

SAHAM TONEY
NEIGHBOURHOOD
DEVELOPMENT PLAN

2018 - 2036



**REGULATION 14 PRE-SUBMISSION (MARCH
2018) CONSULTATION REPRESENTATIONS**

**VOLUME 2: STATUTORY AND
NON-STATUTORY CONSULTEES**

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1. REPRESENTATION BY ANGLIAN WATER

RESPONDING ORGANISATION:

Anglian Water Services Ltd

DATE:

13 April 2018

REPRESENTATION(S):

Thank you for the opportunity to comment on the Saham Toney Draft Neighbourhood Plan consultation. The following comments are submitted on behalf of Anglian Water.

I would be grateful if you could confirm that you have received this response.

Policy 8: Surface water Management and sewerage provision Management

P8.1 - Reference is made to the use of sustainable surface drainage systems (SuDS) solutions on developments which are within or in close proximity to areas susceptible to surface water flooding within the Parish.

Anglian Water support the requirement for applicants to include the provision of Sustainable Drainage Systems (SuDS) so as not to increase flood risk and to reduce flood risk where possible. The use of SuDS would help to reduce the risk of surface water and sewer flooding.

It is considered that Policy 8 could be strengthened by stating that SuDS is the preferred method of surface water disposal and the use of SuDS is not limited to sites which are identified as being within or close to an area susceptible to surface water flooding as identified by the Environment Agency's maps.

It is therefore suggested Policy 8 be amended as follows:

'P8.1 All development proposals **including those** coming forward within....shall satisfy the following criteria'

c. The provision of SuDS is the preferred method to manage surface water run-off from new developments. Where a sustainable drainage system....shall be provided.'

P8.2 – Anglian Water is supportive of the text relating to the public sewerage network as drafted.

Supporting text paragraphs T8.1 and T8.3

Reference is made to applicants demonstrating that they have met the standard for adoption of SuDS by Anglian Water. There are several options for the adoption and maintenance of SuDS including Norfolk County Council as Highways Authority, Breckland District Council (where agreed as part of a S106 agreement) or a maintenance company.

In addition to the SuDS Adoption Handbook referred to in the plan there a number of other documents which are of relevance to applicants in relation to surface water management including:

- Anglian Water's surface water management policy
(<http://www.anglianwater.co.uk/developers/surface-water-policy.aspx>)
- the guidance published by Norfolk County Council as Lead Local Flood Authority
(<https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers>)
- Non statutory technical standards for SuDS
(<https://www.gov.uk/government/publications/sustainable-drainage-systems-non-statutory-technical-standards>)

Should you have any queries relating to this response please let me know.

Regards,

Stewart Patience

Spatial Planning Manager

Anglian Water Services Limited

Mobile: 07764989051

Thorpe Wood House, Thorpe Wood, Peterborough, PE3 6WT

www.anglianwater.co.uk

RELEVANT SECTION(S) OF PLAN:

Policy 8

REACTION TO REPRESENTATION(S)

All guide documents will be useful in policy, text or evidence

ACTION TAKEN:

Additional text suggested for P8.1 is accepted and will be incorporated in the next update of the Plan

Additional reference documents will be included in the supporting text

2. REPRESENTATION BY BOWES ESTATES LTD

RESPONDING ORGANISATION:

Bowes Estates Ltd

DATE:

19 April 2018

REPRESENTATION(S):

EJW Planning Ltd act on behalf of Bowes Estates Ltd who own land to the south of Grange Farm, Saham Toney. It is noted that whilst the draft Neighbourhood Plan acknowledges the need for some housing growth within Saham Toney it does not identify any specific sites for housing development.

The land at Grange Farm lies to the south of Chequers Lane, and currently comprises a pig rearing unit and pasture land. The site lies within a residential context with residential dwellings opposite, a pair of bungalows to the west and a house known as The Grange to the east. Land to the south of the site is currently open pasture land.

The current use of this site results in a significant level of noise and smell, both of which have a negative impact on the amenity of neighbouring residential properties. Furthermore, the existing buildings have an unsightly appearance that detracts from the character of the local area. In this context, a sensitively designed rural housing scheme of no-more than ten dwellings would bring about a positive enhancement to the environmental quality and character of the site and surrounding area.

There are no physical constraints to the development of this site. The land has been subject to a flood risk assessment, a desk based archaeological assessment and phase 1 habitats survey as a part of the pre-application considerations in preparation for a previous planning application that was submitted and withdrawn prior to its determination.

The site is available and deliverable for residential development in the early stages of the plan.

In the light of the availability of this site Bowes Estates Limited offer their full support for Policy P2A.2 of the Saham Toney Neighbourhood Development Plan. Which provides for developments of up to ten dwellings on brownfield sites and in accordance with part C would bring about:

- i. A significant improvement to the visual appearance of the site
- ii. Decrease flood risk within the site and surrounding area as a result of the removal of a large area of hardstanding and sustainable drainage interventions within the new development; and
- iii. More importantly remove the existing use that gives rise to noise and odours that have a negative impact on neighbouring properties.



RELEVANT SECTION(S) OF PLAN:

Policy 2A

REACTION TO REPRESENTATION(S)

Density = $10 / .8585 = 11.6$

ACTION TAKEN: It was subsequently decided to allocate housing sites in the Plan, and this site was proposed by a formal "call for sites". It underwent independent assessment and passed a site selection process and subject to the owner's agreement of a site-specific policy, will be an allocated site in the Plan.

3. REPRESENTATION BY NORFOLK CONSTABULARY CRIME PREVENTION & ARCHITECTURAL LIAISON OFFICER

| | |
|--|-------------------------------|
| RESPONDING ORGANISATION: Norfolk Constabulary Crime Prevention and Architectural Liaison Officer | DATE: 19 March 2018 |
|--|-------------------------------|

REPRESENTATION(S):

Dear Mr Blow,

My Name is Stephanie and I am one of four Architectural Liaison Officers for Norfolk Constabulary. I am personally tasked to support the Breckland and West Norfolk Districts.

Last year a letter (attached) was distributed by the Government's Chief Planner (Department for Communities and Local Government) to the Chief Planning Officers Nationwide. This letter endorses the Architectural Liaison Officers part to play to ensure safety and security is achieved within proposed developments. The hoped outcome of this would be for ALO's (or DOCO's as they are also known) to engage with chief planners, reinforcing our relationship within the planning process and ultimately promoting the principles of Secured by Design. Locally in Norfolk there is disappointingly very little awareness / promotion / and applications to Secured by Design, compared to the rest of the UK. This needs to change to ensure we create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life and community cohesion.

So with this in mind, I would like to take this opportunity to advice the Parish and District Council of the wide benefits of Secured by Design, with the hope that safety and security can be factored into any new planning policies that are put in place and to promote better lines of communication between the Police and Council Planning Departments.

Secured by Design is a Police initiative to guide and encourage those engaged within the specification, design and build of new homes, commercial buildings, hospitals and schools (and those buildings that are undertaking major or minor property refurbishment), to adopt crime prevention measures.

Secured by Design is owned by the Police Service and is supported by the Home Office and referenced by the Department for Communities and Local Government in Approved Document Q. I would recommend that all properties within new development meet the physical security requirements of Secured by Design.

The environmental benefits of Secured by design are supported by independent academic research which consistently proves that SBD developments experience up to 75% less burglary, 25% less criminal damage. If any developer would like to apply for the Secured by Design Award they can access the application form on the website www.securedbydesign.com.

Designing out crime is far cheaper and it more practical to "Build in Security" from the beginning – so involvement from the start is more cost effective. Research shows that retro fitting security could cost up to 10 times more than getting it right first time.

I am available throughout the planning and construction phases to provide the free of financial charge, Designing Out Crime service and advice.

Thank you for taking the time to read this and if I can be of any assistance please do not hesitate to contact me.

Kind regards

Stephanie

Stephanie Segens

Architectural Liaison & Crime Prevention Officer
Breckland and West Norfolk
Dereham Police Station
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DOCO Update
Friday 14th July, 2017

10 July

2017

The Chief Planning Officer

This letter is to remind local planning authorities of the important role the planning system plays in ensuring appropriate measures are in place in relation to counter-terrorist and crime prevention security.

Both the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) set out guidance in creating safe and accessible communities. In particular, I would draw your attention to the following: paragraphs 58 and 69 of the NPPF recommend that local planning authorities ensure their policies and decisions aim to create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Paragraph 164 advises that when preparing their Local Plan, local authorities should work with local advisors and others to ensure that they have taken into account the most up-to-date information about higher risk sites in their area for malicious threats and natural hazards, including steps that can be taken to reduce vulnerability and increase resilience. The Design section of the PPG includes crime prevention and security measures.

Links to the above guidance are contained in Annex A to this letter. Reference should also be made to the guidance: "Protecting crowded places: design and technical issues".

The NPPF recognises that local planning authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage, as this can help ensure high quality schemes that best deliver all parties priorities. For instance, and where appropriate, pre-application discussions between planning officers and security advisors, such as Counter Terrorism Security Advisors and police Crime Prevention Design Advisors, will ensure that authorities and applicants share an understanding, right at the beginning of the design process, of the level of risk and the sort of measures available to mitigate the risk in a proportionate and well-designed manner. Pre-application engagement can also explore whether some measures needed to enhance safety and security may be achieved using permitted development rights.

Permitted Development rights allow for a range of works which can aid security to be undertaken without the need to submit a planning application. The rights are set at a level appropriate for a national grant of planning permission. They do not preclude planning permission being sought for works that go beyond and which may be necessary to deal with local circumstances.

Steve Quartermain
Chief Planning

DOCO Update
Friday 14th July, 2017

Annex A

NPPF: <https://www.gov.uk/guidance/national-planning-policy-framework>

NPPF: paragraph 58 (requiring good design)

<https://www.gov.uk/guidance/national-planning-policy-framework/7-requiring-good-design>

NPPF: paragraph 69 (promoting healthy communities)

<https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

NPPF: paragraph 164 (Defence, national security, counter-terrorism and resilience)

<https://www.gov.uk/guidance/national-planning-policy-framework/plan-making>

PPG: paragraphs 10 and 11 specifically address crime prevention and security measures

<https://www.gov.uk/guidance/design>

Home Office, CPNI, and NaCTSO: Guidance - protecting crowded places: design and technical issues

<https://www.gov.uk/government/publications/protecting-crowded-places-design-and-technical-issues>

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| RELEVANT SECTION(S) OF PLAN: Policy 3 Policy 4C |
| REACTION TO REPRESENTATION(S) |
| ACTION TAKEN: Secured by Design has been added as a criteria to Policy 3A: Design |

4. REPRESENTATION BY HISTORIC ENGLAND

RESPONDING ORGANISATION:

Historic England

DATE:

12 April 2018

REPRESENTATION(S):

Thank you for consulting Historic England regarding your draft neighbourhood plan. Please find our comments attached, and please get in touch if you have any queries.

Yours Sincerely

Edward James

Historic Places Advisor, East of England

E-mail: Edward.James@HistoricEngland.org.uk

Direct Dial: 01223 582746

Mr Chris Blow

Saham Toney Neighbourhood Plan Steering

Committee

Direct Dial: 01223 582746

Our ref: PL00340322

12 April 2018

Dear Mr Blow

Draft Neighbourhood Plan for Saham Toney

Thank you for consulting Historic England about your Regulation 14 draft Neighbourhood Plan. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. We are therefore pleased to have the opportunity to review your neighbourhood plan at this early stage.

Your Neighbourhood Plan Area contains a number of designated heritage assets including 2 Scheduled Monuments and eleven listed buildings including the Church of St George, which is of very high significance and listed Grade. The NPPF (paragraph 58) sets out that Neighbourhood Plans should, amongst other things, be include clear objectives for the future of the area and a robust evidence base that shows an understanding and evaluation of the area, in this case the Parish of Saham Toney. The policies of neighbourhood plans should also ensure that developments in the area establish a strong sense of place, and respond to local character and history by reflecting the local identity of the place - for instance through the use of appropriate materials, and attractive design.

We therefore welcome the detailed consideration of these issues provided in Policy 3, which is usefully supported by the Evidence Base Document 5. However, we would suggest that point 1. (Pavements), if followed strictly, could result in the loss of rural character in Saham Toney. Village centres and rural lanes historically often do not have, or need, segregated pedestrian footpaths, and their introduction could - if inappropriately located - lead to an 'urbanising' effect on the character of the village. We would suggest that the caveat "Where appropriate, pavements..." is introduced to allow flexibility on this point. We would refer you to the our Streets for All East of England publication: <https://historicengland.org.uk/images-books/publications/streets-for-all-east-of-england/>; as well as Sections 2.7, 2.8 and 5.1 of the government's guidance Manual for Streets 2, which can be found here: <https://www.gov.uk/government/publications/manual-for-streets-2>. This provides further guidance on different road user's needs, and how to plan and design for them.

The government's [National Planning Practice Guidance](https://www.gov.uk/guidance/neighbourhood-planning--2) <https://www.gov.uk/guidance/neighbourhood-planning--2> on neighbourhood planning is also clear that, where relevant, Neighbourhood Plans need to include enough information about local heritage to guide local authority planning decisions and to put broader strategic heritage policies from the local authority's local plan into action but at a *neighbourhood* scale.

It is therefore important that, as a minimum, the strategy you put together for this area safeguards those

elements of your neighbourhood area that contribute to the significance of its heritage assets. This will ensure that they can be enjoyed by future generations of the area and make sure your plan is in line with the requirements of national planning policy, as found in the National Planning Policy Framework. We are therefore pleased to see that your neighbourhood plan includes a comprehensive strategy in line with this requirement and welcome the detailed and robust content of Policy 6 and its supporting text, as well as the accompanying maps.

As you are aware, in addition to considering designated heritage assets, a Neighbourhood Plan is an important opportunity for a community to develop a positive strategy for the area's locally important heritage assets that aren't recognised at a national level through listing or scheduling. This includes identifying any non-statutorily designated historic buildings, sites, views or places of importance to the local community, and setting out what factors make them special. We therefore welcome the fact that these elements of your neighbourhood area are afforded a level of protection from inappropriate change through an appropriately worded policy in the plan, backed up with clear and detailed identification of particularly the locally important views in the parish.

We would suggest that, while the maps provided are helpful, the location of supporting information (the Heritage Asset Register cited) is made clearer on these specific pages, to aid the reader. In addition, Policy Map 4 contains small boxes with heritage asset numbers in. These are quite difficult to read due to the small font size, and it would also be useful to say what and where these numbers refer to.

We suggest that your plan could also include consideration of any Grade II listed buildings or locally-designated heritage assets which are at risk or in poor condition, and which could then be the focus of specific policies aimed at facilitating their enhancement.

The conservation officer at Breckland District Council will be the best placed person to assist you in the development of the Plan with respect to the historic environment and can help you to consider and clearly articulate how a strategy can address the area's heritage assets where appropriate. If you have not already done so, we would recommend that you speak to the staff at Norfolk County Council who look after the Historic Environment Record and give advice on archaeological matters. They should be able to provide any further details of not only any designated heritage assets but also non designated locally-important buildings, archaeological remains and landscapes.

You can also use the neighbourhood plan process to identify any potential Assets of Community Value in the neighbourhood area. Assets of Community Value (ACV) can include things like local public houses, community facilities such as libraries and museums, or again green open spaces. Often these can be important elements of the local historic environment, and whether or not they are protected in other ways, designating them as an ACV can offer an additional level of control to the community with regard to how they are conserved. There is useful information on this process on Locality's website here: <http://mycommunity.org.uk/take-action/land-and-building-assets/assets-of-community-value-right-to-bid/> .

Communities that have a neighbourhood plan in force are entitled to claim 25% of Community Infrastructure Levy (CIL) funds raised from development in their area. The Localism Act 2011 allows this CIL money to be used for the maintenance and on-going costs associated with a range of heritage assets including, for example, transport infrastructure such as historic bridges, green and social infrastructure such as historic parks and gardens, civic spaces, and public places. As a Qualifying Body, your neighbourhood forum can either have access to this money or influence how it is spent through the neighbourhood plan process, setting out a schedule of appropriate works for the money to be spent on. Historic England strongly recommends that the community therefore identifies the ways in which CIL can be used to facilitate the conservation of the historic environment, heritage assets and their setting, and sets this out in the neighbourhood plan. More information and guidance on this is available from Locality, here: <https://mycommunity.org.uk/resources/community-infrastructure-levy-neighbourhood-planning-toolkit/>

Further information and guidance on how heritage can best be incorporated into Neighbourhood Plans has been produced by Historic England, including on evidence gathering, design advice and policy writing. Our webpage contains links to a number of other documents which your forum might find useful in helping to identify what it is about your area which makes it distinctive, and how you might go about ensuring that the character of the area is

protected or improved through appropriate policy wording and a robust evidence base. The guidance document available to download also provides useful links to exemplar neighbourhood plans that may provide you with inspiration for your own. This can be found here: <http://www.historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

The following general guidance also published by Historic England may also be useful to the plan forum in preparing the neighbourhood plan, or considering how best to develop a strategy for the conservation and management of heritage assets in the area. It may also be useful to provide links to some of these documents in the plan:

HE Advice Note 2 - making changes to heritage assets: <https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/>

HE Good Practice Advice in Planning 3 - the setting of heritage assets: <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

If you are considering including Site Allocations for housing or other land use purposes in your neighbourhood plan, we would recommend you review the following two guidance documents, which may be of use:

HE Advice Note 3 - site allocations in local plans: <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans>

HE Advice Note 8 - Sustainability Appraisal and Strategic Environmental Assessment : <https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>

We recommend the inclusion of a glossary containing relevant historic environment terminology contained in the NPPF, in addition to details about the additional legislative and policy protections that heritage assets and the historic environment in general enjoys.

Finally, we should like to stress that this advice is based on the information provided by Saham Toney Parish Council in your correspondence of 11 March 2018. To avoid any doubt, this does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed neighbourhood plan, where we consider these would have an adverse effect on the historic environment.

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,



Edward James
Historic Places Advisor, East of England
Edward.James@HistoricEngland.org.uk

RELEVANT SECTION(S) OF PLAN:

Policy 6

REACTION TO REPRESENTATION(S)

The Heritage Asset Register is already clearly referenced on Policy maps 3 & 4

NCC Historic Environment Record officers were contacted

ACVs not applicable to this Plan

CIL is not applicable in Breckland

Reviewed the referenced guidance documents

Review glossary in HAR for completeness and consider moving it to supporting text

ACTION TAKEN:

Policy 6 was updated in accordance with the comments and further informally reviewed by Historic England prior to re-publication of the Plan.

5. REPRESENTATION BY NORFOLK COUNTY COUNCIL

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|---|-------------------------------|
| RESPONDING ORGANISATION: Norfolk County Council | DATE: 18 April 2018 |
| REPRESENTATION(S): Norfolk County Council Comments on the: Saham Toney Neighbourhood Plan (Reg 14) 18th April 2018 | |
| 1. Preface | |
| 1.1. The officer-level comments below are made on a without prejudice basis and the County Council reserves the right to make further comments on the emerging Neighbourhood Plan. | |
| 1.2. The County Council welcomes the opportunity to comment on the emerging Neighbourhood Plan and recognises the considerable amount of work and effort which has been put into developing the Plan to date. | |
| 2. General Comments | |
| 2.1 The County Council supports the Vision, Aims and Objectives set out in the Plan (page 18). In particular the County Council supports environmental objective 5.2.2, community objective 5.2.3 and economic objective 5.2.4. | |
| 3. Infrastructure Delivery | |
| 3.1 The neighbourhood plan will need to consider the following; | |
| <ul style="list-style-type: none">• The following text could be included within the supporting text to policy 2A. Housing and other development will be expected to contribute towards improving local services and infrastructure (such as transport, education; library provision, fire hydrant provision, open space etc.) through either the payment of a Community Infrastructure Levy (CIL); planning obligations (via an s106 agreement / s278 agreement); or use of a planning condition/s.• Norfolk Fire and Rescue Service advocates the installation of sprinklers in all new developments. Sprinklers have a proven track record to protect property and lives. It would therefore be helpful if the emerging Neighbourhood Plan could refer to the installation of Sprinklers in new development. | |
| The neighbourhood plan should therefore contain policies referencing the delivery of the above infrastructure and services. | |
| 3.2. Should you have any queries with the above comments please call Naomi Chamberlain (Trainee Planner) on 01603 638422 or email naomi.chamberlain@norfolk.gov.uk . | |
| 4. Environment | |
| 4.1. The County Council has the following minor amendments which are as follows: | |
| 4.2. Map 7 (page 84): Structural Landscape Blocks shows a number of symbols and colours on the map, which are not keyed, therefore, a key should be added to this map. | |
| 4.3. Map 8 (page 85): The County Council supports the idea of Wildlife Corridors and the accompanying policy. However, further detail would be useful as to when records for the species were collected and why these species/headings were chosen, some indication of the protected species would be beneficial. Justification for the location of the green corridors would strengthen this policy, as it appears that some of these corridors go across open arable fields and don't follow landscape features such as hedgerows or ditches. | |
| 4.4. Map 10 (page 90): Not all County Wildlife sites are shown and the line type chosen for Parish Boundary and Settlement Boundary is not clear, they appear the same in the legend. Therefore, all of the County Wildlife sites should be added to the map and the Parish Boundary and Settlement Boundary line colour should be made distinguishable. | |
| 4.5. P7C.8 (page 82): States that 'wildlife sites or corridors shown on policy map 8', however, wildlife sites do not appear to be mapped. Therefore, wildlife sites should be mapped in map 8. Also, in P7C.8.e (page 82): There is repeated wording of "harmful effects", therefore, this repetition should be deleted. | |
| 4.6. Should you have any queries with the above comments please call David White (Senior Green Infrastructure Officer) on 01603 222058 or email david.white.etd@norfolk.gov.uk . | |
| 5. Lead Local Flood Authority (LLFA) | |
| 5.1. The County Council has amended the wording on policy 8, see attached, which should be incorporated in the neighbourhood plan in policy 8 (page 87). | |
| 5.2. The neighbourhood plan could include statements related to SuDS and minor development, however, government advice is clear in stating that the LLFA would not be involved in these applications and so it would be down to the LPA to determine if the drainage strategy was appropriate. | |
| 5.3. ALLOCATION OF SITES | |

The County Council would expect that the Neighbourhood Planning Process provide a robust assessment of the risk of flooding, from all sources, when allocating sites. If a risk of flooding is identified then a sequential test, and exception test were required, are undertaken. This would be in line with Planning Practice Guidance to ensure that new development is steered to the lowest areas of flood risk. However, any allocated sites will also still be required to provide a flood risk assessment and / or drainage strategy through the development management planning process.

5.4. Should you have any queries with the above comments please email the LLFA at llfa@norfolk.gov.uk.

Lead Local Flood Authority Response to the Saham Toney Neighbourhood Plan Reg 14 Policy 8 Surface Water Management and Sewerage Provision

P8.1 All development proposals coming forward with the areas of high, medium and low risk from surface water flooding as identified by the Environment Agency in its up to date online RoSWF mapping shall satisfy the following criteria;

a) The application includes a Flood Risk Assessment and Surface Water Drainage Strategy that gives adequate and appropriate consideration to all sources of flooding and proposed surface water drainage to ensure that there is no increased risk of flooding (from any source) either on the development site itself or to existing property of infrastructure as a result of the development.

b) The FRA should include:

a. appropriate measures to address any identified risk of flooding (in the following order or priority: assess, avoid, manage and mitigate flood risk).

b. Where appropriate undertake sequential and /or exception tests.

c. Locate only compatible development in areas at risk of flooding, considering the proposed vulnerability of land use.

d. Inclusion of appropriate allowances for climate change

c) The surface water drainage strategy including any necessary flood risk mitigation measures should be agreed as a condition of the development before any working commences on site and implement before the new development is connected to the existing drainage system.

d) SuDS should be considered for all major planning applications. Where SuDS are proposed, preliminary, outline and final design statements shall be provided at appropriate stages of a planning application and a SuDS Management and Maintenance plan setting out ongoing maintenance requirements for the schemes satisfactory operation shall be provided.

e) Appropriate on-site water storage shall be incorporated in drainage scheme to intercept, attenuate or store long term surface water run-off up to and including the 1% AEP event plus an appropriate allowance for climate change.

f) Where the highest measured ground water level is within 1.2m of the base of any infiltration feature or within 1m ground level, measures of ensuring the satisfactory operation of SuDS schemes must be clearly demonstrated prior to approval.

P8.2 All new development will be expected to connect to the public foul sewerage network in accordance with the requirements of Anglian water unless evidence is produced that it is not feasible to do so. Evidence shall be provided by applicants to demonstrate that capacity is available within the foul sewerage network or can be made available in time to serve the development. If mains sewerage is demonstrably not feasible then an effective and sustainable private sewerage system plan shall be agreed with the Local Planning Authority in advance of development commencing. Such a plan must be implemented prior to the occupation of the first dwelling.

Supporting text – implementation:

T8.1 A surface water drainage strategy shall include the following as a minimum:

a) A clear demonstration that criteria of P8.1 are satisfied;

b) A description of the outcome of any pre-application discussion with Breckland Council, Anglian Water, Environment Agency, Lead Local Flood Authority (LLFA)

c) A evaluation of the site with regard to its surface water drainage needs and risk from flooding from all sources.

d) An outline description of the proposed surface water drainage system, referencing the SuDS drainage hierarchy and having a neutral or positive impact on surface water drainage

e) An outline surface water drainage layout drawing showing flow routes, storage and treatment locations and discharge location

f) Pre and Post-development surface water run-off rates and surface water flow volume from the site

g) Evidence of compliance with Anglian Water standards if appropriate

h) Surface water drainage system long term management and maintenance proposals
i) Evidence of compliance with LLFA guidance for developers (available on the Norfolk County Council website)
The level of detail presented shall be proportionate to the site of the proposed scheme and the severity of the flood risk at the proposed site.

T8.2 no comments

T8.3 Areas of high, medium and low risk of flooding from surface water shall be defined by the Environment Agency in the up to date long term flood risk information provided online by the government at <https://flood-warning-information.service.gov.uk/long-term-flood-risk/>. data taken from this source of January 2018 is given in Map T8 below and in the Evidence base as an aid for information by developers and planning decision makers shall ensure the most up to date information is used at the time of making or deciding planning applications.

T8.4 In general when seek to implement SuDS schemes developers shall adhere to the guidance given in Anglian Water's publication "Towards Sustainable Water Stewardship – a Sustainable Drainage Systems Adoption Manual" and the LLFA's "Guidance for Developers" It should also be taken into account that SuDS may not always be feasible in areas with high seasonal groundwater levels. It may be that a channel or swale has to be created to divert groundwater away instead.

T8.5 Small details are also important when avoiding flood risk. When access to a new site crosses a roadside ditch it should be ensured that a drainage pipe of a suitable diameter is installed under the crossing and that measures are adopted to prevent blockage of such pipes. Consent from the LLFA is required for any works that affect an ordinary watercourse, including but not limited to culverting. Information can be found on the Norfolk County Council website.

T8.6 Proposed development in areas subject to fluvial flood risk shall be subject to national and district policies and subject to Environment Agency guidelines and requirements. Note: fluvial flooding for small watercourses (catchments less than 3km²) is not shown on national Environment Agency fluvial flood risk maps. Reference should be made to RoSWF mapping as surface water flooding can be used as a proxy for fluvial flooding from an ordinary watercourse in many instances.

T8.7 no comments

T8.8 The Environment Agency advises the extent of its flood risk zones does not take account of climate change. As a result policy 8 requires a flood risk assessment not only for high and medium risk zones but also for sites within low risk zones as the low risk zones can demonstrate a possible climate change scenario. This is considered appropriate additional protection in the light of actual flooding events in the parish.

T8.9 Planning Policy requires a flood risk assessment for developments that "could be affected by sources of flooding other than rivers and the sea (for example surface water drains)

T8.10 – No comments

T8.11 – no comments

T8.12 – no comments

T8.13 – Breckland have provided an SFRA

T8.14 – no comments

T8.15 – The LLFA have produced a flood investigation report for Watton and surrounding area for the flooding in June 2016 which includes Saham Toney. It is publicly available on the Norfolk County Council website.

6. Historic Environment

6.1. It is noted that the consideration of the historic environment and heritage assets is fully integrated into the neighbourhood plan documents. The County Council supports the attention to detail towards the heritage assets and the historic environment which is at the centre of the Saham Toney Local Plan. The recognition of the importance of undesignated historic buildings as important heritage assets is welcomed, as is the adherence to Historic England guidelines.

6.2. Policy Maps 3 and 4 (pages 58 and 59) have been produced using data taken from the Norfolk Heritage Explorer website. Currently section 3.2 of the Heritage Asset Register is worded as follows:

3.2 Norfolk Heritage Explorer (NHE) records include a description and where known, a map reference of an asset and in many cases an aerial photo showing its location and / or photos of the asset. Hence developers and others are recommended to use the NHE resource as an aid when reviewing if / how Policy 6 applies to a particular development site. Where NHE online records record an aerial map the exact location it shows takes precedence over the locations shown on Policy Maps 2 and 3 of Policy 6.

The Norfolk Heritage Explorer website contains a partial dataset (extracted from the Norfolk Historic Environment

Record) which is updated periodically and is therefore not suitable for use in the planning process. Use of Norfolk Heritage Explorer data for planning purposes is potentially in breach of the terms and conditions of the Norfolk Heritage Explorer website and a breach of Norfolk

County Council copyright. It is recommended that references to Norfolk Heritage Explorer are removed from all documents and replaced with references to the Norfolk Historic Environment Record. It is also recommended that data obtained by the authors of the plan from a full Historic Environment record search carried out in July are fully integrated into all documents.

6.3. The authors of the plan should be aware that even appropriately derived Norfolk Historic Environment Record data is not static and may be subject to change and enhancement within the lifetime (up to 2036) of the Saham Toney Local Plan. New discoveries are made and existing sites and buildings can be reinterpreted. The implementation of new nationally or locally derived guidance and policies can lead to reassessment of the significance of individual or groups of heritage assets.

6.4. As it stands Policy 6, para P6.3 (page 55) goes further than is required by the National Planning Policy Framework and would require levels of archaeological intervention in development in Saham Toney greater than for any other parish in Breckland. Whilst the County Council commends the consideration given to the historic environment within the Saham Toney Neighbourhood Plan it is considered that policy 6, para P6.3 required rewording. The type and levels of archaeological intervention that may be required in relation to any development should instead focus on the significance of heritage assets affected and the potential impact of any proposed development (as explained by paragraphs 128- 141 of the National Planning Policy Framework). At least one other neighbourhood plan in Norfolk has recommended that potential developers contact Norfolk County Council Environment Service historic environment strategy and advice team directly for pre-application advice (hep@norfolk.gov.uk) to identify archaeological implications.

6.5. Should you have any queries with the above comments please call John Percival (Historic Environment Officer) on 01362 869275 or email john.percival@norfolk.gov.uk.

RELEVANT SECTION(S) OF PLAN:

Representation 2: Sections 5.1 and 5.2

Representation 3: Policy 2A, Policy 3, Policy 4C

Representation 4: Policy 7C, Map 10: Saham Toney Policy Map

Representation 5: Policy 8

Representation 6: Policy 6

REACTION TO REPRESENTATION(S)

All comments noted and further researched prior to updating the Plan

ACTION TAKEN:

3. Infrastructure delivery: This is covered by the emerging Breckland Local Plan.

Map 7 has been deleted from the Plan.

Map 8: A comprehensive habitats and corridors map has been commissioned from the Norfolk Biodiversity Information Service and will replace Map 8. Therefore Map 8 is a temporary map and will not be updated. The NBIS map will not be ready until the Regulation 15 submission of the Plan.

Map 10 has been deleted from the Plan.

4.5 See note regarding the future update of Map 8. Typographical error corrected.

5. Text amendment incorporated in conjunction with other comments from Anglian Water

5.3 The LLFA provided site assessments as part of the process of allocating sites in the Plan, the results of which were fully accounted for during selection of sites to be allocated.

Policy 8 Recommended amendments incorporated

6. REPRESENTATION BY NORFOLK WILDLIFE TRUST

| | |
|--|-------------------------------|
| RESPONDING ORGANISATION: Norfolk Wildlife Trust | DATE: 18 April 2018 |
| REPRESENTATION(S): Thank you for consulting NWT on the Regulation 14 pre-submission consultation. These comments follow from comments made at an earlier consultation. We are fully supportive of Policy 7C relating to Ponds, Hedges, Biodiversity and Habitats and pleased to see that a map of County Wildlife Sites and other biodiversity assets has been included. We also pleased to see that the information relating to biodiversity is clearly set out in the evidence documents for the plan Kind regards John Hiskett Senior Conservation Officer Office: 01603 625540 Fax: 01603 598300 Web: www.norfolkwildlifetrust.org.uk | |
| RELEVANT SECTION(S) OF PLAN: Policy 7C | |
| REACTION TO REPRESENTATION(S) Support noted | |
| ACTION TAKEN: Non required | |

7. REPRESENTATION BY THE RAMBLERS (NORFOLK)

| | |
|---|---------------|
| RESPONDING ORGANISATION: | DATE: |
| The Ramblers (Norfolk) | 11 April 2018 |
| REPRESENTATION(S): | |
| <p>I have read through your Plan. The Ramblers has no comment to make on the main issues in the Plan, but I would draw your attention to a couple of issues which you may find of use.</p> <p>In PARISH ACTION POINT 2: FOOTPATHS AND PEDESTRIAN ACCESS, it is stated that “At present there are no official footpaths in open country in the neighbourhood area, and those that border highways are unfit for pedestrian use, being as many respondents pointed out, too narrow and exposed to traffic.”</p> <p>I note from a review of Definitive Map for the area (https://maps.norfolk.gov.uk/definitivemaps/TF90SW.pdf) that Ashill Footpath 7 ends at the parish boundary, but that the path continues to join Coburg Lane. It would safeguard this route if the connecting section within Saham Toney were to be claimed as a public rights of way.</p> <p>I also note that there is a short stretch of route - Saham Toney Restricted Byway 1 - which connects Ashill Restricted Byway 11 to Mill Lane in the north east of the parish.</p> <p>Finally, you have the Peddars’ Way (together with the adjoining Norfolk Coast Path, the only National Trail in Norfolk) running along the parish boundary in the west of the parish.</p> <p>You may want to take these into account in future thinking for the parish.</p> <p>Best wishes</p> <p>Ken Hawkins</p> <p>Secretary, Area Council The Ramblers (Norfolk) 07505 426750 http://www.norfolkra.org.uk/</p> | |



RELEVANT SECTION(S) OF PLAN:

Parish Action Point 2

REACTION TO REPRESENTATION(S)

ACTION TAKEN:

Parish Action Points have been formally handed over to the Parish Council for implementation and no longer form part of the Plan

8. REPRESENTATION BY SPORT ENGLAND

| | |
|--|-------------------------------|
| RESPONDING ORGANISATION: Sport England | DATE: 12 March 2018 |
| REPRESENTATION(S): Thank you for consulting Sport England on the above application. The proposed development does not fall within either our statutory remit (Statutory Instrument 2015/595), or non-statutory remit (National Planning Policy Guidance (PPG) Par. 003 Ref. ID: 37-003-20140306), therefore Sport England has not provided a detailed response in this case, but would wish to give the following advice to aid the assessment of this application. General guidance and advice can however be found on our website: www.sportengland.org/planningapplications If the proposal involves the loss of any sports facility then full consideration should be given to whether the proposal meets Par. 74 of National Planning Policy Framework (NPPF), link below, is in accordance with local policies to protect social infrastructure and any approved Playing Pitch Strategy or Built Sports Facility Strategy that the local authority has in place. If the proposal involves the provision of a new sports facility , then consideration should be given to the recommendations and priorities set out in any approved Playing Pitch Strategy or Built Sports Facility Strategy that the local authority may have in place. In addition, to ensure they are fit for purpose, such facilities should be designed in accordance with Sport England, or the relevant National Governing Body, design guidance notes: http://sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/ If the proposal involves the provision of additional housing (then it will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then new and/or improved sports facilities should be secured and delivered in accordance with any approved local policy for social infrastructure, and priorities set out in any Playing Pitch Strategy or Built Sports Facility Strategy that the local authority has in place. In line with the Government's NPPF (including Section 8) and PPG (Health and wellbeing section), consideration should also be given to how any new development , especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing or assessing a proposal. Active Design provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing Sport England's Active Design Guidance: https://www.sportengland.org/activedesign <i>Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.</i> Yours sincerely, Planning Admin Team T: 020 7273 1777 E: Planning.central@sportengland.org | |
| RELEVANT SECTION(S) OF PLAN: Policy 2A? | |

REACTION TO REPRESENTATION(S)

No specific measures in the Plan for sports facilities. Anything that comes up in future is dealt with by the emerging Breckland Local Plan

ACTION TAKEN:

None required

9. REPRESENTATION BY THE WOODLAND TRUST

| | |
|--|-------------------------------|
| RESPONDING ORGANISATION: Woodland Trust | DATE: 13 April 2018 |
| REPRESENTATION(S): Dear Sir/Madam Please find attached the Woodland Trust's response to the consultation on the Neighbourhood Plan for Saham Toney. Regards Ian Lings Local Planning Support Volunteer Gov Affairs Temp Telephone: 03437705481 Email: GovAffairsTemp@woodlandtrust.org.uk Woodland Trust, Kempton Way, Grantham, Lincolnshire, NG31 6LL 0330 333 3300 woodlandtrust.org.uk  The Woodland Trust Grantham Lincolnshire NG31 6LL Telephone 08452 935798 Email VictoriaBankesPrice@woodlandtrust.org.uk | |
| 22 nd April 2018 | |
| Re: Consultation on Saham Toney Neighbourhood Plan | |
| Woodland Trust response | |
| Thank you very much for consulting the Woodland Trust on your neighbourhood plan for Saham Toney, we very much appreciate the opportunity. Neighbourhood planning is an important mechanism for also embedding trees into local communities, as such we are very supportive of some of the policies set out in your plan. | |
| <u>Vision and objectives</u> | |
| The Woodland Trust is pleased to see that your vision for Saham Toney Neighbourhood Plan identifies the importance of protecting its landscape, and the environmental objectives seek to ensure the protection and enhancement of green spaces and its landscape. | |
| Trees are some of the most important features of the area for local people. This is being acknowledged with the Breckland Local Plan Pre-Submission Publication (2017), which identifies the need to retain local distinctiveness in trees, veteran trees, woodland, ancient woodland and hedgerows because these are of particular significance. Policy ENV 06 (Trees, Hedgerows and Development) seeks to maintain and extend tree cover and also through the retention of important trees. | |

Therefore, the environmental objectives of your Neighbourhood Plan should be amended to also seek to protect and enhance the local landscape character of Saham Toney, and include the following:

“To protect and enhance the local environment, green and open spaces, ancient woodland, veteran trees hedgerows and trees”.

Trees, Hedges, Biodiversity and Habitats

We are pleased to see that the Neighbourhood Plan for Saham Toney does identify the fact that trees and hedgerows are prominent in the landscape of your areas which need to be conserved or enhanced, and how any new development in your Parish needs to respect this distinctive landscape character.

However, your Plan for Saham Toney should also seek to ensure development must conserve mature trees and hedgerows, so there is no loss or degradation of ancient woodland in your parish. It should also support conserving and enhancing woodland and trees, such as Oak trees, with management, and also to plant more trees in appropriate locations. Increasing the amount of trees and woods in Saham Toney will provide enhanced green infrastructure for your local communities, and also mitigate against the future loss of trees to disease (eg Ash dieback), with a new generation of trees both in woods and also outside woods in streets, hedgerows and amenity sites.

Information can be found here: <http://www.magic.gov.uk/MagicMap.asp> and <http://www.ancient-tree-hunt.org.uk/discoveries/interactivemap/>

Ancient woodland would benefit from strengthened protection building on the National Planning Policy Forum (NPPF). On 5th March 2018 the Prime Minister Theresa May launched the draft revised NPPF for consultation. Paragraph 173 c states:

development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused, unless there are wholly exceptional reasons and a suitable mitigation strategy exists. Where development would involve the loss of individual aged or veteran trees that lie outside ancient woodland, it should be refused unless the need for, and benefits of, development in that location would clearly outweigh the loss;

Whilst recognising that this policy is draft we believe it must be given due weight in the plan making process as it shows a clear direction of travel from central Government to strengthen the protection of irreplaceable ancient woodland.

Therefore, we would recommend that Policy 7C (Trees, Hedges, Biodiversity and Habitats) should include something along these lines:

“Substantial harm to or loss of irreplaceable habitats such as ancient woodland, should be wholly exceptional”.

The Woodland Trust would suggest that your Neighbourhood Plan is more specific about ancient woodland protection. For example, the introduction and background to the consultation on the Kimbolton Neighbourhood Development Plan (2017) identified the importance of ancient woodland, and how it should be protected and enhanced. Also, we would like to see buffering distances set out. For example, for most types of development (i.e. residential), a planted buffer strip of 50m would be preferred to protect the core of the woodland in the geographical area of your Neighbourhood Plan. Standing Advice from Natural England and the Forestry Commission has some useful information:

<https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

The profile of Saham Toney identifies the need to retain and enhance its rural character as a small rural settlement, and also the need for development to integrate with the landscape. Given that Neighbourhood Plans are a great opportunity to think about how trees can also enhance your community and the lives of its residents, the natural environment and tree and woodland conservation in Saham Toney, should also be taken into account

with a Policy in your Plan.

Therefore, we would like to see the importance of trees and woodland recognised for providing healthy living and recreation also being taken into account with your Neighbourhood Plan for Saham Toney. In an era of ever increasing concern about the nation's physical and mental health, the Woodland Trust strongly believes that trees and woodland can play a key role in delivering improved health & wellbeing at a local level. Whilst, at the same time, the Health & Social Care Act 2012 has passed much of the responsibility for health & wellbeing to upper-tier and unitary local authorities, and this is reinforced by the Care Act 2014. Also, each new house being built in your parish should require a new street tree, and also car parks must have trees within them.

Delivery and Monitoring

Whilst the Woodland Trust is pleased to see that your monitoring indicators for Policy 7C identifies that there should be no loss of ancient woodland or veteran trees and that new a number of new trees and hedges will be planted, it should also seek to protect ancient hedgerows and deciduous woodlands, as well as also seeking to retain and enhance open green spaces and resist the loss of open space. Whilst also ensuring the provision of some more, to what extent there is considered to be enough accessible open space in your community also needs to be taken into account. There are Natural England and Forestry Commission standards which can be used with developers on this:

The Woodland Access Standard aspires:

- That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size.
- That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes.

The Woodland Trust also believes that trees and woodlands can deliver a major contribution to resolving a range of water management issues, particularly those resulting from climate change, like flooding and the water quality implications caused by extreme weather events. This is important in the area covered by your Neighbourhood Plan because trees offer opportunities to make positive water use change, whilst also contributing to other objectives, such as biodiversity, timber & green infrastructure - see the Woodland Trust publication ***Stemming the flow*** – the role of trees and woods in flood protection - <https://www.woodlandtrust.org.uk/publications/2014/05/stemming-the-flow/>.

Woodland Trust Publications

We would like to take this opportunity to draw your attention to the Woodland Trust's Neighbourhood planning microsite: <https://www.woodlandtrust.org.uk/campaigning/neighbourhood-planning/> which may give you further ideas for your plan and monitoring progress.

Also, the Woodland Trust have recently released a planners manual which is a multi-purpose document and is intended for policy planners, such as community groups preparing Neighbourhood Plans. Our guide can be found at: <https://www.woodlandtrust.org.uk/mediafile/100820409/planning-for-ancient-woodland-planners-manual-for-ancient-woodland-and-veterandtrees.pdf?cb=8298cbf2eaa34c7da329eee3bd8d48ff>

In addition other Woodland Trust research which may assist with taking your Neighbourhood Plan foreword is a policy and practice section on our website, which provides lots of more specific evidence on more specific issues such as air quality, pollution and tree disease: <https://www.woodlandtrust.org.uk/publications/>

Our evidence base is always expanding through vigorous programme of PhDs and partnership working. So please do check back or get in touch if you have a specific query. You may also be interested in our free community tree packs, schools and community groups can claim up to 420 free trees every planting season: <http://www.woodlandtrust.org.uk/plant-trees/community-tree-pack/>

If I can be of any assistance please do not hesitate to get in touch, I would be more than happy to discuss this

further with you. If you require any further information or would like to discuss specific issues please do not hesitate to contact Victoria Bankes Price – Planning Advisor 0343 7705767 victoriabankesprice@woodlandtrust.org.uk

Best wishes and good luck with your plan

Ian Lings – Local Planning Support Volunteer

On behalf of the Woodland Trust

RELEVANT SECTION(S) OF PLAN:

Policy 7C

Policy 8?

REACTION TO REPRESENTATION(S)

Some of the recommendations made conflict with responses from other consultees, most importantly those of Breckland Council

ACTION TAKEN:

Comments addressed in the updated Plan where appropriate and not in conflict in other comments / planning regulations