

SAHAM TONEY NEIGHBOURHOOD PLAN PRESENTATION

SUB-SECTION 1: BRECKLAND COUNCIL CONSULTATION COMMENTS



In response to the Reg. 14 consultation that ran from August to October 2019, Breckland Council submitted 88 comments.

Those ran to 12 pages and included the comments, plus justification for each and suggested amendments to the Plan.

A meeting was held with the Council's Neighbourhood Planning Coordinator on 15 October 2019 to discuss and where necessary to clarify the comments and better explain the Plan's intent.

Following that, responses to each comment were finalised.

This presentation summarises each comment and response in a more concise form, but in doing so, of necessity omits the detailed nuances within some of the comments, and details of the discussion points that led to the final responses. The full and definitive set of comments and responses to them can be found in the Consultation Statement, available at www.stnp2036.org (after Plan submission at Reg. 15)

NEIGHBOURHOOD PLAN SECTION & POLICY DETAILS FOR REFERENCE

To assist in reading the tables of comments on the following slides, the section and policy numbers and titles are listed below, as they were at the time of the Reg. 14 pre-submission of the Plan. Some of these have changed at the Reg. 15 stage

Policies

1: Services, Facilities & Infrastructure
2A: Residential Housing Allocation
2B: Residential Development Within the Settlement Boundary
2C: Residential Development Outside the Settlement Boundary
2D: Affordable Housing
2E: Housing Mix
2F: Common Criteria for Allocated Sites
2G-2Q: Individual Site Allocation Policies
3A: Design
3B: Density of Residential Developments
3C: Site Access and On-Site Streets
3D: Parking
3E: Dark Skies Preservation
4: Non-Residential Development
5: Saham Toney Rural Gap

Policies

6: Heritage Assets
7A: Landscape Character Preservation & Enhancement
7B: Key Views
7C: Local Green Spaces
7D: Biodiversity & Habitats
7E: Green Infrastructure
7F: Trees & Hedges
8: Surface Water Management & Sewerage Provision

Sections

1. Foreword
2. Introduction
3. The Neighbourhood Area
4. Consultation Summary
5. Vision Statement & Objectives
6. Existing Planning Policy Context
7. The Policies
8. Parish Action Points
9. Monitoring of the Plan



Summarised Breckland Council Consultation Comments & Responses: 1

COMMENT	RESPONSE	COMMENT	RESPONSE
General: Some policies restrictive; see individual comments	None required, see applicable specific comments	Policy 1 evidence maps: improve readability	Map format improved
General: References to NPPF to be to 2019 version throughout	2 references required update	Policies 2A, 2G-2Q: Concern re phasing of development (3 comments)	Phasing justified and agreed
General: Line spacing inconsistent	Corrected	Policy 2A: Site allocation numbering system unclear	Clarified in Policy supporting text
General: Some maps difficult to read	Map presentation improved throughout	Policy 2A: Limit on total housing numbers too prescriptive	Overall limit justified and agreed
Front cover: Typing error	Corrected	Policy 2C: Refer to Policies 2A & 2D	References added
Table of Contents: Improve format for noting maps	Format amended accordingly	Policy 2C: Additional text re brownfield sites	Text added
Section 3: Place demographic figures where relevant to text	Optional change not implemented	Policy 2C: Hierarchy of sites inconsistent with the policy	Hierarchy amended accordingly
Section 6: Paragraph number duplicated	Numbering corrected	Policy 2C: Refer to Site Assessment Report	Reference added
Section 6, Policy 3B: Local Plan main modification (MM) references incorrect (2 comments)	'MM' references removed from Local Plan, so no longer relevant; also removed from Neighbourhood Plan	Policy 2D: Revise affordable housing threshold text	Text revised accordingly
Policy 1: Unnecessary wording in criterion 1	Wording moved to supporting text	Policy 2D: Affordable housing priority inconsistent with allocations policy	Policy text amended accordingly

[Back to main presentation](#)



Summarised Breckland Council Consultation Comments & Responses: 2

COMMENT	RESPONSE	COMMENT	RESPONSE
Policy 2D: Additional affordable housing criterion	Criterion added	Policy 2G: Number of dwellings allocated to be 'approximate' rather than a maximum	Agreed that evidence justifies a limit on dwelling numbers
Policy 2D: Missing line space between paragraphs in supporting text	Corrected accordingly	Policies 2G, 2K-2M: Combine criteria dealing with similar topics (4 comments)	Agreed and implemented
Policy 2E: Requirement for affordable housing on smaller sites not permitted	Requirement removed	Policies 2G, 2I-2L, 2P, 7A: Requiring full Landscape & Visual Impact Assessment unreasonable for site size (7 comments)	By agreement, requirement relaxed to Landscape and Visual Appraisal
Optional: Combine Policies 2E and 2F	Implemented in part, but full merging of policies not appropriate	Policy 2H: Confirm exact area of STNP2 (ref. affordable housing requirement)	Site area measured and confirmed – below affordable housing threshold
Policy 2F: Introduction of general policy for allocated sites welcomed	None required	Policy 2H: Add requirement for ground contamination assessment for STNP2	Requirement added
Policy 2F: Add visibility spay criterion to general policy	Agreed and added	Policy 2K: Confirm exact area of STNP6 (ref. affordable housing requirement)	Site area measured and confirmed – below affordable housing threshold
Policies 2G-2Q: Rephrase opening text of each site allocation policy	Rephrased	Policy 2K: Two criteria duplicated in policy for STNP6	Duplication removed
Policies 2H, 2I-2P: Criteria stating what is not required are not policy	Criteria moved to supporting text	Policy 2L: STNP7 area > 0.5 ha, hence affordable housing required	Affordable housing requirement added
Policies 2G, 2I, 2J, 2Q: Viability constraint too prescriptive	Amended to apply unless 'exceptional circumstances' exist	Policy 2M: Concern about low density of site STNP9	Further justification added to support the site's density
Policies 2G, 2I-2L: Non-deliverable sites should not be allocated	Agreed that sites may also be allocated if developable	Policy 2O: Realignment of site STNP14 welcomed	None required



Summarised Breckland Council Consultation Comments & Responses: 3

COMMENT	RESPONSE	COMMENT	RESPONSE
Policy 2O: One STNP14 criterion duplicates general requirements policy	Site-specific criterion deleted	Policy 3B: Number of density areas inconsistent	Erroneous comment – map and table are consistent
Policy 2Q: Future management and maintenance for amenity land at STNP16	Agreed there is no clear mechanism to enforce this	Policy 3C: Title appears incorrect	Not incorrect but modified as suggested for clarity
Policy 2Q: Map reference incorrect for STNP16	Reference corrected	Policy 3C: Use of conditions should be in the implementation text	Text moved from supporting facts section
Policy 2Q: STNP16 viability requirement unclear	Requirement clarified	Policy 3D: Parking bay criterion to be clarified	Clarified accordingly
Policy 3A: Design policy lacks Saham Toney specific detail and duplicates Local Plan	Design policy rewritten after further discussion with Council officers	Policy 3D: Delete reference to County Council parking guidelines	Reference deleted
Policy 3A: Documentation requirement should be in policy text	Requirement moved to policy text	Policy 3D: Erroneous line space in policy supporting text	Line space deleted
Policy 3A: Add a summary of the guiding principles of the Village Design Guide	Summary added as Plan appendix	Policy 3E: Operational measure for street lighting not appropriate	Criterion deleted
Policy 3A: Reference requires amendment	Amended accordingly	Policy 3E: Bullet point format in Policy 3E inconsistent with other policies	Amended to be consistent with format used elsewhere in the Plan
Policy 3B: Clarify site density criterion	Clarified accordingly	Policy 3E: Supporting text inconsistent with policy text	Policy text deleted in line with another comment



Summarised Breckland Council Consultation Comments & Responses: 4

COMMENT	RESPONSE	COMMENT	RESPONSE
Policy 4: Amend term 'severe' to 'significant'	Amended accordingly	Policy 7B: First sentence is a statement, adds nothing to policy	Criterion amended to be applicable as policy
Policy 4: Statement in policy text should be moved to supporting text	Moved to supporting text accordingly	Policy 7B: No strategy advice provided for Key Views 2, 3, 6 and 9	Appropriate advice added
Policy 5: Concern about western extent of 'Rural Gap'	Gap reduced in size as recommended	Policy 7C: Add evidence for Local Green Spaces to supporting text	Tabulated evidence added
Policy 5: Commercial site on Evidence Map 5.4 shown incorrectly	Erroneous comment, map agreed to be correct as presented	Policy 7D: Lacks clarity between types of natural environment designations	Policy rewritten to include greater clarity re designations
Policy 6: Council will decide if archaeological field evaluations required	Added text confirming responsibility lies with Breckland Council	Policy 7D Policy map keys difficult to read	Policy maps and their keys presented at a larger scale with improved clarity
Policy 6: Clarify references to 'designated' & 'non-designated' heritage assets	Clarified accordingly	Policy 7E: Criteria 4 & 5 would be better placed in Policy 3A	Criteria moved accordingly
Policy 6: Amend reference to value of archaeological assets to sites and finds	Reference amended accordingly	Policy 7F: Amend root protection criterion to reflect BS5867 requirements	Criterion amended accordingly
Policy 6: Useful to have a glossary for the entire Plan, not just for heritage assets	Complete glossary of terms added to the Plan	Section 8: Amend title of plan monitoring section	Section title amended accordingly
Policy 6: Numbering of heritage assets unclear	Clarifying note added to heritage asset policy maps	Section 8: Align monitoring indicators & targets with those used by Breckland Council	Agreed in discussion that this was not required

