

21<sup>st</sup> January 2026

Our ref: [REDACTED]

Via email only to:

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Dear Sir/Madam

**RE: Swanton Morley Neighbourhood Plan Review 2025 – Submission Draft (Regulation 16) Consultation**

This representation has been prepared by Sworders and submitted on behalf of our client [REDACTED] who is landowner of the site south of Elsing Road (south of the convenience store and Darby's Public House) in Swanton Morley. It is made in response to the Regulation 16 consultation on the submission draft of the Swanton Morley Neighbourhood Plan Review.

By way of background, Sworders have previously made representations to Breckland District Council in relation to our client's land within the Call for Sites consultations in 2022 and more recently in 2025. Representations were also made within the Regulation 18 Preferred Options consultation in July 2024 and again in December 2025. The site was put forward for commercial and residential land use with 0.42ha for commercial use and 2.99ha for residential use alongside. The site is located partially within the settlement boundary and extends southwards beyond the settlement boundary of Swanton Morley. Planning permission (ref. 3PL/2017/1393/F) was granted in July 2018 for the development of the car park serving the local butchers', deli, general store, post office and Darby's Public House. The proposal was to provide additional commercial units along with ancillary car parking and landscaping. Whilst the proposal was not built out due to economic circumstances at the time resulting in the lapse of permission, the landowner remains keen to deliver these facilities for the community. The land put forward for residential development of 60 dwellings sits directly adjacent the village centre and between housing to the west and Pyes Lane to the east. It is considered that the land is within a highly sustainable location, available and suitable for development that would support the village.

On behalf of our clients, we wish to respond to the Swanton Morley Neighbourhood Plan Review consultation in relation to matters which are of most relevance to the potential development of the site for residential/commercial developments. As set out in the consultation notification, comments are to be based on whether the plan proposal fulfils the basic conditions set out in Paragraph 8, Schedule 4B of the Town and Country Planning Act 1990 (as amended). These are set out and responded to as follows:



### **1. Does the Plan have regard to national policy and guidance from the Secretary of State?**

Whilst the vision and policies of the Swanton Morley Neighbourhood Plan (SMNP) are in general conformity with the National Planning Policy Framework (NPPF) published December 2024 as the current national planning policy and likely that it is appropriate to make the order, there is a new draft NPPF under consultation since December 2025. With potential for full publication in the summer of 2026, the draft NPPF sees a complete overhaul of its national policies. Therefore, the SMNP may require further amendment to reflect the changes soon after it has been 'made'.

Whilst it is noted that the review document is supported by a 'Consultation Statement Review', this is not carried through to the review SMNP document. The SMNP should be updated to reflect the more recent consultations with the parish residents in 2024/2025 that were required to take place, in addition to those conducted around 10 years ago.

### **2. Does the Plan preserve Listed Buildings and their setting.**

N/A as noted in the 'Basic Conditions Statement'.

### **3. Does the Plan preserve or enhance the character of any conservation area?**

Not relevant to Swanton Morley.

### **4. Does the Plan contribute to sustainable development?**

It is agreed that the SMNP seeks to support Sustainable Development in a proactive manner. With reference to Policy 1, it is supported that the ambition is to maintain Swanton Morley as a distinct and separate village with its own identity and maintaining its local economy. Our clients site offers potential to enhance this through the opportunity to provide small commercial units alongside housing. The site would also support the SMNP of pursuing growth in the right places (Policy 2) and Policies 14 and 15 which also seek to support local business and employment and additional community facilities.

Socially our clients site supports the requirement for additional housing that could be provided for existing and future residents of Swanton Morley and environmentally the site is in a highly sustainable location within the village. Collectively, it is considered that the SMNP does contribute to sustainable development, however the inclusion of development in the right places would further enhance this, such as the potential for our clients centrally located parcel of land that can support anticipated growth.

### **5. Is the Plan in general conformity with the strategic policies of the development plan for the area or any part of that area?**

The SMNP indicates that it has had regard to the emerging Breckland Local Plan (eBLP), however it does not account for the changes to the rural settlement hierarchy within the eBLP. Swanton Morley would become a 'Primary Parish' (eBLP Policy GEN02) rather than a Local Service Centre. The



hierarchy changes set out in the eBLP Rural Parish Hierarchy Topic Paper (July 2025) aims to inform the distribution of new housing development for the next Local Plan period and to help understand the size of growth which parishes can accommodate.

Given that Neighbourhood Plans are to sit alongside the Breckland Local Plan and forms part of the Development Plan, it is considered that further reference should be made to the emerging policies of the BLP. The SMNP should not conflict with agreed spatial planning objectives for Breckland.

The evidence base that supports the SMNP review provides the consultation responses for March - May 2025 within the 'Consultation Statement Review 2025'. It can be seen that Breckland District Council, in their response, set out that the review will need to reflect the new mandatory housing targets that are to be met within the district which may require further allocations within Swanton Morley beyond the two additional sites that the SMNP indicates at Rectory Road. The housing need has substantially increased, and this is correctly noted in the SMNP, however Primary Parishes are indicated within the eBLP to receive the highest proportion of the housing distribution expected amongst all the parishes. It should be recognised that as Swanton Morley is to be a Primary Parish it may be targeted for further housing above that currently set out within the SMNP. Whilst reference to the eBLP is in the 'Basic Conditions Statement Review 2025' it is not reflected in the SMNP directly.

Map 5 within the SMNP should be updated to include the more recent development completed at Rectory Road (formerly reference LP[098]013), given that it refers to allocation of sites adjacent to this.

Our client's site has gone through the Call for Sites processes since the current SMNP was made in 2019, however the available land was not considered for an allocation despite a previous permission for commercial use. The site would be suitably located directly within the centre of the village supporting local economy and housing need. The SMNP does not update more recent sites that have been put forward within the Call for Sites process that could be supported by residents. The importance of joining up the split village is supported when considering growth, however it leaves very limited consideration for other opportunities to expand that could support the village, such as our client's site alongside existing services within the village.

**6. Does the Plan breach or is otherwise compatible with EU obligations – this includes the SEA Directive of 2001/42/EC?**

It is considered that making the order would not breach and is otherwise compatible with EU obligations as set out in the Basic Conditions Statement.

**7. Is the making of the Neighbourhood Plan not likely to have a significant effect on a European site (as defined in the Conservation of Habitats and Species regulations 2010(d), either alone or in combination with other plans or projects?**

No comment to be made.



Overall, whilst the Basic Conditions may generally be considered to be met as set out in the Basic Conditions Statement as supporting evidence, it is not evidenced within the Swanton Morley Neighbourhood Plan Review document itself, which should therefore be updated. There are many changes to planning policy currently taking place at a local and national level that are likely to require further amendments to this Review within 2026.

I would be very grateful if you could kindly acknowledge safe and timely receipt of these representations.

Yours faithfully,

