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CROXTON VILLAGE



14 July 2025

OBJECTION TO THE BRECKLAND COUNCIL CALL FOR SITES 2025 WITHIN CROXTON PARISH

Summary

Croxton Parish Council has reviewed the call for sites and have raised a formal objection to the proposed and potential development of the land identified within the parish boundary. The case for objection is presented in this document and considers the special nature of the area and the impact this would have on the both the natural environment, local agriculture and parish residents. The objection further reflects on the lack of consideration given to the parish by this call for sites, particularly the lack of regard to the recent boundary change which was put in place specifically to protect area along with a total disregard of the in force Neighbourhood Plan.

The foundational promise behind the Croxton, Kilverstone and Brettenham Joint Neighbourhood plan ¹:

"The "predominantly rural" and tranquil character of the parish will be preserved and maintained"

Introduction

Between April and May 2022, Breckland Council undertook a formal Call for Sites consultation as part of the full update of the Local Plan and for which Croxton Parish Council (PC) earmarked an area to the rear of the Village Hall as Local Green Space. However, in December 2024 the Government published an increased target for Breckland, from 625 dwellings per annum to 903, a 30% increase. As a result, Breckland Council initiated another Call for Sites in order to source additional housing land, that could be suitable for development, which closed 28 April 2025. This Call for Sites includes significant land within the Croxton Parish boundary, on active arable farming land.

Historical Background

Due to a considerable proportion of the Kingsfleet development being in the Croxton Parish and following several public consultations, a full meeting of Breckland Council decided on 6th December 2018 to extend the Parish Boundary for Thetford to include all the land to the

¹ https://www.breckland.gov.uk/media/12956/Croxton-Brettenham-Kilverstone-Joint-Neighbourhood-Plan-Final/pdf/JNP_CLEAN_COPY_FINAL_UPDATED.pdf?m=1632329097123

South of the A11 and to the west of the A1075 which had previously been a part of the parish of Croxton.²

The reasoning given was: “To protect the Rural Character of the Village Parishes — If the boundary was not moved, then the new development would dominate the parish council areas, changing it from a relatively small rural parish to a largely urban one.”³

At the time this decision had the full support of Croxton Parish Council (PC) as it was felt that this would ensure the preservation of the existing rural village community, additionally it was agreed that the revised A11 and A1075 boundaries would act as a demarcation line against further development into agricultural areas to the North of the A11 and A1075.

These new parish boundaries came into effect for the local elections in May 2023.

Objection

A large proportion the areas marked ‘Kingsfleet Grove Thetford’ breach the recently changed Croxton Parish boundary, which was established as a demarcation line to prevent exactly this type of behaviour, and contravene the Neighbourhood Plan.

Croxton Parish Council strongly object to the sites referenced in the Call for Sites north of the A11 inside of the Croxton Parish boundary, giving the following justifications.

1. Breach of A11 and A1075, permanently impacting the rural and tranquil character of this historic village

The proposed development would breach the newly established A11 and A1075 demarcation lines that were established by the boundary change in May 2023.

The Parish Council wish to protect the boundaries in order to preserve the rural village identity. It is also feared that should these parish boundary lines be breached there may be further development proposals forthcoming in an attempt to ‘tack onto’ any proposed sites North of the A11 and by stealth change a rural agricultural parish into an urban extension of Thetford town.

This would go against and make void the reasoning adopted by Breckland Council when they originally made their decision to change the Parish boundary.

Croxton Parish Council recognises that Breckland Council has an increased housing target however the placement of 6,000 additional houses in the marked area would in effect bring the urbanisation of Thetford to within a few hundred yards of an ancient rural village.

2. Breach of the Approved and In Force Neighbourhood Plan

The Neighbourhood Plan Policy 10⁴ is clear about the “Avoiding the coalescence of settlements, designates the undeveloped area between settlements (Thetford/Croxton)

² https://www.breckland.gov.uk/media/11592/Public-Notice/pdf/Public_notice_CGR_decisions_Dec_18.pdf

³ <https://thetford.mathmos.net/councils/boundary-review-2018/>

⁴ P49 https://www.breckland.gov.uk/media/12956/Croxton-Brettenham-Kilverstone-Joint-Neighbourhood-Plan-Final/pdf/JNP_CLEAN_COPY_FINAL_UPDATED.pdf?m=1632329097123

South of Croxton Village between the village and the A11 by-pass as an Identified Protected Area (IPA) as shown on the map at Appendix 2.”

This is to prevent the coalescence of settlements within the IPA, to respect the separate character and identity of settlements including their setting and to preserve the rural identity of Croxton Parish. Within the designated IPA proposals for built development will not be supported where they would have a detrimental impact on the predominantly open and undeveloped character of the landscape or which would contribute towards an erosion in the physical gap between the settlements concerned.

At the time **the inclusion of the IPA was both endorsed by Breckland Council and who increased the area it contained**⁵, details of the full decision can be found here⁶

3. Contravention of Protected Habitats and Buffer Zones

The area covered by the Neighbourhood Plan is one of the most environmentally sensitive in the country.

Notwithstanding the recognised landscape importance of the “Brecks” landscape within which the parish sits, the area is also covered by a large number of internationally, nationally and locally important nature conservation designations and home to some incredibly rare species.

Appendix 1 shows the overlay of four designations of conservation interest and protection on the land marked in the Call For Sites:

- 1) Nesting Site Buffer
- 2) SPA Buffer
- 3) Site of Special Scientific Interest
- 4) Special Protection Area

A fifth designation is Entry Level Stewardship and Higher Level Stewardship schemes which are scattered across the farmland the Call for Sites straddles, including cultivated field margins designed to encourage rare Breckland plant species and bird and bumble bee strips, crucial to creating and linking together habitats for these pollinators.

The whole area is an important habitat for internationally important bird species, particularly Stone Curlew, Woodlark and Nightjar. New developments will need to consider direct and **indirect impacts** to the European Protected Sites and SSSIs within the Neighbourhood Plan area, in order to comply with the Habitats Regulations. Impacts can result from new housing development directly e.g. through land take or indirectly through disturbance from recreation and access.

In more detail: the Special Protection Area designation

Breckland is a Special Protection Area⁷ with an objective to *‘Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;*

⁵ <https://democracy.breckland.gov.uk/ieDecisionDetails.aspx?id=1739&LLL=0>

⁶

<https://democracy.breckland.gov.uk/documents/s50524/D28%2018%20Croxton%20Brettenham%20Kilverstone%20JNP%202ndDecision%20Report%20-%20final%20draft.pdf>

⁷ <https://publications.naturalengland.org.uk/file/4973014479536128>

- *The extent and distribution of the habitats of the qualifying features*
- *The structure and function of the habitats of the qualifying features*
- *The supporting processes on which the habitats of the qualifying features rely*
- *The population of each of the qualifying features, and,*
- *The distribution of the qualifying features within the site.'*

The following are the qualifying species which would be impacted by any proposed development:

A133 *Burhinus oedicnemus*; Stone-curlew (Breeding)

A224 *Caprimulgus europaeus*; European nightjar (Breeding)

A246 *Lullula arborea*; Woodlark (Breeding)

In addition, it should be noted that the highlighted areas of the IPA are located on safeguarded minerals resource sites (sand and gravel) under adopted Minerals and Waste Core Strategy Policy CS16⁸ and that mineral extraction is not an inappropriate use of land in the countryside.

Any development that may come forward within the Neighbourhood Plan must have a high regard for the environmental sensitivities of the area. This relates not only to the direct impacts of development e.g. taking land for development, enclosures created by fencing, new external lighting etc but also indirect impacts associated with new residents accessing the countryside, walking their dogs, free roaming cats or other forms of recreation including walking and cycling.

4. Endangerment of Protected Species

The area to the NE of the proposed site is earmarked as an SPA buffer area for the Stone Curlew, see map at Appendix 1 to this document. The proposed site would therefore encroach into an SPA restricted area which would be against Breckland Councils own planning guidance.⁹

A considerable amount of research has been undertaken in the last 10 years looking at the effects of housing and roads on the distribution of Stone Curlews in the Brecks. This research has informed Breckland Council's local planning policies and the imposition of a policy buffer zone of 1,500m around the Special Protection Area. Much of the Neighbourhood Plan area is covered by SPA designations especially when the 1500m buffer is applied.

A nationally rare species of beetle was discovered within the area marked in the Call for Sites in 1997 – *Ophonis Laticollis* – and this beetle colony has been actively managed by Goucher Farms (the tenants of the land marked on the Call For Sites) for nearly 30 years. Bill Nickson, the (then) Natural England team leader for Breckland said "The Land Management at Croxton Hall Farm provides exactly the right conditions for these Breckland species which thrive on light, sandy soils. It is particularly gratifying that under his management, Gerald Goucher's land provides the UK stronghold for such a rare beetle."

⁸ <https://www.north-norfolk.gov.uk/media/9022/j3-core-strategy-minerals-waste-development-management-policies-dpd-2010-2026.pdf>

⁹ [https://www.breckland.gov.uk/article/20784/Brecks-Special-Protection-Area#:~:text=To%20address%20this%20a%201.5,a%20given%20area%20over%20time\).&text=Thes e%20types%20of%20development%20will,potentially%20impacts%20a%20European%20site.](https://www.breckland.gov.uk/article/20784/Brecks-Special-Protection-Area#:~:text=To%20address%20this%20a%201.5,a%20given%20area%20over%20time).&text=Thes e%20types%20of%20development%20will,potentially%20impacts%20a%20European%20site.)

Additionally, another nationally rare species of beetle, *Harpalus griseus*^{10 11} (RDB3), has been found within the area of the call for sites. The Breckland Farmers Landscape Recovery Project¹² includes a focus on creating a network of habitat corridors through arable land, connecting areas of high biodiversity value. Baseline invertebrate monitoring done as part of the project has already found two rare beetles on arable land in the Brecks. These include one Nationally Rare species *Harpalus griseus* (RDB3) that can only be found within the Brecks in the UK and which has been recorded on the proposed site.¹³

5. Loss of Arable Farmland and its Special Role in Food Production and Species Protection in the Brecks

The area at the centre of what might become Kingsfleet Grove Thetford is currently used for arable farming so there would be a loss of food production, arable farming and arable land in that area.

Arable land provides a diversity of habitats which tend to be undervalued. Farmland provides not only a crucial habitat but a network of habitat corridors, protecting and connecting biodiversity.

Arable plants are the fastest declining group of plants in the UK, and the site in question is considered an 'Important Arable Plant Area'. The Breckland Biodiversity Audit has identified over 600 species in the Brecks that require regular ground disturbance (i.e. cultivation), of which 263 of the regions priority invertebrates and plants can be supported by arable habitats such as cultivated margins.^{14 15}

The Crown Estate completed a comprehensive hedge planting investment in January 2024, creating new hedges and gapping up hedges, straddling the area in the Call for Sites.

A large part of the land earmarked in this call for sites is farmed by G R Goucher (Goucher Farms) who are already due to lose 80ac of land on the South side of the bypass (Kingsfleet) so this new proposal would mean the viability of the farm would only be possible if they farm more intensively and much reduce the amount of land put aside for conservation. At the moment a large part of the area affected is part of a Higher-Level Stewardship scheme. They would also have to cut down on their areas of cereals, roots and vegetable production, their own employees and their present contractors would all be negatively affected.

P Dauny
Chairman Croxton Parish Council

¹⁰ <https://species.nbnatlas.org/species/NHMSYS0020919980>

¹¹ <https://eol.org/pages/29373116>

¹² <https://brecklandfarmerswildlifefenetwork.org/>

¹³

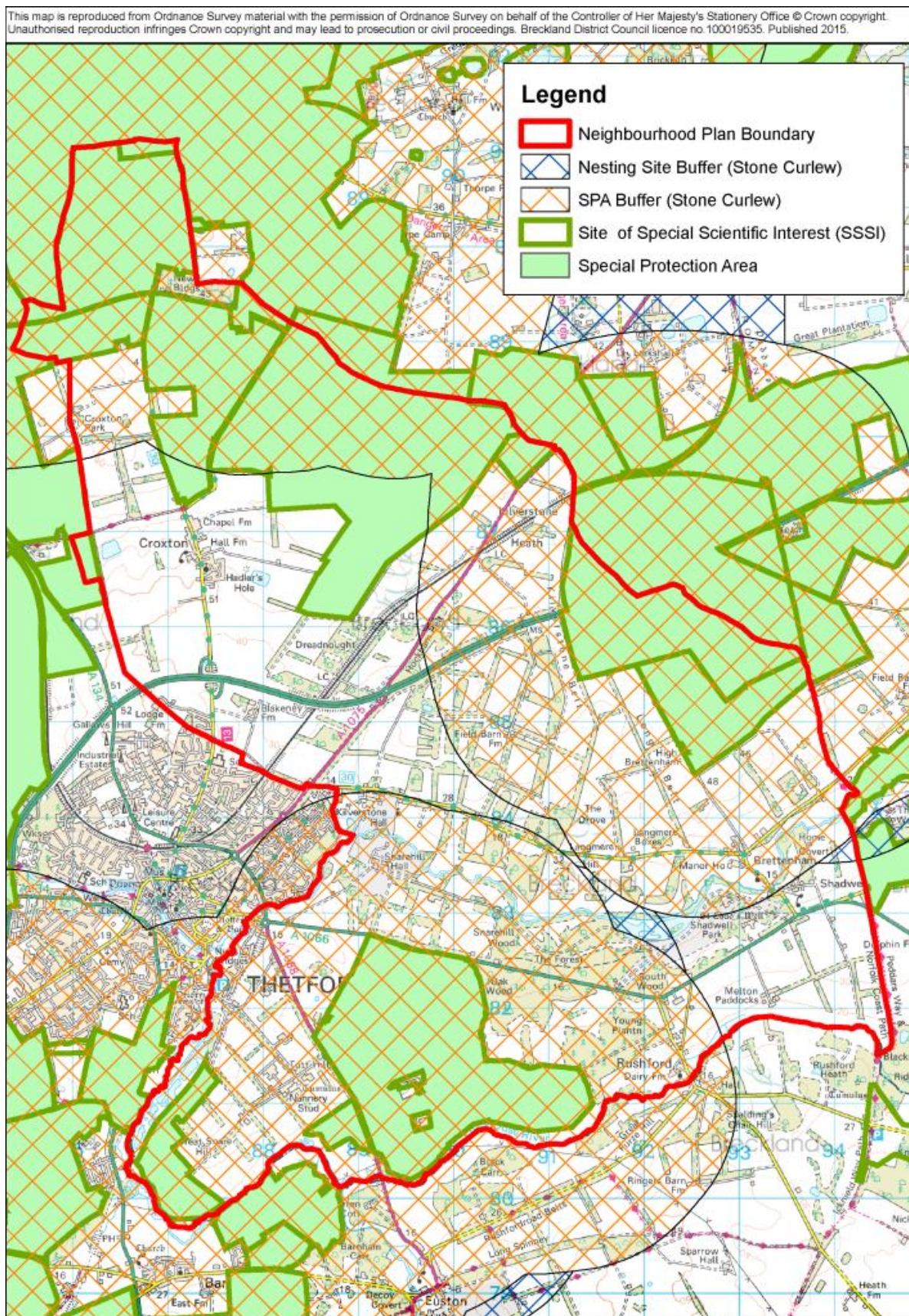
https://records.nbnatlas.org/occurrences/search?q=lsid%3ANHMSYS0020919980&nbn_loading=true&fq=-occurrence_status%3A%22absent%22#tab_mapView

¹⁴

http://www.nbis.org.uk/sites/default/files/documents/Important%20Arable%20Plant%20Areas%20in%20Norfolk_SCREEN.pdf

¹⁵ http://www.nbis.org.uk/sites/default/files/documents/BBA_Report_MainReport.pdf

Appendix 1 to
**OBJECTION TO THE BRECKLAND COUNCIL CALL FOR SITES 2025 WITHIN
CROXTON PARISH**
Dated 8 July 2025



Appendix 2 to
**OBJECTION TO THE BRECKLAND COUNCIL CALL FOR SITES 2025 WITHIN
CROXTON PARISH**
Dated 8 July 2025

