

**Mattishall 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 to produce three Pre-submission versions (Reg.14). In light of this further review of the Plan, we have not only dealt with new policy and text, but we have also aimed to take a consistent approach when key issues have not been addressed. We have also considered other issues not previously addressed, as a result of responses made in the Consultation Statement (particularly when they are incorrect) in order to help the Parish Council produce the best Neighbourhood Plan possible.

**Key National Planning Policy Framework – NPPF / Neighbourhood Plan – The Plan**

<b>Page and Policy/ Paragraph No</b>	<b>Comment</b>	<b>Justification</b>	<b>Suggested Amendments</b>
1.6	The Government has published a draft NPPF alongside new mandatory housing targets that if adopted will require the District Council to make new allocations for development within Breckland. This may include Mattishall parish and the Council considers that this should be highlighted in this Neighbourhood Plan to set out the latest position.	To ensure that the local community is aware of the review of the Local Plan and the possible need for Mattishall to accommodate new development	<b>ADD TO 1.6:</b> The District Council is currently reviewing its Local Plan. This Review will need to reflect the emerging changes to the National Planning Policy Framework and any new mandatory housing targets that will need to be met within the District. This may require new allocations to be made within Mattishall Parish
Objective 6 (Housing and the Built Environment)	It may not be possible for all future new developments to be near the village Centre. The new Local Plan may include allocations for new development within Mattishall on the edge of the village.	To ensure that future development is well related to the built form of the village and well connected to local services and facilities	Objective 4: To ensure that future development is near to the village centre so that our community does not need to rely on cars to access services and facilities. Development located elsewhere in the village should be well related to the built form of the village and where possible include safe pedestrian and cycle links to local

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			<p>facilities</p> <p>Objective repeated before para 8.1</p>
<p>MNP ENV4: Open and Local Green Space</p> <p>Site 4: Rayners Way / Dereham Road, Mattishall</p>	<p>The District Council proposed this site as a LGS in its Regulation 18 Draft Local plan based on the information provided in the Assessment accompanying this Neighbourhood Plan. Following Regulation 18 consultation on the Draft Breckland Local Plan, an objection was made in respect of this site being proposed as a LGS. The Council has considered this objection and does no longer consider that the site should have this designation.</p> <ul style="list-style-type: none"> <li>• The land is a private garden and is not considered to be open land and there is no public access to the land</li> <li>• The land is adjacent to the main Dereham Road and cannot be considered as tranquil (It scored the lowest of the sites included in the LGS Assessment)</li> <li>• There is already TPO protection for trees on the site.</li> <li>• The richness of wildlife is uncertain. An Ecology Survey Report considered at a 2022 planning appeal<sup>1</sup>concluded that there remains uncertainty with regard to the potential of the site to provide habitat to reptiles and that further survey work be carried out in relation to bats and that no bats were confirmed as using trees within the site for roosting purposes.</li> <li>• It is understood from the landowner that the site is not a wild meadow but forms part of their private garden</li> </ul>	<p>The site does not meet the criteria required for its inclusion as LGS</p>	<p><i>Delete site 4 from the LGS</i></p>

<sup>1</sup> Appeal Ref: APP/F2605/W/22/3301662 Land to the West of Rayners Way, Mattishall, Dereham NR20 3NQ

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	<ul style="list-style-type: none"> <li>It is understood that the landowner is preparing a new planning application for residential development following a refusal of permission in 2023. Whilst the District Council will consider any new application objectively, if a new proposal was considered acceptable then this proposed designation could be seen as an attempt to block possible future development on a site within the built up area of the village on land that does not meet the requirements for designation as LGS for the reasons set out above. If any future application were to be refused then the site would remain undeveloped but would still not meet the criteria for LGS designation.</li> <li>It is also noted that the landowners have also objected to its inclusion within the Neighbourhood Plan and that these objections do not appear to have been addressed.</li> </ul>		
MNP ENV4: Open and Local Green Space  Site 5: Thynne's Lane	<p>The District Council has begun a Full Update to the adopted Local Plan</p> <p>The Council notes that this site was submitted to the Call for Sites as being suitable for development. It was also proposed for designation as a Local Green Space.</p> <p>In the Regulation 18 Draft Local Plan (2024) the site was not allocated for development nor was it identified as a Local Green Space.</p> <p>The Council is aware of the current consultation on a new NPPF including a proposed new mandatory housing requirement for Breckland of 917 dwellings per annum, a 39% increase on the current figure provided for in the Regulation 18 Plan of 661 dwellings per annum. The Council has paused work on the Local Plan pending the final outcome of the new NPPF and housing figure. However, it is clear that if a new annual housing requirement similar to that currently being proposed is imposed on the District this will require a significant of the development strategy and significantly greater</p>	<p>The Council is concerned that designation of this site as LGS at this time would block a possible future development site that may be required to meet an increased housing requirement</p>	<p><i>Delete site 5 from the LGS</i></p>

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	<p>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 one of the more sustainable villages within the District.</p> <p>The Council is aware that representation have also been made on behalf of a major housebuilder that consider the site as suitable for development and also questions the sites suitability for designation s LGS.</p> <p>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 plan making process.</p>		
8.9	<p>Since the Plan was published the Government has announced significant changes to the planning system and housing targets</p>	<p>Text requires updating to reflect the current situation</p>	<p><b>REWORD 8.9:</b> The District Council has completed consultation on issues and options, the Development Strategy and a Regulation 18 consultation on its Local Plan Review. In July 2024 the Government announced major changes to planning policies, including bringing back compulsory housebuilding targets. The housing figure for Breckland is approximately 300 more per annum than that used in the recent consultations. As a result of this the Council has paused work on the review of the Local Plan until these changes are finalized and the</p>

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			consequences for the Local Plan and in particular the Development Strategy and allocations is known.
8.10	The paragraph refers to the issues and Options consultation on the new Local Plan. This should be updated to reflect the latest stage of the plan making process	To reflect the latest position on the new Local Plan	<p><b>Amend the first 3 sentences of 8.10 as follows:</b></p> <p>The Local Plan Regulation 18 Plan did not include settlement boundaries for any settlements including Mattishall, preferring a criteria based policy approach. Mattishall Parish does not support a criteria based policy since settlement.....</p>

8.14 and MNP HOU 01	8.14 Policy MNP HOU1 therefore supports, in principle, new residential development within the settlement boundary and resists development outside of it other than where certain criteria are met.	This approach is noted. However, it should also be noted that there may be a need for new allocations for development on sites outside the settlement boundary as part of the Local Plan Review	<b>ADD TO</b> bullet point 3 under point 3 of the Policy for clarification  Sites that are allocated as part of a strategic policy in the Adopted Local Plan or those allocated as part of the Review of the Local Plan
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