

APPENDIX A3. Pre-Submission Consultation March-April 2018: Breckland Council Comments with STNP Responses

Saham Toney Neighbourhood Plan

Draft Plan for Regulation 14 Consultation

We welcome the significant progress that has been made on the Neighbourhood Plan, and it is obvious that it has involved extensive research and evidence gathering. When making our representations on the plan, as well as assessing whether it is meeting the 'Basic Conditions', we need to ensure that we are able to implement the plan. In light of this we need to ensure that any Neighbourhood Development Plan works on the basis of a "presumption in favour of development" - para 14 National Planning Policy Framework (NPPF).

Please note that where comments have been made on just the policy, the text justification for this may also need amending in light of this.

Key terminology – LPA - Local Planning Authority / LDF – Local Development Framework / NPPF – National Planning Policy Framework

Comment No.	Page and Policy/ Paragraph	Comment	Justification	Suggested Amendments
1	General	We welcome the development of the policy; however there remains concern that a number are over restrictive and will frustrate development.	Plans should "... <i>promote development and flexible use of land...</i> " para 157, NPPF.	A review of the wording of all policies is required in light of this – see detailed comments below.
<u>STNP Response:</u> General comment noted. No specific response required to this comment - see detailed comment responses below				
<u>Amendment to the Neighbourhood Plan:</u> None required for this general and non-specific comment				

2	General	Welcome the development of evidence within the supporting text of the plan; however, a number of the text paragraphs are written as if they are policy, requiring additional requirements, which will not be met as they do not form part of the policy.	Text does not have the same status as policy and should provide the evidence for policy, not add to it.	See detailed comments below.
<p><u>STNP Response:</u></p> <p>General comment noted and policy / evidence will be restructured accordingly. No specific response required to this comment - see detailed comment responses below</p> <p><u>Amendment to the Neighbourhood Plan:</u></p> <p>None required for this general and non-specific comment</p>				
3	General	Terminology – as previously advised, this appears to be partially unique to this document.	The terminology needs to reflect primary legislation and planning guidance to ensure that it is understood by those that need to use it.	See detailed comments below.
<p><u>STNP Response:</u></p> <p>General comment noted. No specific response required to this comment - see detailed comment responses below</p> <p><u>Amendment to the Neighbourhood Plan:</u></p> <p>None required for this general and non-specific comment</p>				
4	General	Format – while we welcome the improvements made to the format of the document, a reduction of font size from the original plan (12pt font) does not help readers with visual disabilities. Having this font size is an example of good practice that has been followed by all ‘made’ plans in the district.	In addressing this issue, Edinburgh University advise that “ <i>no smaller than font size 12, to assist readers with visual impairments</i> . They also advise avoiding “ <i>the use of non sans-serif fonts</i> ” e.g. <i>Times Roman</i> – <i>better fonts include: Arial; Verdana; & Calibri</i> .	Increase font size to a minimum of 12pt font. See https://www.ed.ac.uk/information-services/help-consultancy/accessibility/creating-materials/word-documents

<u>STNP Response:</u> 12 pt font will be used throughout update				
<u>Amendment to the Neighbourhood Plan:</u> 11pt font increased to 12 pt throughout.				
5	p2.5 4th sentence	The criteria listed apply to a ' <i>plan</i> ' rather than ' <i>order</i> '.	See 38C (5) & (5) (d), Planning & Compulsory Purchase Act 2004	Reference should be made a ' <i>plan</i> ' rather than ' <i>order</i> '.
<u>STNP Response:</u> Agreed				
<u>Amendment to the Neighbourhood Plan:</u> Text changed accordingly				
6	Last sentence	This should be an insert, with the other 4 above.	See Schedule 4B, paragraph 8 (2) of the Town and Country Planning Act 1990	Add 'v' to the start of the sentence.
<u>STNP Response:</u> Comment agreed				
<u>Amendment to the Neighbourhood Plan:</u> Text changed accordingly				
7	p18, Vision & H2	Part of the vision concerning site size may restrict the presumption in favour of sustainable development.	"At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development...", Para 14, NPPF.	"This will be achieved through a process of gradual, appropriate small -scale developments in suitable appropriate and sustainable locations,..."
<u>STNP Response:</u> Proposed rewording not accepted. Emerging Local Plan strategic objective 4 states "recognises "...the need for small scale and appropriate development in rural areas..."; hence the Neighbourhood Plan mirrors a strategic objective of the Local Plan as required to meet the Basic Conditions. To improve wording, the following amendment to the Vision is proposed: "This will be achieved through a process of gradual development of a scale having regard to, and consistent with, the Neighbourhood Area's development constraints, and appropriate to its place in the Breckland settlement hierarchy." The following amendment to Objective H2 is proposed: "To support developments of a scale having regard to the Neighbourhood Area's development constraints, in suitable and sustainable locations within or immediately adjacent to the settlement boundary."				
<u>Amendment to the Neighbourhood Plan:</u> As noted above				

8	p25, Policy 1, P1.1	Assumes map 13 refers to the inset map for Saham Toney, which could change as the Local Plan has not yet been adopted.	To ensure consistency with the Local Plan.	Replace map 13 with Saham Toney Inset Map.
<u>STNP Response:</u> Agreed				
<u>Amendment to the Neighbourhood Plan:</u> Comment redundant as the previous policy 1 has been deleted				
9	p25, Policy 1, P1.2 – this also applies to text under 6.4	It is not considered appropriate to refer to the need to give full consideration to the Evidence Base that forms the policy. If there are specific elements of the Evidence Base which are needed to be included within the policy, this should be included. Otherwise this should be referred to in the reasoned justification.	To ensure the easy use of the document. Also, elements not included in the plan will not have the same status as those in the development plan - see section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004	As included within the comment.
<u>STNP Response:</u> We will check all such references and then adapt / restructure text accordingly				
<u>Amendment to the Neighbourhood Plan:</u> Updated throughout Plan				
10	p25, Policy 1, P1.3	The wording of policy 1.3 does not conform to the requirements of Policy HOU04 within the emerging Local Plan. Policy HOU04 states that 5% housing growth will be from the adoption of the Local Plan rather than from 31 st December 2017.	<i>“...neighbourhoods should: • develop plans that support the strategic development needs set out in Local Plans...”</i> . Para 16, NPPF. To ensure conformity with the strategic policies in the Local Plan and therefore the Basic Conditions.	Remove paragraph 1.3 or amend as follows: After “ <i>shall be taken</i> ”, delete the remaining text and replace with “ <i>...in line with the local plan</i> ”.

<u>STNP Response:</u> Comment redundant as previous policy 1 has been deleted				
<u>Amendment to the Neighbourhood Plan:</u> No action required as policy deleted				
11	p25, Policy 1, P1.4	Development within the boundary will be treated differently from that outside the boundary, hence the reason for a boundary; the use of the word 'adjacent' without clarification does not make the approach being taken very it clear.	<i>"[Policy] It should be concise, precise and supported by appropriate evidence"</i> Para 041, PPG on Neighbourhood Planning.	Clarify what area 'adjacent' to the boundary includes.
<u>STNP Response:</u> The wording was taken from the Local Plan but has been removed to reflect the new approach of allocating sites				
<u>Amendment to the Neighbourhood Plan:</u> Clause deleted				
12		Also, this policy is worded negatively and should be reworded positively.	<i>"...● plan positively to support local development..."</i> . Para 16, NPPF.	<i>".. proportionate share will not be supported by the Neighbourhood Plan where and shall not be permitted unless..."</i>
<u>STNP Response:</u> Agreed				
<u>Amendment to the Neighbourhood Plan:</u> Text amended accordingly				
13	a)	The phrase 'Local Development Plan' is mixing up terminology – there are Local Plans and Local Development documents.	While the NPPF uses both alternatives, the former is more appropriate in this context.	Amend as follows: <i>"...update of the Local Development Plan..."</i>
<u>STNP Response:</u> Agreed				

<u>Amendment to the Neighbourhood Plan:</u> Changed to read "Breckland Local Plan"				
14	b)	Any allocation scheme for determining the priorities and defining the procedures, to be followed in allocating affordable housing accommodation, is a housing authority's responsibility, not LPA one.	Housing authorities are required to do this under this by the Housing Act 1996 s166A (as amended).	"The development will comprise affordable or self-build housing to meet the needs of those with a connection to the Parish of Saham Toney, or the development will be specifically designed to ..."
<u>STNP Response:</u> Council has subsequently accepted similar local housing priority wording in the Swanton Morley Plan				
<u>Amendment to the Neighbourhood Plan:</u> Change not accepted. New policy follows wording of the Swanton Morley Neighbourhood Plan that has now been accepted by the Council				
15	c) (also applies to para T1.10)	The desire for engagement is welcome, but it goes beyond the requirements of the regulations and therefore cannot be implemented.	Just as LPA " <i>cannot</i> require that a developer engages with them before submitting a <i>planning application...</i> " this also applies to a Parish Council." Para 189, NPPF. Also see Para 66.	"The community of Saham Toney are <i>encouraged to be consulted over</i> fully engaged with the ..." and subsequent supporting text.
<u>STNP Response:</u> Comment redundant as policy has been completely replaced				
<u>Amendment to the Neighbourhood Plan:</u> Policy deleted				

16	d)	Clearer use of planning terminology is required; preserve only applies to heritage, where conserve applies to both heritage and landscape. N.B. It is noted that some of the wording copies element of emerging Local Plan policy e.g. this section duplicates HOUS 04, criteria 4.	See NPPF for appropriate planning terminology to avoid confusion over intent. <i>"Avoid duplication – there is little point in addressing issues that are already covered by the policies in your Local Plan". p3 3, Box 1- Top tips for writing planning policies, Writing planning policies (Locality).</i>	<i>"The development is shown to contribute to the preservation conservation, and where possible.... .."</i>
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STNP Response:

Agreed

Amendment to the Neighbourhood Plan:

Amended throughout

17		Also, regarding isolated dwellings, this is unreasonable to request or implement, as they are permitted under special circumstances.	Permitted where relates to rural workers, best viable use of a heritage asset, re-use of a redundant / disused buildings which enhances the setting or an innovative design. Para 189, NPPF.	<i>".. isolated dwellings unsustainable development".</i>
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STNP Response:

We believe the reference should be to NPPF para 55 not 189 (of the old NPPF). To meet this requirement, we propose alternate rewording as we consider the term "unsustainable development" is too broad in the context of this clause: "and does not result in isolated dwellings in the countryside except in special circumstances permitted under National Planning Policy Framework paragraph 55".

NPPF2 covers this in paragraph 79

This will then also address comment no. 18

Amendment to the Neighbourhood Plan:

NPPF2 paragraph 79 criteria included in new policy 2B - this reflects the special circumstances referred to in the comment

18		Also, it is not clear how this conforms to paragraph 55 of the NPPF i.e. it does not appear to take into account rural workers.	To ensure the neighbourhood plan conforms to the NPPF.	This issue needs to be addressed in line with national guidance.
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STNP Response: See response to comment 17 which addresses this issue in line with national guidance				
Amendment to the Neighbourhood Plan: NPPF2 paragraph 79 criteria included in new policy 2B				
19	p26, para T1.8	<p>This definition is contrary to that found in Breckland’s allocations policy.</p> <p>N.B. As written, this first policy broadly speaking cuts off both likely sources of affordable housing delivery i.e. S106 and exceptions sites, with the likely effect that limited to nil affordable housing would be provided within the parish during the plan period.</p>	<p>Highly likely that, without a final cascade line permitting occupation by those from district wide area as last resort, a) housing associations will find it impossible to raise funding to build properties in the parish; b) policy may be open to challenge on the grounds of failure to observe reasonable preference per the Housing Act (notwithstanding the boilerplate phrase below which has limited weight given the lack of clarity over how it can be applied – i.e. as written it doesn’t adequately make provision for those in reasonable preference.)</p>	<p>Amend to that found in BDC allocations policy. Amend to provide clarification over interaction between this policy, and that required under the reasonable preference provisions of the housing act. Amend to re-introduce the possibility of housing associations being able to obtain finance on schemes – all per notes in justification.</p>
STNP Response: Council has subsequently accepted similar local housing priority wording in the Swanton Morley Plan				
Amendment to the Neighbourhood Plan: New policy follows wording of the Swanton Morley Neighbourhood Plan that has now been accepted by the Council and includes the required amendment				

20	p26, para T1.9	This approach is unduly restrictive.	Local authorities and housing associations will have housing need data available to them which is neither in the public domain (due to confidentiality), nor as a result of a survey, such as data from the housing register. As written, this excludes this information from any possible use, and compels anyone hoping to develop an exceptions site to using a survey – which whilst valuable, can be time and cost consuming	Amend to take account of information that may be held by local authority/ housing association which may of itself be sufficient to provide evidence base to prove need for a particular site.
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Comment redundant as policy has been deleted

Amendment to the Neighbourhood Plan:

Policy deleted

21	p26/7, para T1.10	The requirement for valid planning application to be put on hold if sufficient community engagement has not occurred prior to submission is not considered to conform to the requirements of section 34 The Town and Country Planning (Development Management Procedure) (England) Order 2015.	The neighbourhood plan needs to conform to section 34 of The Town and Country Planning (Development Management Procedure) (England) Order 2015. See comments re P1.4 c).	Amend in light of comments re P1.4 c), welcoming early engagement and the use of development briefs. Also delete final sentence.
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STNP Response:

Comment redundant as policy has been deleted

Amendment to the Neighbourhood Plan:

Policy deleted

22	p29, Policy2A,	Policy 2A seeks to add numerous restrictions to development which would not be in conformity with the principles of sustainable development set out in the NPPF or emerging policies HOU04 or HOU06.	To ensure conformity with the Local Plan and NPPF.	Delete policy and supporting text or amend as outlined below:
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STNP Response:

We do not agree to delete Policy 2A, but instead address the concerns in response to comments 23-40 below

Amendment to the Neighbourhood Plan:

Not accepted

23	p29, Policy2A,1	As outlined in comments on p18, Vision & H2, part of the vision concerning site size may restrict the presumption in favour of sustainable development.	<i>"At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development..."</i> , Para 14, NPPF.	<i>"Within the settlement boundary appropriately small--scaled, sensitively designed, in-fill residential Development..."</i>
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STNP Response:

Policy replaced by site allocations which remove this criterion

Amendment to the Neighbourhood Plan:

Revised policy reflecting site allocations

24	P2A.1 a.	Although a definition of 'appropriate' is attempted in the supporting text, this fails to provide sufficient detail in the plan, by referring to external evidence which does not form part of the development plan.	<i>"[Policy] It should be concise, precise and supported by appropriate evidence".</i> Para 041, PPG on Neighbourhood Planning.	This needs to be clearly clarified in the supporting text - para T2A.4.
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STNP Response:

Policy replaced by site allocations which remove this wording

<u>Amendment to the Neighbourhood Plan:</u> Revised policy reflecting site allocations				
25	b.	This requirement for a need for fronting directly onto a highway is too restrictive.	Plans should "... <i>promote development and flexible use of land...</i> ". Para 157, NPPF.	Replace with: " <i>The scheme is in an accessible location</i> ".
<u>STNP Response:</u> Principle agreed but we propose amended rewording: "The proposed site is in a readily accessible location."				
<u>Amendment to the Neighbourhood Plan:</u> Change included in new policy 2B				
26	c.	As currently worded, the approach in the first part of this policy could cause poor design.	Plans should replace "... <i>poor design with better design...</i> ". Para 9, NPPF.	" <i>The scheme has a similar form of development to properties in the immediate surrounding area and does not detract from the character and appearance of the immediate area and comprises...</i> ".
<u>STNP Response:</u> Comment redundant due to policy being rewritten to reflect site allocations				
<u>Amendment to the Neighbourhood Plan:</u> Policy rewritten				
27		The second requirement regarding site size may restrict the presumption in favour of sustainable development. Also, applications are judged against a range of site constraints, not just numbers.	Plans should "... <i>promote development and flexible use of land...</i> ". Para 157, NPPF.	Replace with: " <i>and comprises no more than 5 dwellings has a density which is appropriate for the area</i> ".
<u>STNP Response:</u> Comment redundant due to policy being rewritten to reflect site allocations				
<u>Amendment to the Neighbourhood Plan:</u> Policy rewritten				

28	d.	All development will create additional traffic; the key issue is whether it is excessive or not.	<i>"Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe."</i> . Para 32, NPPF.	Replace <i>"additional"</i> with <i>"excessive"</i> .
STNP Response: Comment redundant due to policy being rewritten to reflect site allocations				
Amendment to the Neighbourhood Plan: Policy rewritten				
29	p29, P2A.2 a)	This approach inhibits the delivery of affordable housing.	Government policy means that provision of affordable housing on schemes of under 11 units is very unlikely.	Consider a revision to take account of this.
STNP Response: Comment redundant due to policy being rewritten to reflect site allocations				
Amendment to the Neighbourhood Plan: Policy rewritten				
30	P2A.2a.	This is not only duplicating the emerging Local Plan, but does not provide evidence justifying why this should be 10 units on brownfield sites.	<i>"[Policy] It should be concise, precise and supported by appropriate evidence"</i> . Para 041, PPG on Neighbourhood Planning.	Replace with: <i>"The density will be appropriate for the area"</i> .
STNP Response: Comment redundant due to policy being rewritten to reflect site allocations				
Amendment to the Neighbourhood Plan: Policy rewritten				

31	b.	Although a definition of 'appropriate' is attempted in the supporting text, this fails to provide sufficient detail, by referring to external evidence, which does not form part of the development plan.	<i>"[Policy] It should be concise, precise and supported by appropriate evidence".</i> Para 041, PPG on Neighbourhood Planning.	This needs to be clearly clarified in the supporting text - para T2A.4.
<u>STNP Response:</u> Comment redundant due to policy being rewritten to reflect site allocations				
<u>Amendment to the Neighbourhood Plan:</u> Policy rewritten				
32	c.	Use of the words 'as a minimum comprising' are over restrictive and the supporting text fails to provide the evidence to support this.	<i>"[Policy] It should be concise, precise and supported by appropriate evidence".</i> Para 041, PPG on Neighbourhood Planning.	Delete the words 'as a minimum comprising'.
<u>STNP Response:</u> Comment redundant due to policy being rewritten to reflect site allocations				
<u>Amendment to the Neighbourhood Plan:</u> Policy rewritten				
33	c.1.ii	As the supporting text fails to provide the evidence to support this approach, it would be more appropriate to rephrase the policy.	An LPA <i>"needs to be satisfied in all cases that the proposed development would be safe and not lead to increased flood risk elsewhere".</i> Para 034, PPG on Flood risk and coastal change.	<i>"...there would be a decrease no increase in flood risk, both at the..."</i>
<u>STNP Response:</u> Agreed				
<u>Amendment to the Neighbourhood Plan:</u> Revised policy reworded to address this comment				

34	c.2.	This requires all small scaled schemes to provide a Neighbourhood Area Housing Needs Assessment, which is neither consistent with the adopted LDF nor likely to be consistent with revised NPPF. Also, some of the criteria listed are not appropriate: i) An allocation scheme for determining the priorities and defining the procedures, to be followed in allocating affordable housing accommodation, is a housing authority's responsibility, not LPA one.	Approach not consistent with the strategic policy of the adopted LDF, therefore the "Basic Conditions". i) Housing authorities are required to do this under this by the Housing Act 1996 s166A (as amended).	Delete.
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STNP Response:

We do not agree to delete this criterion.

It is not the intention for all schemes to provide a new Housing Needs Assessment, but instead to show that they address the Neighbourhood Area's housing needs by using the most up-to-date available information in that respect. We will propose revised wording to clarify that.

Reworded in rewritten policy 2B

Amendment to the Neighbourhood Plan:

Reworded

35	d.	This exception for rural exceptions sites is positive and welcomed.	N.A.	N.A.
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STNP Response:

Support noted

Amendment to the Neighbourhood Plan:

None required

36	e.	The desire for engagement is welcome, but it goes beyond the requirements of the regulations and therefore cannot be implemented.	Just as LPA “cannot require that a developer engages with them before submitting a planning application...” this also applies to a Parish Council.” Para 189, NPPF. Also see para 66.	“The community of Saham Toney are encouraged to be consulted over fully engaged with the ... ” and subsequently supporting text.
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STNP Response:

Requirement deleted from rewritten policy

Amendment to the Neighbourhood Plan:

Clause deleted

37	f.	Clearer use of planning terminology is required; ‘preserve’ only applies to heritage, where ‘conserve’ applies to both heritage and landscape. N.B. It is noted that some of the wording copies element of emerging Local Plan policy e.g. this section duplicates HOUS 04, criteria 4.	“Avoid duplication – there is little point in addressing issues that are already covered by the policies in your Local Plan”. p3 3, Box 1- Top tips for writing planning policies, Writing planning policies (Locality).	“The scheme is shown to contribute to the preservation conservation , and where possible, the enhancement of the historic and rural nature and landscape setting of the Neighbourhood Area.”
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STNP Response:

Agree

Amendment to the Neighbourhood Plan:

Amended

38	p30, T2A.2	The justification for limiting in-fill to have a ‘built up frontage’ is missing. The Planning Portal describes in-fill as “The development of a relatively small gap between existing buildings”.	“Proportionate, robust evidence should support the choices made and the approach taken”. Para 040, PPG on Neighbourhood Planning.	Provide the evidence or remove the restriction regarding the need for this.
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STNP Response:

Further to the response to comment 23, P2A.1 no longer makes reference to "in-fill" and hence TA.2 is deleted

<u>Amendment to the Neighbourhood Plan:</u>				
Policy updated				
39	p30 T2A.12	See prior comment (para T1.8) regarding this issue.	Definition does not follow Breckland allocations policy or reasonable preference criteria as defined by housing act as set out prior.	As per comment re para T1.8.
<u>STNP Response:</u>				
Council has subsequently accepted similar local housing priority wording in the Swanton Morley Plan				
<u>Amendment to the Neighbourhood Plan:</u>				
New policy follows wording of the Swanton Morley Neighbourhood Plan that has now been accepted by the Council and includes the required amendment				
40	p31 T2a13	See prior comment (para T1.9) regarding this issue.	Alternative sources should also be included.	See prior comment re para T1.9.
<u>STNP Response:</u>				
Comment redundant as policy has been deleted				
<u>Amendment to the Neighbourhood Plan:</u>				
Addressed in new policy 2C				
41	p33, Policy 2B	The policy does not conform with the findings of the Central Norfolk Strategic Housing Market Assessment, which shows that there is not a need for 1-bedroom market houses in Breckland. The CNSHMA shows a need for larger houses.	To ensure conformity with national planning policy.	Delete policy and supporting text or amend to be consistent with evidence and comments below.
<u>STNP Response:</u>				
We do not agree to delete Policy 2B, but instead address the concerns in response to comments 42 and 43 below				
<u>Amendment to the Neighbourhood Plan:</u>				
None specific to this comment				

42	P2B.1	In light of comments regarding P2A.2 c.2. above concerning housing need assessment, this text needs amending.	Approach not consistent with the strategic policy of the adopted LDF, therefore the "Basic Conditions" .	Delete reference to <i>"(as evidenced in an up to date assessment of in the Neighbourhood Area)"</i> .
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STNP Response:

Wording deleted

Amendment to the Neighbourhood Plan:

Policy (now 2D) updated

43	e.	This is already covered by c).		Delete.
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STNP Response:

Agreed

Amendment to the Neighbourhood Plan:

Criterion deleted

44	p38, Policy 3, P3.1	The requirement that all of the criteria should apply is too restrictive and also does not provide evidence for all the criteria.	<i>"...the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. Para 173, NPPF</i>	<i>"...shall meet take into account the all of the following design criteria:..."</i>
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STNP Response:

We do not accept the proposed rewording. The emerging Local Plan has a similar approach in its Policy COM 01, which on challenge at the Local Plan hearing on the subject was verbally confirmed as acceptable by the Examiner. As an alternate proposal we would be willing to use the same wording as the emerging Local Plan: "High quality design in the Neighbourhood Area will be promoted by requiring that the design of new residential developments meets the following criteria" We will also be preparing a more comprehensive design guide as an annex to the Plan

Amendment to the Neighbourhood Plan:

Not accepted; alternate wording matching the Local Plan included

45	P3.1 b.	As currently worded, this approach could cause poor design.	Plans should replace "...poor design with better design...". Para 9, NPPF.	<i>"The design and layout does not detract from the character and appearance of the immediate area complements and is consistent and compatible with that prevailing for neighbouring properties in terms of density and.."</i>
<p><u>STNP Response:</u></p> <p>Agreed but with the substitution of "immediately surrounding" for "immediate"</p> <p><u>Amendment to the Neighbourhood Plan:</u></p> <p>Amended accordingly</p>				
46		This specific requirement regarding density may restrict sustainable development.	<i>"The purpose of the planning system is to contribute to the achievement of sustainable development". Para 6, NPPF.</i>	<i>" and will not exceed approximately 20 dwellings per hectare unless a higher figure is justified by design issues shall be of a density appropriate for the area;"</i>
<p><u>STNP Response:</u></p> <p>While we agree in principle, we consider that the intention of the comment has been addressed by new policy 3B which deals specifically with density of dwellings</p> <p><u>Amendment to the Neighbourhood Plan:</u></p> <p>Addressed in new policy 3B</p>				
47	e.	This requirement to control the garden size is too restrictive.	<i>"...the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. Para 173, NPPF</i>	<i>"The design includes appropriate rear garden spaces at least equal to the footprint size of the dwelling;..."</i>
<p><u>STNP Response:</u></p> <p>Agreed</p> <p><u>Amendment to the Neighbourhood Plan:</u></p> <p>Updated accordingly</p>				

48	f.	<p>This states that the design and layout of the development does not <i>'impact adversely'</i> any building defined as a heritage asset. It is not clear whether a heritage asset refers to both designated and non-designated heritage assets - this should be clarified.</p> <p>Furthermore, the test is higher than required through the NPPF at paragraphs 132 to 134 for which for designated heritage assets the test is substantial harm. For non-designated heritage assets, the NPPF requirements are set out at paragraph 135.</p>	Criterion a does not conform to the NPPF at paragraphs 132-136.	Delete criterion f. and revise to comply with the NPPF.
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[STNP Response:](#)

Reworded to match NPPF2 requirements

[Amendment to the Neighbourhood Plan:](#)

Reworded

49	i.	<p>All development will have an impact on traffic and parking; the key issue is whether it is excessive or not.</p>	<p><i>"Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe"</i> . Para 32, NPPF.</p>	<p>Delete <i>"at their junctions with public roads they do not impede local traffic"</i> and replace with <i>"...,the site access is compatible with the local road network,..."</i>.</p>
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[STNP Response:](#)

Addressed by new policy 3C

[Amendment to the Neighbourhood Plan:](#)

See new policy 3C

50	k.	The latter part of the policy concerning parking provision is too restrictive.	"...the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened". Para 173, NPPF	<i>"Where parking provision sympathetic boundary treatment and planting and the provision of at least an equal area of landscaped front garden;</i>
<u>STNP Response:</u> Addressed by new policy 2D				
<u>Amendment to the Neighbourhood Plan:</u> See new policy 2D				
51	m.	No one has the right to any specific view.	The Planning Aid leaflet on 'material considerations' confirms that a 'loss of view' is not a material planning consideration. http://www.rtpi.org.uk/media/686895/Material-Planning-Considerations.pdf	<i>"The design and layout...visual openness of its surroundings, protects existing public views to the countryside, and ..., as demonstrated through a Visual and Landscape Landscape and Visual Impact Assessment;..."</i>
<u>STNP Response:</u> Deleted from this policy; covered in new landscape policies				
<u>Amendment to the Neighbourhood Plan:</u> Deleted from policy				
52	o.	In March 2015 a Ministerial Statement indicated that planning policies shouldn't identify any local requirements or technical standards that related to the building, internal layout or functioning of new dwellings. This included policies that sought any form of compliance with the Code for Sustainable Homes.	The Ministerial Statement was made after a technical housing standards review, which withdrew the Code for Sustainable Homes on 27 March 2015.	Delete.
<u>STNP Response:</u> The comment has been made redundant by the publication of NPPF2 which allows design codes. Comment not accepted				

<u>Amendment to the Neighbourhood Plan:</u>				
No change				
53	P3.2	While understanding the concern, such schemes should be considered on their individual merits, but no evidence has been provided for not supporting rear parking courts.	<i>"[Policy] It should be concise, precise and supported by appropriate evidence". Para 041, PPG on Neighbourhood Planning.</i>	Need to provide the evidence or delete the policy.
<u>STNP Response:</u>				
Rewritten under new policy 3D				
<u>Amendment to the Neighbourhood Plan:</u>				
Deleted from this policy and reworded in new policy 3D				
54	p39, P3.4	The requirement that all of the criteria should apply is too restrictive and also does not provide evidence for all the criteria.	<i>"...the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. Para 173, NPPF</i>	<i>"...will take into account the only be permitted providing it strictly complies with all of the following criteria":</i>
<u>STNP Response:</u>				
We not agree to the proposed change. While we consider we have submitted more than enough evidence to support our approach, we would be willing to collate more if the Council specifies precisely what additional evidence it might need. Local Plan Policy COM 01 Design uses the same approach as we do - i.e. multiple criteria to be met - not just taken into account				
<u>Amendment to the Neighbourhood Plan:</u>				
None				
55	P3.4, a - d.	Whilst appreciating why the parish council are seeking to avoid excessive light pollution, these criterions are considered to be excessive and unreasonable. Consideration does not seem given to sunrise and sunset times in winter.	The criteria is excessive and not enforceable. <i>"...the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. Para 173, NPPF</i>	Delete criteria b -d.

STNP Response:

We not agree to the proposed change. While we consider we have submitted more than enough evidence to support our approach, we would be willing to collate more if the Council specifies precisely what additional evidence it might need.

Criterion (c) addresses lighting-up times and thereby gives consideration to winter sunrise and sunset times

Amendment to the Neighbourhood Plan:

None

56	P44, Policy 4A, P4A.2	Developer obligations can only be sought where they conform to the requirements of regulation 122 of the Community Infrastructure Levy regulations 2010.	To ensure conformity with national planning policy.	Amend paragraph to refer to requirements of regulation 122.
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STNP Response:

Comment agreed and incorporated

Amendment to the Neighbourhood Plan:

Updated accordingly

57	P45, Policy 4B, P4B.1 d.	This criteria states that new business or tourism will be supported where it would not give rise to unacceptable increase of road traffic. The NPPF at paragraph 32 sets the test for refusal of development on transport grounds as 'severe'. The criterion would suggest a higher test than that what would currently be supported within the NPPF.	Neighbourhood plan should conform with paragraph 32 of the NPPF.	Replace 'unacceptable' with 'severe'.
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STNP Response:

Comment agreed and incorporated

But also add "safe and suitable access " per NPPF2 paragraph 108 as a new criterion

Amendment to the Neighbourhood Plan:

Updated accordingly

58	P46, Policy 4C.1	The requirement that all of the criteria should apply is too restrictive and also does not provide evidence for all the criteria.	<i>"...the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened".</i> Para 173, NPPF.	"...shall comply with all of the following design criteria:..." take into account the with all of the following design criteria:..."
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STNP Response:

Policy deleted as it is now covered by policy 3A

Amendment to the Neighbourhood Plan:

Policy deleted

59	P4C.1, a.	This states that the design and layout of the development does not <i>'impact adversely'</i> any building defined as a heritage asset. It is not clear whether a heritage asset refers to both designated and non-designated heritage assets - this should be clarified. Furthermore, the test is higher than required through the NPPF at paragraphs 132 to 134 for which for designated heritage assets the test is substantial harm. For non-designated heritage assets, the NPPF requirements are set out at paragraph 135.	Criterion a does not conform to the NPPF at paragraphs 132-136.	Delete criterion a. and revise to comply with the NPPF.
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STNP Response:

See also comment 48 as policy 4C has been deleted and incorporated in policy 3A

Amendment to the Neighbourhood Plan:

Policy 4C deleted; see policy 3A

60	d.	The standards act as guidelines; however, there may be mitigating factors why a slightly reduced numbers may be acceptable e.g. the provision of public transport.	Planning should “ <i>make the fullest possible use of public transport</i> ”. Para 17, NPPF	“The design and layout provides adequate on-site parking space consistent with ... and take into account the in accordance with parking standards defined in the emerging Local Plan;
<p><u>STNP Response:</u></p> <p>Agreed</p>				
<p><u>Amendment to the Neighbourhood Plan:</u></p> <p>Addressed in new policy 3D</p>				
61	e.	All development will have an impact on traffic and parking; the key issue is whether it is excessive or not.	“Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe” . Para 32, NPPF.	“Where applicable access links successfully to and from public roads does not impede local traffic or reduce parking provision for existing neighbouring residents”;
<p><u>STNP Response:</u></p> <p>See comment 49 as policy 4C has been deleted and incorporated in Policy 3A</p>				
<p><u>Amendment to the Neighbourhood Plan:</u></p> <p>See Policy 3A</p>				
62	h.	No one has the right to any specific views.	This leaflet on ‘material considerations’ confirms that a ‘loss of view’ is not a material planning consideration, Planning Aid.	“The design and layout...visual openness of its surroundings, protects existing public views to the countryside, and ... , as demonstrated through a Visual and Landscape Landscape and Visual Impact Assessment;...”.
<p><u>STNP Response:</u></p> <p>See comment 51 as this policy has been deleted and incorporated in policy 3A</p>				
<p><u>Amendment to the Neighbourhood Plan:</u></p> <p>See policy 3A</p>				

63	p46, 4C.2	The requirement that all of the criteria should apply is too restrictive and also does not provide evidence for all the criteria.	<i>"...the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. Para 173, NPPF</i>	<i>"...will take into account the only be permitted providing it strictly complies with all of the following criteria":</i>
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STNP Response:

See comment 54. We do not agree to the proposed change. While we consider we have submitted more than enough evidence to support our approach, we would be willing to collate more if the Council specifies precisely what additional evidence it might need Local Plan Policy COV 01 has a similar approach to our own and was not challenged at the examination hearings

Amendment to the Neighbourhood Plan:

Policy deleted but covered in policy 3A without change to approach

64	P4C.2, f- i	Whilst appreciating why the parish council are seeking to avoid excessive light pollution, these criterions are considered to be excessive and unreasonable. Consideration needs to be given to sunrise and sunset times in winter.	The criteria is excessive and not enforceable. <i>"...the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. Para 173, NPPF.</i>	Delete criterion g & h.
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STNP Response:

See also comment 55. We not agree to the proposed change. While we consider we have submitted more than enough evidence to support our approach, we would be willing to collate more if the Council specifies precisely what additional evidence it might need.

Criterion (c) addresses lighting-up times and thereby gives consideration to winter sunrise and sunset times

Amendment to the Neighbourhood Plan:

Policy deleted but covered in policy 3D without change to approach

65	p48, Policy 5	<p>While we support the broad principle of a gap, the Policy (particularly para 2) is negatively worded and overly restrictive. It also should have regard to development which is permitted within rural areas.</p> <p>There is concern regarding the detail, as it is considered to be too excessive, restricting any development near the Saham Toney/Watton boundary.</p> <p>Insufficient evidence is also considered to have been provided to justify the gap across this whole area. It would be better to provide a focus on the key areas of key concern such as Richmond Road.</p> <p>In addition to this it does not have regard to the existing development within the gap, including land within Richmond Park Golf Club.</p>	<p>The policy is too negative and restrictive and lacks sufficient evidence:</p> <p><i>"...● plan positively to support local development..."</i>. Para 16, NPPF.</p> <p><i>"...the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. Para 173, NPPF.</i></p> <p><i>"[Policy] It should be concise, precise and supported by appropriate evidence"</i>. Para 041, PPG on Neighbourhood Planning.</p>	<p>Review policy to reword positively. The gap in its current form cannot be supported. As it is considered to be excessive and need to be reviewed. Either delete these areas or provide the evidence for these areas.</p>
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STNP Response:

Policy split into 2: 5A - strategic gap along Richmond Road and Cley Lane; justified a previously by development pressures and 5B - green wedges justified by specialist Landscape Character Assessment

Amendment to the Neighbourhood Plan:

Splitting of policy; provision of Landscape Character Assessment as evidence; rewording to be more positive

66	p49, Map	The map is missing the legend.	To assist with the understanding of the map.	Add legend, including the scale and compass rose.
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STNP Response:

Although this was intentional, we will add a map title block and legend

Amendment to the Neighbourhood Plan:

Map amended

67	P55, Policy 6.P6.2	The section on non-designated heritage assets does not conform to the NPPF which requires a balanced judgement to be reached in relation to these assets having regard to the scale of any harm or loss and the significance of the heritage asset.	Paragraph does not conform to paragraph 135 of the NPPF.	Delete paragraph or revise in light of NPPF.
<p><u>STNP Response:</u></p> <p>Policy 6 redrafted in accordance with NPPF2 and incorporating informal review comments on revision by Heritage England</p>				
<p><u>Amendment to the Neighbourhood Plan:</u></p> <p>Policy updated</p>				
68	P6.3	Scheduled monuments are designated heritage assets. Inclusion of them within this paragraph appears to reduce the level of protection which has to be afforded to them. The NPPF sets out that substantial harm or loss of a scheduled monument should be wholly exceptional.	The inclusion of scheduled monuments does not conform to the requirement of paragraph 132.	Remove reference to scheduled monuments or revise in light of NPPF.
<p><u>STNP Response:</u></p> <p>Policy 6 redrafted accordingly</p>				
<p><u>Amendment to the Neighbourhood Plan:</u></p> <p>Policy reworded</p>				
69	P56, T6.7, 6.8 and 6.9	Regard reference to specific Historic England guidance, this may change over the life of the plan.		Add a note to inform that the H.E guidance may change during the life of the plan and that this will need to be cross referenced with the H.E website

<u>STNP Response:</u>				
Agreed				
<u>Amendment to the Neighbourhood Plan:</u>				
Updated accordingly				
70	p60, Policy 7A	Para's 1 & 2 appear to contradict themselves in relation to what development would be allowed within these areas. Also, the NPPF, para 77 states that Local green space should not be an extensive tract of land. Saham Mere extends to 7.9 hectares; an extensive tract of land and as such does not meet the requirements of the NPPF.	The designation of Saham Mere does not conform to the NPPF.	Remove reference to Saham Mere. Delete paragraph P7A.2 Note – There may be other means to offer protection for Saham Mere.
<u>STNP Response:</u>				
We propose to merge P7A.1 and 2 to eliminate any contradiction. Since the water area of Saham Mere is approximately 4.3 hectares, that leaves 3.6 ha of protected surrounding land, similar to sports field (3.6ha); so, we have revised the designation to cover just that land and not the Mere itself				
<u>Amendment to the Neighbourhood Plan:</u>				
Policy updated				

71	p68, Policy 7b	<p>This policy seeks to significantly restrict areas where development can be permitted and restricts the presumption in favour of sustainable development.</p> <p>Whilst it is acknowledged that some assessment has been provided, it is limited and it is not clear why these sites have been chosen over others. The evidence base does not appear to consider any alternatives or set out why the particular characteristic has been chosen i.e. why does the neighbourhood plan consider view 10 to be rare?</p> <p>Also the policy as currently written is negatively worded.</p>	<p>As currently worded does not conform to the Basic Conditions in relation to contributing to sustainable development, as well as requiring more evidence, and be worded positively. <i>“At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development...”</i>, Para 14, NPPF</p> <p><i>“[Policy] It should be concise, precise and supported by appropriate evidence”</i>. Para 041, PPG on Neighbourhood Planning. <i>“...● plan positively to support local development...”</i>. Para 16, NPPF.</p>	<p>Replace second sentence with <i>“Development proposals should seek opportunities to retain and incorporate key views”</i>.</p> <p>Further evidence should be provided to justify the views.</p>
<p><u>STNP Response:</u></p> <p>In the light of our landscape consultant's new report on key views we have completely revised this policy and present the report as evidence</p>				
<p><u>Amendment to the Neighbourhood Plan:</u></p> <p>See revised policy 7J</p>				

72	p82, Policy 7c, P7C.4 & 5	These requirements regarding trees and hedge rows requirements are too restrictive. Although replacement planting is desirable, it is not possible to put a number on what can be planted as each site is different; there is no point forcing planting where trees do not have space to reach maturity or will become a nuisance - each has to be judged individually. Planting nearby is not enforceable or practical. Climate change and disease dictate that we must be more diverse with planting rather than restricting it to only around 30 species. Also no evidence appears to have been provided for why new residential development should provide 3 trees for each new dwelling.	<i>"...the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened".</i> Para 173, NPPF. <i>"[Policy] It should be concise, precise and supported by appropriate evidence".</i> Para 041, PPG on Neighbourhood Planning.	<i>"New development shall provide for an appropriate level of tree planting and landscaping".</i> Where suitable, planning conditions could be sort to secure planting of trees suitable for the location with adequate room to reach maturity.
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STNP Response:

While we agree with the principle of the comment, we have used alternate wording to match that agreed on by the Council at the Local Plan hearings and included in the Local Plan main modifications list

Amendment to the Neighbourhood Plan:

See revised policy 7M

73	P7C.6	Not all trees and Hedges can be retained.	As above	<i>"Appropriate measures shall be taken to protect the roots of all existing trees and hedges that are to be retained on a site during the process of development".</i>
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<u>STNP Response:</u>				
Agreed				
<u>Amendment to the Neighbourhood Plan:</u>				
See policy 7M				
74	p86, Policy map 9	Map 9 includes wildlife corridors which extend beyond the parish boundary. Neighbourhood plans can only plan for land within their own parish and therefore this needs to be revised.	Neighbourhood plans should “ <i>reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared</i> ”. Para 041, PPG on Neighbourhood Planning.	Revise map 9 to reflect this.
<u>STNP Response:</u>				
Agreed				
<u>Amendment to the Neighbourhood Plan:</u>				
Map amended				
75	p86, Policy 8	The policy requires all new development (including significant alterations to existing building) to include an appropriate assessment in relation to flood risk. This policy is onerous for small scale development, which may incorporate householder planning applications. Also no justification is provided as to the necessity of the policy being applied at a much smaller scale than what would be expected through the NPPF	(see footnote 20 of the NPPF). As worded, the policy does not have appropriate regard to national policy and therefore does not meet the Basic Conditions.	Revise policy to ensure it reflects the NPPF and is not overly onerous on small scale development.
<u>STNP Response:</u>				
The criterion is accordance with NPPF2 paragraphs 163 and 164, with attention drawn to footnotes 50 and 51 in NPPF2				

Amendment to the Neighbourhood Plan:

None justified in this respect

76	p95, PAP3	Buses to Watton.	Should be clarified that all the no11 Dereham to Watton services do also call in Watton – the service runs Dereham – Watton – Swaffham with Saham Toney in the Watton-Swaffham leg. Therefore, there are 11 buses per day to Dereham, Swaffham and Watton. Point about bus to Academy noted, but that is not the only bus to Watton as could be implied otherwise.	Amend for clarity – this is relevant to housing as public transport is raised as a limiting factor to housing development.
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STNP Response:

Agreed but PAP's now removed and passed to Parish Council for action

Amendment to the Neighbourhood Plan:

PAP's deleted

77	p97, PAP 7	This is phrased in a much more collaborative way than the policies earlier in document.	Reflects co-operative working and national law/policy which is not within the gift of Breckland Council.	Amend references earlier in document to follow this line.
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STNP Response:

Noted but not agreed re earlier references which are policy rather than PAP's

Amendment to the Neighbourhood Plan:

PAP's now removed and passed to Parish Council for action

APPENDIX A4. Pre-Submission Consultation March-April 2018: Statutory and Non-Statutory Consultee Comments and STNP Responses

A4.1. Representation by Anglian Water

RESPONDING ORGANISATION: Anglian Water Services Ltd	DATE: 13 April 2018
<p>REPRESENTATION(S):</p> <p>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.</p> <p>Policy 8: Surface water Management and sewerage provision Management</p> <p><u>P8.1</u> - 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.</p> <p>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.</p> <p>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.</p> <p>It is therefore suggested Policy 8 be amended as follows:</p> <p>'P8.1 All development proposals including those coming forward within.... shall satisfy the following criteria'</p> <p>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.'</p> <p><u>P8.2</u> – Anglian Water is supportive of the text relating to the public sewerage network as drafted.</p> <p>Supporting text paragraphs T8.1 and T8.3</p> <p>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.</p> <p>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:</p> <ul style="list-style-type: none"> • 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) <p>Should you have any queries relating to this response please let me know.</p>	

Regards,
Stewart Patience
Spatial Planning Manager

Anglian Water Services Limited

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 was incorporated in the subsequent update of the Plan

Additional reference documents were included in the supporting text

A4.2. Representation by Bowes Estate 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 was designated as an allocated site in the updated Plan.

A4.3. 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): <p>Dear Mr Blow,</p> <p>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.</p> <p>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.</p>	

So with this in mind, I would like to take this opportunity to advise 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
Commercial Road
Dereham
NR19 1AE
01362 652050

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>

RELEVANT SECTION(S) OF PLAN:

Policy 3

Policy 4C

REACTION TO REPRESENTATION(S)

Advice noted

ACTION TAKEN:

Secured by Design has been added as a criterion to Policy 3A: Design

A4.4. 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: email withheld Mr Chris Blow Saham Toney Neighbourhood Plan Steering Committee 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 I. (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 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 <	

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/>](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/>](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/>](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/>](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/>](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>](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/>](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

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.

A4.5. Representation by Norfolk County Council

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;

- 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 withheld.

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 withheld.

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) An 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 withheld.

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

A4.6. 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:

None required

A4.7. Representation by The Ramblers (Norfolk)

RESPONDING ORGANISATION:

The Ramblers (Norfolk)

DATE:

11 April 2018

REPRESENTATION(S):

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.

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.”

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 right of way.

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.

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.

You may want to take these into account in future thinking for the parish.

Best wishes

Ken Hawkins

Secretary, Area Council
The Ramblers (Norfolk)
07505 426750
<http://www.norfolkra.org.uk/>



RELEVANT SECTION(S) OF PLAN:

Parish Action Point 2

REACTION TO REPRESENTATION(S)

Noted

ACTION TAKEN:

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

A4.8. 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>

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.

Yours sincerely,

Planning Admin Team

T: 020 7273 1777

E: Planning.central@sportengland.org

RELEVANT SECTION(S) OF PLAN:

None specifically

REACTION TO REPRESENTATION(S)

There are 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

A4.9. 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  WOODLAND TRUST <div>The Woodland Trust Grantham Lincolnshire NG31 6LL Telephone 08452 935798 Email withheld</div> 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 (e.g. 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/stepping-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 planner's 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-veteran-trees.pdf?cb=8298cbf2eaa34c7da329eee3bd8d48ff>

In addition other Woodland Trust research which may assist with taking your Neighbourhood Plan forward 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

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

APPENDIX A5. Pre-Submission Consultation March-April 2018: Parishioner Comments and STNP Responses

A5.1. Representations by Saham Toney Parishioners

RESPONDENT NUMBER: 1 Comment 1	DATE: 10th April 2018
Would like to see no more loss of road frontage except for access to estate development	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Policy 3(?)	
REACTION TO REPRESENTATION(S): Comment does not appear to relate specifically to any wording in the Plan or its supporting documents	
ACTION TO BE TAKEN: None required	

RESPONDENT NUMBER: 1 Comment 2	DATE: 10th April 2018
REPRESENTATION: Do not support 20mph restriction	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Section 7, Parish Action Point 1	
REACTION TO REPRESENTATION(S): Noted. Before adoption Parish Action Points are a matter for the Parish Council to review in consultation with parishioners and others before determining what actions, if any, should be taken.	
ACTION TO BE TAKEN: It was made clearer in the Parish Action Points set out are subject to further review, study and consultation by the Parish Council before implementation. Parish Action Points were subsequently and formally handed over to the Parish Council for implementation and no longer form part of the Neighbourhood Plan.	

RESPONDENT NUMBER: 2 Comment 3	DATE: April 2018
REPRESENTATION: This being a country village it doesn't have sufficient infrastructure to support large development	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Policy 2A / Evidence Base Volume 1 / General	
REACTION TO REPRESENTATION(S): Noted. Comment accords with the Plan	
ACTION TO BE TAKEN: None required	

RESPONDENT NUMBER: 3 Comment 4	DATE: 2 April 2018
REPRESENTATION: I value the dark skies from the absence of street lights.	

RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Policies 3 and 4C
REACTION TO REPRESENTATION(S): Noted. Comment accords with the Plan
ACTION TO BE TAKEN: None required

RESPONDENT NUMBER: 3 Comment 5	DATE: 2 April 2018
REPRESENTATION: I particularly value the view from Pound Hill to the Mere and suspect that it is of archaeological significance.	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Policy 7B	
REACTION TO REPRESENTATION(S): The respondent refers to Communal View CV1, which is protected under Policy 7B. Support noted	
ACTION TO BE TAKEN: None required	

RESPONDENT NUMBER: 4 Comment 6	DATE: April 2018
REPRESENTATION: The village is very much a rural location and does not support massive developments, as the amenities, highways are unable and insufficient to cope	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Section 5.1 / Policy 2A / Evidence Base Volume 1 / General	
REACTION TO REPRESENTATION(S): Noted. Comment accords with the Plan	
ACTION TO BE TAKEN: None required	

RESPONDENT NUMBER: 5 Comment 7	DATE: 10 April 2018
REPRESENTATION: I see that once again the village boundary line on Ovington Road excludes the last two road side houses on Ovington Road. I have tried unsuccessfully in the past to get an explanation for this exclusion, the reasons for it and the significance of it. I have never been able to find out why these two properties, so obviously a part of the ribbon of development along Ovington Road are always excluded. My property is Cranford House, the last village house with road frontage on Ovington Road. Our garden already has planning permission for development and this, along with Brick Kiln Cottage, will make three houses excluded by the boundary line, for no apparent reason and for no known effect. In the absence of any reason why it should be excluded, I wish for my property to be included within the village boundary line. If you are the wrong person to contact, I would be grateful if you could forward this email to the correct authority.	

I would also be grateful for a name and contact details of that authority.
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Policy 1
REACTION TO REPRESENTATION(S): Although Policy 1 refers to the settlement boundary map for Saham Toney, control of that boundary is the responsibility of Breckland Council and cannot be amended by the Neighbourhood Plan. The respondent has been put in touch with Breckland Council
ACTION TO BE TAKEN: None required

RESPONDENT NUMBER: 6 Comment 8	DATE: 18th March 2018
REPRESENTATION: Your leaflet shows the Settlement Boundary thumbnail but I cannot find a dedicated PDF on the website only map 10, a ST policy map (overall) which distorts when zoomed in to find my property. Please add a dedicated PDF.	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Regulation 14 Consultation publicity leaflet	
REACTION TO REPRESENTATION(S): The respondent was sent a link to the required map on the website for the Plan	
ACTION TO BE TAKEN: None required	

RESPONDENT NUMBER: 6 Comment 9	DATE: 18th March 2018
REPRESENTATION: Policy 2A.2.2 states that "An appropriate level of services, facilities and infrastructure is in place or provided to serve the development: Perhaps this statement is not in the old plan but having being forcibly removed from Watton Surgery to Shipdham Surgery because of lack of spaces at the Dr's I feel this statement needs to carry much more weight in planning terms. I feel the word "appropriate" should be defined, for instance a maximum fixed number of residents to the number of Dr's, or "a minimum fibre speed to the development", or "footpaths be provided to and from the development connecting to the nearest existing footpath", or "There shall be a gas main provided to the development". I am sure the committee can think of some more.	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Policy 2A / Section 7	
REACTION TO REPRESENTATION(S): It would be impossible for a Neighbourhood Plan to quantify criteria as suggested. Additionally, policies cannot address provision of healthcare or footpaths; these are dealt with to the extent practical in Section 7	
ACTION TO BE TAKEN: None required	

RESPONDENT NUMBER: 6 Comment 10	DATE: 18th March 2018
REPRESENTATION:	

<p>Policy 2A.2.3.3.1 states: Improving the ratio of one and two-bedroomed dwellings in the Neighbourhood Area to three, four and five bed-roomed dwellings.</p> <p>Again I feel this needs more definition and more weight in planning terms.</p> <ul style="list-style-type: none"> • What is the ratio at present? Without that how can we judge if it has been improved or not? • The new ratio should be specified. I suggest it should be 50/50! • What is affordable? Chris Tilley (and others) build some lovely houses but I would not call these "affordable" to be affordable to around Saham. <p>With these major exceptions above, I feel the plan is good. Thank you to all who contributed.</p>
<p>RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:</p> <p>Policy 2A / Policy 2B</p>
<p>REACTION TO REPRESENTATION(S):</p> <p>The comment actually refers to PA2.2 c.2.iii. Chart 2B2 in the supporting text for Policy 2B shows the numbers of dwellings by size, as does Evidence Base Volume 4, but it is agreed the charts do not show actual numbers.</p> <p>It is highly unlikely that the Plan would be allowed to specify an exact ratio so that suggestion will not be pursued.</p> <p>The definition of "Affordable" is given in the National Planning Policy framework and cannot be varied in the Neighbourhood Plan</p>
<p>ACTION TO BE TAKEN:</p> <p>Baseline data on dwelling sizes at 31 March 2019 has been added to section 8 of the Plan</p>

<p>RESPONDENT NUMBER: 7</p> <p>Comment 11</p>	<p>DATE: 17th April 2018</p>
<p>REPRESENTATION:</p> <p>Compliments on a well presented and well documented case report. Thank you all for your work, and time given to this</p>	
<p>RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:</p> <p>General</p>	
<p>REACTION TO REPRESENTATION(S);</p> <p>Support noted</p>	
<p>ACTION TO BE TAKEN:</p> <p>None required</p>	

<p>RESPONDENT NUMBER: 8</p> <p>Comment 12</p>	<p>DATE: 17th April 2018</p>
<p>REPRESENTATION:</p> <p>Regarding 7(2)</p> <p>I always understood there was a public footpath via Coberg Lane through the Panworth Estate to Ashill, in the past this has been used by locals but to my knowledge was not registered as a Local Footpath by the then Parish Council in the 1970's when Village PC were asked to detail. For interest there is a branch Path in the Panworth area that proceeds to Saham Waite.</p>	
<p>RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:</p> <p>Section 7, Parish Action Point 2</p>	
<p>REACTION TO REPRESENTATION(S)</p> <p>The representation from the Ramblers Norfolk (see Representations Volume 2, section 7) deals with the noted route and suggests it be claimed as a public right of way. This would be a matter for the Parish Council to pursue outside of the Neighbourhood Plan should it choose to do so</p>	
<p>ACTION TO BE TAKEN:</p> <p>None required</p>	

RESPONDENT NUMBER: 8 Comment 13	DATE: 17th April 2018
REPRESENTATION: As long as this action does not mean that the good detailed work is no corrupted by higher genders.	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Section 8	
REACTION TO REPRESENTATION(S) Comment unclear but is not seen as suggesting a revision to the wording of the Plan	
ACTION TO BE TAKEN: None required	

RESPONDENT NUMBER: 9 Comment 14	DATE: 21 March 2018
REPRESENTATION: Roads will not be made safer with 20mph limits or traffic calming - all it will do is cause excess pollution and extra maintenance problems for vehicles. Long Road/Hill Road being single track with passing places does nothing for the 'character of the village', it's a major pain in the arse. Leave the 30mph speed limit in place. Do not under any circumstances install traffic calming measure. Instead make sure the road surface is smooth and well-maintained including drainage and edging as this increases safety and reduces traffic noise. Similarly ensure Hill Road and Long Road are properly resurfaced, including the passing places as the road is currently a death trap with holes sufficiently deep that they're likely to cause serious injury if struck. Patching them up in the council normal half-arsed manner is not good enough - it needs doing properly	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Section 7, Parish Action Point 1	
REACTION TO REPRESENTATION(S): Noted. Before adoption Parish Action Points are a matter for the Parish Council to review in consultation with parishioners and others before determining what actions, if any, should be taken.	
ACTION TO BE TAKEN: It was made clearer in the Parish Action Points set out are subject to further review, study and consultation by the Parish Council before implementation. Parish Action Points were subsequently and formally handed over to the Parish Council for implementation and no longer form part of the Neighbourhood Plan.	

RESPONDENT NUMBER: 10 Comment 15	DATE: 15 April 2018
REPRESENTATION: In my opinion 20mph speed limits and so-called traffic calming measures are a nuisance, they serve no purpose other than to antagonise drivers and increase pollution. Far better to enforce existing limits and remind drivers of them by increased signage and electronic warnings. Generally, I agree with the remainder of this paragraph.	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Section 7, Parish Action Point 1	
REACTION TO REPRESENTATION(S): Noted. Before adoption Parish Action Points are a matter for the Parish Council to review in consultation with parishioners and others before determining what actions, if any, should be taken.	
ACTION TO BE TAKEN: It was made clearer the Parish Action Points set out are subject to further review, study and consultation by the Parish Council before implementation. Parish Action Points were subsequently and formally	

handed over to the Parish Council for implementation and no longer form part of the Neighbourhood Plan.

RESPONDENT NUMBER: 10 Comment 16	DATE: 15 April 2018
REPRESENTATION: Section 7 should include a parish action point to improve drainage, despite the parish being plagued by flooding the parish council appears to take little or no interest other than items in the minutes such as report xxxx to highways. We even have councillors who fail to clear their ditches. In my opinion the parish should be the collecting point for local information regarding drainage choke points and take action to ensure they are cleared.	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Section 7	
REACTION TO REPRESENTATION(S) It would be very difficult for the Parish Council to solve existing drainage problems, which are more properly the responsibility of the Lead Flood Authority, Anglian Water and landowners	
ACTION TO BE TAKEN: A Parish Action Point on this subject was added. Parish Action Points were subsequently and formally handed over to the Parish Council for implementation and no longer form part of the Neighbourhood Plan.	

RESPONDENT NUMBER: 11 Comment 17	DATE: 24 March 2018
REPRESENTATION: It states that homes already in the process of being built will not count towards the final allocation of 19 (already increased from 15). As the plan will be quite some time before it is actually finalized, let alone agreed, this could mean that we could be facing one huge housing estate in Saham Toney. Policy 1 states that between 19 & 48 houses up till 2036 only if services, roads and transport etc are considered. The roads around here are not suitable for the constant flow of huge lorry's and work site vehicles. This should be taken into consideration before planning permission is granted.	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Policy 1 / Evidence Base Volume 1	
REACTION TO REPRESENTATION(S) The emerging Local Plan sets an allocation that will start only when that Plan is adopted. Policy 1 allocates a minimum of 50% more houses than Breckland Council indicates in its hearing statement for the Local Plan examination (32). Policy 1 sets a start date for the allocation it specifies as 1 January 2018. To date Breckland Council do not accept that. The comment regarding roads accords with the development constraints set out in Evidence Base Volume 1 and referenced in Policy 1	
ACTION TO BE TAKEN: None required	

RESPONDENT NUMBER: 12 Comment 18	DATE: April 2018
REPRESENTATION: Improved road edging is a MUST. Now with more housing = more vehicles - more pathways are needed. A pedestrian bridge over Watton Brook should be a <u>priority</u> before anyone is killed.	

Hedges and trees need cutting back and overgrown verges. More TROD paths are a must. Life moves on and plans have to change accordingly for safety.

RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:

Section 7, Parish Action Point 1

REACTION TO REPRESENTATION(S):

The points made are dealt with by Parish Action Point 1C and 1D and will be reviewed for feasibility by the Parish Council at a future date, outside of the Plan

ACTION TO BE TAKEN:

None required

RESPONDENT NUMBER: 12

Comment 19

DATE: April 2018

REPRESENTATION:

A community shop would be great as there are more folk in the village - including a P.O.

RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:

Section 7

REACTION TO REPRESENTATION(S):

Paragraph 7.3 explains why this was not included as a Parish Action Point

ACTION TO BE TAKEN:

None required

RESPONDENT NUMBER: 12

Comment 20

DATE: April 2018

REPRESENTATION:

For the future a community bus would be wonderful, especially for the elderly and less mobile. Not everyone drives.

I have MS and need my mobility scooter to get out and about. I am not allowed on the small buses.

RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:

Section 7

REACTION TO REPRESENTATION(S):

It is possible this suggestion could be included under Parish Action Point 3

ACTION TO BE TAKEN:

This point was covered in a general way by a Parish Action Point. Parish Action Points were subsequently and formally handed over to the Parish Council for implementation and no longer form part of the Neighbourhood Plan.

RESPONDENT NUMBER: 13

Comment 21

DATE: 28th April 2018

REPRESENTATION:

I have lived at High House Ploughboy Lane for many years and neither my house or land have flooded in that time. Please correct the flood risk map

RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:

Evidence Base Volume 12

REACTION TO REPRESENTATION(S):

Comment noted

ACTION TO BE TAKEN:

Evidence Base Volume 12, including its maps, has been withdrawn and no longer forms part of the Plan.

RESPONDENT NUMBER: 14

Comment 22

DATE: 27 April 2018

REPRESENTATION:

I have lived at Homelands Ploughboy Lane for many years and neither my house or land have flooded in that time. Please correct the flood risk map

RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:

Evidence Base Volume 12

REACTION TO REPRESENTATION(S):

Comment noted

ACTION TO BE TAKEN:

Evidence Base Volume 12, including its maps, has been withdrawn and no longer forms part of the Plan.

RESPONDENT NUMBER: 15

Comment 23

DATE: 16th April 2018

REPRESENTATION:

Evidence Map ST 06

This area should never be considered for planning, surface water will run naturally toward Mere, the level of which is much higher than in the past. I take the excess water from this through my land and I know from the amount of water that flows throughout the year it is so. It is not impossible that it could contribute to further flooding to an already vulnerable area - Bell Lane/Richmond Road

RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:

Evidence Base Volume 1

REACTION TO REPRESENTATION(S):

There is no Evidence Map ST06 in the Plan or Evidence Bases. The comment is thought to refer to Constraints Map I in Evidence Base Volume 1, which is taken from a Strategic Housing Land Availability Assessment by Breckland Council in 2014, and which includes depiction of a site designated "ST06". Saham Toney was subsequently reclassified in the emerging Local Plan as a "Rural Settlement with Boundary" instead of a Local Service Centre, and hence no site allocations are made for Saham Toney in the Local Plan, nor in the Neighbourhood Plan.

It is also noted that an application to develop 19 houses on the site indicated was refused both by Breckland Council and at appeal in 2017.

ACTION TO BE TAKEN:

None required

RESPONDENT NUMBER: 15

Comment 24

DATE: 16th April 2018

REPRESENTATION:

Oppose policy

A bad planning decision regarding the Su-Bridge development has already vastly increased the number of articulated lorries negotiating totally unsuited road, undermining verges, width of road restricting traffic, being quite dangerous, Church corner particularly. Non-residential development should only be on Industrial Estates identified for ease of access, minimum invasion of residential areas.

RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:

Policy 4C
REACTION TO REPRESENTATION(S): Comment noted, but the Neighbourhood Plan cannot dictate that non-residential development should only be on industrial estates. Policy 4C sets criteria against which the design of non-residential developments is to be judged
ACTION TO BE TAKEN: None required

RESPONDENT NUMBER: 16 Comment 25	DATE: 17th March 2018
REPRESENTATION: We must have affordable housing for LOCAL's only We must help local people in the community.	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Policy 2B / Parish Action Point 7	
REACTION TO REPRESENTATION(S): Policies 1, 2A and 2B address this to the level felt most likely to be deemed acceptable. While we may like to go further, we do not consider that would be in accordance with national planning rules	
ACTION TO BE TAKEN: None required	
RESPONDENT NUMBER: 17 Comment 26	DATE: 17th March 2018
REPRESENTATION: It is important to have more affordable housing for first time buyers.	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Policy 2B / Parish Action Point 7	
REACTION TO REPRESENTATION(S): Policies 1, 2A and 2B address this to the level felt most likely to be deemed acceptable. While we may like to go further, we do not consider that would be in accordance with national planning rules	
ACTION TO BE TAKEN: None required	

RESPONDENT NUMBER: 18 Comment 27	DATE: 7th April 2018
REPRESENTATION: i) If possible, further weight should be applied to the known problems with the inadequate drainage system. Not sure that you have the ability to address this in this document. ii) Preservation of the bridge in Cley Lane/Saham Road should be enhanced. This bridge is taking excessive weight. It is a lovely bridge and it would be a shame to lose it. In the absence of pavements, pedestrian safety is compromised.	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Section 7	
REACTION TO REPRESENTATION(S) i) It would be very difficult for the Parish Council to solve existing drainage problems, which are more properly the responsibility of the Lead Flood Authority, Anglian Water and landowners ii) Noted	
ACTION TO BE TAKEN:	

A Parish Action Point was added on the subject of drainage. Parish Action Points were subsequently and formally handed over to the Parish Council for implementation and no longer form part of the Neighbourhood Plan.

RESPONDENT NUMBER: 18 Comment 28	DATE: 7th April 2018
REPRESENTATION: We have serious concerns that any form of development should take place without the agreement of all stakeholders, i.e., Anglian Water.	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Policy 8 / General	
REACTION TO REPRESENTATION(S): Agreed. We have received comments on Policy 8 from Anglian Water and will consider how best to incorporate them in the Plan. The Neighbourhood Plan cannot dictate who must agree to new development. Breckland Council must consult statutory consultees on planning applications, but do not require agreement of all stakeholders before granting approval.	
ACTION TO BE TAKEN: Policy 8 improved and strengthened based on representations from Anglian Water and the Lead Local Flood Authority	

RESPONDENT NUMBER: 19 Comment 29	DATE: 21st April 2018
REPRESENTATION: With reference to the neighbourhood plan and in response to your request for comments <u>Evidence Map Flood Risk from Surface Water - Ovington Road and Mill View.</u> You have incorrectly marked number 6 Mill View as being a property which flooded. Numbers 6,7 and 9 Mill View have never suffered any flooding to either their buildings or gardens and you should remove any areas on these properties that you have coloured or boxed blue. Having spoken to a number of residents on Mill View following the flooding of 2016 we do not believe that there were any buildings flooded on the estate. You have incorrectly marked a portion of our field to the north of Mill View as Land Flooded. This land did not flood and you should remove the area that you have coloured blue. You have marked the entire road on Mill View as Land Flooded again this is incorrect due to the levels and falls on this road it would not be possible for it to have flooded in this way. Please note that only a small area of the lowest part of the estate road (where it meets the Ovington Road) flooded and then only for a short period of time. We understand that the Highway Authority only classes a road as having flooded if over 3/4 of the road has been under water for a period of 24 hours. What criteria have you set for the land and roads you have marked as having been flooded? This information does not appear to have been specified. We note that the worst flooding on the Ovington Road occurred at the point where it is crossed by the old railway line, as shown on the original Environment Agency Map, however this area is not marked on your plan. <u>Evidence Map Flood Risk From Surface Water - Chequers Lane/Pound Hill South Bell Lane etc.</u> Firstly this map does not correspond with the previously mentioned map where it overlaps. Numbers 3, 4 and 5 Mill View are shown on this map as having their gardens flooded. Although it was not possible to see into their back gardens the front gardens on these properties certainly did not flood. You have on this map shown the rear garden of number 6 as being Land Flooded. This land did not flood and you should remove the area that you have coloured blue.	

There have been a number of photographs of the crossroads at the end of Bell Lane in the local papers, these show all four of the roads at that point underwater, again this is as shown on the original Environment Agency Map, however this area is not marked on your plan. We note that you have drawn in a cross shaped area of flooding on the right-hand side of this map. Is this area in the wrong place? Should it actually be on the crossroads in order that it corresponds with the official map?

This and the other errors on these maps raise questions about two other areas you have marked as Land Flooded on this map.

Firstly, the area shown on Amys Close should this area actually be on Bell Lane which would then correspond with the official map?

Secondly the area at the corner of Richmond Road where it meets the road leading to Su-Bridge.

This road occasionally floods on the corner as this is the lowest point in this area and this corresponds with the official map.

The area of Land Flooded you have marked runs through the gardens of a number of properties the gardens of these properties appear to be on a slope making it unlikely that your map is correct.

Evidence Map Flood Risk From Surface Water - Pages Lane and Chequers Lane.

On this map on Chequers Lane the area between the pig farm and Stanway Farm is not coloured blue.

This area of the road together with the bottom of Ploughboy Lane was also under water, in line with the official map.

You may recall that there was again a picture in the local paper showing the water covering Ploughboy Lane.

You appear to have put three Property flooded boxes at Stanway Farm (a single property) although one of these boxes is not even on a building!

The area around Charlean, Shambani and Chequers is shown on the official map as at risk of flooding but again these properties have not been coloured blue on your maps.

Evidence Map Flood Risk from Surface Water - Hills Road Central North.

Flooding also occurred on Hills Road at the point where it is crossed by the old railway line, as shown on the original Environment Agency Map, however again this area is not marked on your map.

Map 10 Saham Toney Policy Map.

On this map there is a blue broken line marked as Indication of principal surface water flood risk areas.

This line runs through the Ovington Road and then up through the highest part of our farm which is certainly not at any risk whatsoever of surface water flooding and out onto Hills Road.

This line needs to be moved to the proper location which is probably the stream by the old rail line.

We note that this map is marked with the words 'Background map source', surely the flood maps should be marked with this same wording.

At present these maps merely state Source: Environment Agency which gives the false impression that your various added colourings on the maps are the work of the Environment Agency.

Given not only the large number of omissions and errors which are on your maps but also their dubious origins they are currently not fit to be put forward as Evidence.

Every area and property you are proposing to mark on your maps should have been checked and validated (preferably independently).

Any parishioner who has not been able or not wished to wade through the vast amount of information you have produced may find themselves in a position where their property is blighted by your mistakes.

This is simply unreasonable and unfair on those people.

The Environment Agency maps were prepared professionally by people who are both independent and properly trained and give a far better indication of events.

These maps are the maps which should be used in the Neighbourhood plan and any future decision making.

RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:

REACTION TO REPRESENTATION(S):

The purpose of the annotations to the Environment Agency maps were to reflect, on an indicative basis only, villager reports of flooding which occurred on 23 June 2016.

Regarding the evidence map for Ovington Road and Mill View (E8.12)

Some of these comments are contrary to reports received from other villagers, three of whom noted their properties in Millview being flooded in June 2016. Additionally, several people who live in Millview highlighted flooding there when objecting to a planning application for land immediately to the north. Going forward we will establish a method to best clarify and confirm the facts behind these apparently opposing reports.

Regarding the evidence map for Chequers Lane /Pound Hill South, Bell Lane etc (E8.10)

We will correct the anomaly at the overlap with map E8.12.

Regarding Millview see notes above.

As stated in the Plan, we did not undertake a scientific survey of the flood event of June 2016, and have not claimed that our map annotations are comprehensive, nor that they are anything but indicative of reports received from villagers. As a result, we were unable to annotate areas that were affected but for which we received no reports.

It is agreed that three annotations noted are incorrectly positioned and those will be corrected; but not accepted this means other annotations are also erroneously positioned.

Regarding the evidence map for Pages Lane and Chequers Lane (E8.9)

As above we did not annotate areas for which we received no reports, but will add the areas for which the respondent has provided information.

It is not the purpose of our annotations to replicate the flood risk areas shown on the Environment Agency maps; they are simply to give an indication of reports received from villagers in response to a questionnaire that went to all households in late 2016.

Regarding the evidence map for Hills Road Central North (E8.6)

As above we did not annotate areas for which we received no reports, but will add those areas for which the respondent has provided information.

Regarding Map 10

We will review this map for accuracy and adjust it accordingly.

More generally in the light of the comments we plan to review how we can better illustrate villager flood reports. If they remain as annotations to the Environment Agency backgrounds, we will certainly label the latter as such; but to further ensure clarity we may in fact separate the two forms of data when updating the evidence base. Either way we will ensure greater clarity and accuracy.

Regarding the more general comments:

☐ It should be understood that there is no proposal for the villager flood report annotations to be used in future planning decisions and this is made clear in the supporting text to Policy 8 and in Evidence Base volume 12. Only the up to date online Environment Agency maps are to be used in that context as the Plan already states. We will give further emphasis and clarity to this fact when updating the plan;

☐ We note that the Environment Agency maps carry their own caveats regarding accuracy;

☐ It is our understanding that the Environment Agency's online maps are based on an assessment carried out in 2008 and hence do not yet account for events in June 2016 (and indeed not for December 2017 / January 2018 events in the village). Therefore, we feel it is reasonable for the Neighbourhood Plan to include some indication of those events. While we do not claim ours to be a highly scientific survey we consider the information is broadly fit for its intended purpose - which is simply to highlight the concerns many villagers have that the Environment Agency maps do not tell "the whole story"; and that mapping flood risk on a 1-in-100 year event basis is not the most relevant consideration to anyone whose home or property is flooded repeatedly over the course of a few years.

ACTION TO BE TAKEN:

Evidence Base Volume 12, including its maps, has been withdrawn and no longer forms part of the Plan.

RESPONDENT NUMBER: 20 Comment 30	DATE: 17th April
REPRESENTATION: In response to the flood risk from surface water evidence maps, can I please state that at no time since we have been living here (since 2009) have we known Mill View road to be flooded apart from the entrance to the road beside number 1. It certainly hasn't flooded outside mine (no 9) or to my knowledge anywhere else on the close. During the floods of 2016 the main Ovington Road (up towards Ovington crossroads) was flooded and also the crossroads with Pages Lane. However it certainly didn't flood on Mill View itself, I know because I was out in it at the time. The evidence map E8.12 therefore is inaccurate in saying that the land had flooded on the whole of Mill View itself, it was just the main entrance to the close beside number 1.	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Evidence Base Volume 12	
REACTION TO REPRESENTATION(S): We have conflicting reports about flooding in Millview, with 3 reports of flooding there in response to a survey in December 2016 and several objectors to a planning application on adjacent land stating their properties / land had been flooded	
ACTION TO BE TAKEN: Evidence Base Volume 12, including its maps, has been withdrawn and no longer forms part of the Plan.	

RESPONDENT NUMBER: 21 Comment 31	DATE: April 2018
REPRESENTATION: This (<i>the strategic gap</i>) is of paramount importance, build much nearer and we will become Watton. This is not what we need. Saham Toney must remain as a village with its own parish council and autonomy	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Policy 5	
REACTION TO REPRESENTATION(S): Noted. Policy 5 and its supporting evidence stresses the same opinion	
ACTION TO BE TAKEN: None required	

RESPONDENT NUMBER: 22 Comment 32	DATE: 29th April
REPRESENTATION: With reference to the neighbourhood plan and in response to your request for comments <u>Evidence Map Flood Risk from Surface Water - Hills Road South and Ploughboy Lane North</u> Homelands bungalow and the land between Homelands and Mercian cottage have never flooded as they are on much higher ground than the river on the opposite side of the road, the meadow at the Hills road/Ploughboy lane junction and the adjoining meadow, are more at risk of flooding as shown on the official Environment agency map.	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Evidence Base Volume 12	
REACTION TO REPRESENTATION(S):	

Noted
ACTION TO BE TAKEN: Evidence Base Volume 12, including its maps, has been withdrawn and no longer forms part of the Plan.

RESPONDENT NUMBER: 23 Comment 33	DATE: 14 March 2018
REPRESENTATION: Average 3-bedroom properties for families not all 1 or 2 bedroom	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Policy 2B	
REACTION TO REPRESENTATION(S): Policy 2B does not stipulate "all 1 or 2 bedroom" properties, and allows larger properties to be put forward	
ACTION TO BE TAKEN: None required	

RESPONDENT NUMBER: 23 Comment 34	DATE: 14 March 2018
REPRESENTATION: Disagree with where the maps show wildlife corridors around High House farm. There are specific corridors and wildlife areas left that are more conservation friendly than the ones shown on the map	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Policy 7C	
REACTION TO REPRESENTATION(S): The parishioner making this comment was asked to provide more detailed information but did not respond further. Regardless of that it is planned to commission the Norfolk Biodiversity Information Service to undertake a detailed study of wildlife areas and corridors in the parish prior to the Regulation 16 submission and the results of that study will be incorporated in an update to Policy 7C	
ACTION TO BE TAKEN: There are conflicting reports for the area in question and given the lack of more detail from the respondent the policy map has not been amended in respect of the comment. A professionally and independently prepared habitats and corridors map has been commissioned from the Norfolk Biodiversity Information Service study and will replace the current policy map at the Regulation 15 submission.	

RESPONDENT NUMBER: 24 Comment 35	DATE: April 2018
REPRESENTATION: The aims and objectives set out in this document clearly show an enlightened view of what the village should be, and the team should be congratulated on their hard work and diligence in getting the plan to its present stage. I believe it would be churlish to start adding bits on to what is a very accomplished document and I look forward to seeing it adopted as a blueprint for the future of the village.	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: General	
REACTION TO REPRESENTATION(S): Noted	

ACTION TO BE TAKEN: None required

RESPONDENT NUMBER: 25 Comment 36	DATE: 27th March 2018
REPRESENTATION: Very impressed with the level of detail in the plan and the supporting evidence Excellent Plan; best of luck with the consultation	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: General	
REACTION TO REPRESENTATION(S): Noted	
ACTION TO BE TAKEN: None required	

RESPONDENT NUMBER: 26 Comment 37	DATE: April 2018
REPRESENTATION: "The Manor" on Page's Lane is an eyesore. P6.2 doesn't meet 1, 2 or 3	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Policy 6	
REACTION TO REPRESENTATION(S): The Manor is otherwise known as Page's Place and is a listed building that is currently undergoing major renovation. The respondent is presumably querying why that was given planning permission, but that was before the designation of the Neighbourhood Area and is outside the remit of the Neighbourhood Plan. it is noted that P6.2 refers to non-designated heritage assets and so would not in any case cover Page's Place, which would be dealt with under P6.1	
ACTION TO BE TAKEN: None required	

RESPONDENT NUMBER: 26 Comment 38	DATE: April 2018
REPRESENTATION: Thank you for your time and energy in putting this excellent plan together	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: General	
REACTION TO REPRESENTATION(S): Noted	
ACTION TO BE TAKEN: None required	

RESPONDENT NUMBER: 27 Comment 39	DATE: 17th March 2018
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REPRESENTATION: P8.1 e Mentions "the highest measured ground water level" and "ground level". The basis for both should be stated to provide an unambiguous baseline
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Policy 8
REACTION TO REPRESENTATION(S): Agreed
ACTION TO BE TAKEN: Revised wording makes this clearer

RESPONDENT NUMBER: 28 Comment 40	DATE: April 2018
REPRESENTATION: More footpaths around the parish. Access to more for walking. Even by fee	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Policy 8	
REACTION TO REPRESENTATION(S): Agreed	
ACTION TO BE TAKEN: Revised wording makes this clearer	

A5.2. Representations by Others

One representation was received from a resident of Watton, a neighbouring town to the Neighbourhood Area. Although there is no requirement to accept comments from individuals who do not live, work or run a business in the Neighbourhood Area, the respondent concerned lives immediately adjacent to the Parish boundary, on the Watton side, and provides helpful evidence regarding Policies 5 and 8. The comment is therefore deemed to be a valid representation.

RESPONDENT NUMBER: 29 Comment 41	DATE: 31st March 2018
<p>REPRESENTATION: I live in Langmere Road Watton on land immediately bordering the "Watton Gap" land. Although Policy 5 relates to the visual aspect of maintaining Saham Toney as a separate entity from Watton, my concern is that this land (known as "Nilefields" south of Broom Hall and used every year by the Wayland Show) floods very easily and regularly causes flood problems at the bridge in Richmond Road. The land slopes from the Watton boundary down to the river, and yet the land floods so badly that it isn't just the land near the river that floods (as would be expected). I have photos of my back garden and Nilefields connected as one flooded area. Should this area be allowed as development the necessary hard paved areas and access roads will only serve to make this flooding more severe and more frequent.</p> <p>Having lived in Watton for 4 years I can confirm that we have experienced sufficient heavy and continuous rainfall to make flushing the toilet impossible, and have had to drive to Watton Library to use their facilities. We have spoken to our neighbours and they say the same, they are unable to flush their toilets when we have a long period of heavy rainfall. From memory this has happened so far on 3 occasions. Although this problem is due to the well documented fact that the drains in this area no longer adequate, I believe that it is also a result of the houses having old soakaways from the rainwater downpipes. These soakaways are over 40 years old (Langmere Road houses were built in 1974) and by now they are presumably no longer doing their job properly. Therefore, any period of heavy prolonged</p>	

rainfall causes the land around the houses to flood very quickly, adding to the problem that the sewers are overflowing (once we had to disinfect, and clear toilet paper from the ground around a manhole cover lifted by water pressure).

Once the rain stops the flood levels subside surprisingly quickly, and although I am no expert on the matter, I presume that this is not due to the water soaking into the ground, as the land is completely saturated. I therefore presume the reason is that the water is flowing towards the lowest point, being the river, travelling across Nilefields - hence the flooding on the Watton/Saham Toney boundary.

By way of explanation on the photo's - I was in the process of renewing the old rear fence (Watton/Saham Toney boundary) when the rains came. I have highlighted with a yellow line to show the boundary, where the new fence is now constructed.

I have attached 9 photos:

- 1) showing the water flowing down our driveway at just under 2" deep.
- 2) the drains full.
- 3) - 9) our back garden and Nilefields connected by flood water.

Photo 1: Driveway

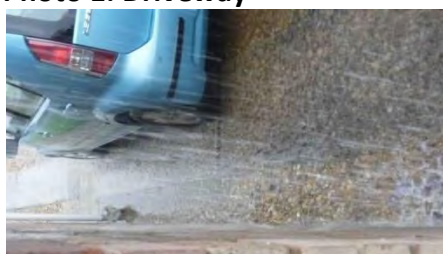


Photo 2: Drive-Water 40mm deep



Photo 3: South of boundary



Photo 4: At parish boundary

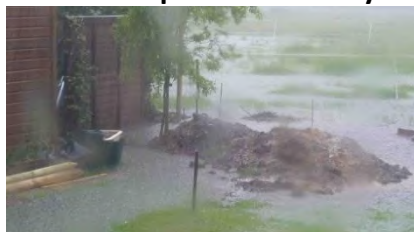


Photo 5: At parish boundary

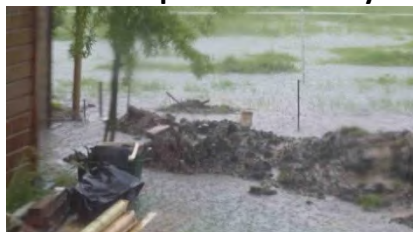


Photo 6: At parish boundary



Photo 7: At parish boundary



Photo 8: At parish boundary



Photo 9: Flood subsiding



RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:

Policy 5 / Policy 8

REACTION TO REPRESENTATION(S)

Noted as useful evidence

ACTION TAKEN:

Elements of the first-hand reports noted have been incorporated into supporting text for Policy 8

APPENDIX A6. Pre-Submission Consultation March-April 2018: Parishioner Suggestions for Additional Communal Views to be Included in Policy

As part of the consultation, parishioners were invited to submit suggestions for possible additions to the Communal Views Policy. Responses are listed below. These were considered during preparation of the Parish Landscape Character Assessment (by Lucy Batchelor-Wylam CMLI, published January 2019), and Table 7B.1 of the supporting text to Policy 7B of the Plan, summarises the results of that consideration. At the subsequent revision of the Plan, “Communal Views” were renamed “Key Views”

Viewpoint	Looking	Justification	Remarks
Along road to Cressingham	South across fields	It is advantageous for those living along Richmond Road behind their houses on the western side, also for anyone walking along the road towards Gt. Cressingham.	Agreed with respondent this is very similar to CV3. No further action
52 Hills Road	West and South West	The views are across open fields to the Swaffham Road in the West and to the church in the South West	As CV5 except from other side of Hills Road and includes west view
From Pound Hill looking view point CV1 looking northwest	North west	Landscape quality, scenic quality and representative of local open farmland	Need to check intrusion of old agricultural buildings Possibly compares with CV9 but from further away
1. Richmond road near the bridge. 2. hole 12 golf course.	1. View across the golf course from Richmond road and 2. from the Fairway of the 12-hole looking north.	These are views that for 1. shows the gap to Watton should be preserved and if the golf course was sold a developer could move in. and 2. This view shows the rural aspect of the landscape.	2. Appears to be along north side of the brook
From Pound Hill	Towards the Mere	Suspect that it is of archaeological significance	As CV1
Past the Terrace towards the Church.	Northwards	A sense of the Church's relation to the old village	Need to find a viewpoint
Ovington Road	South towards golf course	Rich in wildlife. Regularly see barn owls, there is a nest box which they use. Also, foxes, roe and muntjac deer and bats.	Need to find a viewpoint
Bullock Shed Lane	South and East towards St. Georges Church and over fields.	This is a high point and offers panoramic views of the Breckland countryside	Need to find a viewpoint

Very bottom of Richmond road looking along Watton Brooke, and the landscape each side	East and West	For birds and wildlife and also because it is in the separation gap	
Bullockshed Lane	A westerly direction looking towards Cressingham Road	It's open countryside as well as farming which describes where we live	Need to find a viewpoint
Ploughboy lane, mainly the view towards the houses on hills road (dolphin crescent)	Both left and right	To maintain the countryside, feel to this section of the village, along with keeping the open field between Ploughboy Lane and Hills Road (Dolphin Crescent) which is a wonderful view, especially during a winter's day.	As CV4 but more westerly
Ovington road	South towards Watton	There is a multitude of birds nesting there - owls hawks, deer	Need to find a viewpoint
Ovington Road	South	Panoramic View to Village Boundary to Watton	Need to find a viewpoint
Ovington Road	South	Open view to boundary of the village with Watton	Need to find a viewpoint
Ovington Road	South-west-ish on approach towards Bell Lane crossroads	View of Bristow's Mill	
The Terrace towards the church	North	Historical	Need to find a viewpoint
Just south of CV4 if on the road going towards Saham Hills just past the beet store looking in a NW-ish direction across the fields towards the wood and poplar trees	NW ish	There is an open view across the fields to the edge of the Saham Hills. It is typical of the edge of a Norfolk village and should be preserved and not spoilt by further development.	Broaden CV4?
	Towards the Mere		Viewpoint?
Hills Road, between 1 and 51	West	Open views. Sunsets	Compare with CV5
From the bend Swaffham in the road at the junction of the Cressingham road	Looking south	Because it gently slopes down to pasture with hedge rows	Similar to CV3

CV5 + 90 degree to the right		To keep the countryside view of the village	
Junction Hills Road/Ploughboy Lane	Looking south south-west	Open field and small mere in centre of village gives a sense of spaciousness rather than being hemmed in by housing as is the rest of Hills Road in this area.	

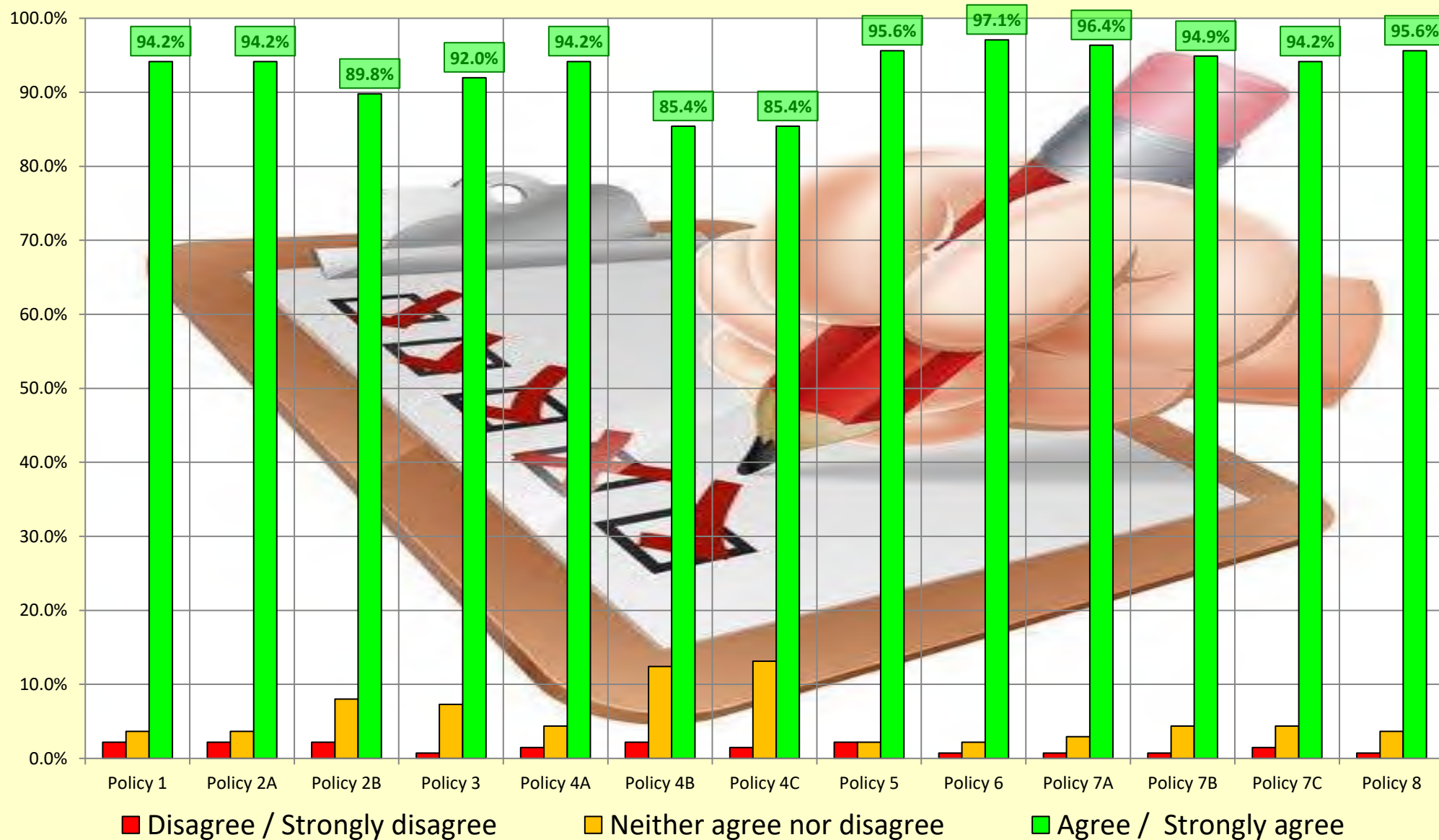
APPENDIX A7. Pre-Submission Consultation March-April 2018: Summary of Parishioner Rating of Policies, Communal Views and Parish Action Points

The three graphs that follow summarise how parishioners responded to the consultation questionnaire when asked regarding (a) the policies; (b) the protected communal views; and (c) the parish action points, if they:

- Strongly agreed with them;
- Agreed with them;
- Neither agreed or disagreed with them;
- Disagreed with them; or
- Strongly disagreed with them.

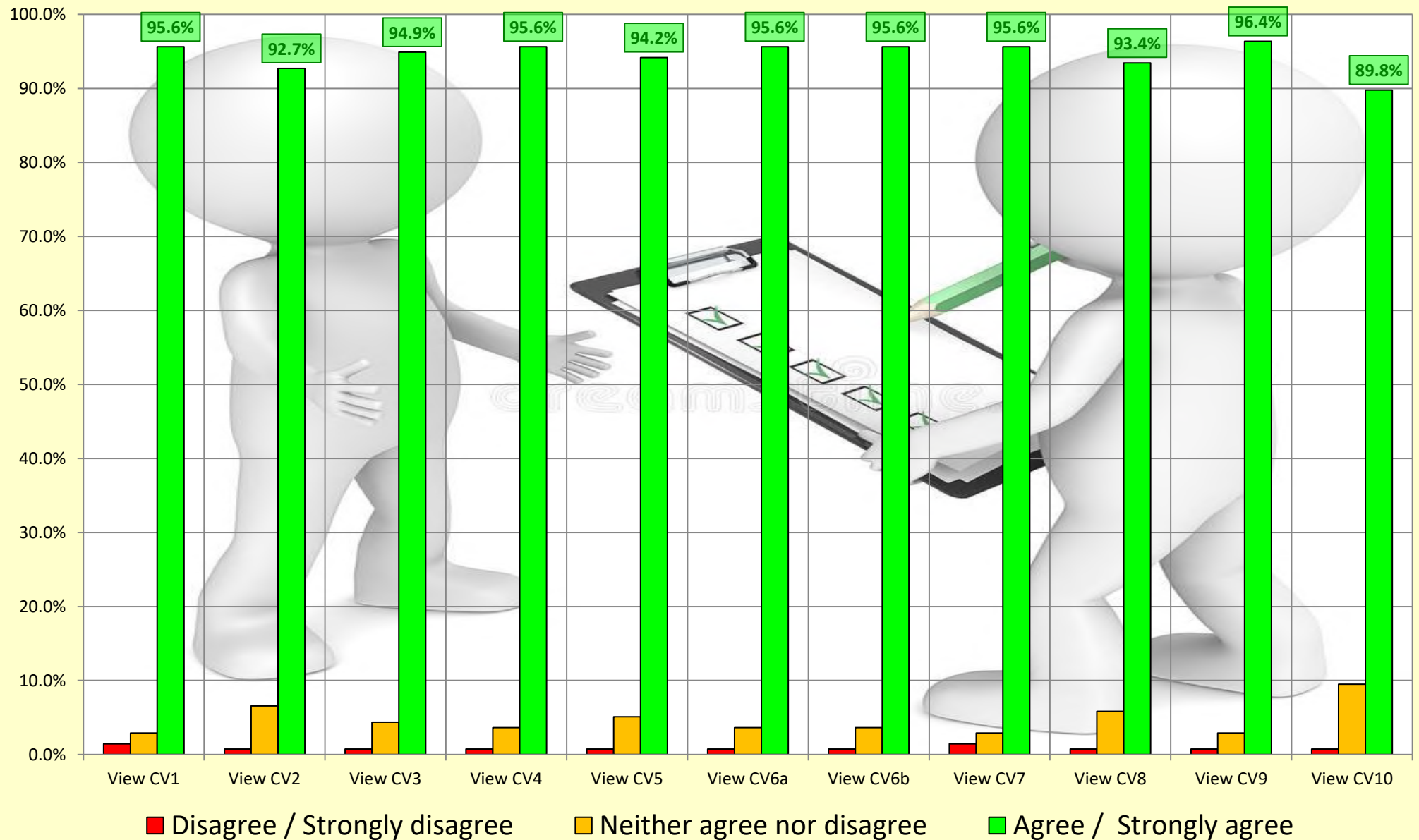
Villager Rating of Policies

Overall 64 times as many agree with the policies than disagree



Villager Rating of Protected Communal Views

Overall 110 times as many agree with the protected views than disagree



Villager Rating of Parish Action Points

Overall 69 times as many agree with the parish action points than disagree

