

15th December 2025
606930 – General/JD/NR

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By email to: LocalPlan@breckland.gov.uk

Dear Sir / Madam

**BRECKLAND LOCAL PLAN FULL UPDATE
REGULATION 18 PREFERRED OPTIONS CONSULTATION 2025
REPRESENTATIONS ON BEHALF OF PIGEON INVESTMENT MANAGEMENT LTD**

Savills (UK) Ltd ('Savills') have been instructed by the Pigeon Investment Management ('Pigeon' / 'PIM') to submit representations in response to the Breckland Local Plan Full Update – Regulation 18 Preferred Options Consultation currently being undertaken by you – Breckland District Council ('the Council').

On behalf of Pigeon, Savills submitted representations to the Council's at the Call-for-Sites stage earlier in 2025. Pigeon have continued to engage with the Council and other stakeholders since then and would welcome continued and further opportunities to do so to support:

- The identification of Kingsfleet Grove in the emerging Local Plan as a 'Sustainable Urban Extension' ('SUE');
- The continued identification of the Thetford SUE; and
- The continued identification of the Thetford Enterprise Park.

Pigeon have submitted a separate representation relating to the Trident Business Park.

Our Response

On behalf of Pigeon, we have prepared and are submitting responses relating to four key areas:

1. Kingsfleet Grove SUE;
2. Other policies (including comments in relation to the existing Thetford SUE, and Thetford Enterprise Park); and
3. Trident Business Park.

The representations below relate to 2. Other Policies.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

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Summary

We trust that our comments are of assistance to the ongoing preparation of the Local Plan.

We also wish to continue to contribute towards the future stages of the Local Plan process and therefore would be grateful if the Council could advise of further opportunities for participation and the submission of representations.

Please do not hesitate to contact me if you have any questions regarding these representations or require any further information.

Yours sincerely,



Jonathan Dixon
BA (Hons) MA MRTPI FRSA
Director

Enc. Appendix 1: Representations to Individual Policies

cc: Pigeon

Appendix 1

Response to 'Breckland Local Plan Full Update – Regulation 18 Preferred Options Consultation 31st October – 15th December 2025'

Representations to Individual Policies

On behalf of Pigeon, we have prepared and are submitting responses relating to four key areas:

1. Kingsfleet Grove SUE;
2. Other Policies (including comments in relation to the existing Thetford SUE, and Thetford Enterprise Park); and
3. Trident Business Park.

The representations below relate to 2. Other Policies.

Which Policy / Paragraph / Site Allocation does comment relate to?

GEN 01: Design and Sustainable Development

Is your comment an objection, supporting or neutral comment?

General Comment / ~~Support~~ / ~~Object~~ / ~~Unsure~~

Response

Pigeon is generally supportive of draft Policy GEN 01.

However, the requirement in the second part of the draft Policy that development proposals should "... *minimise* ..." emissions and pollution sets an unquantified high threshold that conflicts with national policy in the NPPF and associated guidance in PPG.

Given the above, Pigeon is generally supportive of draft Policy GEN 01 but consider that the draft Policy should be subject to some further consideration and appropriate revision.

Pigeon reserves the right to comment further regarding the above.

Which Policy / Paragraph / Site Allocation does comment relate to?

Policy GEN 02: Parish Hierarchy and Spatial Development Strategy

Is your comment an objection, supporting or neutral comment?

General Comment / Support / ~~Object~~ / ~~Unsure~~

Response

Pigeon is generally supportive of draft Policy GEN 02.

Policy GEN 02 provides a clear structure as to where development is to be located within the District. It is noted that Thetford is identified as a one of five Market Towns, and that, together with the Strategic Development Areas ('SDAs') and Sustainable Urban Extensions ('SUEs'), this is where approximately 75% of new housing development is directed.

As set out at Paragraph 9 of the NPPF (December 2024, as amended February 2025), planning policies and decisions should play an active role in guiding development towards sustainable solutions, whilst taking into account local circumstances and meeting the needs of a particular area. Therefore, there must be a degree of flexibility within policy wording to encourage and promote growth across all tiers of the settlement hierarchy, and ultimately where it is most appropriate and needed.

Pigeon reserves the right to comment further regarding the above.

Which Policy / Paragraph / Site Allocation does comment relate to?

Policy GEN 03: Built Form

Is your comment an objection, supporting or neutral comment?

General Comment / ~~Support~~ / ~~Object~~ / ~~Unsure~~

Response

Pigeon is generally supportive of draft Policy GEN 03.

However, objection is raised to the statement in part (d) of the draft Policy that:

"... The built-up area will exclude: ... Undeveloped land that is allocated for new development or that has extant planning permission for new development that is yet to commence. ..."

On the basis that the those parts of the existing Thetford 'Sustainable Urban Extension' ('SUE'), allocated in the 2012 'Thetford Area Action Plan' ('TAAP'), where development is permitted and progressing on a phased basis but has not yet been commenced, could be viewed as not being part of the 'built form' (see also Pigeon's representations to draft Policies GEN 04 and EMP 02).

Given the above, Pigeon is generally supportive of draft Policy GEN 03 but consider that it should be subject to some further consideration and appropriate revision.

Pigeon reserves the right to comment further regarding the above.

Which Policy / Paragraph / Site Allocation does comment relate to?

Policy GEN 04: Development and the Built Form

Is your comment an objection, supporting or neutral comment?

General Comment / ~~Support~~ / ~~Object~~ / ~~Unsure~~

Response

Pigeon is generally supportive of draft Policy GEN 04.

However, the introductory paragraph only refers to “... allocations ...” and “... sites with extant planning permission ...”. The existing Thetford Sustainable Urban Extension (‘SUE’), allocated in the 2012 Thetford Area Action Plan might thus be viewed as only forming part of the ‘built form’ so long as the existing outline planning permission remains extant (see also Pigeon’s representations to draft Policy GEN 03). However, it would appear that this is to be by means of the draft Local Plan NOT replacing many of the policies relevant to the SUE as contained in the TAAP, and these policies remaining in force. This will mean that elements of the 2012 TAAP could remain applicable to the Thetford SUE until the end of the emerging plan period – i.e. 2042.

Pigeon consider that this previous allocation should be explicitly carried through into the new Local Plan with an allocation that continues the acceptance of development on the site in principle, reflects the extant permission, and allows appropriate flexibility in the consideration of any future applications.

In addition, planning law requires that applications for permission are considered against the Development Plan as a whole. It is possible for an application to be deemed acceptable and in accordance with the Development Plan as a whole, whilst conflicting with one or more policies. The third part of the draft Policy conflicts with this principle.

Given the above, Pigeon is generally supportive of draft Policy GEN 04 but consider that it should be subject to some further consideration and appropriate revision.

Pigeon reserves the right to comment further regarding the above.

Which Policy / Paragraph / Site Allocation does comment relate to?

Policy HOU 01: Breckland’s Housing Requirement

Is your comment an objection, supporting or neutral comment?

~~General Comment~~ / Support / ~~Object~~ / ~~Unsure~~

Response

Pigeon is generally supportive of draft Policy HOU 01.

The current minimum Local Housing Need figure of 920 dpa results in a total minimum requirement of 16,560 homes over the 18-year plan period 1st April 2024 to 31st March 2042. The proposed Local Plan housing requirement of 17,388 includes a 5% buffer on top the current minimum LHN, which we support. This results in the proposed Local Plan housing requirement being an average of 966 dpa.

Pigeon would note the requirement that Local Plans have 15 years of the plan period remaining at the point of adoption. The above assumes that the emerging Plan is adopted no later than the end of March 2027.

Pigeon reserves the right to comment further regarding the above.

Which Policy / Paragraph / Site Allocation does comment relate to?

Policy HOU 04: Large Housing Sites Development Principles

Is your comment an objection, supporting or neutral comment?

~~General Comment~~ / ~~Support~~ / ~~Object~~ / ~~Unsure~~

Response

Pigeon is generally supportive of draft Policy HOU 04.

However, with regard to the third part of the draft Policy, whilst it is clearly desirable that masterplans have the support of all key stakeholders, including infrastructure providers, there might be occasions where one or more key stakeholders do not fully support the masterplan, irrespective of whatever engagement process has been gone through. Pigeon therefore considers the following amendment to the second part of the draft Policy:

“... The Masterplan and Design Code should clearly evidence the ~~support of~~ engagement held with all key stakeholders, ...”

Similarly, whilst it is likely that an outline application will be submitted for all such developments, to ensure that the draft Policy does not constrain what might be an otherwise acceptable approach, Pigeon consider the following amendment to the third part of the draft Policy:

“... and be submitted alongside the first planning application (likely an outline application) for the proposed development.”

The fifth part of the draft Policy (the cross-reference to draft Policy HOU 17) is not necessary.

The sixth part of the draft Policy requires (part (a)): “*Engagement and partnership discussions ...*” to have taken place with Registered Providers (‘RPs’) in relation to the provision of affordable housing; albeit it does not say by what stage of the process this should have happened. In practical terms, it is unlikely that an RP will be able to make any meaningful commitment to a major (/ strategic) site prior to the submission of an application. It is likely that applications for such sites will be in outline, and RPs are only usually able to provide any meaningful commitment when the detailed mix and layout are being agreed – i.e. at full permission or reserved matters stage. Pigeon would further suggest that evidence of such discussions is only required when an application is submitted for full permission or reserved matters. Pigeon therefore consider that Part (a) of the sixth part of the draft Policy is deleted or suitably amended.

In addition, the sixth part of the draft Policy also requires (part (b)) the inclusion of a “... nursing care facility ...” on all sites – a requirement repeated elsewhere in the draft Plan. Pigeon is supportive of the need to provide specialist accommodation for an aging demographic, however, no further explanation is provided as to what this facility might be / comprise / include, nor why it is required. Without such, Pigeon considers that this part of the draft Policy requires further attention.

Given the above, Pigeon is generally supportive of draft Policy HOU 04 but consider that it should be subject to some further consideration and appropriate revision.

Pigeon reserves the right to comment further regarding the above.

Which Policy / Paragraph / Site Allocation does comment relate to?

Response

Policy HOU 05: Development Viability

Is your comment an objection, supporting or neutral comment?

General Comment / Support / Object / Unsure

Response

Pigeon is generally supportive of draft Policy HOU 05.

However, Pigeon considers that the second part of the draft Policy risks undermining the deliverability of the Local Plan. Whilst all parties strive to ensure that all pertinent matters are taken into account prior to the granting of planning permission, it sometimes happens that unforeseen circumstances arise, whether they be site related or for some other reason – e.g. a change in national government (planning) policy, that materially changes the viability of a development proposal. Setting out in policy such a categorical refusal to re-visit viability within five years of a planning permission having been issued risks affecting the deliverability of any site where there is a change of circumstances – i.e. there is a potential risk that sites could be ‘mothballed’ until viability can be revisited. Pigeon consider that the second part of the draft Policy requires further attention.

In addition, the fourth part of draft Policy sets out an approach that is the opposite of what occurs in practice, and which is allowed for elsewhere in the draft Plan. The draft Local Plan (e.g. para. 5.159 and draft Policy HOU 21: Affordable Housing) allows for a reduction in the provision of affordable housing provision, as a result of a viability assessment, but not a reduction in other financial obligations. This is the usual approach as it allows for much-needed housing to be delivered, which could not be delivered, or even permitted, if the resulting ‘impacts’ were not mitigated. For example, where a financial obligation is required towards highway improvements or education or healthcare provision, these cannot be reduced without making the development proposal unacceptable in planning terms, which would presumably then result in the proposal being refused. Unless and until there is a solution to this oft-recurring quandary, Pigeon consider that the fourth part of the draft Policy should be deleted.

Further, the sixth part of the draft Policy presupposes that any additional contributions obtained via a financial reappraisal relate to the local area, whereas they might not. Pigeon thus considers that the final part of the sixth part of the draft Policy – “... *within the same or adjoining parish* ...” should be deleted.

Given the above, Pigeon is generally supportive of draft Policy HOU 05 but consider that it should be subject to some further consideration and appropriate revision.

Pigeon reserves the right to comment further regarding the above.

Which Policy / Paragraph / Site Allocation does comment relate to?

Policy HOU 10: Housing for the Elderly and Specialist Care (Two or more dwellings)

Is your comment an objection, supporting or neutral comment?

General Comment / ~~Support~~ / ~~Object~~ / ~~Unsure~~

Response

Pigeon is generally supportive of draft Policy HOU 10.

However, Pigeon considers the reference to “... 400m ...” in part (a) of the first part of the draft Policy to be overly restrictive. There are many different types of residential accommodation of the elderly and those in need of specialist care, and likewise many different types of potential occupiers, many of whom will find distances exceeding 400m within “... *easy* ...” reach. Pigeon therefore consider that this specific reference should be removed from the draft Policy.

Given the above, Pigeon is generally supportive of draft Policy HOU 10 but consider that it should be subject to some further consideration and appropriate revision.

Pigeon reserves the right to comment further regarding the above.

Which Policy / Paragraph / Site Allocation does comment relate to?

Policy HOU 16: Adaptable and Accessible Homes

Is your comment an objection, supporting or neutral comment?

General Comment / ~~Support~~ / ~~Object~~ / ~~Unsure~~

Response

Pigeon is generally supportive of draft Policy HOU 16.

However, the opening sentence, in particular the reference to all new homes “... *must be designed and constructed in a way that enables them to be adaptable* ...” is at odds with the more detailed requirements that follow and is sufficiently vague that it will not provide clear guidance to designers and developers, or to those assessing planning applications.

Given the above, Pigeon is generally supportive of draft Policy HOU 16 but consider that the draft Policy should be subject to some further consideration and appropriate revision.

Pigeon reserves the right to comment further regarding the above.

Which Policy / Paragraph / Site Allocation does comment relate to?

Policy HOU 17: Water Efficiency

Is your comment an objection, supporting or neutral comment?

General Comment / ~~Support~~ / ~~Object~~ / ~~Unsure~~

Response

Pigeon is generally supportive of draft Policy HOU 17.

However, the supporting text only references, explains and justifies the setting of a target of 110 litres per person per day (compared the default limit of 125 litres required by the Building Regulations (Part G2), which also provides for the alternative limit of 110 litres), not the 85 litres required by part (1) (a) of the draft Policy.

In addition, the second part of the draft Policy could more appropriately be significantly reduced, with supporting information included in the Council’s planning application validation checklist.

Given the above, Pigeon is generally supportive of draft Policy HOU 17 but consider that it should be subject to some further consideration and appropriate revision.

Pigeon reserves the right to comment further regarding the above.

Which Policy / Paragraph / Site Allocation does comment relate to?

Policy HOU 18: Securing A Mix of Housing

Is your comment an objection, supporting or neutral comment?

~~General Comment~~ / Support / ~~Object~~ / Unsure

Response

Pigeon is generally supportive of draft Policy HOU 18.

Pigeon is unsure whether part (h) of the second part of the draft Policy should be listed as such, or be a separate statement.

Pigeon reserves the right to comment further regarding the above.

Which Policy / Paragraph / Site Allocation does comment relate to?

Policy HOU 21: Affordable Housing

Is your comment an objection, supporting or neutral comment?

General Comment / ~~Support~~ / ~~Object~~ / Unsure

Response

Pigeon is generally supportive of draft Policy HOU 21.

Pigeon supports the proposed requirement for 25% affordable housing as set out in part (b) of the second part of the draft Policy.

Pigeon also supports the reference to the need to ensure development proposals remain viable, as set out in part (g) of the second part of the draft Policy.

However, part (e) of the second part of the draft Policy does not reflect the usual requirements of Registered Providers (of affordable housing), who generally do not accept the distribution of affordable housing in single units, instead preferring suitably-sized clusters.

Further, the final part of the draft Policy on "*Vacant Building Credit*" effectively reiterates national policy in the NPPF and associated guidance in PPG, which is not necessary and could be confusing.

Given the above, Pigeon is generally supportive of draft Policy HOU 21, but consider that the draft Policy should be subject to some further consideration and appropriate revision.

Pigeon reserves the right to comment further regarding the above.

Which Policy / Paragraph / Site Allocation does comment relate to?

Policy EMP 01: Economic Growth Strategy

Is your comment an objection, supporting or neutral comment?

~~General Comment / Support / Object / Unsure~~

Response

Pigeon is generally supportive of draft Policy EMP 01, albeit attention is drawn to Pigeon's representations to draft Policy EMP 02.

Notwithstanding, Pigeon reserves the right to comment further on the draft Policy during future stages of Local Plan preparation.

Which Policy / Paragraph / Site Allocation does comment relate to?

Policy EMP 02: Employment Land Provision

Is your comment an objection, supporting or neutral comment?

~~General Comment / Support / Object / Unsure~~

Response

(NB Pigeon has submitted a separate representation to this policy in relation to employment land provision in general, and the Kingsfleet Grove SUE in particular.)

Thetford Enterprise Park and Thetford 'Sustainable Urban Extension' ('SUE'): Employment Areas

Thetford Enterprise Park (TEP):

In the adopted Local Plan, Policy EC 03: General Employment Areas states (emphasis added):

*"Sites that are [...] **identified as General Employment Areas**, [...] **employment allocations that have not been superseded** by this Plan and [...] **proposed employment allocations** in this Plan, as illustrated on the Policies Map will be protected for employment use."*

The site known as the 'Thetford Enterprise Park' ('TEP') is identified on the adopted 2023 Local Plan Policies Map as falling within just such a 'General Employment Area'.

With regard to TEP, in particular, the draft Plan states in the supporting text to draft Policy EMP 02 (paras. 6.23 and 6.27) (formatting adapted by Savills):

"Saved Allocations

6.23 The following are employment allocations in the 2019 Local Plan that are yet to be granted planning permission. These policies will be saved.

...

Thetford

6.27 Located across multiple parcels of land to the north of Thetford, employment opportunities integral to the current live planning permission at Thetford Sustainable Urban Extension (SUE) and land at Thetford Enterprise Park providing nearly 40 hectares of employment land. ..."

The draft Policies Map published alongside the draft Plan does specifically identify TEP, but as both a "Saved Allocation" and as a "Preferred Allocation".

It would appear that the Council intends to continue identifying TEP as an employment site but it is considered that this could be clearer in the draft Local Plan.

Thetford 'Sustainable Urban Extension' ('SUE'):

In a similar vein, Pigeon welcomes the proposed 'saving' of the employment areas within the Thetford SUE. However, it would appear that this is to be by means of the draft Local Plan NOT replacing many of the policies relevant to the SUE as contained in the TAAP, and these policies remaining in force. This will mean that elements of the 2012 TAAP could remain applicable to the Thetford SUE until the end of the emerging plan period – i.e. 2042.

Pigeon consider that this previous allocation should be explicitly carried through into the new Local Plan with an allocation that continues the acceptance of development on the site in principle, reflects the extant permission, and allows appropriate flexibility in the consideration of any future applications.

Summary

Given the above, Pigeon is generally supportive of draft Policy EMP 02 but consider that it should be subject to some further consideration and appropriate revision.

Pigeon reserves the right to comment further regarding the above.

Which Policy / Paragraph / Site Allocation does comment relate to?

Policy ENV 01: Climate Responsive Design

Is your comment an objection, supporting or neutral comment?

General Comment / Support / Object / Unsure

Response

Pigeon is generally supportive of draft Policy ENV 01.

However, as currently worded, much of the draft Policy is phrased as more of an aspiration, aim or objective, rather than a clear policy against which applications can be assessed.

In addition, the draft Policy is vague, and will not provide clear guidance to designers and developers, or to those assessing planning applications.

In addition, Pigeon consider that the second part of the draft Policy could be more appropriately included in the Council's planning application validation checklist, rather than in the draft Policy.

Given the above, Pigeon is generally supportive of Policy ENV 01 but consider that it should be subject to some further consideration and appropriate revision.

Pigeon reserves the right to comment further regarding the above.

Which Policy / Paragraph / Site Allocation does comment relate to?

Policy ENV 02: Green and blue infrastructure

Is your comment an objection, supporting or neutral comment?

General Comment / ~~Support~~ / ~~Object~~ / ~~Unsure~~

Response

Pigeon is generally supportive of draft Policy ENV 02.

The focus on delivering well-connected and multi-functional green and blue infrastructure is recognised within national policy in the NPPF and associated guidance in PPG as an important feature in achieving healthy, inclusive, and safe places.

However, Pigeon consider that the final part of the draft Policy could more appropriately be significantly reduced, with supporting information included in the Council's planning application validation checklist.

Given the above, Pigeon is generally supportive of draft Policy ENV 02, but consider that it should be subject to some further consideration and appropriate revision.

Pigeon reserves the right to comment further regarding the above.

Which Policy / Paragraph / Site Allocation does comment relate to?

Policy ENV 03: Improving Biodiversity

Is your comment an objection, supporting or neutral comment?

General Comment / ~~Support~~ / ~~Object~~ / ~~Unsure~~

Response

Pigeon is generally supportive of draft Policy ENV 03.

However, the first and third parts of the draft Policy effectively reiterate the statutory requirement of The Environment Act 2021, which is not necessary and could be confusing.

In addition, the second part of the draft Policy encourages a greater level of Biodiversity Net Gain ('BNG') provision than that required by the Environment Act (i.e. 10%) and suggests that a "... *minimum of 20%* ..." will be "... *actively encouraged* ...". This reference to an optional, yet seemingly minimum, higher threshold is unclear and confusing and will not provide clear guidance to designers and developers, or to those assessing planning applications. In this regard, PPG advises (ID: 74-006-20240214):

"Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies, they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will

also need to be given to how the policy will be implemented.”

Neither the draft Plan nor any of the supporting evidence base provides either the required evidence of local need, or assessment of impact on viability.

Further, the fifth part of the draft Policy states (emphasis added):

*“... Locally defined ecological networks will be identified in the Norfolk Local Nature Recovery Strategy (LNRS) which is currently being prepared by Norfolk County Council, and these **will be** the focus for the delivery of offsite and landscape scale biodiversity net gain. ...”*

As noted above, BNG is delivered pursuant to the terms of the Environment Act. How and where BNG needs are met is for the applicant to decide. As such, whilst Pigeon understand and appreciate the intention in the fifth part of the draft Policy, it is considered to be contrary to the Environment Act.

Given the above, Pigeon is generally supportive of draft Policy ENV 03 but consider that it should be subject to some further consideration and appropriate revision.

Pigeon reserves the right to comment further regarding the above.

Which Policy / Paragraph / Site Allocation does comment relate to?

Policy ENV 06: Designated Historic Assets

Is your comment an objection, supporting or neutral comment?

General Comment / Support / Object / Unsure

Response

The draft Policy appears to simply reiterate national policy in the NPPF and associated guidance in the PPG, which is not necessary and could be confusing.

As such, Pigeon consider that the draft Policy should be deleted.

Pigeon reserves the right to comment further regarding the above.

Which Policy / Paragraph / Site Allocation does comment relate to?

Policy ENV 07: Non-Designated Heritage Assets

Is your comment an objection, supporting or neutral comment?

General Comment / ~~Support~~ / Object / Unsure

Response

Pigeon is generally supportive of draft Policy ENV 07.

However, in large part Pigeon considers that the draft Policy simply reiterates national policy in the NPPF and associated guidance in the PPG, which is not necessary and could be confusing.

In addition, it would appear that the fourth and fifth parts of the draft Policy could be significantly reduced, with supporting information included in the Council's planning application validation checklist.

Given the above, Pigeon is generally supportive of draft Policy ENV 07 but consider that the draft Policy should be subject to some further consideration and appropriate revision.

Pigeon reserves the right to comment further regarding the above.

Which Policy / Paragraph / Site Allocation does comment relate to?

Policy ENV 08: Archaeological Sites

Is your comment an objection, supporting or neutral comment?

General Comment / ~~Support~~ / ~~Object~~ / ~~Unsure~~

Response

Pigeon is generally supportive of draft Policy ENV 08.

However, the draft Policy appears incomplete, in only referencing 'non-designated' heritage assets.

In addition, the third part of the draft Policy effectively reiterates national policy in the NPPF and associated guidance in the PPG, which is not necessary and could be confusing.

Given the above, Pigeon is generally supportive of Policy ENV 08 but consider that it should be subject to some further consideration and appropriate revision.

Pigeon reserves the right to comment further regarding the above.

Which Policy / Paragraph / Site Allocation does comment relate to?

Policy ENV 09: The Brecks Protected Habitats and Species

Is your comment an objection, supporting or neutral comment?

General Comment / ~~Support~~ / ~~Object~~ / ~~Unsure~~

Response

Pigeon is generally supportive of draft Policy ENV 09.

Notwithstanding, Pigeon reserves the right to comment further on the draft Policy during future stages of Local Plan preparation.

Which Policy / Paragraph / Site Allocation does comment relate to?

Policy ENV 10: Development in Nutrient Sensitive Areas

Is your comment an objection, supporting or neutral comment?

General Comment / ~~Support~~ / ~~Object~~ / ~~Unsure~~

Response

Pigeon is generally supportive of draft Policy ENV 10.

However, Pigeon note that the issue of nutrient neutrality is the subject of discussion nationally at present, as are the ways and means of addressing potential impacts. In addition, revised national policy in the NPPF and associated guidance in PPG is expected to be published between the current consultation on the draft Local Plan and the anticipated date for a consultation on a Regulation 19 draft Local Plan (i.e. summer 2026). Given this, it is possible that the national policy and guidance context for this draft Policy will have changed prior to the next consultation, and/or Examination or adoption of the Local Plan.

As such, Pigeon reserves the right to comment further regarding the above.

Which Policy / Paragraph / Site Allocation does comment relate to?

Policy ENV 12: Open Space, Sport & Recreation

Is your comment an objection, supporting or neutral comment?

General Comment / ~~Support~~ / ~~Object~~ / ~~Unsure~~

Response

Pigeon is generally supportive of draft Policy ENV 12.

However, the detailed requirements set out in the second part of the draft Policy entitled “*New Provision*” serve to significantly lengthen the policy. Given the existence of the Breckland Design Guide, to which Pigeon submitted extensive representations, Pigeon consider that this part of the draft Policy could be incorporated within that document rather than within the draft Policy, with a suitable cross-reference included within the Policy.

Given the above, Pigeon is generally supportive of draft Policy ENV 12 but consider that the draft Policy should be subject to some further consideration and appropriate revision.

Pigeon reserves the right to comment further regarding the above.

Which Policy / Paragraph / Site Allocation does comment relate to?

Policy DES 01: Promoting High Quality Design

Is your comment an objection, supporting or neutral comment?

General Comment / ~~Support~~ / ~~Object~~ / ~~Unsure~~

Response

Pigeon is generally supportive of draft Policy DES 01.

However, the requirement in the part (d) of the draft Policy for development proposals to “... *maximise* ...” connectivity within, through and beyond the proposal itself sets an unquantified high threshold that would also not provide clear guidance to designers and developers, or to those assessing planning applications.

Given the above, Pigeon is generally supportive of draft Policy DES 01 but consider that it should be subject to some further consideration and appropriate revision.

Pigeon reserves the right to comment further regarding the above.

Which Policy / Paragraph / Site Allocation does comment relate to?

Policy DES 02: Integrating Development With Nature

Is your comment an objection, supporting or neutral comment?

General Comment / ~~Support~~ / ~~Object~~ / ~~Unsure~~

Response

Pigeon is generally supportive of draft Policy DES 02.

However, the draft Policy is vague in places and might not provide clear guidance to designers and developers, or to those assessing planning applications. For instance, whilst the first part of the draft Policy requires that (emphasis added):

*“Development proposals should be designed around existing mature landscape features **which support local character or biodiversity.** ...”,*

whilst the second part of the draft Policy then requires that (emphasis added):

*“... Existing mature trees and hedgerows **should be retained** as they are important landscape features, as well as aiding biodiversity. ...”*

In short, the former requires that a mature tree should be retained where it “... *supports local character* ...”, whilst the latter requires that it should simply “... *be retained* ...”. In both cases, there is no mention as to whether the quality or the life expectancy of the tree should be considered, or where retention might otherwise prejudice an overall far more acceptable proposal.

Given the above, Pigeon is generally supportive of draft Policy DES 02 but consider that it should be subject to some further consideration and appropriate revision.

Pigeon reserves the right to comment further regarding the above.

Which Policy / Paragraph / Site Allocation does comment relate to?

Policy DES 03: Distinctive Local Identity

Is your comment an objection, supporting or neutral comment?

General Comment / ~~Support~~ / ~~Object~~ / ~~Unsure~~

Response

Pigeon is generally supportive of draft Policy DES 03.

However, the draft Policy is vague and will not provide clear guidance to designers and developers, or to those assessing planning applications. It opens discussing aspects of local distinctiveness (the purpose of the policy):

“New development should relate to the positive local character and enhance it, evolving and innovating

existing character in a way that is appropriate to local circumstances. ..."

but then moves on to discussing general design matters:

"... [Plot sizes] ... should be of a sufficient size and shape to allow for amenity space, parking, services, and waste to be accommodated, without cluttering the street scene or impacting on residents' amenity space. ...",

Notwithstanding that such a form of development in the centre of a (residential) development proposal might well be reflective of local distinctiveness, it then sets out that:

"... High density detached housing with narrow gaps between houses create a poor-quality amenity and street scene and will not be acceptable. ..."

before moving on to discuss matters of sustainability rather than design, that do not relate to local distinctives, such as:

"All new developments should incorporate any service elements such as e.g. utilities, waste, recycling and, where possible, cycle storage, EV charging points and air source heat pumps without impacting the street scene."

Given the existence of, and reference in the first part of the draft Policy to, the Breckland Design Guide, to which Pigeon submitted extensive representations, Pigeon consider that many of the points raised in the draft Policy could better be incorporated within that document rather than within the draft Policy.

In addition, Pigeon consider that too much weight is given to the existing character and identity of a site and its' surroundings, with very little reference to / allowance for what might otherwise be possible, as both appropriate and good design. For instance, the second part of the draft Policy requires that:

"Proposals should retain, where possible, existing building and landscape features and incorporate them positively into their development proposal."

seemingly irrespective of whether these features have any merit, are worthy of retention, or might otherwise prejudice an overall far more acceptable proposal. Meanwhile, the third part of the draft Policy requires that (emphasis added):

*"Plot sizes should be appropriate to the character of the local area **and comparable to nearby development**. ..."*

seemingly irrespective of what this might mean – potentially a very low density and inefficient use of land on a highly sustainable site.

Given the above, Pigeon is generally supportive of draft Policy DES 03 but consider that it should be subject to some further consideration and appropriate revision.

Pigeon reserves the right to comment further regarding the above.

Which Policy / Paragraph / Site Allocation does comment relate to?

Policy COM 01: Healthy Lifestyles

Is your comment an objection, supporting or neutral comment?

General Comment / ~~Support~~ / ~~Object~~ / ~~Unsure~~

Response

Pigeon is generally supportive of draft Policy COM 01.

However, as currently worded, the first part of the draft Policy is phrased as more of an aspiration, aim or objective, rather than a policy for development management purposes. As such, it is vague and will not provide clear guidance to designers and developers, or to those assessing planning applications.

In addition, and similarly, the second and third parts of the draft Policy simply set out part of the process that the Council will follow when considering applications, rather than representing a policy for development management purposes.

Given the above, Pigeon is generally supportive of draft Policy COM 01 but consider that it should be subject to some further consideration and appropriate revision.

Pigeon reserves the right to comment further regarding the above.

Which Policy / Paragraph / Site Allocation does comment relate to?

Policy COM 02: New Development and Health Impacts

Is your comment an objection, supporting or neutral comment?

General Comment / ~~Support~~ / ~~Object~~ / ~~Unsure~~

Response

Pigeon is generally supportive of draft Policy COM 02.

However, the requirement in the first part of the draft Policy that development proposals (emphasis added) “... *take appropriate steps* ...” to “... *avoid / mitigate potential negative effects on health* ...” and in the second part of the draft Policy that development proposals “... *reduce disparities in health between different parts of Breckland* ...” is vague and will not provide clear guidance to designers and developers, or to those assessing planning applications. In addition, the draft Policy does not explain what might be considered a ‘potential negative effect on health’ or a ‘disparity in health’ that requires avoidance, mitigation, or reduction.

Given the above, Pigeon is generally supportive of draft Policy COM 02 but consider that it should be subject to some further consideration and appropriate revision.

Pigeon reserves the right to comment further regarding the above.

Which Policy / Paragraph / Site Allocation does comment relate to?

Policy COM 03: Protection of Amenity

Is your comment an objection, supporting or neutral comment?

General Comment / ~~Support~~ / ~~Object~~ / ~~Unsure~~

Response

Pigeon is generally supportive of draft Policy COM 03.

However, the first part of the draft Policy states that development proposals will not be permitted that results in “... *unacceptable effects* ...” or does not provide for “... *adequate levels of amenity* ...”. Pigeon consider that this is vague and will not provide clear guidance to designers and developers, or to those assessing planning applications. In addition, the draft Policy does not explain what might be considered ‘unacceptable’ or ‘adequate’.

Given the above, Pigeon is generally supportive of draft Policy COM 03 but consider that it should be subject to some further consideration and appropriate revision.

Pigeon reserves the right to comment further regarding the above.

Which Policy / Paragraph / Site Allocation does comment relate to?

Policy COM 04: Protecting and enhancing Community Facilities

Is your comment an objection, supporting or neutral comment?

General Comment / Support / Object / Unsure

Response

Pigeon is supportive of draft Policy COM 04.

Which Policy / Paragraph / Site Allocation does comment relate to?

Policy INF 01: Sustainable Transport

Is your comment an objection, supporting or neutral comment?

General Comment / Support / Object / Unsure

Response

Pigeon is generally supportive of draft Policy INF 01.

However, the requirement for development proposals to “... *minimise* ...” the need to travel in part (a) of the second part of the Policy sets an unquantified high threshold that conflicts with national policy in the NPPF and associated guidance in PPG.

In addition, the requirement for development proposals to “*not adversely impact on the operation of safety of the strategic highway network*” in part (c) of the second part of the Policy also conflicts with national policy in the NPPF and guidance in PPG.

Given the above, Pigeon is generally supportive of draft Policy INF 01 but consider that it should be subject to some further consideration and appropriate revision.

Pigeon reserves the right to comment further regarding the above.

Which Policy / Paragraph / Site Allocation does comment relate to?

Policy INF 02: Transport Requirements

Is your comment an objection, supporting or neutral comment?

General Comment / ~~Support~~ / ~~Object~~ / ~~Unsure~~

Response

Pigeon is generally supportive of draft Policy INF 02.

However, the requirement in part (a) of the first part of the draft Policy for development proposals to “*maximise flexibility in the choice of travel modes*” sets an unquantified high threshold that conflicts with national policy in the NPPF and guidance in PPG.

In addition, the requirement in part (b) of the first part of the draft Policy for development proposals to mitigate “... *the cumulative effects of development* ...” is potentially misleading, irrespective of the later reference to this being via “... *contributions towards* ...”. Pigeon wishes to highlight that there is no general requirement to mitigate **all** off-site transport impacts of a development proposal, which the wording of the draft Policy seems to imply. Not only is mitigating **all** impacts practicably impossible, but where there are impacts, many of these can be satisfactorily accommodated on existing transport networks without the need for mitigation. In order to comply with the limitations on the use of planning obligations as set out in the Community Infrastructure (‘CIL’) Regulations (2010), specifically Regulation 122, development proposals can only be required to mitigate or contribute towards the cost of mitigation if that mitigation is:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

The wording of part (b) of the draft Policy appears to suggest that development proposals could be required to mitigate the cumulative impacts of multiple developments, which Pigeon consider would fail the above tests. In this regard, Pigeon considers that part (b) of the first part of the draft Policy be reworded as follows: “*Deliver appropriate mitigation and/or financial contributions to address off-site development transport impacts.*”

Further, the requirement in part (e) of the first part of the draft Policy that development proposals should (amended by Savills) “*avoid inappropriate traffic generation and not compromise highway safety*” is both unclear – it does not explain what might or might not be ‘inappropriate’, and, again, in conflict with national policy in the NPPF and guidance in PPG.

Given the above, Pigeon is generally supportive of draft Policy INF 02 but consider that it should be subject to some further consideration and appropriate revision.

Pigeon reserves the right to comment further regarding the above.

Which Policy / Paragraph / Site Allocation does comment relate to?

Policy INF 03: Flood Risk & Surface Water Drainage

Is your comment an objection, supporting or neutral comment?

General Comment / ~~Support~~ / ~~Object~~ / ~~Unsure~~

Response

Pigeon is generally supportive of draft Policy INF 03.

However, the requirement for development proposals to “... *minimise* ...” the risk of flooding sets an unquantified high threshold that conflicts with national policy in the NPPF and associated guidance in PPG.

In addition, aspects of the draft Policy (e.g. paras. 3 and 6¹) effectively reiterate national policy in the NPPF and guidance in PPG, which is not necessary and could be confusing.

Further, the first half of para. 7² of the draft Policy could more appropriately be significantly reduced, with supporting information included in the Council's planning application validation checklist. This paragraph also requires that substantial information is required at ‘pre-application’ stage, including, for example, “*details of means of adoption and maintenance of the systems over the lifetime of the development*”. Such a requirement, especially one set out in policy, represents a misunderstanding of the pre-application and application processes where such detailed information is very unlikely to be known, even if a (detailed) drainage design has been prepared, at such an early stage.

Given the above, Pigeon is generally supportive of draft Policy INF 03 but consider that it should be subject to some further consideration and appropriate revision.

Pigeon reserves the right to comment further regarding the above.

Which Policy / Paragraph / Site Allocation does comment relate to?

Para. 11.23

Policy INF 04: Renewable Energy Development

Is your comment an objection, supporting or neutral comment?

General Comment / Support / Object / Unsure

Response

Pigeon is generally supportive of draft Policy INF 04.

However, the first part of the draft Policy states that proposals for new renewable energy and low carbon development will be supported “... *subject to consideration of the impact of the development and whether this can be made acceptable*”. Pigeon consider that this is vague and will not provide clear guidance to designers and developers, or to those assessing planning applications. The draft Policy sets out five considerations ((a) to (e)) and then continues to explain that proposals will be permitted where these (adverse) impacts can be “... *made acceptable*...” but does not explain what might be considered ‘acceptable’ or not ‘acceptable’.

In addition, the second part of the draft Policy then requires that “... *any adverse impacts ... be mitigated* ...” but does not explain what might be considered to the sufficient mitigation – e.g. fully mitigated, or mitigated to an otherwise acceptable degree.

Further, the third and fourth parts of the draft Policy effectively reiterate national policy in the NPPF and guidance in PPG, which is not necessary and could be confusing.

In particular, Pigeon welcomes the inclusion in the draft Policy of specific reference to “Solar Energy Development”. However, Pigeon considers that the draft Policy would effectively establish a sequential-test type approach that would constrain the delivery of new solar energy development. Pigeon notes that the

¹ Starting: “*Proposals for vulnerable ...*” and “*In the case of ...*”.

² Starting: “*All applications ...*”.

Government's recently-published 'Clean Power 2030 Action Plan'³ expressly notes (p. 28) that (emphasis added):

"... all routes to a Clean Power system will require mass deployment of offshore wind, onshore wind, and solar ...".

Table 1 in the Action Plan identifies the need to **treble** the installed capacity of solar from 16.6 GW to 45-47 GW **over the next 5 years**. Whilst the need to expand the provision of solar is discussed in the supporting text to the draft Policy (para. 11.23), the discussion fails to reflect the urgency and scale of the issue, as noted in the Action Plan.

Given the above, Pigeon is generally supportive of draft Policy INF 04 but consider that it should be subject to some further consideration and appropriate revision.

Pigeon reserves the right to comment further regarding the above.

Which Policy / Paragraph / Site Allocation does comment relate to?

Policy INF 06: Developer Contributions

Is your comment an objection, supporting or neutral comment?

General Comment / ~~Support~~ / ~~Object~~ / ~~Unsure~~

Response

Pigeon is generally supportive of draft Policy INF 06.

Pigeon note that the first part of the draft Policy effectively reiterates the Community Infrastructure ('CIL') Regulations (2010), specifically Regulation 122, national policy in the NPPF, and guidance in PPG, which could be confusing; albeit the reference to "... *subject to viability* ..." is welcomed, should be retained, and could justify the retention of the first part of the draft Policy.

It would appear that there is a typo in the second part of the draft Policy and that there is a missing full stop prior to "... *Developer contributions will be required to secure infrastructure which is necessary to ensure* ...".

With regard to this statement, Pigeon consider that it could be viewed as being contrary to the first part of the Policy, the Regulations, etc, as contributions (or rather 'planning obligations') can only be required as set out in the first part of the policy, not simply where it is deemed "*necessary*".

Pigeon consider that the draft Policy should be amended to include reference to the CIL Regulations, and the second part of the draft Policy amended to remove the potential for obligations to be required that are contrary to the first part of the draft Policy.

The final part of the draft Policy cross-references potential planning obligations that might be identified by the County Council. Pigeon considers that the draft Policy should instead reference all potential obligations, irrespective of which authority might identify the need for them. In this respect, Pigeon note that the draft Policy already appears to do so, in part, with some references to some potential obligations that might be required in relation to transport, flood risk, healthcare, etc.

Given the above, Pigeon is generally supportive of draft Policy INF 06 but consider that it should be subject to some further consideration and appropriate revision.

³ <https://assets.publishing.service.gov.uk/media/677bc80399c93b7286a396d6/clean-power-2030-action-plan-main-report.pdf>

Pigeon reserves the right to comment further regarding the above.
