

Saham Toney Neighbourhood Plan

Regulation 16 Consultation - Representations (comments) – extracts

Ref	Received	Name/ Organisation	Page and Policy/ Paragraph No	Comment	Amendments
01/01	28.10.20	Cadent Gas		I have forwarded the below and attached document over to our plant protection team. If they have any concerns or queries, they will get in touch. <i>N.B. No further response received.</i>	
02/01	29.10.20	Roger Holden		I am very pleased to support this plan that has had a lot of time and effort invested in it. I am particularly pleased that it emphasises the endemic flooding issues in the village and seeks to at least ensure they are not worsened as has been the case with some past developments. Let us hope that in future planning applications are properly controlled by Breckland as there are too many cases of requirements not being adhered to resulting in eyesores and further flooding to say the least.	
03/01	29.10.20	Highways England	N/A	It is acknowledged by Highways England that Saham Toney and the surrounding area is somewhat remote from the Strategic Road Network (SRN). It is expected that any traffic generation as a result of any proposed development would be diluted on the local highways before reaching the SRN. As a result, there is unlikely to be any adverse effect upon the SRN resulting from any proposed developments contained within the Saham Toney Neighbourhood Plan. Consequently, Highways England offers No Further Comment.	N/A
04/01	04.11.20	Mark Thompson (planning agent)	POLICY 2P: SITE	The landowner at Richmond Hall, Mr Graham Tweed, would like to confirm his support for the inclusion of	N/A

		on behalf of Graham Tweed (landowner)	ALLOCATION & STNP16: RICHMOND HALL	his site as an allocation for residential development as per the policy	
05/01	05.11.20	Water Management Alliance		I am confirm that the Parish of Sahem Toney does not fall within the jurisdiction of any of the WMA member Boards and therefore we have no comments to make.	
06/01	24.11.20	Anglian Water	Policy 5	We note that essential utility infrastructure including that provided by Anglian Water is permitted within the designated rural gap and therefore this policy is supported.	
			Policy 8A	We note that Policy 8A of the Neighbourhood Plan has been amended in response to comments previously made by Anglian Water as part of the previous consultation. Anglian Water welcomes the changes made in respect of our previous comments. P8A.5 – reference is made to the sewerage undertaker (Anglian Water) commenting on proposals where it is proposed to make a surface water connection to the public sewerage network irrespective of scale. Anglian Water generally comments on proposals of 10 or more dwellings or 0.5 ha or more for non-housing uses. On request from the relevant planning authority we provide comments on development proposals below this threshold and in doing so we ask that they provide reasons of any issues they wish us to consider in our response.	
			Policy 8B	We note that Policy 8B of the Neighbourhood Plan has been amended in response to comments previously made by Anglian Water as part of the previous consultation. Anglian Water is supportive of Policy 8B as drafted.	

			Policy 8C	Anglian Water welcomes the requirement for developers to undertake infiltration testing to establish whether surface water infiltration is feasible.	
			Policy 8D	Anglian Water welcomes the requirement for developers to make an allowance for climate change when considered surface water discharge.	
			Policy 8F	Anglian Water welcomes the requirement for developers to provide a SuDs Management and Maintenance Plan setting out who will responsible for any ongoing maintenance of SuDs.	
			Policy 8H	Anglian Water is supportive of the statement that any SuDs being put forward for adoption by Anglian Water should meet the required design standards.	
			Policy 9	We note that Policy 9 of the Neighbourhood Plan has been amended in response to comments previously made by Anglian Water as part of the previous consultation. Anglian Water is supportive of Policy 9 as drafted.	
07/01	04.12.20	Natural England		Natural England welcomes that the site allocations are outside the 1500m constraint zone around Breckland Special Protection Area (SPA) put in place to protect Stone Curlews. However as stated in the Habitats Regulations Assessment (Aecom, September 2020) land functionally linked to the SPA extends 3km from it. Built development has also been shown to impact on Stone Curlew up to a distance of 1.5km. Therefore if an ecological assessment of a site is required and historic Stone Curlew records are not available within 1.5km of the site, up to a distance of 3km from the SPA, 3 years of surveys may be required on potentially suitable areas of arable land. 3 years would account for spatial variation in the location of Stone Curlew nests due to crop rotations. We also advise that Stone Curlews may nest throughout the spring and summer so any survey	

				should be for the period early April – end August, not mid-May as written in the supporting text of the policies. The government has announced that that all developments will be required to demonstrate a 10% increase in biodiversity on or near development sites. This is outlined in the 2020 Environment Bill. Natural England therefore suggests that your authority may want to advise the applicant to take the opportunity to include this within policy 7D. Policies around biodiversity net gain should propose the use of a biodiversity measure for development proposals. Natural England has recently published the Biodiversity Metric 2.0 which can be used to calculate biodiversity net gain.	
08/01	7.12.20	Cllr Helen Crane, Breckland District Council		The document is very comprehensive and I salute the members of the working group who have volunteered to give their time to the making of this plan. Having said that it is a very long document which may be problematic for anyone to access and drill down to find what they need when either making planning decisions or in intending to build in Saham Toney. I have concerns that where Breckland have made suggestions from the previous Reg 14 document they have not been changed or improved. In a population of over 1500 there were only 16 resident comments on specifics of the plan and 56 who responded with support for the plan during the latest consultation period. I am making these comments in a personal capacity and not on behalf of Breckland Council	
09/01	10.12.20	Avison Young on behalf of National Grid		National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.	

	10.12.20	Norfolk County Council - Highway Authority Comments	STNP1	We reiterate our comments of no objection subject to the allocation policy requiring the highway conditions set out in planning application 3PL/2015/1430/F.	Visibility requirements should not be left to general policy on highway visibility. The exact requirement must be included in the site-specific policy. The allocation policy should incorporate the requirements of Policy 2F.5. If these cannot be met the site will not be able to meet the basic highway safety requirements.
		Highway Authority Comments	STNP2	The objection remains as the site cannot provide a footway on Hills Road and the policy does not make this a requirement, so the original objection stands.	
		Highway Authority Comments	STNP7	No objections to the proposals.	The allocation policy should incorporate the requirements of Policy 2F.5. Policy 2F visibility requirements should be included in each allocation and not left to general policy. If these cannot be met the site will not be able to meet the basic highway safety requirements.
		Highway Authority Comments	STNP9	Our objection on the lack of continuous footway provision remains.	The policy only proposes frontage footway but does not link to the existing provision.
		Highway Authority Comments	STNP13 and STNP14	Our objections remain as the sites cannot provide a footway on Hills Road and the policies do not make this a requirement, so the original objections stand.	
		Highway Authority Comments	STNP15	The Highway Authority objects on the basis that it is not demonstrated that adequate visibility can be achieved. The plan submitted demonstrates that acceptable visibility cannot be achieved to the west indicating only 8m can be achieved, which is well below the required standard.	

		Highway Authority Comments	STNP16	No objections	The allocation policy should incorporate the requirements of Policy 2F.5. Policy 2F visibility requirements should be included in each allocation and not left to general policy. If these cannot be met the site will not be able to meet the basic highway safety requirements.
		Lead Local Flood Authority (LLFA) Comments	General Supporting Comments	The LLFA welcome the widespread references to flood risk, surface water, drainage and SuDS in the submitted Neighbourhood Plan. We welcome the acknowledgement of our previous comments made at the Reg 14 stage of consultation. The LLFA appreciate the specific references to the LLFA Statutory Consultee for Planning Guidance Document. We welcome references to publications made by Norfolk County Council (LLFA), noting references to flood investigation reports produced by the LLFA. The LLFA note references to the Environment Agency surface water flood maps. We recommend inclusion of a surface water flood map for the entire parish representative of the 3.33%, 1.0% and 0.1% AEP events. Since the Reg 14 stage of consultation, we have updated our standard wording in regards to surface water flood risk (see below). However, we welcome that that the current level of analysis and information presented by the submitted Neighbourhood Plan covers these points. The LLFA currently hold 18 records of internal flooding dating from 2016 to 2020, 24 records of external flooding dating from 2016 to 2020 and 3 records of anecdotal flooding dating from 2016 to 2020 in the	

				Parish of Saham Toney. We note that our records differ from some of the figures stated within the Neighbourhood Plan.	
		Lead Local Flood Authority (LLFA) Comments	Allocation of Sites (STNP1-16)	We 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 where required, should be 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. A number of site allocations are included as part of the Reg 16 consultation. Comments on site allocations were previously provided as part of LLFA response FWS/19/3/7594 (see attached document). These previous comments still stand and the LLFA have no further comments to make.	
		Lead Local Flood Authority (LLFA) Comments	Local Green Spaces (LGS) ST-GS3 and ST-GS6	The document proposes a number of pre-existing spaces as local green spaces (LGS). It is understood that designation of LGS provides a level of protection against development. The LLFA do not normally comment on LGS unless they are/are proposed to be part of a sustainable urban drainage (SuDS) feature. Two of the named spaces are identified as being potential present surface water drainage features: • ST-GS3: The land immediately surrounding Saham Mere • ST-GS6: The bird sanctuary The LLFA would therefore recommend against development of this space to limit any negative impact on the current drainage contributions. The LLFA have	

				no comments to make on all other submitted open spaces.	
		Lead Local Flood Authority (LLFA) Comments	Policy 8A	The LLFA do not support Policy 8A, in particular paragraph P8A.5. As we respond to consultations from the LPA on major development following the thresholds in our LLFA Guidance.	P8A.5 should be reworded to: <i>“The LLFA will be consulted on proposals for major development and will receive a substantive response in line with the LLFA Statutory Consultee Guidance”</i> . The supporting text – T8A.10 should also be amended to reflect this.
		Lead Local Flood Authority (LLFA) Comments	Policy 8B-8H	We welcome Policy 8B, 8C, 8D, 8E, 8F, 8G, and 8H and note the details these policies address. We welcome the supporting information provided to evidence reasoning behind each policy with clear references to specific documents and relevant sourced information.	
10/01		Breckland Council		See Decision Report (Blue Form) and Appendix A - C	
11/01	11.12.20	East of England		We welcome the production of this neighbourhood plan, but do not currently have capacity to provide detailed comments.	