

**Swanton Morley Neighbourhood Plan Review**  
**Breckland Council comments for Regulation 16 Consultation**

We welcome the production of the submission version of the Neighbourhood Plan and are aware of the volume of work that this has involved.

Page and Policy/ Paragraph No	Comment	Justification	Suggested Amendments
3.8.2	The outcome of the review has seen four new policies developed, two of the existing policies have been amended, while the remaining existing fourteen policies remain unchanged and are 'save' within the Swanton Morley Neighbourhood Plan Review 2025.	Typographical change	<b>ADD TO 3.82:</b> 'd' at end of save
5.4.3	The Regulation 18 consultation, a 6-week period of public consultation on the Full Update (emerging development strategy) for the Local Plan finished on 19th February 2024. The proposals included:- <ul style="list-style-type: none"> <li>• Alternative development strategy options.</li> <li>• Settlement boundaries and the removal of settlement boundaries.</li> <li>• Call for sites &amp; site assessments and potential new development sites.</li> </ul>	It is important to note that the Regulation 18 Stage of a Local Plan process focusses on evidence gathering and initial policy approaches, and is open to significant changes. It therefore carries significantly less weight than subsequent stages of the plan making process. However, the Council acknowledges that the Regulation 18 Draft Plan sets out a direction of travel  The text also needs updating to reflect the latest Regulation 18 Consultation (2025)	<b>The Regulation 18 consultation for the Breckland Local Plan finished on December 15 December 2025. The proposals included:</b> <ul style="list-style-type: none"> <li>• <b>A proposed development Strategy</b></li> <li>• <b>The removal of settlement boundaries and replacement with a criteria based approach relating to the built up area of settlements.</b></li> </ul> <b>Whilst it is important to note that the Regulation 18 Plan is an early stage of plan making and could change it is considered important for this Neighbourhood Plan to reflect the key direction of travel that it sets out.</b>

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5.4.4	Through June and July 2024 the Draft Local Plan Full Update Preferred Options document was consulted on in a further Regulation 18 consultation. Swanton Morley Parish Council submitted a detailed response to the consultation highlighting many issues and concerns.	Remove	<b>Delete paragraph as now out of date.</b>
5.4.5	It was anticipated at the time that the Regulation 19 consultation would happen in January 2025, with the Draft Local Plan Full Update being adopted late in 2026	Remove	<b>Delete paragraph as now out of date. Current timetable is reflected in para 5.4.9</b>
5.4.6	Following a change of Government, in July 2024, Target Housing Numbers were reintroduced. The impact of this will increase the Breckland annual housing need number from 625 to a Target Housing number of 903 per year, an increase of just under 45%.	Update to reflect current housing figure	<b>Following a change of Government, in July 2024, mandatory target Housing Numbers were reintroduced. The Government has identified a need for 920 homes a year (dpa) in Breckland – equivalent to 16,560 dwellings over the 2024-42 plan period. This is an increase of just under 47% from the figure in the current Local Plan.</b>
5.4.7	The implications of this change in national policy on the Breckland Local Plan has resulted in the need for Breckland District Council to allocate more sites for development, which could include additional sites in Swanton Morley for development, and produce a new Local Development Framework timetable.	Update as Local Development Scheme is agreed	<b>The implications of this change in national policy on the Breckland Local Plan has resulted in the need for Breckland District Council to allocate more sites for development, which could include additional sites in Swanton Morley for development.</b>
5.4.8	5.4.8. To facilitate this, Breckland District Council initiated in April 2025 a new ‘Call for Sites’ and is now analysing the proposals.	Remove	<b>Delete paragraph as now out of date.</b>

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5.4.9	<p>Next stages and key dates in the Local Development Framework are:-</p> <ul style="list-style-type: none"> <li>• 2025 – October to December Revised Regulation 18 Consultation (Preferred Options Draft Plan) for public consultation.</li> <li>• 2026 – July to September Regulation 19 Pre- Submission Draft public consultation.</li> <li>• 2026 - December Submission for examination.</li> <li>• 2027 – Q3 / Q4 Adoption of new Local Plan Full Update.</li> </ul>	Update	<p><b>Next stages and key dates in the Local Development Framework are:-</b></p> <ul style="list-style-type: none"> <li>• <b>2026 – July to September Regulation 19 Pre- Submission Draft public consultation.</b></li> <li>• <b>2026 - December Submission for examination.</b></li> <li>• <b>2027 – Q3 / Q4 Adoption of new Local Plan Full Update.</b></li> </ul>
6.20	<p>In the Breckland Draft Local Plan Full Update Preferred Options June 2024 consultation document it proposes to move away from using ‘settlement boundaries’ (as a way of defining where development appropriate to the settlement in question will usually be permitted) to a less familiar criteria based approach.</p>	Update	<p><b>In the Breckland Draft Local Plan Full Update Preferred Options (2025) consultation document it proposes to move away from using ‘settlement boundaries’ (as a way of defining where development appropriate to the settlement in question will usually be permitted) to a less familiar criteria based approach.</b></p>
6.21	<p>Breckland District Council have stated their intent to move to a criteria based approach but has also stated that “Neighbourhood Plan updates could if desired implement local Settlement Boundaries informed by the strategy and criteria for growth established in the Local Plan.”</p>	Update to reflect 2025 Regulation 18 Draft Plan	<p><b>Breckland District Council have stated their intent to move to a criteria based approach, but in the 2025 Regulation 18 Draft Plan, has also stated that ‘Neighbourhood Plan updates could, if desired, implement local Settlement Boundaries informed by the strategy and criteria for growth established in the Local Plan’.</b></p>

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6.22 & 6.23	<p>This approach introduces the term ‘Built Form’ which it defines quite simply in Policy GEN 03: Built Form as....</p> <p>6.23. Built Form is defined as the closely grouped and visually well related residential, community, retail, and employment buildings of the main part of the settlement and land closely associated with them.</p>	Update to reflect 2025 Regulation 18 Draft Plan	<p><b>The District Council is proposing the adoption of a criteria-based approach that it considers has the potential to protect the character of settlements and the countryside whilst enabling sustainable development.</b></p> <p><b>This approach introduces the term ‘Built Form’ which it defines in Policy GEN 03 of the Regulation 18 Draft Plan. This can be viewed at the following link:</b></p> <p><a href="https://www.breckland.gov.uk/local-plan-2025">https://www.breckland.gov.uk/local-plan-2025</a></p>
6.24	Policy GEN 04: Development and the Built Form sets out that development within the built form will be permitted and all other land is defined as countryside. Development in the countryside is strictly controlled by a number of policies both within the Breckland Local Plan and National Planning Policy Framework (NPPF).	Update to reflect 2025 Regulation 18 Draft Plan	<p><b>With regards to Swanton Morley, Policy GEN 04: (Development and the Built Form) sets out that development (with exceptions) will be permitted where it is within or immediately adjacent to the built form of a settlement. Development in the countryside is strictly controlled by a number of policies both within the Breckland Local Plan and National Planning Policy Framework (NPPF).</b></p>

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POLICY 1 (Part)	<p>Outside the defined settlement boundary (as defined in Map 4 Swanton Morley Settlement Boundary) development will not be supported unless it involves:</p> <ul style="list-style-type: none"> <li>i) Rural exception sites;</li> <li>ii) Dwellings to meet the essential need for a rural worker;</li> </ul>	<p>To accord with Para 63 of the NPPF this should be expanded to include other 'specialist housing' needs</p> <p>The Policy requires future proofing in the event that the emerging Breckland Local Plan removes settlement boundaries with a criteria based policy based on built form</p>	<p><b>Add the following:</b></p> <p><b>Outside the defined settlement boundary (as defined in Map 4 Swanton Morley Settlement Boundary) development will not be supported unless it involves:</b></p> <ul style="list-style-type: none"> <li>I. Rural exception sites;</li> <li>II. housing to meet the essential need for a rural worker;</li> <li>III. housing with-care and care homes; people with disabilities;</li> <li>IV. service families;</li> <li>V. homes for travellers</li> <li>VI. self and custom build homes.</li> </ul> <p><b>In the event that the updated Breckland Local Plan removes settlement boundaries then the boundary set out in this Neighbourhood Plan will define the built form of the Settlement</b></p>
6.32	Map 4: Swanton Morley Settlement Boundary	Duplicate map as unnecessary	<b>Delete duplicate map showing settlement boundary under para 6.32</b>
Policy 2	<p>The primary focus of new residential development in the Swanton Morley Neighbourhood Plan area will be within the three allocated housing sites identified on the Map 5 as:</p> <ul style="list-style-type: none"> <li>1) LP(098)013;</li> </ul>	Policy should be updated to reflect current planning status on the 3 sites	Update Policy to update sites either developed or where planning permission has now been granted and which remain as allocations

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	<p>2) LP(098)014; and 3) LP(098)016</p> <p>Planning applications for up to 205 dwellings on these three allocated residential sites will be supported where they comply with the other policies within the Swanton Morley Neighbourhood Plan and the requirements of other development plan policies.</p>		Site 1) LP(098)013 developed;
6.51	<p>Within emerging Breckland Local Plan Preferred Options and Settlement Boundaries both sites are identified as ‘alternative options’, with site LP(098)016 to be developed in conjunction with sites LP[098]013 and/or Swanton Morley Neighbourhood Plan (Updated Review 2025) 41 Review 2025 Examination Version: V4 Deleted: referendum LP[098]014. The SMNP includes these three contiguous sites LP[098]013, LP(098)014 and LP(098)016 as effectively a single larger housing site with capacity for up to 205 dwellings following HRA screening and Appropriate Assessment in December 2018.</p>	Text should be updated to reflect current planning status on the 3 sites	<b>Update to reflect that one site now developed out</b>
6.117	<p>These areas also form part of the designations proposed in the Breckland Local Plan Full Update and published in July 2024 the Regulation 18 Consultation (Preferred Options Draft Plan)<sup>4</sup>, which had been paused and why these four areas are now included within the updates in the Swanton Morley Neighbourhood Plan Review 2025.</p>	<p>No objection to the new LGS designations. Recommend that the justification for each is included in the Plan as an appendix or accompanying evidence document.</p> <p>Update paragraph to reflect 2025 Regulation 18 Draft Plan. If This Plan is ‘made’ then they will be removed from the Breckland Local Plan to avoid duplication</p>	<p><b>These areas also form part of the designations proposed in the Breckland Local Plan Full Update and published in 2025 the Regulation 18 Consultation (Preferred Options Draft Plan).</b></p> <p><b>Add an appendix setting out the justification for the designations to meet the criteria in national planning policy</b></p>

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6.129	Four of these areas (Village Hall Playing Field, Allotments, Playing Field – Youth Football Pitches and Cricket Ground), have now been proposed for designation as Local Green Space	<p>Sites that are now proposed as LGS should be removed from this list as open space 6.130. This would then not conflict with the following</p> <p><i>Ambition: This policy seeks to recognise the importance of these areas to the village and as areas of recreational and visual value. The policy is not seeking 'Local Green Space' designation (6.129).</i></p>	<b>Amend text and accompanying Table of Open Spaces</b>
6.170	Map 7: Swanton Morley Landscape Character Area Sensitivity	Map 7: Swanton Morley Landscape Character Area Sensitivity also appears after paragraph 6.105. It is considered best placed at 6.170	<b>Delete Map 7: Swanton Morley Landscape Character Area Sensitivity from 6.105 and associated reference in adjacent text</b>
6.169 – 6.171	6.169. a) provide a 6.170. b) consider identifying 6.171. And NPPF paragraph 169 –	Numbering should be amended (Typographical)	<b>Edit numbering to avoid beginning paragraphs with numbered lists or 'And'</b>
6.178	The red shaded area on Map A: Swanton Morley Areas of Least Sensitivity	<p>It is assumed this is referring to Map 10.</p> <p>Need to check map numbering as previous Map with number 7</p>	<p><b>6.178. The red shaded area on Map 10: Swanton Morley Areas of Least Sensitivity</b></p> <p><b>Check Map numbering across the Plan</b></p>
6.179	The following plans, documents and strategies support Policy 17: § National Planning Policy Framework § Breckland Local Plan (September 2023) § Breckland Local Plan Full Update Regulation 18 Preferred Options	Update to reflect 2025 Regulation 18 Draft Plan and spelling of September	<b>6.179. The following plans, documents and strategies support Policy 17: § National Planning Policy Framework § Breckland Local Plan (September</b>

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	(June 2024)		<b>2023)</b> <b>§ Breckland Local Plan Full Update Regulation 18 Preferred Options (2025)</b>
Policy 18 (Part)	Each new home is required to provide at least one electric charging point and infrastructure which is accessible and convenient for the homeowner to use.	<p>Building Regulations and permitted development already cover EV charging points and so this policy may not be necessary</p> <p>Building Regulations Summary</p> <p>Residential new builds and retrofits</p> <p>All new homes which have parking will need an electric car charger. This includes buildings undergoing a change of use, such as an office block being repurposed into apartments. Residential properties that are undergoing a major renovation and will have over 10 parking spaces must have at least one EV charger per dwelling with associated parking, plus cable routes for all spaces without chargers</p>	<b>Remove references to electric charging from Policy and supporting text as unnecessary</b>

