

## Yaxham Neighbourhood Plan Review (2025) - Regulation 16 Consultation

### Summary of Comments

Reference	Clause	Comment	Suggestion
004 Breckland District Council	1.2	Agree, but clarify which version of the NPPF is being referred to.	If referring to the December 2024 version, then all paragraph numbers and references throughout the whole document should apply to the December 2024 version.
005 Breckland District Council	2.1	Update with latest information. In March 2025, Breckland District Council produced its most recent statement stating Breckland District Council no longer has a 5 Year Housing Land Supply (5YHLS)	<b>Recommend replacement text as follows:</b>  In relation to the 5-year land supply the most recent statement by Breckland District Council states:- “Breckland Council cannot demonstrate a 5-year supply of housing land as set out below. The Council will review the 5-year land supply position in March 2025.” Source: Breckland Council Statement of Five-Year Housing Land Supply (March 2025). <a href="https://democracy.breckland.gov.uk/ieListDocuments.aspx?CId=124&amp;MId=5155">https://democracy.breckland.gov.uk/ieListDocuments.aspx?CId=124&amp;MId=5155</a>

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006 Breckland District Council	Map 5	The Settlement Boundary should reflect the boundary in the Adopted Breckland Local Plan (2019).	<p><b>Recommend update to the NP Map 5 to reflect the correct Settlement Boundary in the Adopted Local Plan (2019) as follows:</b></p> <p>Page 270 <a href="https://www.breckland.gov.uk/local-plan/adoption">https://www.breckland.gov.uk/local-plan/adoption</a></p>
007 Breckland District Council	7.1	It is noted that the Plan refers to the Breckland adopted Core Strategy and Development Policies Development Plan Document 2009. This was largely replaced by the 2019 Breckland Local Plan and as such this should now be referred to as the District wide spatial plan for Yaxham.	<p><b>Recommend replacement text as follows:</b></p> <p><b>Paragraph 3.18 of The Breckland Local Plan 2019 identifies Yaxham Parish as a ‘village with boundaries and states that ‘In line with the Spatial Development Strategy and Settlement Hierarchy, the level of new development permitted in settlements defined in the policy will be restricted, consistent with the rural character of these villages and reflective of the more limited-service provision and infrastructure available.</b></p>
008 Breckland District Council	7.5	The latest Settlement Boundary as set out in the 2019 Adopted Local Plan link. Update link and Map 5 to show correct boundary.	<p><b>Recommend replacement text as follows:</b></p> <p><b>The settlement boundaries for settlements of Yaxham and Clint Green are referred to in these policies as set out in Breckland’s Local Plan 2019 (see Maps 5 and 6). Brakefield Green does not have a settlement boundary.</b></p>

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009 Breckland District Council	7.13	<p>The settlement hierarchy in the adopted Local Plan is informed by The Local Service Centre Topic Paper that includes an assessment of services and facilities within each parish area within Breckland. These assessments were based on services and facilities within each parish and were undertaken with co-operation from each parish council.</p> <p>The outcome of this assessment, as agreed by the Local Plan Inspector, is set out in Policy HOU02 that lists the parishes included under each of the policy HOU03, 04 and 05.</p> <p>The lists in policy HOU 02 for HOU 03, HOU 04 and HOU05 are in fact names of parishes. The only exception is that Clint Green is included with Yaxham village. The remainder of the parish of Yaxham, including Brakefield Green, is also covered by Policy HOU 04. This is important as the list under HOU 05 sets out those parishes within Breckland not covered by other policies.</p> <p>Brakefield Green is not listed under Policy HOU 02. If policies HOU 03 and HOU04 were settlement based (ie: just Yaxham and Clint Green) but not any other parts of the parish then the list set out in Policy HOU 02 of the areas covered by HOU05 should either name all those settlements without settlement boundaries or not have any list of named areas, inferring that it</p>	<p><b>Recommend replacement text as follows</b></p> <p><b>The remainder of the parish of Yaxham, including Brakefield Green, is also covered by Policy HOU 04.</b></p>

covers all the other settlements not named on other policies. The fact that it does include a list and that list reflects those parishes not included in higher level tiers indicates that the whole settlement hierarchy is in fact parish based. If the policies were settlement and not parish based, then it would be unclear as to under which policy any applications for development would be considered if not listed.

In considering applications under Policy HOU04 it is also important to note that commitments and development within the whole parish are counted against the 5% figure set out in the Policy and not just those within or immediately adjacent to the settlement boundary.

This approach has consistently been supported at appeals including for example at the village of Quidenham (Appeal Ref: APP/F2605/W/24/3344783

1 Sandfield Cottages Sandfield Lane, Eccles, Quidenham, Norwich NR16 2PB) where the Inspector applied a parish-based approach to the Local Plan in paragraph 12 of the decision notice.

It is therefore important that the text is amended to make it clear that the remainder of the parish of Yaxham, including Brakefield Green, is also covered by Policy HOU 04.

Reference	Clause	Comment	Suggestion
010 Breckland District Council	7.17	This paragraph requires updating with the latest Local Plan Timetable	<p><b>Recommend replacement text as follows:</b></p> <p>In June and July 2024, the Draft Local Plan Full Update Preferred Options document was consulted on. Breckland DC has published an updated timetable to reflect the changes to housing numbers required following the revised National Planning Policy Framework (NPPF) issued in December 2024 and the transition period during which plans can be made under the existing system. It is anticipated that the Regulation 19 consultation will happen in Summer 2026, and the Draft Local Plan Full Update will be submitted for Examination by December 2026.</p> <p><a href="https://www.breckland.gov.uk/local-plan-review">https://www.breckland.gov.uk/local-plan-review</a></p>

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011 <b>Breckland District Council</b>	7.23	This needs updating as it is referring to out of date reports from 2015. The most recent Local Plan evidence is required.	<p><b>Recommend replacement text as follows</b></p> <p>It is noted Breckland Council is considering the future development strategy that will be required to meet the new mandatory housing requirement, including Yaxham and neighbouring towns and parishes. This will include updated evidence on key issues including transport and a water cycle study.</p>
012 <b>Breckland District Council</b>	9.2	<p>It is important to refer to the review of the Local Plan and the fact that future development in Yaxham may not be restricted to sites within the Settlement Boundary.</p> <p>The purpose of this policy is to prompt development to be within the existing settlement boundary. However, it is important to note that Breckland District Council is preparing a Local Plan Review. It will cover the period from 2024 to 2046. This review will include new allocations for development to comply with the National Planning Policy Framework and other statutory requirements. The most recent version of the NPPF was published in December 2024. This will provide the broader context for the Local Plan and in particular the Development Strategy and allocations.</p>	<p><b>Recommend replacement text as follows</b></p> <p><b>Policy HOU1 – Correct spelling in first sentence ‘Yaxham’.</b></p> <p><b>Amend bullet 4 to read: "significantly more than 5%".</b></p>

Reference	Clause	Comment	Suggestion
		Policy HOU 01: The Local Plan refers to growth not being significantly more than 5%. The 5% is therefore not a limit and allows for some flexibility. This should be mirrored in Policy HOU 01 as, as worded, it is more restrictive than the Strategic Policy HOU 04 of the Local Plan.	
<b>013</b> <b>Breckland District Council</b>	<b>9.10</b>	Breckland District Council has adopted a Breckland Design Guide. This should be referenced in this section of the Neighbourhood Plan.	<p><b>Recommend replacement text as follows</b></p> <p><b>NP4Yaxham requires those planning new development to demonstrate the highest standards of design in the context of the immediate locality within small rural settlements.</b></p> <p><b>In preparing any proposals for development, consideration should be given to the Breckland Design Guide</b></p> <p><b><a href="https://www.breckland.gov.uk/article/19942/Local-Plan-Full-Update-2024">https://www.breckland.gov.uk/article/19942/Local-Plan-Full-Update-2024</a></b></p>

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014  Breckland District Council	10.8 and Policy ENV3	<p>Object to inclusion of Site 5 – East of St Peters Close.</p> <p>The Council notes that this site was submitted to the Call for Sites as being suitable for development with a housebuilder identified. The Council is preparing the new Local Plan based on the 2024 NPPF and new mandatory housing requirement for Breckland of 903 dwellings per annum, an increase of over 36% increase on the figure provided for in the May 2024 Regulation 18 Plan of 661 dwellings per annum.</p> <p>It is clear that the new mandatory annual housing will require further consideration of the development strategy and significantly greater number of new allocations for development than previously made. Therefore, the Council is concerned that the identification of this site as LGS at this time could be seen as an attempt to block possible future development on a site on the edge of Yaxham. The District Council is not suggesting that the site is or is not a suitable development site at this time but considers that it should be allowed to consider this site as part of the statutory plan making process.</p> <p>The proposed designation conflicts with Paragraph 106 of the NPPF that states that ‘. The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to</p>	<p><b>Recommendation:</b></p> <p><b>Delete Site 5 - St Peter’s Close from Policy ENV3, Map 12 and 10.8</b></p> <p><b>Para 10.8. Description should be clarified as Local Green Spaces.</b></p>



	<p>them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.’. This proposed designation potentially blocks the potential to provide for the provision of sufficient homes to meet identified needs.</p> <p>Furthermore, the proposed designation is contrary to National Planning Policy Guidance as follows:</p> <p>How does Local Green Space designation relate to development?</p> <p>Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs, and the Local Green Space designation should not be used in a way that undermines this aim of plan making.</p> <p>Paragraph: 007 Reference ID: 37-007-20140306</p> <p>Furthermore, the Council is concerned that the identification of the site as a local green space is not supported by objective evidence. It does not appear to be included in the accompanying Local Green Space evidence document but is only supported by a small assessment in Appendix A to the Plan. This appears to be an internal assessment derived from the Working Group. There appears to be a lack of detailed</p>	
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objectively derived evidence or of demonstrably special features. As such it does not meet the high tests for LGS designation.

10.8 The Council notes in paragraph 10.8 that reference is made to designated Local Green Areas, (see Map 12). This description should be clarified as Local Green Spaces.

