoing HEDNA to ensure housing delivery, including affordable housing, supports the economic aspirations of the district.
- 8.6 Exceeding the standard methodology figure will increase the probability of delivering the required numbers of homes to meet all needs within the district, improving the accessibility of the housing market to all and supporting economic growth.

Question 4: Do you think the settlement categories as defined in the hierarchy above should be carried forward into the Local Plan Update? Y/N Please provide further comments.

Question 5: Are there any settlements that you think should be added, removed, or moved into a different category? Please indicate which settlements and give reasons.

- 8.7 Please note this text responds to both Questions 4 and 5 of the consultation paper.
- 8.8 We consider Swaffham to be highly accessible, located just off the key trunk road off the A47. Moreover, it has established sustainable transport links including a circular bus service within Swaffham and bus links to settlements across the region, as well as a 'Dial-a-bus' service and community car share schemes.
- 8.9 In comparison to other 'market towns' such as Watton, we consider Swaffham has a substantial range of amenities, including, but not limited to, Primary and Secondary Schools, healthcare facilities, sports facilities, community facilities, supermarkets, hotels, alongside a range of shops, restaurants and café, and is therefore well established from a services and facilities perspective, and could accommodate significant growth in a sustainable manner within the district.
- 8.10 Swaffham also falls outside of the Broads and River Wensum catchment areas and is therefore unaffected by the ongoing nitrate pollutant issue, which has halted development in affected areas, including Dereham.

- 8.11 Given the scale of growth already planned for at Attleborough in relation to its existing size, we do not believe further growth should be directed there beyond that already consented. As such Thetford should sit alone at the top of the hierarchy as a destination for growth. Swaffham is then considered to be the next most sustainable location for growth beyond Thetford and this should be reflected in the hierarchy. as a 'Tier 1 market town'.
- 8.12 Swaffham should therefore sit only below Thetford as the next most sustainable location in the district to accommodate growth (alongside Dereham and Attleborough – where no further growth should be planned for based on the reasons described above), and above Watton. Re-ordering the hierarchy to this effect would enable a number of smaller-medium scale sites which are immediately available to come forward within Swaffham, such as those promoted as part of these representations. This would complement the larger strategic urban extensions planned for in Thetford and Attleborough which require significant infrastructure provisions, and reduce pressure to develop further at Dereham whilst constraints relating to the catchment of the River Wensum or the Broads Special Area of Conservation and Ramsar site are addressed.
- 8.13 In this context, we urge the Council to reidentify Swaffham as a 'Tier 1 market town' in the settlement hierarchy in the emerging Local Plan below only Thetford, and as a key priority for growth.
- 8.14 ***Question 10: Which of the spatial principles listed below do you consider are most important in developing a strategy for development in the Local Plan? Please rank (1) for most important and (12) for least important***

- 1. Maximise re-use of previously developed (brownfield) land***
- 2. Focus development in locations where there is greatest accessibility to employment, local services and facilities***
- 3. Respect the character of the existing settlement pattern including maintaining gaps between settlements***
- 4. Focus development in locations where there is greatest potential to maximise sustainable travel (public transport, walking and cycling)***
- 5. Locate development to minimise its impact on protected or locally important landscapes, heritage and biodiversity***
- 6. Focus on locations and development that will deliver or contribute most to infrastructure and local facilities***
- 7. Focus on sites that can be delivered quickly to ensure a flexible development supply***

8. Provide new housing and facilities to help sustain rural settlements

9. Locate development to maximise use of existing available infrastructure capacity (e.g., transport, wastewater treatment)

10. Seek to increase development densities in locations close to local facilities or with good public transport links

Please provide your ranking and comments below

8.15 We rank the points listed as follows:

1. Focus development in locations where there is greatest accessibility to employment, local services and facilities.
2. Focus development in locations where there is greatest potential to maximise sustainable travel (public transport, walking and cycling).
3. Locate development to maximise use of existing available infrastructure capacity (e.g., transport, wastewater treatment).
4. Seek to increase development densities in locations close to local facilities or with good public transport links.
5. Focus on sites that can be delivered quickly to ensure a flexible development supply.
6. Focus on locations and development that will deliver or contribute most to infrastructure and local facilities.
7. Locate development to minimise its impact on protected or locally important landscapes, heritage and biodiversity.
8. Respect the character of the existing settlement pattern including maintaining gaps between settlements.
9. Provide new housing and facilities to help sustain rural settlements.
10. Maximise re-use of previously developed (brownfield) land.

8.16 Paramount to achieve sustainable growth, is locating development in easily accessible locations with access to jobs, services and facilities and sustainable modes of transport, in accordance with national guidance. Swaffham provides a strong opportunity to bring forward a significant level of new homes in sustainable location in the district. However, also of significant importance is deliverability. Development must be deliverable in the national interest of building sufficient homes. Focus should therefore be given to ensuring a consistent supply of housing and employment development. Deliverable sites such as those promoted in these representations should therefore be prioritised for development.

Question 11: Do you think development should be concentrated within the market towns? Y/N 22 If so which ones and why?

- 8.17 We have considered the suitability of Swaffham to accommodate growth in Section 3 of these representations and in our responses to Questions 4 and 5. In summary, given the accessible nature of Swaffham along the A47 trunk road, the available sustainable modes of transport within the town itself and those which link the town to surrounding areas, the broad range of services and facilities available and the fact it falls outside the nitrate pollutant catchment areas, we consider Swaffham should be identified as the preferred 'Tier 1 market town' for housing and employment growth in the new Plan period, over and above Dereham and Watton, but also Attleborough, given the scale of growth already planned there.

Question 14: Should development be concentrated on the main transport routes (A47, A11 or others)? Y/N

- 8.18 We encourage Breckland to focus development on the main transport routes, including the A47. Along these trunk roads exist established settlements including Swaffham, which have significant services and facilities, good sustainable modes of transport and are key locations for economic growth (which supports housing delivery). Focusing development along trunk roads will foster sustainable principles, delivering socio, economic and environmental benefits in accordance with the NPPF.

Question 15: Do you think that the Local Plan should continue to define settlement boundaries or rely on a criteria-based policy / Y/N. What are your reasons for your answer?

- 8.19 We fully support a criteria-based policy over defined settlement boundaries, but those boundaries should be amended in the first instance to ensure growth can be accommodated in the right location.
- 8.20 The settlement boundaries were defined during a period in which the character of Swaffham was significantly different. Swaffham has changed through development and the boundaries that once existed are no longer present. Over the years, development has extended towards the A47, which has become the logical defensible urban boundary to Swaffham.
- 8.21 Whilst three of the Promoter's Sites fall within the settlement boundary of Swaffham, 'Land East of Sporle Road' (Site 4) does not, and given the need for additional housing in

sustainable locations, such as Swaffham, which would be the 'Tier 1 market town' in the district, the boundary should be extended to accommodate it, to facilitate wider comprehensive development is planned for in conjunction with Sites 2 and 3. The Swaffham Neighbourhood Plan, clearly recognises the potential for this, stating that development to the east and west of Swaffham is preferable. Sites falling outside of any future defined settlement boundary, as amended to accommodate Site 4, should also not be dismissed should they offer a more sustainable option for growth. They should be considered against a criteria-based policy on their own merits. Matters such as sustainability, layout, design and form should all be considered.

8.22 ***Question 20: Which criteria do you think is the most important when considering development? Please rank (1) for most important and (5) for least important***

1. The provision of sufficient affordable housing to meet Breckland's housing needs

2. The provision of sufficient retirement housing to meet Breckland's housing needs

3. Raising standards of design in the district

4. Meeting the challenges of climate change

5. Protecting and Enhancing the Environment including green space, biodiversity, river and air quality Please explain your answer

8.23 The district should prioritise the delivery of a sufficient level of new homes, seeking to meet the affordable housing needs and general housing needs of each demographic within the emerging Plan period. This priority should be reflected in the emerging Local Plan, through the setting of appropriate housing targets to address ongoing shortfalls. We therefore rank affordable housing (1) and retirement housing (2). Through the delivery of new homes, the other three criteria should be considered, to ensure proposals seeks to achieve high quality design, taking into consideration climate change and the natural environment, in accordance with national planning guidance.

Question 22: Should the Council plan for the minimum economic growth needs required to meet the minimum increase in housing need or seek to increase or maximise inward investment and local employment opportunities by planning for across the plan period?

- 8.24 An intrinsic link exists between employment growth and housing delivery. National guidance required local authorities to adopt an integrated approach to considering the location of housing, economic uses and community facilities and services (NPPF Para 93).
- 8.25 The Council must use the standard methodology as a starting point only. Setting a higher housing target will ensure local needs are met, including affordable housing need for which there is a significant shortfall in Breckland. However, new homes need to be supported by significant employment growth. The Council should therefore focus on maximising inward investment and employment opportunities to support the level of new homes require to meet existing needs and foster sustainable growth principles.

Question 23: Do you agree with the current approach of concentrating industrial space in the market towns and Snetterton? Y/N Please explain your response.

- 8.26 We support the focus of industrial space within Swaffham, an identified 'market town'. Within Swaffham is a significant 'Employment Area' (as defined in the adopted Proposals Map, published 2019) to the north west of the town. A range of businesses are located within this area including Tesco, Waitrose, building material suppliers, motor suppliers and various manufacturing business. This area is set to expand further, with a planning application for use classes E(g) (ii) [R&D] and (iii) [Light Industrial], Class B2 and B8 [Storage]) (application reference 3PL/2022/0412/H) on land off Turbine Way (Site 1 being promoted as part of these of representations) currently being determined by the Council. Within the western section of the identified 'Employment Area' is a large parcel of land yet to be subject to a planning application.
- 8.27 The potential of Swaffham is set to grow further with the committed A47 trunk road improvements, which will create significant economic opportunities at settlements along the A47.
- 8.28 Finally, as set out in these representations, Swaffham should be a key focus for housing growth. Locating employment and housing in a coordinated manner near key infrastructure, would promote sustainable forms of growth, in accordance with national planning guidance.

Question 43: Do you consider that a higher biodiversity percentage than the statutory minimum of 10% should be delivered by new development in the district? If so what % and give reasons for your answer

- 8.29 The policy should reflect the requirements of the Environment Act (2021). 10% should therefore be the acceptable target, however, policy should allow promoters to exceed this voluntarily.

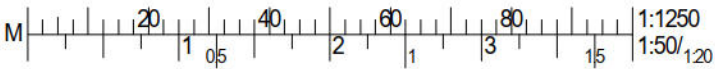
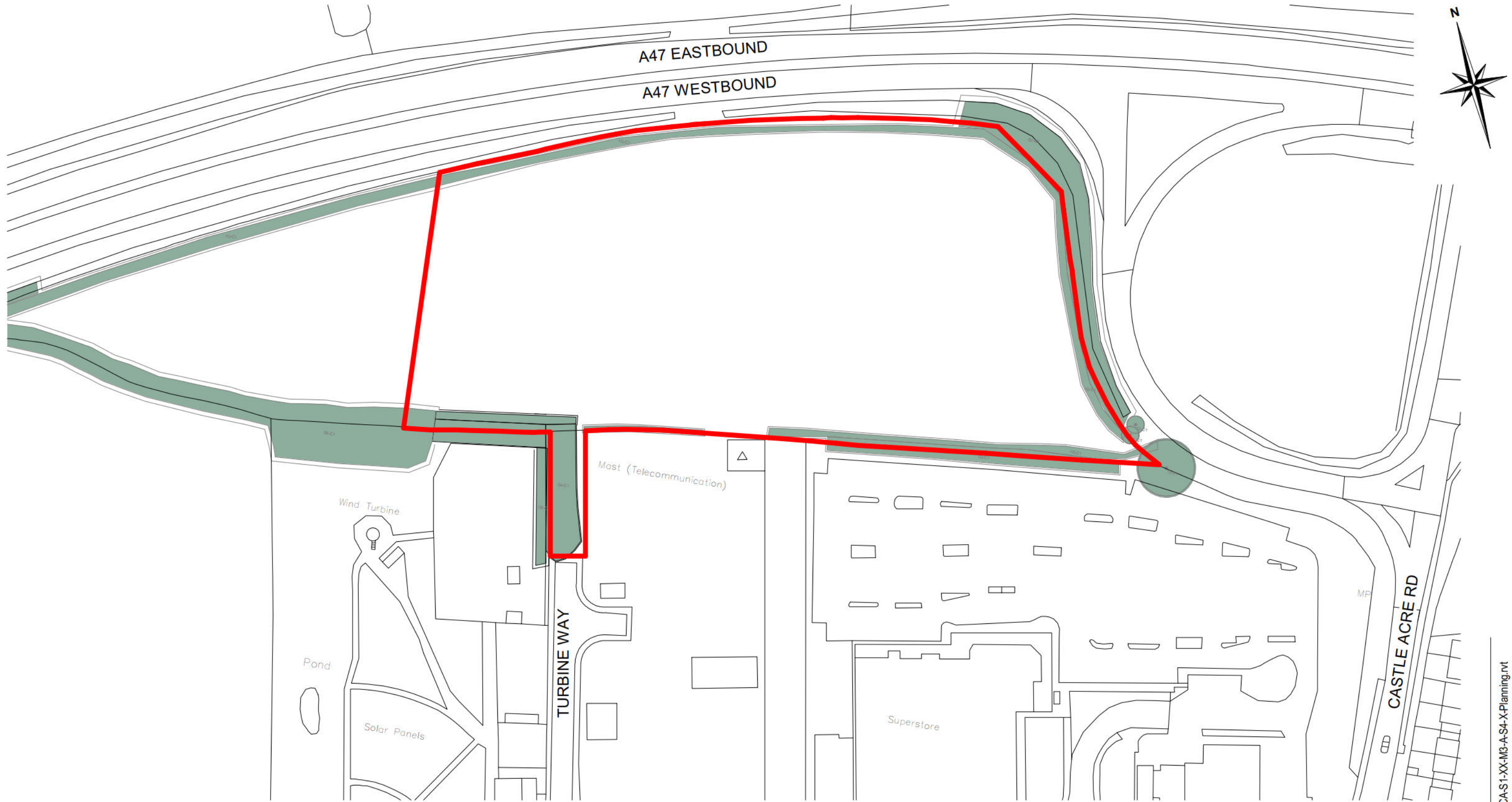
9.0 SUMMARY AND CONCLUSION

- 9.1 These representations have been provided on behalf of the Promoters with respect to their land interests in Swaffham.
- 9.2 Together with the supporting evidence base, they demonstrate the realistic and reasonable opportunity to deliver:
- a. Site 1 'Land off Turbine Way' – Employment floorspace
 - b. Site 2 'Land of New Sporle Road' – A residential led scheme of circa 160 units.
 - c. Site 3 'Land West of Sporle Road' – A residential led scheme of circa 150 units
 - d. Site 4 'Land East of Sporle Road' – A residential led use scheme of circa 250 units or circa 275 units under 'Option 2'.
- 9.3 These proposals would seamlessly connect to the existing settlement of Swaffham and accommodate new, up to date employment space and circa 585 new homes to assist the Council in meeting its local housing need. Sites 1-3 are allocated within the existing Local Plan (2019) as per the uses set out above. Site 4 is currently unallocated, however, would be the next logical site to come forward for development.
- 9.4 A suite of evidence and supporting material is appended to these representations to aid the Council's understanding of the sites.
- 9.5 The Promoters' land is under freehold ownership. Development of these sites would be well-located within Swaffham, with strong links to the town centre and existing sustainable transport links. Allocating the Promoter's sites would deliver a sound spatial strategy and positively contribute to existing communities.
- 9.6 In summary, we urge the Council to allocate the Promoter's sites within the Regulation 19 Publication Plan as follows:
- a. Site 1 'Land off Turbine Way' – Employment Allocation (reallocation).
 - b. Site 2 'Land off New Sporle Road' – Housing Allocation for circa 160 units (reallocation).
 - c. Site 3 'Land West of Sporle Road' – Housing Allocation for circa 150 units (reallocation).
 - d. Site 4 'Land East of Sporle Road' – Housing allocation for circa 250 units (new allocation).

- 9.7 Alongside Site 4, we would also recommend the allocation of the additional parcel of land shown in **Appendix 2** for residential development.

APPENDIX 1

Sites 1, 2, 3 and 4 Location Plans



Construction staff and operatives must ensure the principle contractor has provided thorough and accurate information on all health and safety aspects relating to the designs identified on this drawing include the review of:

- Designers/contractors risk assessments
- Method statement
- Permit to work
- Pre construction information

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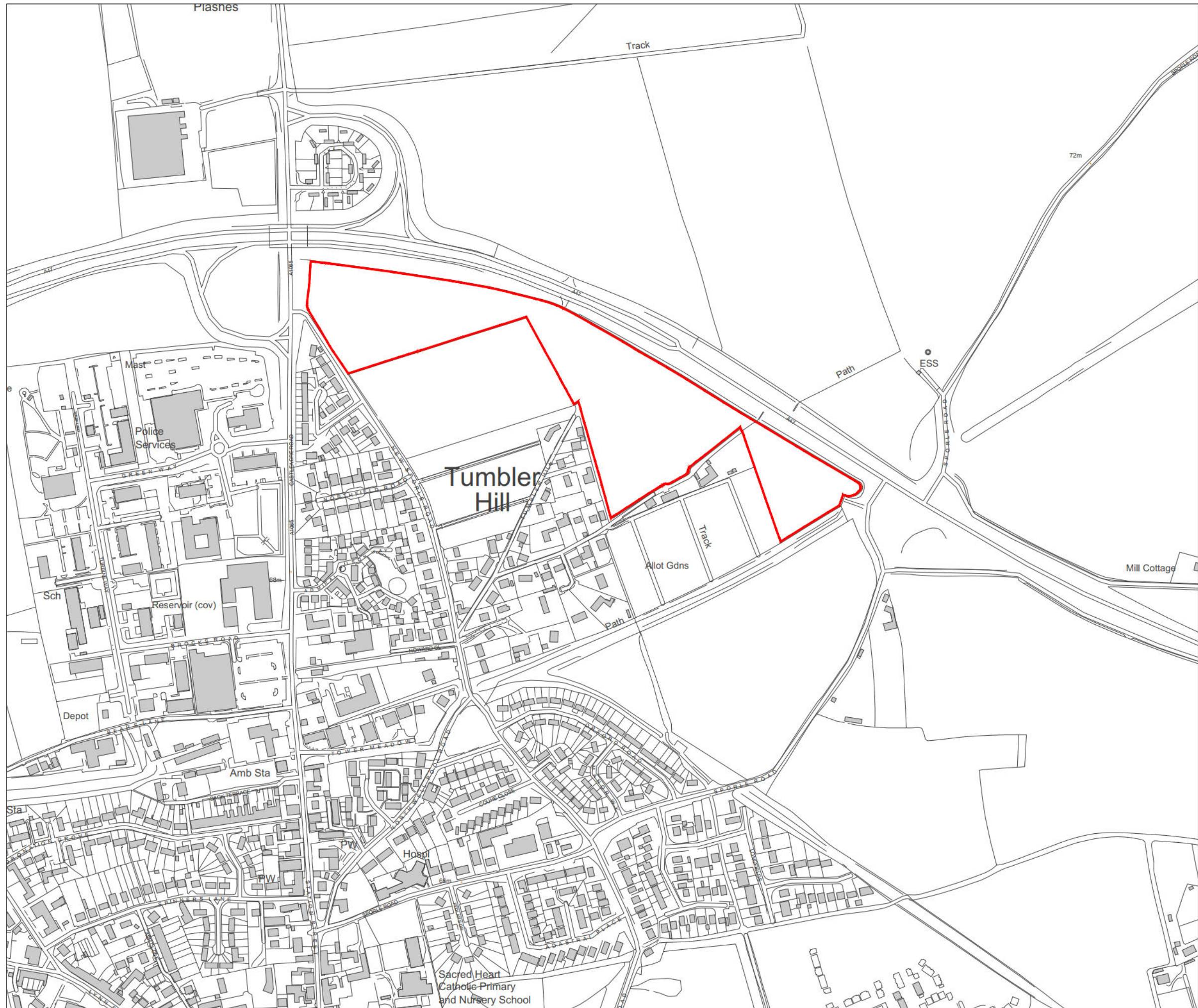
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B	Revised Planning Drawings	12/03/22	LB	AS	
A	Issue for Planning	26/01/22	LB	AS	
	revision	date	by	chk	
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DRAWING ISSUE					
☐	Preliminary	☐	Costing	☐	Construction
☒	Planning	☐	Tender	☐	Record

drawn by	checked by	date	scale @ A3		
LB	AS	27/01/22	1 : 1250		
Land on the North West side of New Sporle Road, Swaffham, Norfolk, PE37 7XD					
Site Location Plan					
role	originator	volume	levels	type	suitability
A	CA	S1	00	DR	S4
project number		drawing number		revision	
21157SW		110_01		B	



The scaling of this drawing cannot be assured

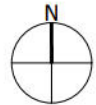
Revision	Date	Drm	Ckd
-	-	-	-

 Site boundary

Project
Swaffham Site Promotion

Drawing Title
Land off New Sporle Road,
Swaffham

Date	Scale	Drawn by	Check by
17.05.23	1:5,000@A3	SM	LH
Project No	Drawing No	Revision	
34121	BM-M-04	-	



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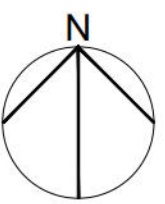
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Landscape Planning & Design • Infrastructure & Environmental Planning •
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NOTES:



Scale 1:1000

Rev	Date	Description	Drawn	App'd
02	11-05-23	Red line amended to suit client markup	AG	
01	12-05-23	First Issue	AG	

WT Design Ltd
Architectural Consultants

M8 House
High Mill Hill
Yarmouth Road
Lutham
Norfolk
NR29 9QZ
t: 01603 389422
e: info@wt-design.co.uk

Project:
Land South of Sporle Road

Drawing Title:
**Site Location Plan
Option 1**

Client:

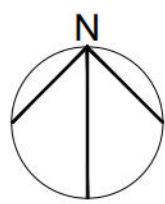
Scale @A0:
1:1000

Date:
05-2023

Project Number: 398-23	Drawing Number: 0150	Revision: P2
Purpose of Issue: Information		

APPENDIX 2

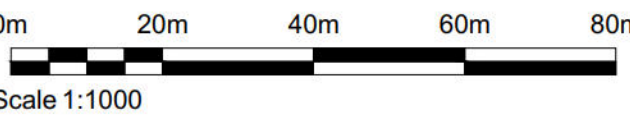
Site 4 Option 2 Additional Land Parcel



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Rev	Date	Description	AC	Appr
P1	12-05-23	First Issue		

WT Design Ltd
Architectural Consultants

M8 House
High Mill Hill
Yarmouth Road
Lutham
Norfolk
NR29 5QZ
t: 01603 389422
e: info@wt-design.co.uk

Project:
Land South of Sporle Road

Drawing Title:
**Site Location Plan
Option 2**

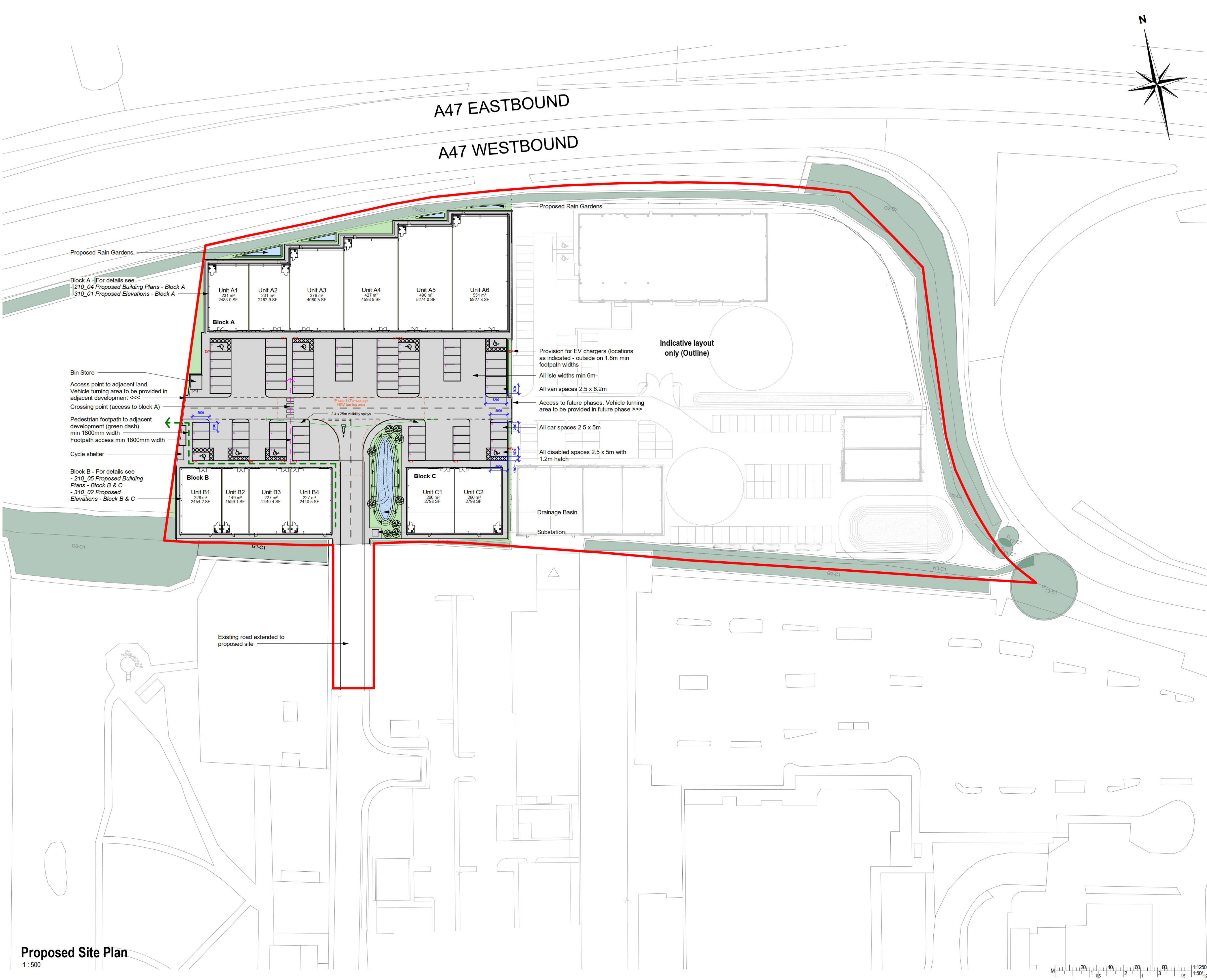
Client:

Scale @A0: 1:1000 Date: 05-2023

Project Number: 398-23	Drawing Number: 0151	Revision: P1
Purpose of Issue: Information		

APPENDIX 3

Site 1 Layout Plan



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 - Construction phase health and safety plan
- The designers note that the following health and safety risk relating to this drawing have not been eliminated during the design process:

ref	residual risk

I	Phase 1 Block C Redesign, with addition of Drainage Basin	28/04/23	GE	ATS
H	Layout updated inline with discussions with highways	11/01/23	ATS	AC
G	Disabled bays amended	05/09/22	ATS	AS
F	Layout annotations, elevation colours changed	18/08/22	ATS	JF
E	Block B plan changed, road crossing relocated, EV charging provision amended, colours to rear of Block A amended	17/08/22	ATS	JF
D	Foopath and crossing added	29/06/22	AS	ATS
C	Amended unit titling	20/04/22	LB	MRJ
B	Revised Planning Drawings	12/03/22	LB	AS
A	Issue for Planning	26/01/22	LB	AS
revision		date	by	chk

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DRAWING ISSUE

☐ Preliminary ☐ Costing ☐ Construction
☒ Planning ☐ Tender ☐ Record

date	scale @ A1	drawn by	checked by
28/07/22	1 : 500	LB	AS

Land on the North West side of New Sporle Road, Swaffham, Norfolk, PE37 7XD

Proposed Site Plan

role	originator	volume	levels	type	suitability
A	CA	S1	00	DR	S4
project number		drawing number	revision		
21157SW		210_02	I		

Proposed Site Plan
1 : 500

APPENDIX 4

Site 2 Layout Plan

A 47

Existing Tree Planting

Proposed Tree Planting

Existing Tree Planting

Parking Area for Plots 36-45

Parking Area for Plots 24-35

Footpath

Proposed Tree Planting

Public Open Space

Adoptable Road

Proposed Tree Planting

Shared foot & cycle path link

1m wide highway verge and New 3m wide shared foot & cycle path along site frontage

43m

New hedgerow planted 1m behind foot / cycle path

New access with 2.4 x 4.3m visibility splay

New hedgerow planted 1m behind visibility splay

A 1065

ST GUTHLAC CLOSE

ST GUTHLAC CLOSE

New tree planting on site boundary

Existing Hedgerow retained along boundary

New tree planting on site boundary

Gate in new hedgerow for public footpath

Public Footpath



Amendments:
A Shared Foot & Cycle Path added along frontage 16/06/14

BERRYS

Willow House East
Shrewsbury Business Park
Shrewsbury SY2 6LG
Tel: 01743 271697
Fax: 01743 271753
www.berrybros.com

Client:
deMerke Estates

Project: Outline Planning Application for 55 Dwellings on land between New Sporle Road & A47

Drawing: Proposed Block showing access with Indicative Layout

Drawing Number: SA13989/02	Rev. A	Scale 1:500	Paper A1	Drawn By: AB Date: March 2014
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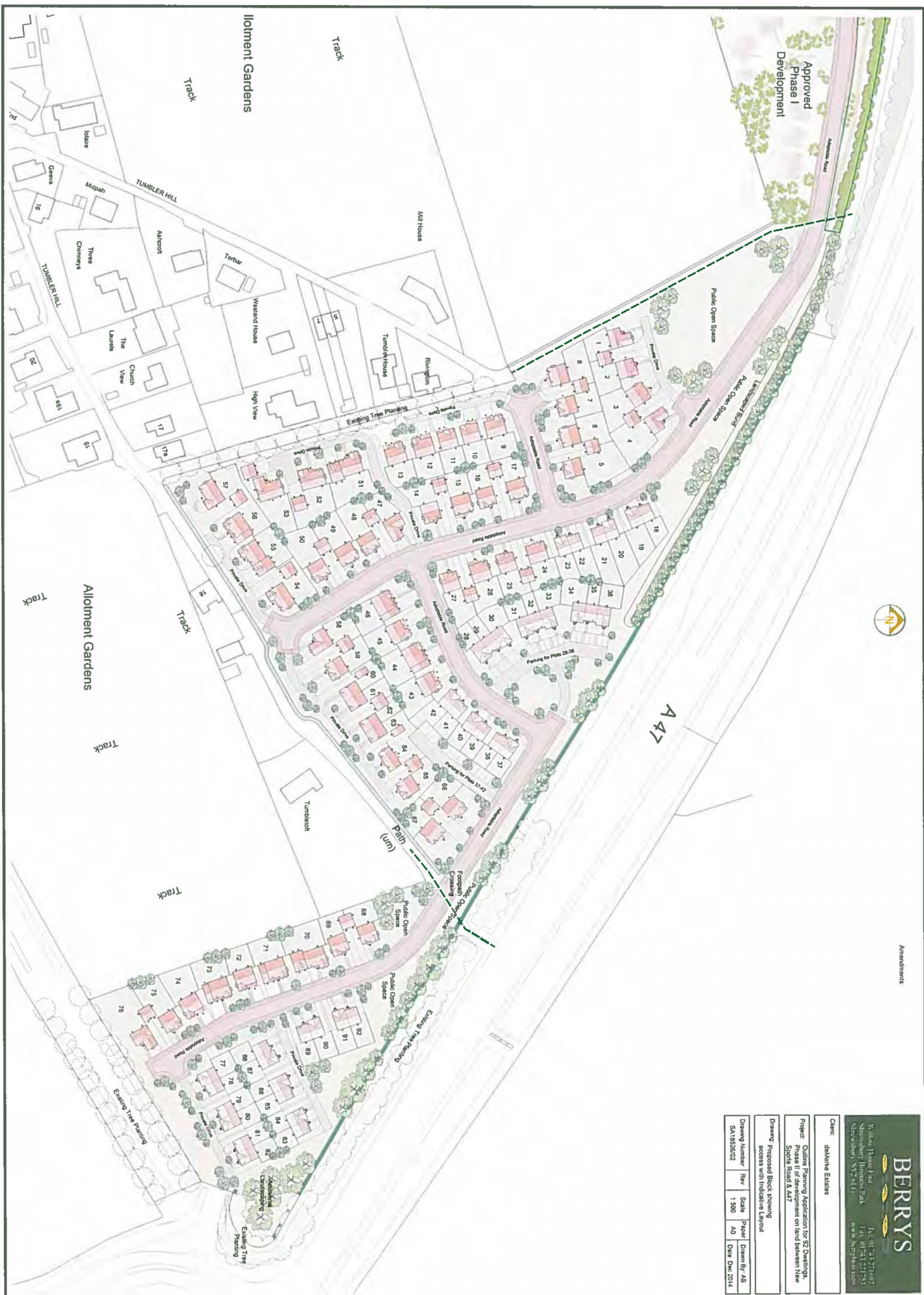


William Thomas Faint
Silvercreek Homeschool Park
Silvercreek, NY 12166
Tel: 01 743 271697
Fax: 01 743 271755
www.berryphase.com

Project: Outline Planning Application for 92 Dwellings,
Phase II of development on land between New
Sports Road & A47

Drawing Number SA18526/02	Rev	Scale 1 500	Paper A0	Drawn By: AB
				Date Dec 2014

Drawing Number	Rev	Scale	Paper	Drawn By	AB
SA18526/02		1:500	A0	Date	Dec 2014



APPENDIX 5

Site 3 Layout Plan



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NOTES:
Key:

- Site Boundary
- Existing Trees
- Existing Hedging
- Trees to be removed
- Hedging to be removed
- Proposed Trees

PS	13-04-23	Parking added to plot 84	JK
PS	14-05-23	Changes as per clients comments	JK
PS	22-05-23	First Issue	JK
Rev	Date	Description	Drawn

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Architectural Consultants
188 House
High Hill Hill
Yarmouth Road
Loutham
Norfolk
NR29 5GZ
T: 01603 389422
E: info@wt-design.co.uk

Project:
Land off Spole Road
Swaffham

Drawing Title:
Masterplan

Client:
Crocus Homes

Scale @A3:
1:500

Date:
04-2023

Project Number:
372-22

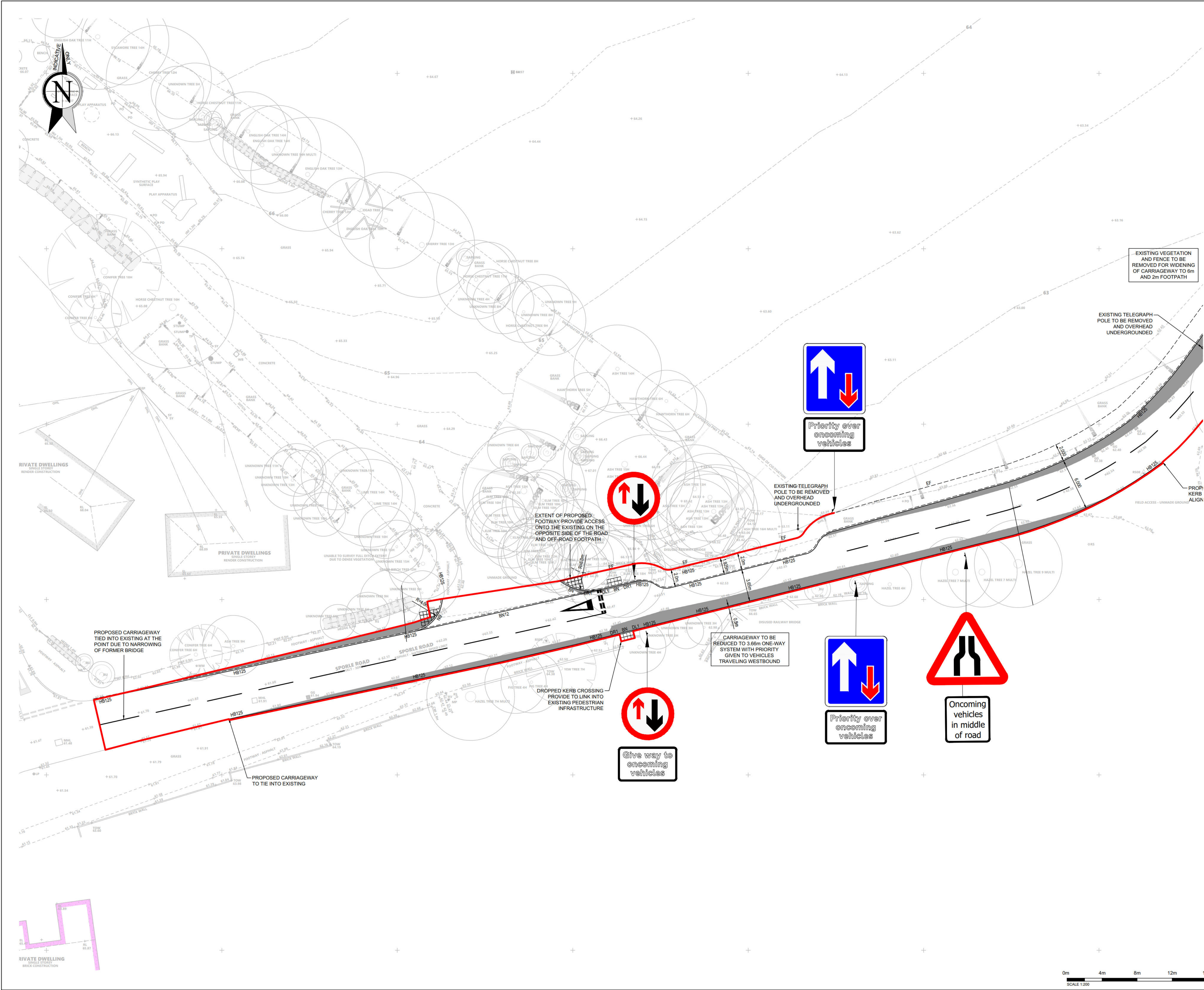
Drawing Number:
0200

Revision:
P3

Purpose of Issue:
Planning

APPENDIX 6

Site 3 Off Site Highway Works



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 - WORKING ADJACENT EXISTING HIGHWAY.
 - OVERHEAD CABLE
 - WORK BY DISUSED BRIDGE
 - WORKING AT HEIGHT

- MAINTENANCE/CLEANING/IN USE RISKS:**
- NO SIGNIFICANT RISKS.
- DEMOLITION RISKS:**
- NO SIGNIFICANT RISKS.

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 2. THE REINSTATEMENT OF THE HIGHWAY SHALL BE CARRIED OUT FULLY IN ACCORDANCE WITH THE HAUG SPECIFICATION FOR THE REINSTATEMENT OF OPENINGS IN HIGHWAYS. REINSTATEMENT SHALL BE PERMANENT (ON FIRST VISIT). TRENCH BACKFILL MATERIAL SHALL BE TYPE 1 GRANULAR SUB-BASE.
 3. THE CONTRACTOR SHALL SUBMIT TO THE STREET WORKS COORDINATOR AND UTILITY COMPANIES THE APPROPRIATE 'N' NOTICES. UPON COMPLETION OF THE WORKS THE CONTRACTOR SHALL SUBMIT TO THE STREET WORKS COORDINATOR THE APPROPRIATE 'R' NOTICE.
 4. THE SURFACE COURSE ON THE ACCESS ROADS SHALL BE DEFERRED UNTIL BUILDING WORK IS SUBSTANTIALLY COMPLETE. GULLY FRAMES AND GRATES AND OTHER IRONWORK SHALL BE SET FLUSH WITH THE BINDER COURSE AND RAISED AT THE TIME THE SURFACE COURSE IS LAID.
 5. ALL ROAD SIGNS AND MARKINGS TO BE IN ACCORDANCE WITH THE TRAFFIC SIGNS REGULATIONS AND GENERAL DIRECTIONS.

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P03	RED LINE BOUNDARY ADDED.	31.03.23	JLH	ML
P02	BUILT OUT AND FOOTWAY ADJUSTED.	27.03.23	JLH	ML
P01	PRELIMINARY ISSUE.	13.02.23	JLH	ML
REV	DESCRIPTION	DATE	BY	AUTH

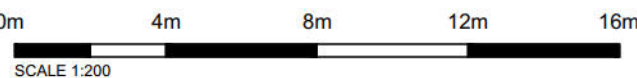
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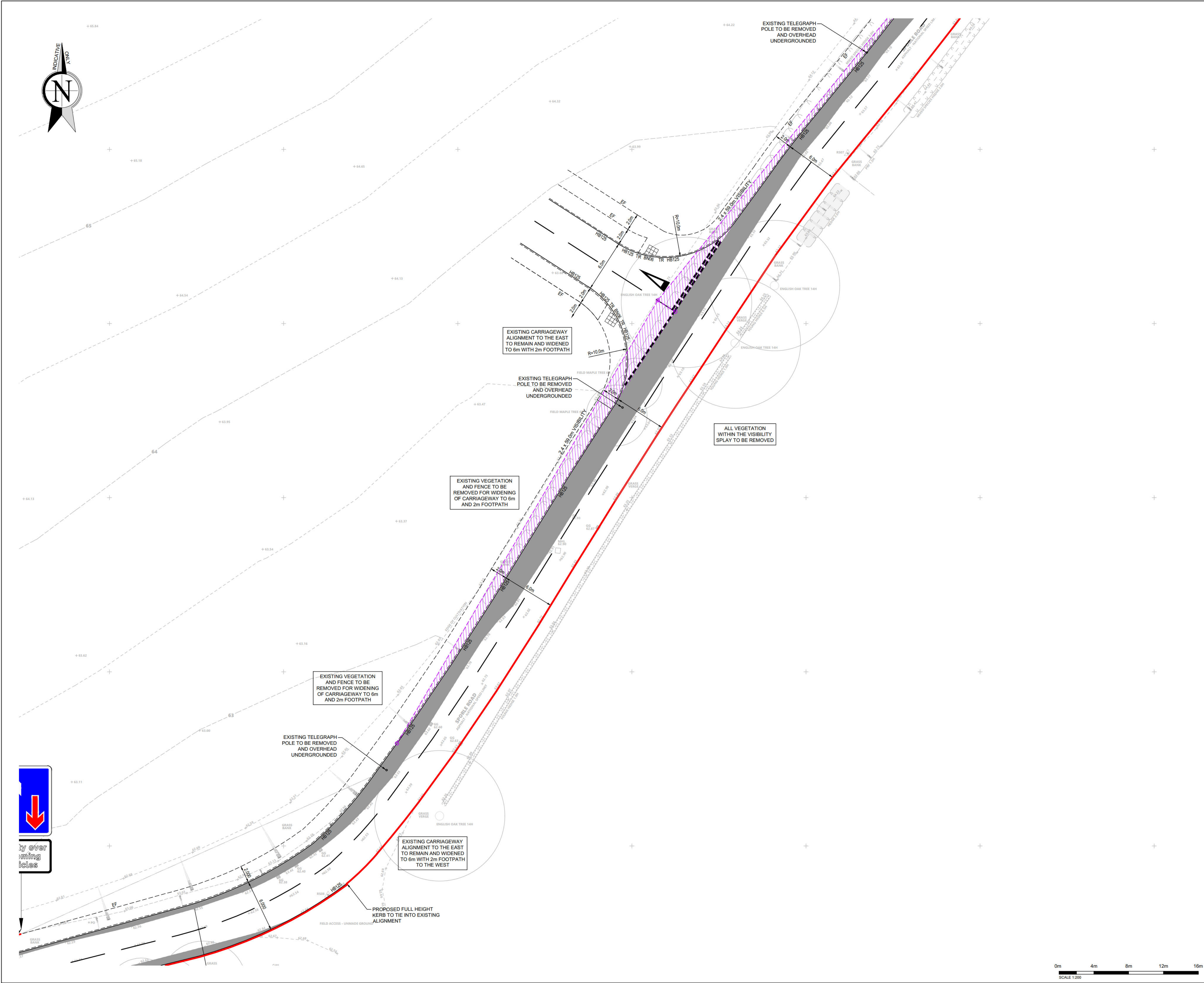
CLIENT
CROCUS CONTRACTORS LTD

PROJECT
SPORLE ROAD, SWAFFHAM

TITLE
OFF-SITE HIGHWAY IMPROVEMENTS (PLANNING) SHEET 1 OF 5

DRAWN	AUTHORISED	DATE	SCALE AT A1
JLH	ML	FEB '23	1:200
SUITABILITY S0 - WORK IN PROGRESS			
PROJECT NO.	DRAWING FIELDS.	DRAWING NO.	REV
221438		C-161	P03





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- UNKNOWN BELOW GROUND SERVICE POSITION.
- WORKING ADJACENT EXISTING HIGHWAY.
- OVERHEAD CABLE
- WORK BY DISUSED BRIDGE
- WORKING AT HEIGHT

MAINTENANCE/CLEANING/IN USE RISKS:

- NO SIGNIFICANT RISKS.

DEMOLITION RISKS:

- NO SIGNIFICANT RISKS.

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P03	RED LINE BOUNDARY ADDED.	31.03.23	JLH	ML
P02	BELLMOUTH AMENDED TO INCORPORATE FILTER STRIPS.	23.02.23	OP	EK
P01	PRELIMINARY ISSUE.	13.02.23	JLH	ML
REV	DESCRIPTION	DATE	BY	AUTH

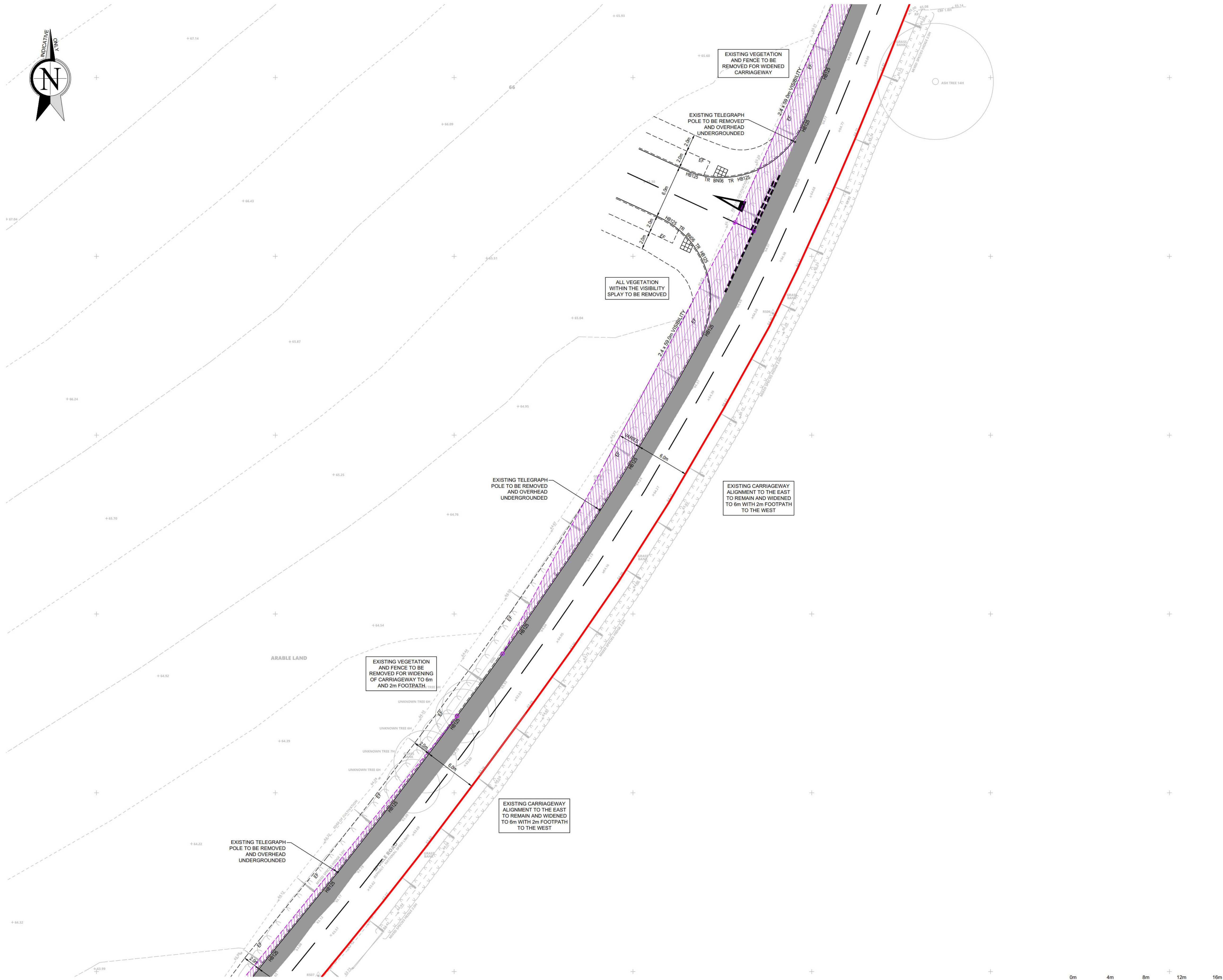
Rossi Long Consulting
16 Meridian Way, Norwich, Norfolk, NR7 0TA
T: 01603 706 420 www.rossilong.co.uk

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PROJECT
SPORLE ROAD, SWAFFHAM

TITLE
**OFF-SITE HIGHWAY IMPROVEMENTS (PLANNING)
SHEET 2 OF 5**

DRAWN	AUTHORISED	DATE	SCALE AT A1
JLH	ML	FEB '23	1:200
SUITABILITY S0 - WORK IN PROGRESS			
PROJECT NO.	DRAWING FIELDS.	DRAWING NO.	REV
221438		C-162	P03



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 - OVERHEAD CABLE
 - WORK BY DISUSED BRIDGE
 - WORKING AT HEIGHT

- MAINTENANCE/CLEANING/IN USE RISKS:**
- NO SIGNIFICANT RISKS.

- DEMOLITION RISKS:**
- NO SIGNIFICANT RISKS.

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P02	BELLMOUTH AMENDED TO INCORPORATE FILTER STRIPS.	23.02.23	OP	EK
P01	PRELIMINARY ISSUE.	13.02.23	JLH	ML

Rossi Long Consulting
16 Meridian Way, Norwich, Norfolk, NR7 0TA
T: 01603 706 420 www.rossilong.co.uk

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PROJECT
SPORLE ROAD, SWAFFHAM

TITLE
OFF-SITE HIGHWAY IMPROVEMENTS (PLANNING) SHEET 3 OF 5

DRAWN JLH	AUTHORISED ML	DATE FEB '23	SCALE AT A1 1:200
SUITABILITY S0 - WORK IN PROGRESS			
PROJECT NO. 221438	DRAWING FIELDS. C-163	DRAWING NO. P03	REV



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WORKING ADJACENT EXISTING HIGHWAY.
OVERHEAD CABLE
WORK BY DISUSED BRIDGE
WORKING AT HEIGHT

NO SIGNIFICANT RISKS.

NO SIGNIFICANT RISKS.

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REV	DESCRIPTION	DATE	BY	AUTH

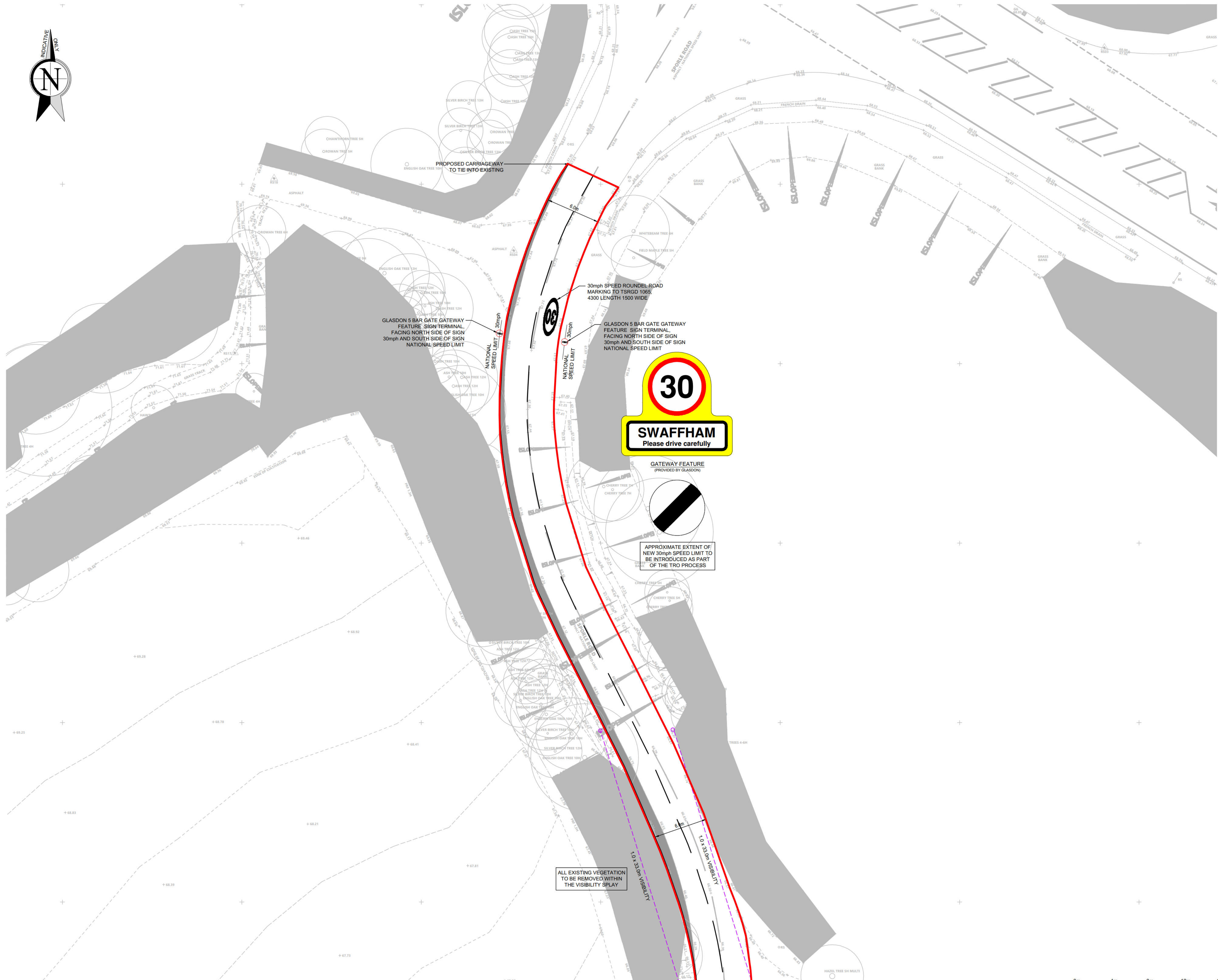


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SPORLE ROAD, SWAFFHAM

OFF-SITE HIGHWAY
IMPROVEMENTS (PLANNING)
SHEET 4 OF 5

RAWN ILH	AUTHORISED ML	DATE FEB '23	SCALE AT A1 1:200
UTILITY			
G0 - WORK IN PROGRESS			
PROJECT NO.	DRAWING FIELDS.	DRAWING NO.	REV
221438		C-164	P02



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REV	DESCRIPTION	DATE	BY	AUTH



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T: 01603 706 420 www.rossilong.co.uk

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TITLE
OFF-SITE HIGHWAY IMPROVEMENTS (PLANNING) SHEET 5 OF 5

DRAWN JLH	AUTHORISED ML	DATE FEB '23	SCALE AT A1 1:200
SUITABILITY S0 - WORK IN PROGRESS			
PROJECT NO. 221438	DRAWING FIELDS. C-165	DRAWING NO. P03	REV



APPENDIX 7

**Site 4 Illustrative Layout Plan,
Transport Technical Note, Flood Risk
and Drainage Technical Note and
Ecological Technical Note**



All dimensions to be verified on site by Main Contractor before the start of any shop drawings or work whatsoever either on their own behalf or that of sub-contractors. Report any discrepancies to the Contract Administrator at once. This drawing is to be read with all relevant Architect's and Engineer's drawings and other relevant information.
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NOTES:

0m 20m 40m 60m 80m
Scale 1:1000

Rev	Date	Description	AC	WT
01	04-05-23	Colour added	WT	WT
02		First Issue	WT	WT

WT Design Ltd
Architectural Consultants
Mill House
High Mill Hill
Yarmouth Road
Luton
Bedfordshire
LU29 5QZ
t: 01463 389422
e: info@wt-design.co.uk

Project:
Land South of Sporie Road

Drawing Title:
Sketch Masterplan

Client:

Scale @A3:
1:1000

Date:
04-2023

Project Number: 398-23	Drawing Number: SK001	Revision: P2
Purpose of Issue: Information		

Transport Note

Proposed Residential Development

Land East of Sporle Road

Swaffham, Norfolk

This Transport Note has been prepared by Rossi Long Consulting Ltd to describe the proposed access strategy for the potential allocation of residential development on land to the east of Sporle Road, Swaffham, Norfolk.

The site location is shown below, with a proposed sketch layout shown on the supporting initial Masterplan:



Figure 1 – Site Location

The site is located north-east of the existing built-up area of the town of Swaffham. It comprises of agricultural land at present, with informal access taken from Sporle Road to the north-west of the site.

Initial investigations show that the land may be able to accommodate in the region of 250 dwellings. Any development on the site will be phased over a period of time to ensure that a balanced and sustainable community will be delivered from the earliest phases, supported by the necessary infrastructure.

Areas of public open space and play will be provided to enable recreation to occur on-site and lessen the need for travel elsewhere. Where appropriate, connections will be made to existing public rights of way to ensure maximum levels of connectivity for residents.

Car and cycle parking within the site will be provided in accordance with Norfolk County Council's latest 'Parking Standards for Norfolk 2022' document. These standards are used to determine the level of parking which is required for new development.

The development proposals will provide a level of parking appropriate for the site in accordance with NCC's car parking standards. The development will contain all its associated parking and servicing requirements within the curtilage of the development site.

As shown on the Masterplan drawing, vehicular access to the site would be taken from both the existing field access to the north-west of the site onto Sporle Road and also from Norwich Road to the south of the site, via new Priority T-junctions.

The Promoter is also exploring the wider opportunity (Option 2) of a residential-led scheme, which includes their Site and a small parcel of land off Sporle Road immediately west – together, these sites could deliver circa 275 units.

The properties will be accessed via appropriate access roads with private drives leading off. The details of the internal highway layout and access strategy will be provided and agreed with the Local Highway Authority at the planning application stage.

Previous planning applications on Sporle Road have included highway improvement measures to provide safe routes for pedestrians to all facilities, services and schools within Swaffham, including a proposed change in speed limit from the existing 60mph to 30mph. Similar measures would be provided as part of any development forthcoming on this site.

Footway facilities will be provided from within the site to the proposed site entrances, and then on to connect with existing public footway facilities. This, along with crossing facilities (such as dropped kerbs and tactile paving), will provide a safe, convenient connection for both new and existing residents to access the facilities/services located to the south-west within Swaffham town centre.

The site adjoins the existing settlement of Swaffham located on its south-western boundary. The town of Swaffham contains many services and facilities including schools, a Medical Practice, Post Office, Pharmacy, shops and leisure/employment facilities.

Therefore, the site is considered to be situated in a sustainable location close to existing residential dwellings, services and facilities.

The site benefits from being located adjacent to an area of existing residential dwellings close to local services and facilities, including a primary school within close walking and cycling distance. The majority of people's daily needs/activities are within 2.0km of the site, and there are excellent opportunities for people to utilise sustainable travel modes.

Families which move to the new dwellings will of course be within the catchment area of the school, meaning more trips to/from the school can be made sustainably, i.e. by foot or by cycle, rather than by car.

The site is also located within walking distance of nearby bus stops, providing frequent services to nearby towns and villages. Notwithstanding this, it is proposed to work with NCC Public Transport Department to assist in the diversion of the existing bus service route on New Sporle Road, and to provide new bus stop facilities within the site to allow for pick up/set down of passengers.

It is appreciated that the promotion of sustainable travel is a key element of the planning application process; therefore, a full Transport Assessment will be prepared to support any planning application for development on the site, which will fully consider travel by all modes including, where possible, measures to promote travel by sustainable modes. Additionally, a Travel Plan will be prepared to support the sustainability of the site.

The full Transport Assessment report will demonstrate that the proposed development site is located in a sustainable location and fully supports the sustainable objectives of the NPPF since:

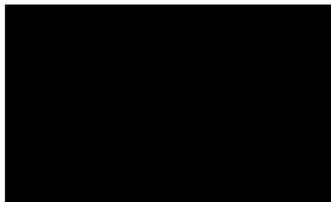
- the development will be accessible by public transport;
- the site will be within walking and cycling distance to nearby facilities and services in Swaffham town centre; and
- the development will provide quality pedestrian links to facilitate sustainable travel.

The conclusion of the above is that the site is located adjacent to an existing residential area which will enable trips to be made by more sustainable modes of travel (e.g. walking, cycling and public transport).

Therefore, the provision of the proposed development on a site such as that proposed will help reduce the impact of the development on climate change and should improve the health and wellbeing of those living and visiting there.

Prepared by

Luke Fairall
BA(Hons), MCIHT, MTPS
Associate



.....

Approved by

Mike Lloyd
BEng(Hons), CEng, MIStructE
Director



.....

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Flood Risk and Surface Water Drainage Strategy Note

Proposed Residential Development

Land East of Sporle Road

Swaffham, Norfolk

1.0 Introduction and Site Description

- 1.1 This Flood Risk & Surface Water Drainage Note has been prepared by Rossi Long Consulting Ltd to provide preliminary flood risk and surface water drainage advice for a proposed residential development on land to the east of Sporle Road, Swaffham, Norfolk.
- 1.2 The site location is shown below, with a proposed sketch layout shown on the supporting initial Masterplan:



Figure 1 – Site Location

- 1.3 The site is located north-east of the existing built-up area of the town of Swaffham. It comprises of agricultural land at present, with informal access taken from Sporle Road to the north-west of the site.
- 1.4 The purpose of this preliminary appraisal is to support promotion of the site through the Local Plan Regulation 18 consultation process.

2.0 Ground Conditions

- 2.1 British Geological Survey (BGS) mapping shows that the superficial (near surface) geology on the majority of the site is Lowestoft Formation – Diamicton. The Lowestoft Formation forms an extensive sheet of chalky till together with outwash sands and gravels, silts and clays. No superficial geology information is available for a section of the site to the north off Sporle Road, suggesting that the bedrock geology outcrops at the site. The underlying bedrock geology is shown as Lewes Nodular and other Chalk Formations:
- 2.2 Site investigation has not yet been undertaken; however, by reference to CIRIA C753, The SuDS Manual 2015, Table 25.1 gives guidance on typical infiltration coefficients based on soil texture. For SAND, typical infiltration coefficients are given in the range of 1.0×10^{-5} to 5.0×10^{-5} m/sec that represents good infiltration media. For CLAY, typical infiltration coefficients are given as $< 3.0 \times 10^{-8}$ m/sec that represents very poor infiltration media:

TABLE 25.1 Typical infiltration coefficients based on soil texture (after Bettess, 1996)

Soil type/texture	ISO 14688-1 description (after Blake, 2010)	Typical infiltration coefficients (m/s)
Good infiltration media		
• gravel	Sandy GRAVEL	$3 \times 10^{-4} - 3 \times 10^{-3}$
• sand	Slightly silty slightly clayey SAND	$1 \times 10^{-5} - 5 \times 10^{-5}$
• loamy sand	Silty slightly clayey SAND	$1 \times 10^{-4} - 3 \times 10^{-5}$
• sandy loam	Silty clayey SAND	$1 \times 10^{-7} - 1 \times 10^{-6}$
Poor infiltration media		
• loam	Very silty clayey SAND	$1 \times 10^{-7} - 5 \times 10^{-8}$
• silt loam	Very sandy clayey SILT	$1 \times 10^{-7} - 1 \times 10^{-8}$
• chalk (structureless)	N/A	$3 \times 10^{-8} - 3 \times 10^{-9}$
• sandy clay loam	Very clayey silty SAND	$3 \times 10^{-10} - 3 \times 10^{-7}$
Very poor infiltration media		
• silty clay loam	—	$1 \times 10^{-8} - 1 \times 10^{-9}$
• clay	Can be any texture of soil described above	$< 3 \times 10^{-8}$
• till		$3 \times 10^{-9} - 3 \times 10^{-8}$
Other		
• rock* (note mass infiltration capacity will depend on the type of rock and the extent and nature of discontinuities and any infill)	N/A	$3 \times 10^{-9} - 3 \times 10^{-8}$

- 2.3 Environment Agency mapping indicates the site is within a groundwater Source Protection Zone (SPZ) which is an area of protection placed around abstraction sites that supplies groundwater of potable quality. The Gov.UK Magic Map Application shows the site is located within a groundwater SPZ – Zone III Total Catchment:

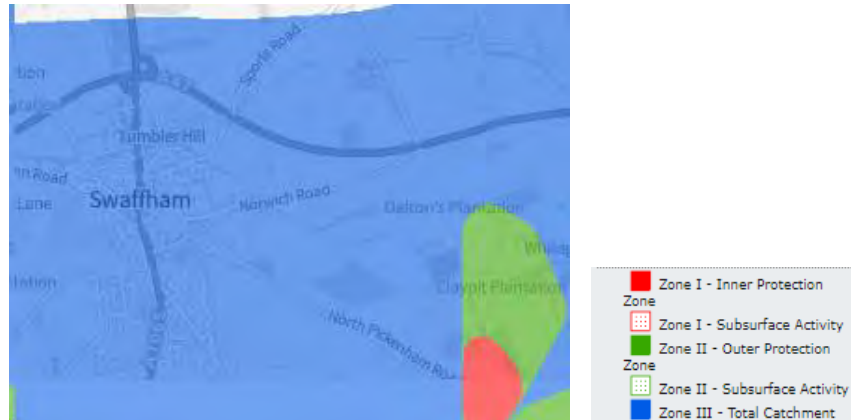


Figure 2 – Extract of groundwater SPZ Map

3.0 Existing Drainage & Topography

- 3.1 Whilst a detailed topographical site survey has not yet been undertaken, from Ordnance Survey mapping the contours on the site appear to fall in an easterly, southerly and westerly direction, with a level plateau appearing from the north (see below):

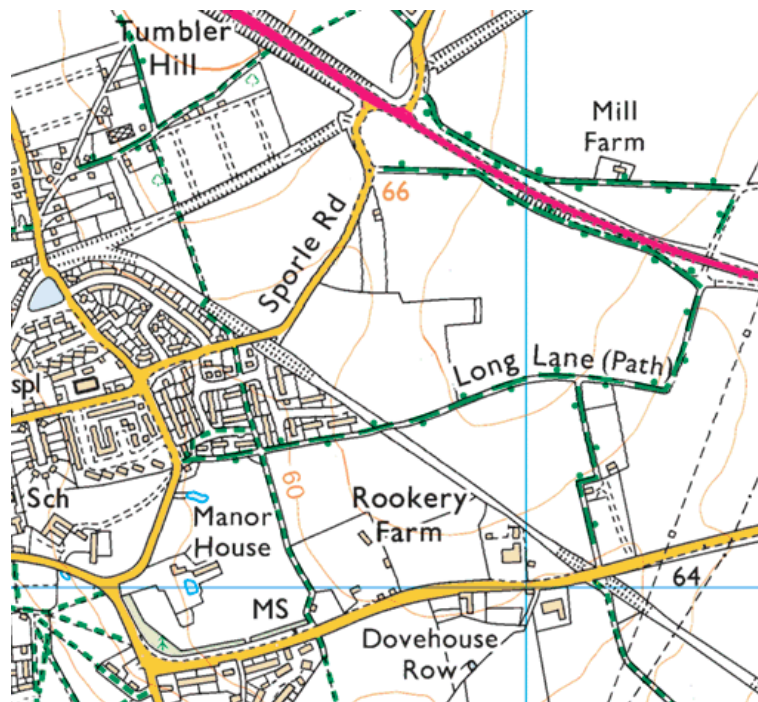


Figure 3 – Extract of OS Map

4.0 Flood Risk

- 4.1 Environment Agency flood mapping indicates the site is located within Flood Zone 1, 'low' risk from river flooding (see below):

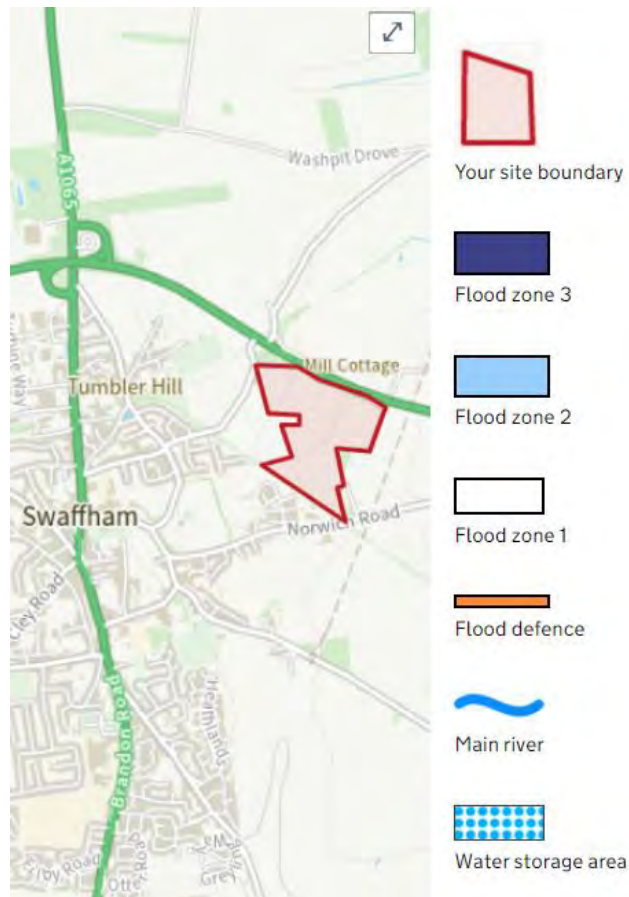


Figure 4 – Extract of Flood Zone Map

- 4.2 Environment Agency mapping for surface water flood risk indicates the site is generally at 'very low' risk of surface water flooding. However, the plan overleaf shows a flow path along both east and west boundaries flowing in a southerly direction. Current guidance by the Norfolk Lead Local Flood Authority (LLFA) suggests all development be avoided in areas of 'low', 'medium' or 'high' risk flooding. If this is not possible, the developer will need to justify the development is safe and does not increase off-site flooding through a detailed hydraulic modelling exercise:

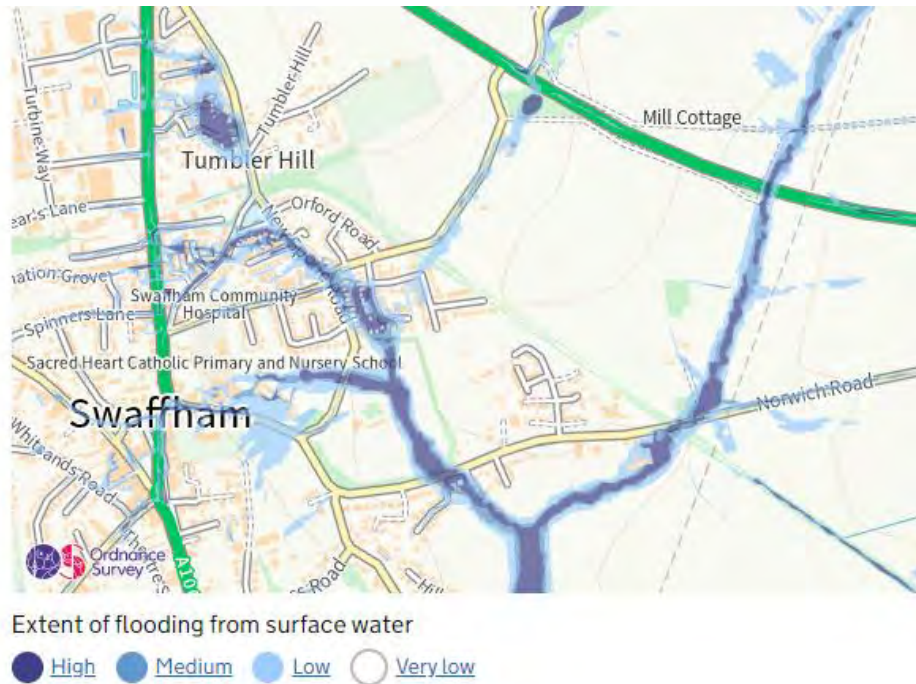


Figure 5 – Extract of Surface Water Flooding Map

5.0 Proposed Surface Water Drainage

- 5.1 The first priority under the Building Regulations and National Planning Policy for the disposal of surface water is by infiltration drainage. Only if infiltration is not feasible should other means of drainage be considered. Site investigation of ground conditions has not yet been completed but, upon completion, it is hoped these investigations will confirm the use of infiltration drainage as a viable option for the majority of the site.
- 5.2 In this respect infiltration drainage is proposed using appropriate Sustainable Drainage techniques (SuDS) such as soakaways, permeable paving, basins, filter strips, swales and filter drains.
- 5.3 In the event infiltration is not proven feasible, discharge to a watercourse would be proposed. In this event discharge would be controlled at 'greenfield' run-off rates to mimic existing conditions with development water stored on-site using appropriate attenuation features in the form of swales, basins, etc.
- 5.4 Attenuation storage should be provided and the rate of off-site discharge limited by flow control to match the pre-development rate of run-off. An above ground attenuation lagoon should ideally be provided, designed to store all storms up to and including the 1 in 100 year storm event including an allowance for climate change.

6.0 Conclusions and Recommendations

- 6.1 The proposal is for a residential development on 'greenfield' land to the east of Sporle Road, Swaffham.
- 6.2 The site is situated in Flood Zone 1 and is at 'low' risk of fluvial flooding and generally 'very low' risk of surface water flooding, except for both eastern and western boundaries. In these flood risk corridors, development should be avoided and existing ground levels maintained.
- 6.3 It is suggested, from a review of BGS map records, that a surface water drainage strategy using ground infiltration of run-off may be feasible on this site. Infiltration testing to BRE Digest 365 will be required to inform drainage designs.
- 6.4 Should ground infiltration not be feasible, a viable alternative comprising off-site discharge to watercourse would be required. For this solution attenuation storage would need to be provided to limit the off-site discharge to the equivalent 'greenfield' run-off rate.
- 6.5 Upon the progression of a detailed Planning Application, further consideration will be made for the management of pollution risks to accord with The CIRIA SuDS Manual 2015 – Chapter 26.

Prepared by	Reviewed by
Mike Lloyd BEng(Hons), CEng, MStructE Director	Emma Kerrison BEng(Hons) Principal Civil Engineer

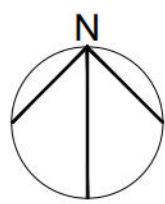
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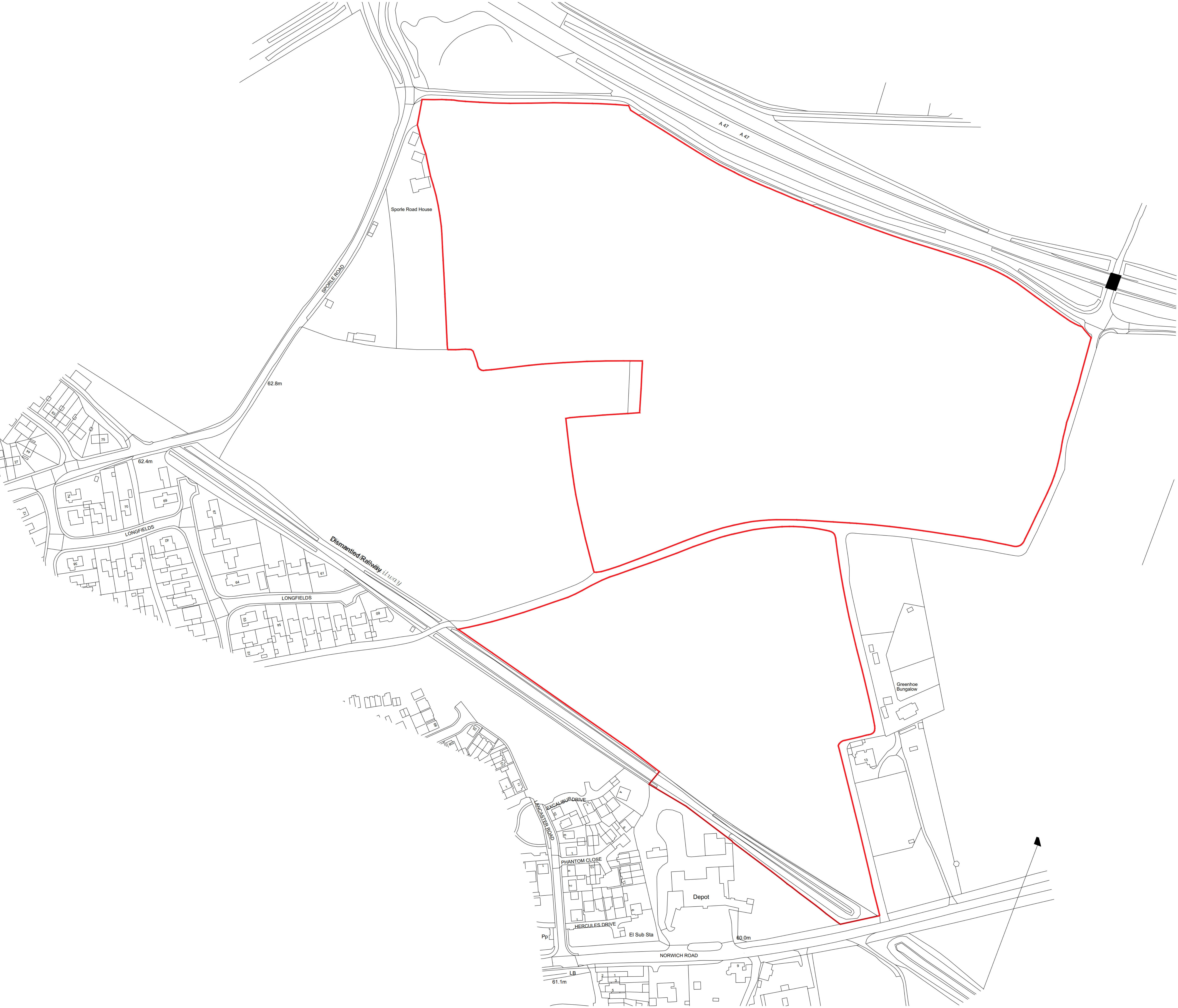
7.0 Appendices

Site Location Plan 398-23_0150_P2

Sketch Masterplan 398-23-SK001_P2



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0m	20m	40m	60m	80m
Scale 1:1000				
Rev	Date	Description	Drawn	App'd
02	11-05-23	Red line amended to suit client markup	AG	
01	12-05-23	First Issue	AG	

WT Design Ltd
Architectural Consultants
Mill House
High Mill Hill
Yarmouth Road
Lutham
Norfolk
NR29 9QZ
t: 01603 389422
e: info@wt-design.co.uk

Project:
Land South of Sporle Road

Drawing Title:
**Site Location Plan
Option 1**

Client:

Scale @A0: 1:1000 Date: 05-2023

Project Number: 398-23	Drawing Number: 0150	Revision: P2
Purpose of Issue: Information		



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0m 20m 40m 60m 80m

Scale 1:1000

Rev	Date	Description	AC	WT
01	04-05-23	Colour added	WT	WT
02		First Issue	WT	WT

WT Design Ltd
Architectural Consultants
Mill House
High Mill Hill
Yarmouth Road
Luton
Bedfordshire
LU29 5QZ
t: 01463 389422
e: info@wt-design.co.uk

Project:
Land South of Sporie Road

Drawing Title:
Sketch Masterplan

Client:

Scale @A3:
1:1000

Date:
04-2023

Project Number: 398-23	Drawing Number: SK001	Revision: P2
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Purpose of Issue:
Information

17th May 2023

Land east of Sporle Road, Swaffham

Technical note - Ecology

This technical note is intended to inform the promotion of land to the east of Sporle Road, Swaffham for residential purposes and provides a basic overview of the site and any likely ecological constraints and considerations¹.

Site context

The land (hereon referred to as the 'Site') is situated on the northern edge of Swaffham in Norfolk. It is 18.74ha in size (Option 1 – see Figure 1) with the option of an additional parcel of land to the west which is approximately 1.13ha in size (Option 2 – see Figure 2). It is bordered by the A47 to the north, Sporle Road to the west, Norwich Road to the south and the restricted byways of Long Lane and Green House Lane to the east. The Site is set within a predominantly arable landscape with hedgerows and treelines and scattered built development with the outskirts of Swaffham town lying adjacent to the south-west, on the opposite side of the dismantled railway embankment. The centre point of the Site is approximately TF8300 0936. The Site is not currently allocated for development within the Local Plan.

Site description and broad habitat types

The Site largely comprises land under arable rotation² bounded on all sides by field margins and hedgerows and/or tree-lines. The Site is bisected by a prominent hedgerow/tree-line which runs on an east-west axis along the Long Lane byway. This links in with that running roughly north-south along the eastern Site boundary, and in turn, with the remaining Site boundaries such that a good network of habitat corridors is present linking in with the surrounding landscape, including small areas of woodland adjacent.

Two options exist for the purposes of site promotion, one of which includes an additional c. 1.13ha of triangular-shaped land to the north-west. Several built structures exist within this additional area, including a residential property and several outbuildings. Grassland, hedgerows and mature trees are also present within this area.

¹ Information presented here is based on a desk-based assessment only (aerial imagery and mapping, and publicly available GIS data layers (magic.gov.uk) and species records, and drawing on relevant survey information for a nearby site under the same ownership. No targeted surveys of the Site have been undertaken to date.

² The land is classed as predominately Grade 3 in the Soil Survey of England and Wales and comprises predominantly Worlington soil type, suitable for cereals, sugar beet and woodland (Site brochure, Savills, undated).

On-site status and designations

The Site is not subject to statutory designation for nature conservation purposes³. It does not appear to be under any form of Countryside or Environmental Stewardship agreement. The Site does not contain any Priority Habitats⁴ (Habitats of Principal Importance) on the Priority Habitats Inventory (magic.gov.uk), although targeted surveys would be required to verify this with regard to boundary features in particular. No ancient woodland is present on Site or in close proximity to it.

The nearest listed Priority Habitats are a parcel of traditional orchard c. 228m to the west of the Site on the opposite side of Sporle Road, and a parcel of deciduous woodland c. 484m to the north-east on the far side of the A47.

Proximity to off-site designated areas

Various statutory designation sites lie within 10km of the Site, including a number of SSSIs, some of which underpin internationally designated SPAs and SACs. The Site lies within the Impact Risk Zones⁵ for several of these, including those below.

At its closest point, the Site lies 2.64km north of Breckland Special Protection Area (SPA), which is underpinned by Breckland Forest Site of Special Scientific Interest (SSSI). This internationally important site is classified for its populations of Annex I ground-nesting birds, stone-curlew, woodlark and nightjar. The SSSI is notified for the same populations as well as several Schedule 8 plant species and a rich invertebrate fauna. Breckland Farmland SSSI, which also underpins Breckland SPA, lies 4.24km to the south. This SSSI is notified for its stone-curlew population which nest on the arable farmland.

At its closest point, Norfolk Valley Fens Special Area of Conservation (SAC) lies 6.76km to the south of the Site, underpinned by Great Cressingham Fen SSSI. The wetland habitats here include alkaline fens, wet heath and alluvial forest as well as other heath-type habitats and invertebrates such as the narrow-mouthed and Desmoulin's whorl snail.

Breckland SAC lies 7.46km to the south, underpinned by Field Barn Heaths, Hilborough SSSI. Qualifying features of the SAC include the inland dunes, and dry grasslands, dry heath, lakes and alluvial forests. Great crested newts are also an interest feature of the SAC, although are not present within the above SSSI.

³ i.e. Site of Special Scientific Interest (SSSI), National Nature Reserve (NNR), Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar site.

⁴ Priority Habitats are those which have been deemed to be of principal importance for the purpose of conserving biodiversity, being listed in the UK Biodiversity Action Plan.

⁵ The Impact Risk Zones (IRZs) are a GIS tool developed by Natural England to make a rapid initial assessment of the potential risks to SSSIs posed by development proposals. They define zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. The IRZs also cover the interest features and sensitivities of international sites, which are underpinned by the SSSI designation and "Compensation Sites", which have been secured as compensation for impacts on international sites.

Potential constraints

The majority of the Site is likely to be of relatively low biodiversity value given that it is currently under intensive agricultural management. However, the boundary features, which comprise hedgerows and tree-lines, and the arable field margins, are of greater value. Within the Option 2 layout, additional value is likely to be provided by the grassland, hedgerow and trees, and potentially, the built structures.

The boundary features, scattered trees and buildings may provide roosting opportunities for bats, as well as nesting and foraging habitat for birds. The network of these hedgerows and tree-lines, which connect with off-site habitat, will be of value to commuting and foraging bats, linking roosts and foraging grounds within the wider landscape. Badgers may utilise boundary features for sett construction and dispersal, and record for this species exist within 2km of the Site.

The arable habitat may afford some value to ground-nesting birds such as skylark, but most value will be linked to the margins of the fields, where management is less intensive. Potentially, such habitat is of value to reptiles and amphibians, farmland birds and plants.

Owing to the sensitivities of the Breckland SPA ground-nesting bird populations to development and recreational disturbance, local planning policy dictates species-specific buffers around the SPA within which it is presumed development with the potential to adversely affect these species will not be permitted. These are set out in ENV03 of the Breckland Local Plan⁶ and are typically 1.5km for stone-curlew and 400m for woodlark and nightjar. The Site therefore falls outwith these buffer zones. It does, however, lie within an area identified within the Plan as supporting habitat potentially suitable for stone curlew and which may be functionally linked to the SPA. As such, consideration of any impacts arising from the proposals on the stone-curlew interest of Breckland SPA would be expected within a project-level Habitats Regulations Assessment (HRA); however, based on a recent consultation response from Natural England for proposals west of Sporle Road, significant effects specifically on stone-curlew are not anticipated.

A further consideration for design layout and subsequent HRA will be the provision of on-site green infrastructure (GI) and/or financial contributions to ensure adverse effects on internationally designated sites from increased recreational pressure. This will need to align with that set out within the Norfolk Green Infrastructure Recreational Avoidance Mitigation Strategy (GIRAMS, Place Services 2021)⁷ which takes into account Natural England's views on minimum requirements for GI provision. Designated sites considered liable to adverse effects from recreational disturbance will include those North Norfolk coastal sites and The Wash, as well as those within Breckland.

⁶ https://www.breckland.gov.uk/media/16659/Adopted-Breckland-Local-Plan/pdf/Appendix_4_-_Breckland_District_Council_Local_Plan_text_final-optimized.pdf?m=637818113682070000

⁷ [Norfolk GI RAMS Strategy March 2021.pdf \(west-norfolk.gov.uk\)](#)

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Potential Surveys and assessment

It is considered, on the basis of information available, that the following ecology surveys will be required to fully inform plans for the Site in due course, and quantify any impacts arising; however, these should not preclude the Site coming forward for promotion at this stage:

- Preliminary Ecological Appraisal (PEA) to include data search from Norfolk Biodiversity Information Service (NBIS) for protected and otherwise notable species and non-statutory designated sites, and a habitat condition assessment to inform subsequent biodiversity net gain assessment;
- Ground level roost assessment of trees to assess suitability to support roosting bats, and to inform the need for further survey such as climbed (aerial) inspection and emergence/re-entry surveys;
- Preliminary Roost Assessment for bats (Option 2 buildings);
- Activity surveys (transects) and static surveys (automated detectors) for bats to determine value of Site for foraging and commuting purposes;
- Reptile surveys;
- Badger survey (could be combined with PEA above);
- Breeding bird surveys.

An Ecological Impact Assessment (EcIA) is recommended to bring together the results and recommendations of the above ecology surveys and to assess the potential for impacts on SSSIs and non-statutory designated sites. A formal Biodiversity Net Gain assessment will also be required to satisfy forthcoming local and national planning policy, and in terms of assessment of the potential for exported (off-site) impacts on international sites, the LPA will be required to undertake an HRA of the proposals and as such, evidence to support this will be needed (shadow HRA).

Biodiversity Net Gain

There is an aspiration to provide a minimum 10% Biodiversity Net Gain through the proposals and a formal net gain assessment will be undertaken to inform this. It is envisaged that existing habitats of higher biodiversity value, such as the hedgerows and tree-lines, will be retained and incorporated into the masterplan with a suitable buffer around them to ensure dark corridors for light sensitive species such as bats. Most habitat loss will therefore be of lower value habitat such as the arable farmland, although options for the triangular piece of land to the west will incur greater loss of trees, hedgerow/scrub, grassland and built structure (Option 2). With the requirement, through local policy, to provide on-site open space, which may be incorporated into areas with attenuation basins and play facilities, there are opportunities to achieve net gain with appropriate planting and habitat creation, new ponds, and other features.

Conclusion

The potential constraints outlined above, whilst requiring further work to characterise to ensure compliance with the relevant legislation and planning policy in due course, are unlikely to preclude the Site coming forward for residential development from an ecological perspective provided due consideration is given to the need to align with current policies around increased recreational pressures

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on internationally designated sites. This assessment is based on the likely ecological receptors on the Site itself and their relative importance within the local context, and the location and nature of the Site in relation to the nearby designated sites.

Yours sincerely



Dr Rachel Saunders BSc (Hons) MCIEEM
Associate Director

temple

Temple Group Ltd
templegroup.co.uk

3rd floor, The Clove Building,
4 Maguire Street, London,
SE1 2NQ

+44 (0)20 7394 3700
enquiries@templegroup.co.uk

Company number: 3305849
VAT number: 683 3138 28
Registered in England

Figure 1: Sketch Masterplan: Option 1 (WT Design Ltd 2023)



[illegible]



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Temple Group Ltd
templegroup.co.uk

3rd floor, The Clove Building,
4 Maguire Street, London,
SE1 2NQ

+44 (0)20 7394 3700
enquiries@templegroup.co.uk

Company number: 3305849
VAT number: 683 3138 28
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APPENDIX 8

Site 4 Option 2 Illustrative Site Layout



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Rev	Date	Description	By
01	04-05-23	Colour added	WT
02		First Issue	WT

WT Design Ltd
Architectural Consultants
Mill House
High Hill Hill
Yarmouth Road
Luton
Bedfordshire
MK45 2JZ
t: 01463 389422
e: info@wt-design.co.uk

Project:
Land South of Sporie Road

Drawing Title:
Sketch Masterplan
Option 2

Client:

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Date:
04-2023

Project Number: 398-23	Drawing Number: SK002	Revision: P2
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Purpose of Issue:
Information

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APPENDIX 2

APPENDIX 2 EMAIL FROM ORBIT HOMES 15 DECEMBER 2025

From: Ian Fieldhouse <Ian.Fieldhouse@orbit.org.uk>
Sent: 15 December 2025 08:19
To: Iain Hill <iain.hill@bidwells.co.uk>
Cc: Sam Hollaus <Samuel.Hollaus@orbit.org.uk>; Rex Elliott <rex.elliott@lsh.co.uk>
Subject: Land at Sporle road Swaffham
Importance: High

Iain,

Good to speak last week

I would like to confirm that Orbit is currently in discussing the above site to develop it out for a scheme of 202 homes.

We have had an offer accepted and we are looking at an all-affordable scheme, which would be a grant funded one, owned and managed by us.

We will be on site in the early new year to complete surveys and investigations, with a view of getting into contract in the mid part of 2026, with an application to follow on shortly thereafter.

We would look to commence works on the site in 2028 and expect it to take around 4 years to develop out as a whole

So, we are supporting this site in its inclusion in the Local plan

I am happy for you to use this in your Representations to the Local plan

Speak soon,

Regards,

Ian

Ian Fieldhouse

Land and New Business Director -East

Land & New Business – Orbit Homes East

T: 07717517695

M: 07814046229

E: Ian.Fieldhouse@orbit.org.uk

W: www.orbithomes.org.uk



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