

SAHAM TONEY

NEIGHBOURHOOD

DEVELOPMENT PLAN 2019 - 2036



CONSULTATION STATEMENT

October 2020



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1. INTRODUCTION

1.1 The Saham Toney Neighbourhood Development Plan is a community-led document aimed at guiding future development in the Parish. Preparation of the Plan has been undertaken with extensive community engagement, consultation and communication.

1.2 This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning (General) Regulations 2012, as amended (*referred to as The Neighbourhood Planning Regulations 2012 from this point onwards in the document*). In accordance with Section 15(2) of Part 5 of the Regulations, this Consultation Statement contains the following information:

- a) Details of the persons and bodies who were consulted about the proposed neighbourhood development plan, including at the three formal consultation stages set out in the table below;

Consultees at Formal Consultations	
First Regulation 14 Pre-Submission Consultation: 12 March – 29 April 2018	See section 8 and Appendix A1
Second Regulation 14 Pre-Submission Consultation: 19 August – 13 October 2019	See section 12 and Appendix B1
Third Regulation 14 Pre-Submission Consultation: 24 June – 14 August 2020	See section 14 and Appendix C1

- b) An explanation as to how they were consulted. Details relating to the three formal Regulation 14 pre-submissions may be found in sections 8, 12 and 14;
- c) A summary of the main issues and concerns raised by the persons consulted. Details relating to the three Regulation 14 consultations may be found in Appendices A, B and C; and
- d) A description as to how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Development Plan. Details relating to the three Regulation 14 consultations may be found in Appendices A, B and C.

1.3 The consultation process adopted has ensured that the Neighbourhood Development Plan reflects the ambitions and objectives of both the local community and all other stakeholders, both of which groups have been engaged in the plan-making process from the outset.

1.4 The Parish of Saham Toney was designated as a Neighbourhood Area by Breckland Council on 16 March 2016.

1.5 The Neighbourhood Development Plan was prepared by a Work Group comprising five parishioners, working under a Steering Committee and reporting to the Parish Council.

1.6 This Consultation Statement summarises all statutory and non-statutory consultation undertaken with the community and other relevant statutory bodies and stakeholders in developing the Neighbourhood Development Plan. As part of this, it describes how concerns have been addressed and the changes which have been made to the submission version of the Neighbourhood Development Plan as a result of three separate statutory pre-submission consultations.

1.7 This Consultation Statement demonstrates that the process and techniques involved in seeking and taking account of community and stakeholder engagement at all stages leading to the Regulation 15 submission of the Plan were extensive and appropriate to the purpose of the Plan. The extent of engagement is considered by the Parish Council to meet the obligations set out in the Regulations. The methods used and outcomes achieved from the engagement process have resulted in the submission of a Plan that, in the opinion of the Parish Council, best meets community and stakeholder expectations.

1.8 When reading this statement, it is important to understand that three Regulation 14 pre-submissions of the Neighbourhood Plan have been made, the first in March 2018; the second in August 2019 and the third in June 2020. All three of those formal consultations on the Plan are covered by this statement. Responses to the first two consultations were appropriately addressed in a Plan update, and are described in sections 8 and 12, and in Appendices A and B, but being the most up to date, the consultation of June-August 2020, described in section 14 and Appendix C, has the greatest relevance.

1.9 A timeline of the main stages in Plan preparation leading to the Regulation 15 submission is given below:

When	What
18 December 2015	Application to designate the Neighbourhood Plan Area
17 March 2016	Neighbourhood Plan Area designated
July – December 2016	Postal questionnaires to all villagers and local businesses and organisations; and information gathering at the village fete
October 2016 – February 2017	Analysis of questionnaire responses, development of vision and objectives, drafting of policies
February 2017	Informal first publication of the draft Plan, with a village exhibition and feedback meeting
February 2017	Informal review of draft Plan by Breckland Council
February – July 2017	Rethink of the approach in light of Breckland Council comments. Reassessment of vision and objectives, leading to preparation of a revised set of policies
July 2017	Second informal version of the Plan presented to villagers at the village fete and commented on by Breckland Council
October 2017	Creation of a Neighbourhood Plan website providing information and regular updates to parishioners and others, with opportunities to engage in the Plan preparation process
November 2017	Consultant engaged to advise of further development of the Plan
December 2017	Third draft version of the Plan presented to villagers at a village meeting
December 2017	Consultant's review of the third draft version of the Plan and subsequent update
January 2018	Third draft version of the Plan discussed informally with Breckland Council planning officers
22 March 2018	First Regulation 14 pre-submission and seven-week consultation One response suggested the allocation of a housing site
April – September 2018	Participation in the Breckland Local Plan examination hearings resulted in some refinement of housing policies and focused further attention on site allocations
May 2018	Independent examiner's 'health check' of the draft Plan Included advice to the effect that site allocations could add certainty about the extent and location of new residential development
May 2018	Landscape consultant engaged to review the communal views included in the Plan and additional views suggested by villagers The resulting report redefined the views it was appropriate to include in the Plan Discussion with the consultant resulted in awareness of the importance of landscape character assessment, rather than simply a focus on key views
May – August 2018	Research into landscape character assessment and preparation of a scope of work for such an assessment
May – August 2018	Research into site allocations and preparation of a strategy to allocated sites in the Plan

August – October 2018	‘Call for sites’ inviting landowners and developers to put forward sites for consideration for allocation in the Plan
January 2019	Parish Landscape Character Assessment published. Used as the basis for rewritten policies dealing with the preservation and enhancement of landscape and key views
November 2018 – July 2019	Independent site assessments Site selection process to determine which sites were suitable for development and should be allocated in the Plan
19 August 2019	Second Regulation 14 pre-submission of the Plan and an eight-week consultation
October 2019	Requirement for Strategic Environmental and Habitats Regulations Assessments identified
September 2019 – February 2020	Masterplanning study of allocated sites comprising major development Masterplanning policy added to the Plan as a result A landscape consultant’s appraisal of the potential landscape impact of the masterplanned sites resulted in two sites being removed from the Plan
January – April 2020	Single drainage policy split into eight component policies, each with expanded detail and additional evidence; in order to address villager concerns about flood risk identified during the second Regulation 14 consultation
February 2020	Professional review of Parish Housing Needs Assessment, leading to its update and refinement of policies for housing mix and affordable housing
February 2020	Strategic Environmental Assessment Scoping Report published. Its findings together with consultation comments on it resulted in some minor refinement of policies
February 2020	Habitats Regulations Assessment Appropriate Assessment published and its recommendations incorporated into the relevant policies
April 2020	Village transport study published, its results used to guide policy updates and address consultation concerns of the Local Highways Authority
May 2020	Flood risk study published, used to guide further drainage policy updates
June 2020	Strategic Environmental and Habitats Regulations Assessments published, confirming the Plan had no significant environmental impacts
June – August 2020	Third Regulation 14 pre-submission of the Plan and a seven and a half-week consultation Consultation on the Strategic Environmental Assessment
July 2020	Second ‘health check’ of the Plan by an independent examiner
July – September 2020	Consultation responses and health check recommendations analysed and appropriate updates made to the Plan to address them, including: <ul style="list-style-type: none"> • The addition of a policy to address climate change effects; • The creation of a sustainable drainage system (SuDS) design manual
September 2020	Consultant’s review of the draft Regulation 15 Plan resulting in final updates to the Plan and supporting documents
September 2020	Final update of the Strategic Environmental and Habitats Regulations Assessment Reports to confirm the updated Plan has no significant environmental impacts
September – October 2020	Breckland Council review of the draft Regulation 15 Plan, Basic Conditions and Consultation Statements for legal compliance prior to submission
October 2020	Regulation 15 submission of the Plan and its supporting documents

1.10 A timeline providing an outline of the different stages of the Habitats Regulations and Strategic Environmental assessments to assist in demonstrating the iterative approach adopted and how it has been used to help shape the development of the Neighbourhood Plan is given below:

DESCRIPTION	DATES	REMARKS
Written request to Breckland Council to undertake environmental screening	11 March 2018	Timing guided by Council advice
First Regulation 14 Plan Pre-Submission and Consultation	18 March - 29 April 2018	No site allocations were included at this stage
SEA screening assessment (by Breckland Council) and consultation responses	April-June 2018	Concluded SEA not required. Available at: https://www.stnp2036.org/sea--hra-screenings.html
SEA screening determination by Breckland Council (Note: At this stage, Breckland Council was advised by its consultants on environmental assessments, Norfolk County Council, that HRA screening assessment was not required with regards to the first Regulation 14 version of the Plan	12 July 2018	Concluded SEA not required. Available at: https://www.stnp2036.org/sea--hra-screenings.html
Decision to allocate sites in the Neighbourhood Plan	6 August 2018	Recommendation by the Plan Work Group approved by the Parish Council
Village presentation by the Neighbourhood Plan Work Group	14 August 2018	Included explanation of: <ul style="list-style-type: none"> • The reasons it was proposed to allocate sites in the Plan; • The process that would involve; & • A Q & A Session Slideshow available at: https://www.stnp2036.org/village-presentation-14th-august-2018.html
Village presentation	7 December 2018	Primarily about site allocations, including the results of a call for sites; and to gather villager feedback on the potential sites put forward Slideshow available at: https://www.stnp2036.org/village-presentation-7th-december-2018.html
Correspondence between STNP Policy Consultant and Breckland Council Neighbour Planning Coordinator re SEA & HRA screening	7-8 August 2019	Confirmed that Breckland Council and consultees prefer to undertake screening during a Plan's Regulation 14 consultation
Written request to Breckland Council to undertake environmental screening	18 August 2019	Timing guided by Council advice

Second Regulation 14 Neighbourhood Plan Pre-Submission and Consultation	19 August - 13 October 2019	Included the allocation of 11 residential housing sites planned to deliver a total of 83 new dwellings
SEA screening report based on the second Regulation 14 Neighbourhood Plan	September 2019	By Norfolk County Council. Concluded that SEA was not required, although two statutory consultees considered it was. Report available at: https://www.stnp2036.org/sea--hra-screenings.html
SEA screening determination by Breckland Council	06 November 2019	Advised by email; copy included in the Consultation Statement
HRA screening assessment based on the second Regulation 14 Neighbourhood Plan. Screening determined that HRA was required. Appropriate assessment concluded there were no likely significant effects.	September 2019	BY Norfolk County Council, who advised Breckland Council they could not complete screening without undertaking appropriate assessment. Hence, the report includes both stages. Report available at: https://www.stnp2036.org/sea--hra-screenings.html
HRA screening determination by Breckland Council	06 November 2019	Advised by email; copy included in the Consultation Statement
STNP decision to undertake new Habitats Regulations and Strategic Environmental Assessments via Technical Support Packages from Locality	September 2019	Following advice from the Local Planning Authority (see Consultation Statement section 13), and lack of agreement from Natural England on the HRA, and in the case of SEA, the fact that two statutory consultees disagreed with the screening conclusion
Application to Locality for SEA and HRA technical support packages	7 November 2019	
Locality approval of SEA and HRA technical support packages	7 January 2020	
SEA scoping report (based on the second Regulation 14 Neighbourhood Plan)	5 February 2020	By AECOM
Consultation on SEA scoping report	5 February - 11 March 2020	Environment Agency, Natural England, Historic England and Norfolk County Council consulted. Representations are included in the Environmental Report
SEA scoping report uploaded to Plan website	12 March 2020	https://www.stnp2036.org/sea--hra.html
SEA assessment of reasonable alternatives	27 April 2020	By AECOM. Not published externally at the time of the assessment, but included in the final report

SEA environmental report (based on the draft and updated Regulation 14 Neighbourhood Plan, as it stood on 2 May 2020)	23 May 2020	By AECOM. Report available at https://www.stnp2036.org/sea--hra.html
SEA statutory and public consultation (alongside the third Regulation 14 consultation on the Neighbourhood Plan)	24 June-14 August 2020	Both the second (August 2019) and third (June 2020) Regulation 14 versions of the Neighbourhood Plan were made available to consultees in addition to the SEA Scoping and Environmental Reports
SEA environmental report (based on the draft Regulation 15 Neighbourhood Plan)	September 2020	Report available at https://www.stnp2036.org/sea--hra.html
HRA appropriate assessment (based on the second Regulation 14 Neighbourhood Plan)	19 February 2020	By AECOM
HRA appropriate assessment report uploaded to Plan website	20 February 2020	https://www.stnp2036.org/sea--hra.html
HRA appropriate assessment consultation	21 February -13 March 2020	Natural England consulted. It confirmed no comments on 3 April 2020
HRA environmental report	June 2020	Report available at https://www.stnp2036.org/sea--hra.html
HRA sent to Breckland Council with a request for it to confirm it is compliant with all regulatory requirements	24 June 2020	
HRA statutory and public consultation (alongside the third Regulation 14 consultation on the Neighbourhood Plan)	24 June-14 August 2020	Both the second (August 2019) and third (June 2020) Regulation 14 versions of the Neighbourhood Plan were made available to consultees in addition to the Environmental Report
Breckland Council confirmation that HRA is legally compliant	To be advised	Breckland Council responsibility. HRA report sent to the Council for this purpose on 24 June 2020
Natural England invited to consult on the HRA environmental report	27 August 2020	On 2 September 2020, Natural England confirmed it agreed with the conclusions of the report
HRA environmental report updated in light of the draft Regulation 15 Neighbourhood Plan	September 2020	Report available at https://www.stnp2036.org/sea--hra.html

2. CONSULTATION OVERVIEW

2.1 In summary, prior to the Regulation 15 submission of the Neighbourhood Plan, the following consultations with the local community, the Local Planning Authority and other stakeholders took place:

- a. Questionnaire 1 to residents by post July 2016;
- b. Questionnaire 2 to residents by post October 2016;
- c. Questionnaire 3 hand delivered to local businesses and organisations late 2016;
- d. Information stand and opinion gathering at the village fete July 2016;



- e. Monthly updates in the parish magazine, the Saham Saga, and at monthly Parish Council meetings;
- f. Exhibition of the first draft version of the plan, with comment gathering, February 2017;



- g. Informal review of the draft Plan by Breckland Council planning department, February 2017 and subsequent discussion of its comments;
- h. Information display about the second draft version of the Plan at the village fete July 2017;



- i. Informal review of the updated draft Plan by Breckland Council planning department, July 2017 and a subsequent meeting to discuss its comments;
- j. Consultation letters to parishioners with homes and/or land directly affected by draft Plan policies, autumn 2017;
- k. Consultation letters to stakeholders outside the Neighbourhood Area inviting their informal review of relevant policies, autumn 2017;
- l. Creation of a Neighbourhood Plan website (www.stnp2036.org), October 2017, with subsequent regular updates to provided parishioners and others with comprehensive information and documentation about the Plan;
- m. Presentation to villagers about the third draft version of the Plan, December 2017. This explained the status of the Plan, gave an overview of where it fits with national and district planning documents and regulations, summarised how villager feedback had shaped the Plan, described what a Plan could and could not do, and explained the policies as they were at the time;



WELCOME!



THE SAHAM TONEY NEIGHBOURHOOD PLAN 2018 - 2036

www.stnp2036.org

- n. Consultant's review of the Plan, December 2017. This was carried out by Rachel Hogger MSc., MRTPI, BA Hons, of Modicum Planning;
- o. Presentation and discussion of the updated draft Plan with Breckland Council planning department, January 2018;
- p. Regular news updates to those parishioners who requested to be on the Work Group's mailing list;

- q. Regulation 14 pre-submission consultation on the Plan and its 14 associated evidence volumes, 22 March - 29 April 2018, accompanied by an information leaflet delivered to all households in the Parish and publicity posters displayed around the village;

Saham Toney Neighbourhood Plan



**Take part in the public consultation on the Plan
from 12th March till 22nd April 2018**



ONLINE:

www.stnp2036.org

HELP SAFEGUARD SAHAM!



ON PAPER:

**AT:
WCCC
PENNY'S TEAROOM
ST GEORGE'S CHURCH
AT A DROP-IN SESSION
OR
BORROW A COPY FROM US -
CALL 880915 TO ARRANGE**

CONSULTATION ON THE SAHAM TONEY

NEIGHBOURHOOD PLAN

Consultation on the Saham Toney Neighbourhood Plan in line with Regulation 14 of the Neighbourhood Planning Regulations (2012), will run for six weeks from:

Monday 12th March 2018 up to and including **Sunday 22rd April 2018**.

Consultation is open to all who live, work or carry on business in the civil parish of Saham Toney, together with a range of statutory bodies whose interests may be affected by the Plan proposals.

All valid comments received by **Sunday 22rd April 2018** will be considered by the Saham Toney Neighbourhood Plan Steering Committee and may contribute to the subsequent update of the Plan, prior to its Regulation 15 submission to Breckland District Council and its independent examination at regulation 16.

Although there will be a further six-week consultation at that later stage, only the independent examiner can decide if any of those comments should be included, and will only do so if they relate to the legal requirements for a plan.

Hence this is the last full opportunity to influence the Plan.

Following receipt of all comments a Consultation Statement will be prepared summarising all comments and stating how each was addressed. That statement will be available to all parishioners, businesses and other bodies at the time of the Regulation 15 submission to Breckland District Council.

The Neighbourhood Plan and its supporting documents can be found online at **www.stnp2036.org** together with a questionnaire for the return of comments.

Paper copies of the Plan will be available for viewing at the following locations throughout the consultation period:

Wells Cole Community Centre, Bell Lane

Penny's Tea Room, Hills Road

St George's Church, Richmond Road

Or may be borrowed by calling **880915** or **884759** or **889550** or **885652**

Issued by the Saham Toney Neighbourhood Plan Work Group, with the approval, and on behalf of, Saham Toney Parish Council

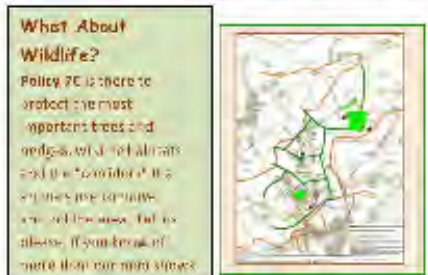
Note: The consultation closing date was subsequently extended to 29th April 2018.



Can the Plan protect the best views Parish?
Yes. Policy 7B defines 11 views of the countryside around us, and prevents development that would adversely affect or detract from them.



Look at the Plan for more details, an aerial map and larger versions of the photos.



What About Wildlife?

Policy 7C is there to protect the most important trees and hedgerows. It also identifies areas of importance for wildlife, and advises that any development should not harm them.



Can the Plan stop our flooding problems?

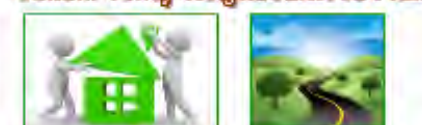
In many cases, we have existing problems, but Policy 7B does not prevent development in making them worse. It does prevent development in areas where flooding is a risk.

There's also a special questionnaire where you can tell us if you value the views we've chosen and tell us about any others you think should be protected.

EVENTS
Sat 17 March - drop-in session on Broom Hill 1.00-3.00 pm
Sat 24 March - drop-in session on Broom Hill 1.00-3.00 pm
Sat 7 April - drop-in session Broom Hill 1.00-3.30 pm
Fri 13 April - drop-in session Penny's tea room 1.30-4.00 pm
Sat 14 April - drop-in session Broom Hill 1.00-3.30 pm
* Moved from WECC due to its closure after its opening

If you'd prefer to borrow a paper copy of the Plan or get a paper version of the questionnaire, we'll deliver and collect at a time convenient for you.
For this or for any other queries, please call:
Chris 880915 Brian 889550
Andrew 884759 Chris 885662
or stnp2036@gmail.com @STNP2036
or www.stnp2036.org

Saham Toney Neighbourhood Plan



What's happening?

There'll be a public consultation on the Plan from 12th March till 22nd April 2018



Everyone who lives, works or runs a business in the Parish can take part, and every member of a household can complete the questionnaire and make comments.

How?
See the Plan & complete a questionnaire online at www.stnp2036.org

Or come to a 'drop-in' session (details overleaf)
Or borrow a paper copy of the Plan
Or see the Plan at your convenience at:
Wells Cafe Community Centre, Penny's tea room or St George's Church

Every valid response from villagers will be entered in a Prize Draw with 3 cash prizes of £50, £25 and £10

www.stnp2036.org stnp2036@gmail.com

www.stnp2036.org stnp2036@gmail.com

www.stnp2036.org stnp2036@gmail.com

The Plan's Vision
To preserve and enhance Saham Toney's distinct and tranquil rural character whilst ensuring Village life is peaceful and fulfilling for all residents. This will be achieved through a process of gradual, small-scale developments in appropriate and sustainable locations, spread over the plan period, and by protecting the area's richness of landscape, history, wildlife and community.

How Many Houses?
Policy 1 says between 10 and 48, until 2036... but only if it's necessary, roads and transport, flooding, the landscape and local housing needs are also properly considered.



Our evidence for Policy 1 tells you how we decided on this number.

Where Will The Houses Be and On What Scale?
Policy 2A says either inside or immediately adjacent to the settlement boundary sites limited to 3 houses (10-11 are not allowed), but only if there's also a community benefit, especially for smaller, affordable homes and village life is a small first step.

What Type of Houses?
Policy 2B specifies a housing mix based on an assessment of local housing needs. Generally small, 1 and 2 bedrooms starter homes, small and affordable housing, and homes to suit older people.



What Sort of Design?
For Policy 3 for houses and 4C for other buildings - they say: Housing density to match what's there now at a maximum of 20 per hectare; Design and materials to blend in; Design gardens; Good landscaping; Street lighting only if it doesn't spoil the look of the street; Safe access to / from main roads.



Community Facilities
Policy 4A states the following: WECC, St George's Church, The Methodist Chapel, The Sports & Social Club, Broom Hill Hall, The Old Mill Inn, Penny's tea room, Lewis's Garden Park.

Does the Plan Support Building for Business or Tourism?
Yes. Policy 4B sets out to do this in a way that protects the countryside, keeps things open, appropriate policy respects neighbouring properties and doesn't cause congestion on our roads.

Will Saham merge with Watton?
NO! Policy 5 prevents that by defining a 'strategic gap' - and which is not for development and so avoids being absorbed by Watton. See the enlarged maps in our evidence for details of precisely where the gap is.

Can we protect our historic buildings?
We certainly can! Policy 6 does that. Apart from 11 listed buildings that are already subject to national planning regulations, we've catalogued another 9 that make Saham a special place in the history of England. Some examples are shown here.



Local Green Spaces
The 6 areas identified as local green spaces in Policy 7A get special protection under planning rules.

The last has been proposed on behalf of Saham Toney Parish Council for the neighbouring Watton area.

www.stnp2036.org stnp2036@gmail.com

www.stnp2036.org stnp2036@gmail.com

www.stnp2036.org stnp2036@gmail.com

- r. Formal and informal village engagement events during the Regulation 14 pre-submission consultation, including five half-day “drop-in” sessions, at which villagers were able to view presentation displays explaining the Plan and raise questions and comments on it;



- s. Consultation with statutory consultees on a screening assessment of a need for Strategic Environmental Assessment and Habitats Regulations Assessment (undertaken by Breckland Council, see section 13);
- t. Examiner's "health check" of the Regulation 14 pre-submission Plan and its 14 associated evidence volumes, and examiner's review of Breckland Council's comments on the Regulation pre-submission Plan May 2018, carried out by Ann Skippers MRTPI FHEA FRSA AoU;
- u. Landscape consultant's review of communal views May 2018, performed by Lucy Batchelor-Wylam CMLI;
- v. Presentation to villagers about plans to allocate sites in the Plan, and to engage a consultant to undertake a village character assessment and prepare a design guide, August 2018;

NEIGHBOURHOOD PLAN PRESENTATION



TUESDAY 14th
AUGUST
7:30 – 9:30 pm
WCCC MAIN HALL

**Hear what we've been
doing recently**



**Find out about 2
important new pieces
of work starting soon**

**Watch a video message
from our local MP**



**Meet our new Norfolk County
Councillor**

NEIGHBOURHOOD PLAN UPDATE

WHAT I'M GOING TO TELL YOU ABOUT

A: What's happened since the consultation in March / April

Consultation responses
The health check
Consultant's review of views
Local Plan hearings
Meeting with George Freeman
Comments on draft NPPF revision
New relations with Breckland planning
Our involvement with planning applications

B: What's coming next

Further grant application
More Local Plan hearings
Biodiversity mapping
A village character assessment
A design guide
Site allocations
Repeat Reg. 14 consultation
Continued involvement with planning applications
Meetings with Breckland Council
Revised Planning rules (NPPF)

Further into the future



- w. A call for sites, 12 August – 18 October 2018, inviting parishioners, landowners, developers and builders to submit potential sites for allocation in the Plan. Sixteen sites were put forward as a result;

NEIGHBOURHOOD PLAN SITE ALLOCATIONS

CALL FOR SITES
17th August – 18th October 2018

Saham Toney Parish Council intends to allocate sites for new residential housing in its Neighbourhood Plan

This is to ensure the village gets the right homes in the right places at the right time

If you wish to propose a site for consideration download a form at www.stnp2036.org, and when completed email it to stnp2036@gmail.com

- x. Regular telephone consultations with the Breckland Council Neighbourhood Planning Co-ordinator;
- y. Meeting with Breckland Council Neighbourhood Planning Coordinator, including a tour of the Parish and a discussion of its development constraints, September 2018;
- z. Questionnaire for villagers at the village harvest fun day, September 2018;
- aa. Professionally prepared Parish Landscape Character Assessment, published January 2019: Lucy Batchelor-Wylam CMLI;
- bb. Presentation to villagers to update them about the status of allocating sites in the Plan and on the Parish Landscape Character Assessment and emerging landscape policies, December 2018;

NEIGHBOURHOOD PLAN PRESENTATION

FRIDAY 7th DECEMBER 7-9 pm WCCC MAIN HALL

500 home development suggested Huge superstore could replace WCCC Developers propose garden village



You can only find out and have a say if you attend!

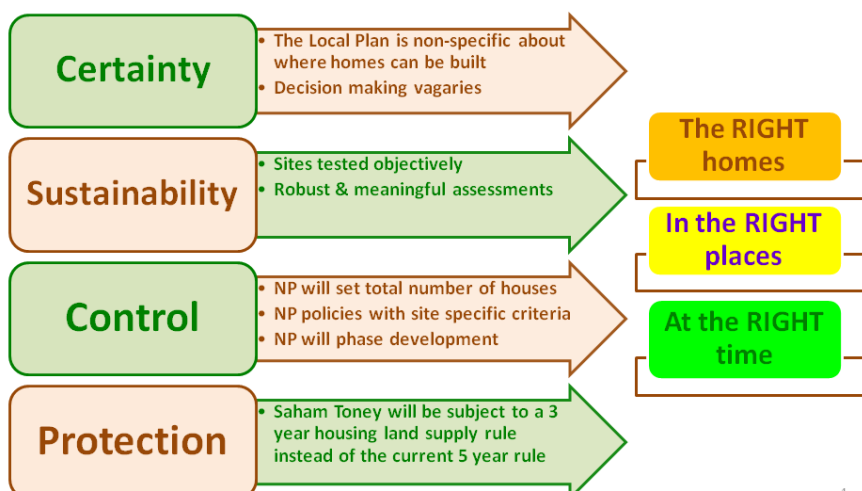
Also hear what our local MP has to say about neighbourhood planning







And get the results of a village character assessment

SITE ALLOCATIONS – WHY WE’RE DOING THIS



- cc. Informal discussions with proposers of potential sites, November 2018 – July 2019;
- dd. Consultant's review of the Plan's updated draft policies, January 2019;
- ee. Consultant's review of the Plan and its 12 associated evidence volumes prior to a second Regulation 14 pre-submission consultation;
- ff. Informal review of the draft Plan by Breckland Council planning department, July 2019 prior to a second Regulation 14 pre-submission, and a subsequent meeting to discuss its comments;
- gg. Village event 14 July 2019 to present, exhibit and take comments on the results of independent site assessments and a site selection process prior to the allocation of sites in the Plan;

NEIGHBOURHOOD PLAN VILLAGE EVENT	
SUNDAY 14th JULY, 2:00 pm WCCC MAIN HALL	
ALL ABOUT SITE ALLOCATIONS: HOW SITES WERE ASSESSED & WHICH HAVE BEEN PROVISIONALLY SELECTED AS SUITABLE	
	HOW MANY HOUSES AND WHERE WILL THEY BE?
Please come along and tell us what you think before we make our recommendations	
POSTED WITH PERMISSION OF BRECKLAND COUNCIL PLEASE DO NOT REMOVE!	

- hh. Second Regulation 14 pre-submission consultation on the Plan and its 12 associated evidence volumes, 19 August – 13 October 2019;

Saham Toney Neighbourhood Plan 2019-2036



Take part in the public consultation on the Plan from 19th August till 13th October 2019



ONLINE

ON PAPER

www.stnp2036.org

At the Wells Cole Community Centre

HELP DECIDE THE FUTURE OF SAHAM!



- ii. A 16-page information leaflet was distributed to every household in the Parish, giving an “at a glance” summary of the Plan. A two-page extract is given below: the full pamphlet can be found online at <https://www.stnp2036.org/2019-regulation-14-consultation-documents.html>;

Neighbourhood Plan at a Glance	THE STNP “TOP 10”
<p>The Saham Toney Neighbourhood Plan (STNP) actively promotes development of the right type and amount in the most suitable locations, and which fulfils the Plan’s vision, as follows:</p>	<p>1 • Seeks to ensure development is consistent with the infrastructure and facilities available</p>
<div data-bbox="352 1339 612 1435"> </div> <p>To preserve and enhance Saham Toney’s distinct and tranquil rural character whilst ensuring village life is peaceful and fulfilling for all residents. This will be achieved through a process of gradual and sustainable 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, spread over the plan period; and by protecting the area’s richness of landscape, history, wildlife and community</p> <div data-bbox="181 1720 788 1850"> </div>	<p>2 • Sets an appropriate level of development by allocating residential housing sites</p>
<p>STNP complies with national and district planning rules, and builds on both by setting out local policies that aim to best satisfy the expressed aspirations of villagers, while also respecting the needs of other stakeholders. Taken together, the policies create a coherent, positive and sustainable framework for development in Saham Toney that preserves its past, respects its present and seeks to ensure it thrives in future. The “STNP TOP 10” overleaf, shows the key measures it adopts to do that.</p>	<p>3 • Defines a housing mix that meets identified Parish needs</p>
	<p>4 • Provides design guidance aimed at maintaining local distinctiveness</p>
	<p>5 • Sets housing density guidelines that respect local character</p>
	<p>6 • Prevents Saham Toney coalescing with neighbouring Watton</p>
	<p>7 • Conserves village heritage</p>
	<p>8 • Sets out measures to preserve and enhance landscape character and key views</p>
	<p>9 • Recognises the importance and value of wildlife and green spaces</p>
	<p>10 • Defines criteria to alleviate surface water flood risk</p>

- jj. Formal and informal village engagement events during the second Regulation 14 pre-submission consultation, including at the harvest fun day (see photo);



- kk. Consultation with statutory consultees on a screening assessment of a need for Strategic Environmental Assessment and Habitats Regulations Assessment (see section 13);
- ll. Consultation with statutory consultees on a Scoping Report for Strategic Environmental Assessment (see section 13);
- mm. Consultation with Natural England on an Appropriate Assessment as part of a Habitats Regulations Assessment;
- nn. In lieu of a village event, which could not be held due to Covid-19 restrictions, in May 2020 a set of 10 'stay at home' presentation slideshows were uploaded to the Plan website and widely publicised on the website itself, by social media and on posters around the village, as well as on the websites of the Parish Council and George Freeman MP. The slideshows were made available as pdf files with additional 'pop-out' notes going into greater detail. They were intended to update all interested parties in progress made on the Plan and key decisions made subsequent to the Regulation 14 consultation of August-October 2019 and covered the following topics:
- The Plan's guiding principles;
 - Responses to the Regulation 14 consultation, including details of how they were addressed in the Plan;
 - Post-consultation studies undertaken;
 - The key points of updates made to the Plan's policies;
 - An outline of the remaining steps in Plan preparation.

A summary 'coffee break' version was also made available, and a video introduction was recorded for those visiting the site. Villagers without access to the internet were offered delivery of a paper copy of that version to their homes.

The slideshows may be seen at <https://www.stnp2036.org/stay-at-home-slideshows-may-2020.html>



STAY-AT-HOME SLIDE-SHOWS

PLEASE NOTE! Not all pdf app's on mobile devices will allow you to view pop-up notes on the slides. We recommend installing and using the Acrobat Reader app to overcome this. Or view the files in your browser

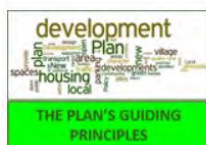


In lieu of a meeting at the village hall during the COVID-19 restrictions, here we are providing a set of presentations to update villagers and others on progress on the Plan and the changes made to it since the consultation of autumn 2019. These are split into 7 different topics as shown below. If perhaps you lack time or inclination to read all the material, please have a look at the summary 'coffee break' version. If you'd be interested in an online Q&A session in due course, please fill out the short form at the foot of this page (your email is needed so we can inform you of such a session). If you download one or more files, we'll be grateful if you could enter "yes" in the form below so that we can understand how many people are using these files (that form is anonymous). And there's one other anonymous form where you can briefly tell us what you think of the slideshows



coffee_break_presentation.pdf
Download File

This version summarises the key points of the detailed slide-shows given below. It's only 9 pages long so can be read in 5-6 minutes, perhaps 10-12 if you also read all the pop-up notes it includes



- oo. A second health check' of the Neighbourhood Plan was undertaken by Intelligent Plans Ltd, June-July 2020.
- pp. Consultation on the third Regulation 14 pre-submission version of the Plan took place from 24 June till 14 August 2020. See section 14 and Appendix C;
- qq. Consultation with statutory consultees and those members of the public likely to be affected by, or have an interest in the decisions involved in the assessment and development of the Neighbourhood Plan, on the Strategic Environmental Assessment Report, in conjunction with the third Regulation 14 pre-submission version of the Neighbourhood Plan (see section 13);

3. SHAPING THE PLAN: INITIAL CONSULTATIONS

3.1 In order to establish the issues seen by the local community to be of importance, initially the views of all local residents and businesses were canvassed via questionnaires circulated during the summer and autumn of 2016 and via whiteboard at an information stand at the village fete in July 2016.

3.2 Eighty-one residents responded to questionnaire 1. Questionnaire 2 subsequently addressed the same topics but sought updated responses in the light of the re-designation of Saham Toney as a rural area in the emerging Local Plan and the serious flooding in the area in June 2016; One hundred and ninety-seven residents responded. Of the fifty-one local businesses and organisations canvassed thirteen responded to Questionnaire 3.

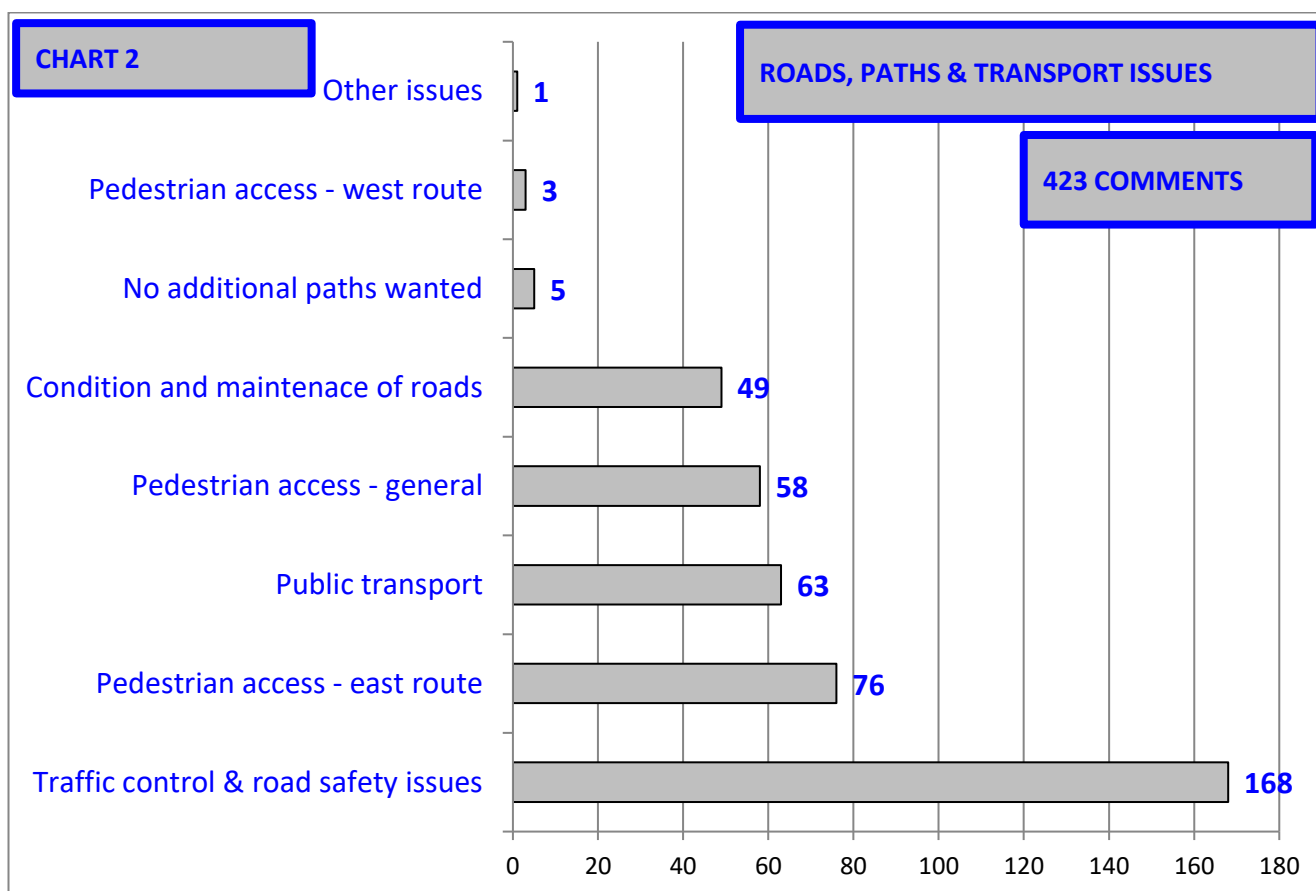
3.3 In July 2016 visitors to the village fete were invited to identify their issues and concerns on whiteboards, and one hundred and thirty-two comments were made.

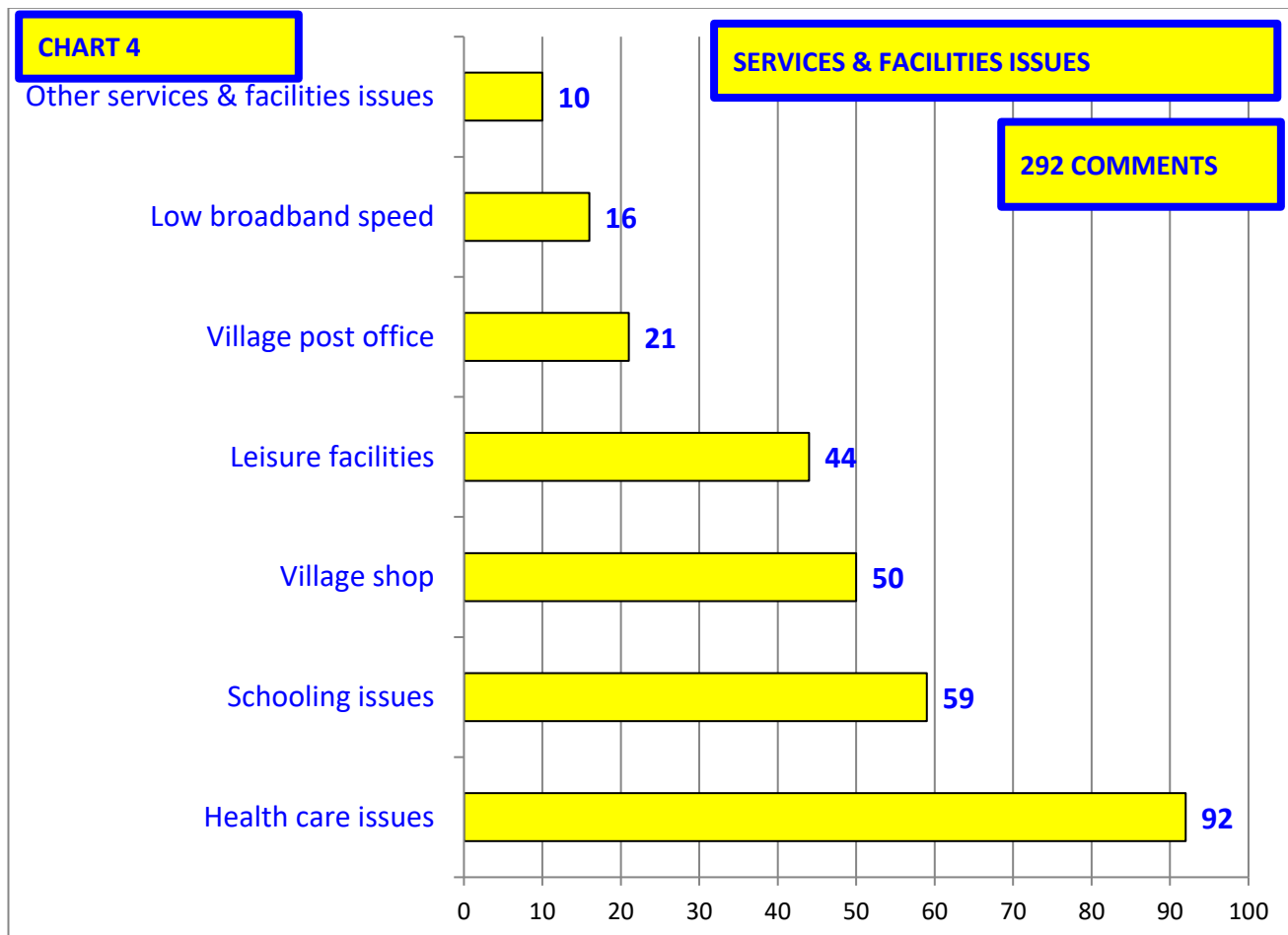
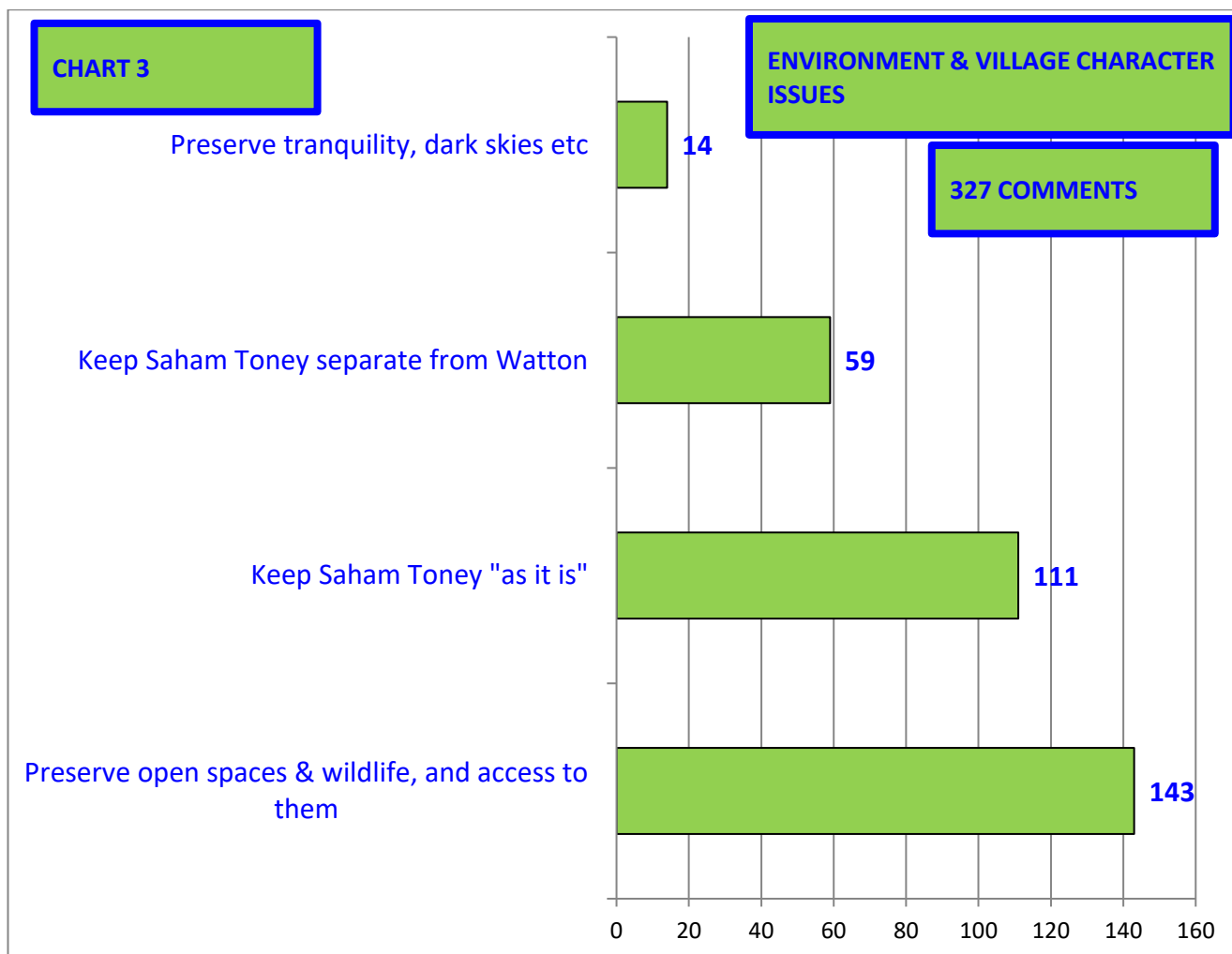
3.4 These preliminary consultations identified a variety of issues and concerns among local residents, businesses and organisations. In some cases, they were direct responses to questions giving clear choices; in others they were more freeform responses. All were categorised into five groups (with an additional "miscellaneous" category) and comments relating to sub-types within each group were summed. Although it is recognised such categorisation has an element of subjectivity, that is considered to be balanced out given the size of the sample analysed. The numbers of comments by group were as follows:

ISSUE CATEGORY	No. of PARISHIONER COMMENTS	No. of BUSINESS / ORGANISATION COMMENTS	TOTAL COMMENTS
HOUSING RELATED	639	3	642
ROADS, PATHS AND TRANSPORT RELATED	412	11	423
ENVIRONMENT & VILLAGE CHARACTER RELATED	324	3	327
SERVICES AND FACILITIES RELATED	286	6	292
FLOODING AND DRAINAGE RELATED	155	4	159
MISCELLANEOUS	31	0	31

Table 1: Main Issue Topics

3.5 The overall comment groups noted above were each derived from several sub-types (other than the flooding and drainage, and miscellaneous categories). The numbers of comments against each sub-type within each category is shown in charts 1-4.





3.6 The evolution of the Plan's vision and objectives

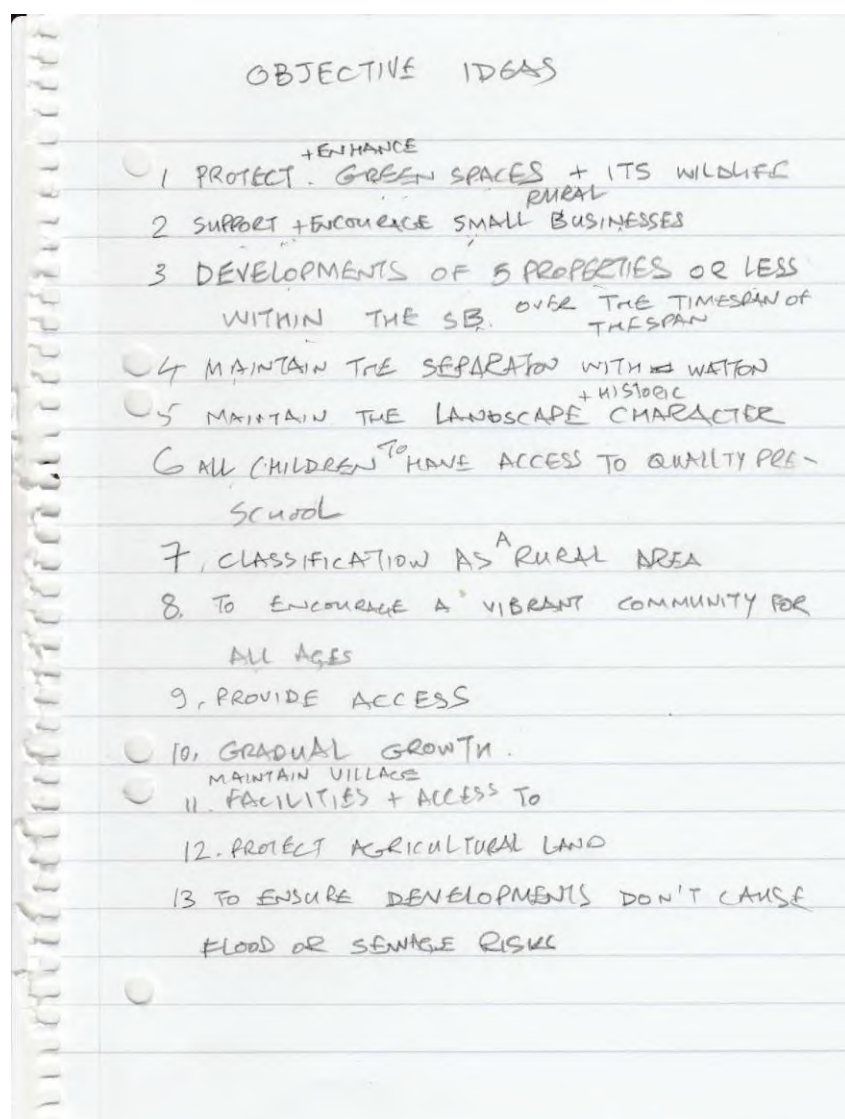
3.6.1 Prior to the drafting of planning policies, the land development issues identified through community engagement provided the basis for the development of a Neighbourhood Plan vision and a set of broad objectives (subsequently set out in Sections 5.1 and 5.2 of the Plan respectively). In this process, regard was also had to the understanding of the existing (and at the time evolving) Local Plan context, together with the emerging evidence base for the Neighbourhood Plan. The Plan's vision and objectives in turn provided the basis for the drafting of planning policies.

3.6.2 As described in 3.1 to 3.5, starting early in the process of preparing the Neighbourhood Plan, engagement took place with the entire community to establish the key issues and concerns of those who live and work in the Parish. Questionnaires were delivered to every household, with reply-paid return envelopes. Fifty-one local businesses and organisations were also contacted for their views. Views were additionally canvassed at village events.

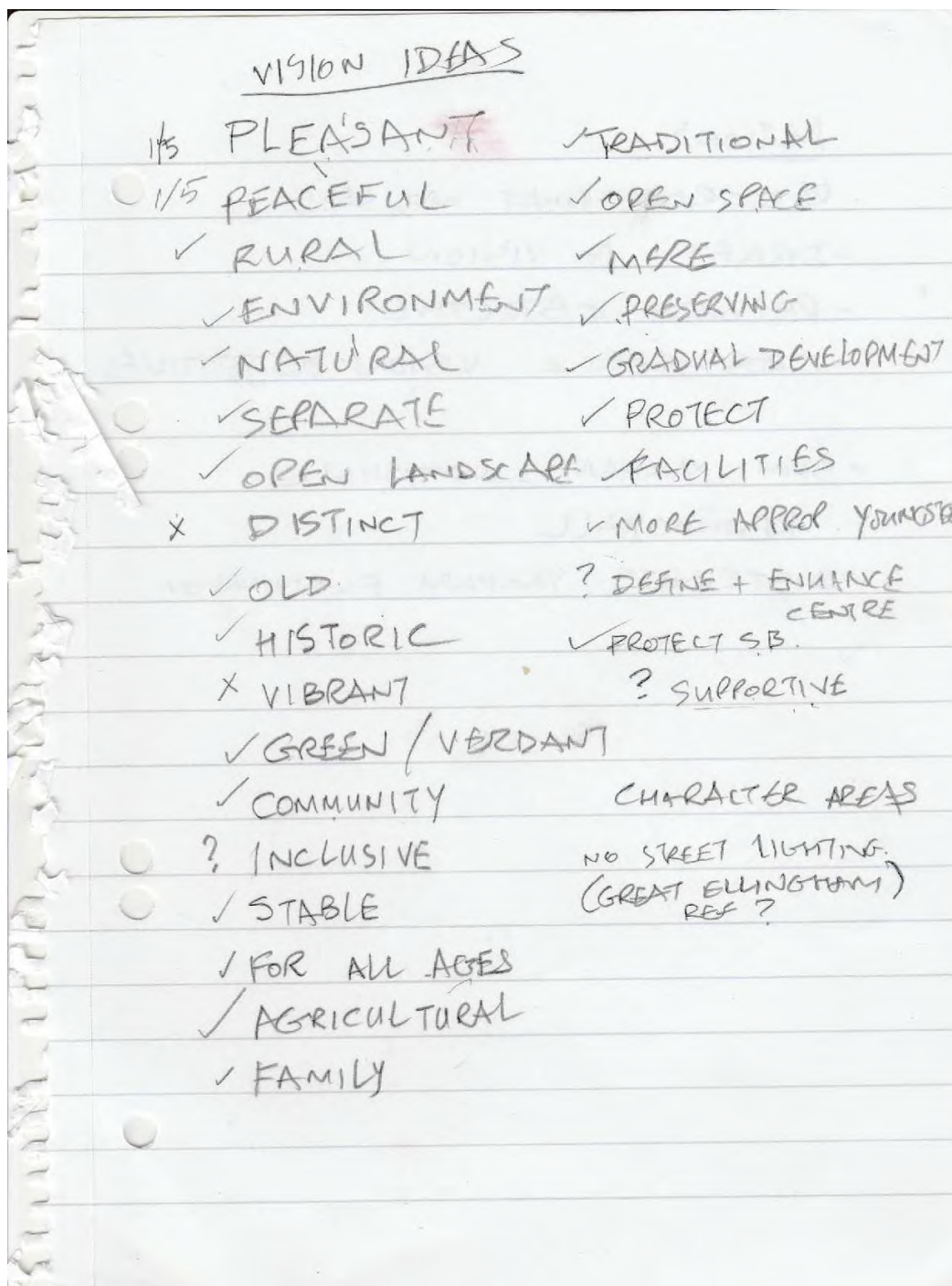
3.6.3 As summarised in Table 1, a total of 1874 different comments were received. Each was reviewed and categorised into one of 6 main groups, each of which was collated from a variety of sub-topics, as shown in charts 1-4.

3.6.4 The topics identified were then brainstormed to highlight potential topics for:

a) Objectives:



b) A vision:



3.6.5 To bring more order to things, the brainstorm ideas were then tabulated as shown in Tables 2, 3 and 4:

TABLE 2: TABULATION OF IDEAS FOR VISION & OBJECTIVES (part 1)	Ideas for a vision statement from brainstorm of 2 May 2017							Categories of objective			
Ideas for objectives from brainstorm of 2 May 2017 <i>* Not raised in brainstorm but included from village survey responses</i>	Agricultural	Character areas	Community	Define and enhance centre	Distinct	Environment	Facilities	Housing	Environment	Community	Economic
Protect & enhance green spaces and wildlife	✓	✓		?	✓	✓			✓		
Support & encourage small rural businesses	✓		✓				✓				✓
Developments of 5 houses or less within the settlement boundaries over the timespan of the plan								✓			
Maintain the separation from Watton									✓		
Maintain the landscape and historic character(s)		✓			✓	✓			✓		
All children to have access to quality pre- school							✓			✓	
Classification as a rural area							✓	✓			
To enhance a vibrant community for all ages			✓				✓			✓	
Provide access							✓		✓		
Gradual growth								✓			
Maintain village facilities and access to them			✓				✓			✓	
Protect agricultural land	✓								✓		
To ensure developments don't cause flood or sewage risk									✓		
<i>Limit development till healthcare, education and footpaths are improved*</i>							✓	✓		✓	

TABLE 3: TABULATION OF IDEAS FOR VISION & OBJECTIVES (part 2)	Ideas for a vision statement from brainstorm of 2 May 2017							Categories of objective			
Ideas for objectives from brainstorm of 2 May 2017 * Not raised in brainstorm but included from village survey responses	Family	For all ages	Gradual development	Character areas	Green / verdant	Historic	Inclusive	Housing	Environment	Community	Economic
Protect & enhance green spaces and wildlife				✓	✓				✓		
Support & encourage small rural businesses											✓
Developments of 5 houses or less within the settlement boundaries over the timespan of the plan			✓					✓			
Maintain the separation from Watton									✓		
Maintain the landscape and historic character(s)						✓			✓		
All children to have access to quality pre-school										✓	
Classification as a rural area			✓					✓			
To enhance a vibrant community for all ages	✓	✓					✓			✓	
Provide access									✓		
Gradual growth			✓					✓			
Maintain village facilities and access to them										✓	
Protect agricultural land			✓						✓		
To ensure developments don't cause flood or sewage risk									✓		
Limit development till healthcare, education and footpaths are improved*			✓					✓		✓	

TABLE 4: TABULATION OF IDEAS FOR VISION & OBJECTIVES (part 3)	Ideas for a vision statement from brainstorm of 2 May 2017							Categories of objective			
Ideas for objectives from brainstorm of 2 May 2017 <i>* Not raised in brainstorm but included from village survey responses</i>	Mere	More appropriate for youngsters	Natural	No street lighting	Old	Open landscape	Open space	Housing	Environment	Community	Economic
Protect & enhance green spaces and wildlife	✓		✓			✓	✓		✓		
Support & encourage small rural businesses											✓
Developments of 5 houses or less within the settlement boundaries over the timespan of the plan								✓			
Maintain the separation from Watton									✓		
Maintain the landscape and historic character(s)			✓	✓	✓				✓		
All children to have access to quality pre- school		✓								✓	
Classification as a rural area								✓			
To enhance a vibrant community for all ages										✓	
Provide access									✓		
Gradual growth								✓			
Maintain village facilities and access to them										✓	
Protect agricultural land						✓			✓		
To ensure developments don't cause flood or sewage risk									✓		
Limit development till healthcare, education and footpaths are improved*								✓		✓	

3.6.6 Tables 2, 3 and 4 and charts 1-4 were then analysed and discussed at length, leading to the first draft of a set of objectives. Those have been somewhat refined and adapted as Plan preparation has progressed, to reflect the results of formal consultations and amendments made necessary by updates to what at the time was the emerging Local Plan (for example an early objective to limit site sizes to 5 dwellings was deleted when an identical policy requirement in the Local Plan was deleted during its examination). Other than such changes the objectives have remained largely the same throughout the process and have guided the development of policies.

3.6.7 Having decided on a set of objectives and referring to the tabulated brainstorm ideas, an iterative process was used to draft a vision statement, that attempts to sum up the Plan's objectives in a short phrase. Like the objectives there have been some minor refinements to the statement as Plan preparation has progressed, but it is essentially the same as was defined in the early stages.

3.6.8 A process of awareness raising on the vision statement and the objectives took place during the period June 2017 to March 2018, through information presented at village events and in the monthly Parish magazine. As part of this, villager feedback on the emerging vision and objectives was invited, but none was received. During the first Regulation 14 consultation on the Plan, questions were specifically included to cover the objectives and vision statement. Those who responded, unanimously supported both.

3.6.9 By considering the objectives in conjunction with the more detailed community and land development issues that were behind them, an initial set of policies was prepared based on both the objectives and vision statement, and included in the first Regulation 14 version of the Plan, published in March 2018. When drafting the planning policies, regard was also had to the understanding of the existing (and at the time evolving) Local Plan context, together with the emerging evidence base for the Neighbourhood Plan. The policy list at that time was as shown in Table 5.

Neighbourhood Plan Policy	Relevant Objective(s)
1. Neighbourhood Area Classification and Housing Allocation	H1
2A. Scale & Location of Residential Developments	H1, H2, H3, E4
2B. Housing Mix	H2
3. Design of Residential Developments	H1, E3
4A. Non-Residential Development: Community Facilities	C1
4B. Non-Residential Development: Business of Tourism Related	C2
4C. Design of Non-Residential Developments	C1, C2, E3
5. Strategic Gap to Watton	E1, E2
6: Heritage Assets	E3
7A. Local Green Spaces	E1
7B. Communal Views	E3
7C. Trees, Hedges and Green Infrastructure	E1
8. Surface Water Management and Sewerage Provision	E5

Table 5: Relationship of Policies and Objectives at First Regulation 14 Pre-Submission, March 2018

The results of a consultation questionnaire showed that community support for the policies was very high, as shown in the chart given in Appendix A7.

3.6.10 Subsequent iterations of the Plan resulted in amendments to the policy list, and an increase in the number of policies, for the variety of reasons explained in sections 4 to 12. That process was mindful of the Plan's overarching vision and objectives, and the links between those and the policies have been maintained throughout the process, as given in Table 6.

Policy	Relevant Objective(s)
1: Services, Facilities & Infrastructure	H1, H2, H3
2A: Residential Housing Allocation	H2, H3
2B: Residential Development Within the Settlement Boundary	H1, H2
2C: Residential Development Outside the Settlement Boundary	H1, H2, E4
2D: Affordable Housing	H2
2E: Housing Mix	H2
2F: Common Criteria for Allocated Sites	H2, H3, E4
2G: Masterplanning	
2H: Site Allocation STNP1	
2I: Site Allocation STNP2	
2J: Site Allocation STNP4	
2K: Site Allocation STNP7	
2L: Site Allocation STNP9	
2M: Site Allocation STNP13	
2N: Site Allocation STNP14	
2O: Site Allocation STNP15	
2P: Site Allocation STNP16	
2Q: Amenity Land at Richmond Hall	E1
3A: Design	H1, E3
3B: Density of Residential Developments	H2, E3, E4
3C: Site Access and On-Site Streets Layout	E3
3D: Parking	E3
3E: Dark Skies Preservation	E3
3F: Climate Change Adaptation and Mitigation	
4: Non-Residential Development	C1, EC1
5: Saham Toney Rural Gap	E1, E2
6: Heritage Assets	E3
7A: Landscape Character Preservation and Enhancement	E3
7B: Key Views	E3
7C: Local Green Spaces	E1
7D: Biodiversity and Habitats	E1
7E: Green Infrastructure	E1
7F: Trees and Hedges	E1
8A: Surface Water Management General Provisions	E5
8B: Surface Water Runoff (Discharge) Rate & Volume	
8C: Infiltration Testing	
8D: Surface Water Flood Risk & Climate Change	
8E: Surface Water Drainage & Water Quality	
8F: Management & Maintenance of Sustainable Drainage Systems	
8G: Resistance & Resilience of Sustainable Drainage Systems	
8H: Design of Sustainable Drainage Systems	

Table 6: Relationship of Policies and Objectives at Plan Pre-Submission

3.6.11 During the evolution of Policy 3A: Design, research and world events focused attention on climate change and it was decided that the Plan should address that on a proportionate level. To do that an additional objective (E6) was incorporated on that topic and measures to deal with the relevant issues were introduced in a new policy on the subject.

3.7 The analysis and categorisation of consultation responses highlighted and clarified the most important issues relating to the development of land. These are listed below, together with a summary of the actions and / or eventual planning policies drafted to address them:

- a. Limit the size of new developments. This was addressed in earlier versions of the Neighbourhood Plan by a policy limiting site size to no more than 5 dwellings. However, when an identical criterion was removed from the Local Plan following its examination on the basis of it not being sound, it was also removed from the Neighbourhood Plan;
- b. Maintain the physical separation from Watton. See Policy 5 and its justification for discussion of this issue and the approach adopted to address it;
- c. "Keep Saham Toney as it is", which may be defined as:
 1. Respect and preserve the landscape of the area and maintain valued views of it. See Policies 7A and 7B and their justification for discussion of this issue and the approach adopted to address it;
 2. Maintain the historic features of the area. See Policy 6 and its justification for discussion of this issue and the approach adopted to address it;
 3. Development to be in keeping with the existing pattern of building. See Policy 3A and its justification for discussion of this issue and the approach adopted to address it;
 4. Protect agricultural land. The Plan's policies in general serve to address this.
- d. Protect against flooding of homes and infrastructure and sewerage problems. See Policies 8A – 8H and 9 and their justification for discussion of this issue and the approach adopted to address it;
- e. Protect and enhance open spaces. See Policy 7C and its justification for discussion of this issue and the approach adopted to address it;
- f. Preserve and protect wildlife and biodiversity. See Policies 7D, 7E and 7F and their justification for discussion of this issue and the approach adopted to address it;
- g. Support and encourage local businesses. See Policy 4 and its justification for discussion of this issue and the approach adopted to address it;
- h. Availability of services and facilities and access to them. See Policy 1 and its justification for discussion of this issue and the approach adopted to address it;
- i. Prioritising new housing for locals. See Policy 2D and its justification for discussion of this issue and the approach adopted to address it.

3.8 The other main issues arising from the preliminary consultation questionnaires did not directly affect development of land and so were addressed by Parish Action Points, rather than Policies. Those were included in the first Regulation 14 pre-submission version of the Plan in March 2018 and received overwhelming support from those who responded. As a result, they were subsequently handed over to the Parish Council to undertake the recommended actions, and removed from the Plan.

4. SHAPING THE PLAN: INITIAL LOCAL PLANNING AUTHORITY FEEDBACK

4.1 The responses to questionnaires 1, 2 and 3 and the opinions gathered at the 2016 fete shaped the first draft of this Plan, and in February 2017 that Plan was sent to Breckland Council Neighbourhood Planning Coordinator for informal review, in parallel with being presented to residents at a village exhibition. The Plan was completely revised to address all of the comments made by Breckland Council planning department in that review.

4.2 As a result of the comments received from the Council in its initial informal review, it was decided to completely re-write and re-structure the Plan. The updated draft Plan was again informally reviewed by Breckland Council Neighbourhood Planning Coordinator and her planning colleagues in July 2017 and 150 of the 165 the comments received are incorporated in this version of the Plan. The comments not incorporated related to:

- i. The impact of a potential lack of a 5-year supply of housing land in Breckland - 2 comments: this is a Breckland Council issue that cannot be resolved in a neighbourhood plan;
- ii. Surface water management policy deemed too restrictive - 1 comment: the Breckland comment recognised it was not based on specialist opinion, whereas the policy concerned is in line with Local Water Authority guidance;
- iii. Building for Life deemed to be not in line with national policy - 1 comment: Building for Life 12 is referred to in the updated National Planning Policy Framework and has been accepted in other made neighbourhood plans;
- iv. Policy wording deemed negative and/or restrictive - 3 comments: justification of comments was lacking any substance;
- v. Comment simply not relevant to the text it referred to - 1 comment;
- vi. Maps to be enlarged - 4 comments: not agreed as maps are readable as presented, both on-screen and in paper form;
- vii. Comment simply a statement of fact - 1 comment: no action required;
- viii. Alternative method of referencing supporting documents suggested - 1 comments: comment advisory only; not agreed;
- ix. Enlarge photos - 1 comment: comment advisory only; not agreed.

5. SHAPING THE PLAN: CONSULTATION ON LAND AND PROPERTY DIRECTLY ADDRESSED BY DRAFT POLICIES

5.1 In the case of draft Plan policies relating to heritage assets, local green spaces and a strategic gap to Watton (since renamed the rural gap), in October 2017 consultation letters were sent to parishioners whose properties and/or land were directly covered by those draft policies, asking them to provide any comments they might have with regard to their property and/or land. Only two responses were received opposing the draft policies:

- i. One home-owner strongly objected to designation of his property as a non-designated heritage asset. It was removed from the draft policy as a result;
- ii. The owners of Broom Hall Hotel requested a reduction in the area of the strategic gap proposed to exclude the hotel's formal gardens and the gardens of a dwelling house in the hotel grounds. The gap was amended accordingly. The hotel owners also requested the reduction of the gap so as not to include land fronting Richmond Road. This was not agreed because the Neighbourhood

Plan Steering Group considered this part of the land contributed greatly to the integrity of the strategic gap (subsequently renamed 'Rural Gap').

6. SHAPING THE PLAN: INFORMAL CONSULTATION WITH OTHER STAKEHOLDERS

6.1 Letters to stakeholders outside the Neighbourhood Area in November 2017 resulted in supportive responses from:

- i. Anglian Water;
- ii. The Norfolk Wildlife Trust;

26 other stakeholders contacted at this informal consultation stage did not respond.

7. SHARING THE PLAN: CREATION OF A DEDICATED WEBSITE

7.1 A website was created in October 2017 and has been regularly updated and improved since that time, to become the main vehicle for sharing information and news about the Plan and to provide opportunities for parishioners (and others) to give their views. The site was created and is maintained by the Neighbourhood Plan Work Group and so is unconstrained in the extent of information it provides. The site can be found at www.stnp2036.org.

8. FORMAL CONSULTATION: FIRST REGULATION 14 PRE-SUBMISSION, MARCH 2018

8.1 The Neighbourhood Plan and 14 supporting evidence documents were published for a formal pre-submission consultation on 12 March 2018. The consultation ran for 7 weeks to 29 April.

8.2 The consultation was widely publicised by:

- a) Formal announcements published on the websites of the Neighbourhood Plan, Saham Toney Parish Council and Breckland Council, with paper copies on the three Parish Council notices boards, at the community centre and at prominent external locations around the village;
- b) Publicity posters around the Parish;
- c) An information leaflet delivered to every household in the Parish;
- d) Articles in the Parish magazine, Saham Saga (delivered to every home in the Parish), and the free local community newspaper, the Wayland News (readership around 7,000 people); and
- e) Announcements on the Neighbourhood Plan's Facebook and Twitter pages and the "Nextdoor" social site.

8.3 Formal consultation events took the form of five village "drop-in" sessions during the consultation period, at each of which there were displays about all main aspects of the Plan and printed copies of the full Plan and all of its supporting evidence were available. At these sessions the Neighbourhood Plan Work Group members and Parish Councillors were in attendance to answer parishioner questions about the Plan.

8.4 Printed copies of the Plan were made available at several public locations around the Parish including the Community Centre and Church, and were also made available for loan by parishioners.

8.5 Full and abridged versions of the Plan and all its supporting evidence documents were made available on the Plan website. In addition, policies and policy maps were uploaded individually to allow consultees to more easily review material they were most interested in.

8.6 The full list of documents submitted at this stage is given below. All are available at www.stnp2036.org.

Document Title
Saham Toney Neighbourhood Development Plan
STNP Evidence Base Volume 1 Saham Toney Key Development Constraints
STNP Evidence Base Volume 2 Reasoned Justification for Policy 1
STNP Evidence Base Volume 3 Reasoned Justification for Policy 2A
STNP Evidence Base Volume 4 Reasoned Justification for Policy 2B
STNP Evidence Base Volume 5 Reasoned Justification for Policy 3
STNP Evidence Base Volume 6 Reasoned Justification for Policies 4A 4B and 4C
STNP Evidence Base Volume 7 Reasoned Justification for Policy 5
STNP Evidence Base Volume 8 Reasoned Justification for Policy 6
STNP Evidence Base Volume 9 Reasoned Justification for Policy 7A
STNP Evidence Base Volume 10 Reasoned Justification for Policy 7B
STNP Evidence Base Volume 11 Reasoned Justification for Policy 7C
STNP Evidence Base Volume 12 Reasoned Justification for Policy 8
STNP Evidence Base Volume 13 Sustainability Statement
Saham Toney Heritage Asset Register

8.7 A detailed questionnaire was made available on the Plan website, allowing consultees to provide online responses. A printed copy of the questionnaire was available for those without access to the internet.

8.8 During the consultation period members of the Plan Work Group undertook informal conversations with various village groups to inform them of the main aspects of the Plan and encourage their involvement in the consultation.

8.9 A list of statutory and non-statutory consultees was agreed with Breckland Council and an email was sent to each consultee, inviting its participation in the consultation. There was a total of 128 such consultees.

8.10 As a result of the consultation responses were received from the following:

- a) 77 comments by Breckland Council;
- b) 41 specific comments by parishioners, plus 97 online questionnaires completed by parishioners, giving their rating of policies;
- c) Another 25 parishioner responses that simply indicated support for the Plan; and
- d) 9 responses by statutory and non-statutory consultees.

The responses and the actions taken to update the Plan as a result of them are given in separate Appendices A3 to A7 to this Consultation Statement.

8.11 The full set of responses and the actions taken to update the Plan where applicable are given in separate Appendices A3 to A7 to this Consultation Statement. For reader convenience only, a summary of the main concerns raised and principal amendments made to the Plan as a result is given in

paragraphs 8.12 to 8.16. Tables 8.1 and 8.2 give a list of the policies that were consulted on, and of the sections of the Plan, to enable easier understanding of comments that make reference to those. It is emphasised that the summaries, by their nature do not always cover the full detail and nuances of the comments, which can only be found in the relevant appendices.

Table 8.1: List of Policies in the First Pre-Submission Version of the Plan

- 1: Neighbourhood Area Classification and Hosing Allocation
- 2A: Scale & Location of Residential Developments
- 2B: Housing Mix
- 3A: Design of Residential Developments
- 4A: Non-Residential Development: Community Facilities
- 4B: Non-Residential Development: Business or Tourism Related
- 5: Strategic Gap to Watton
- 6: Heritage Assets
- 7A: Local Green Spaces
- 7B: Communal Views
- 7C: Trees, Hedges, Biodiversity and Habitats
- 8: Surface Water Management & Sewerage Provision

Table 8.2: List of the Sections in the Second Pre-Submission Version of the Plan

- 1. Foreword
- 2. Introduction to the Plan
- 3. The Neighbourhood Area: Saham Toney Parish
- 4. Preliminary Consultation Summary and the Issues Arising
- 5. Vision Statement & Objectives
- 6. The Policies
- 7. Parish Action Points
- 8. Monitoring and Update of This Neighbourhood Plan

8.12 Summary of Breckland Council Representations and the Responses to Them (see Appendix A3 for full details)

COMMENT	RESPONSE	COMMENT	RESPONSE
Delete reference to 'small-scale developments' in the vision statement	Not accepted. This part of the vision originates from villagers' expressed wishes	Opposition to requirements regarding the Parish Housing Needs Assessment	Not accepted. Intent clarified to make clear the requirement did not apply in the way the Council had assumed
Restructure policy and supporting text to make clear which is which	No specific guidance given, but implemented to the best of STNP's abilities	Disagreement with the findings of the Parish Housing Needs Assessment	Not accepted. Made clear it is more valid locally than the Central Norfolk Assessment
Correlation with emerging Local Plan policies	Updated accordingly, though in some cases the applicable policies became redundant due to the introduction of allocated sites	General clarity and terminology	Updated and clarified where appropriate
Reword policies positively	Little specific guidance given, but implemented to the best of STNP's abilities	Proposed relaxation of design policy criteria	Not justified and not accepted
Opposition to affordable housing being allocated to those with a local connection	Not accepted since Breckland Council had already accepted this in other neighbourhood plans	Policy 5 negatively worded and strategic gap insufficiently justified	Policy wording amended. Additional evidence provided including a Parish Landscape Character Assessment
Opposition to community engagement	Comment made redundant by the deletion of the policy to which it applied	Policy 6 does not align with the NPPF	Policy rewritten with assistance from Historic England

Requirement to delete Policy 2A	Not accepted, but superseded by the decision to allocate sites	Opposition to surface water management policy with regard to small sites	Not accepted since small sites in the wrong location can create more flood risk than larger sites in lower risk areas
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8.13 Summary of Villager Representations and the Responses to Them (see Appendices A5 to A7 for full details)

COMMENT	RESPONSE
Village infrastructure will not support large development	Noted. The comment accords with the premise of the Plan and its evidence base
Maintain the village's dark skies	Noted. The comment accords with the Policy 3A (subsequently a policy specific to this topic was introduced)
Queries about the settlement boundary	Clarified that this is not a topic for the Plan, and respondent referred to Breckland Council
Understanding of housing mix requirements	Baseline data added
Objection to Parish Action Point relating to traffic speed	Made clearer that Parish Action Points are subject to more review study and consultation before being implemented
Suggestion to add a Parish Action Point on drainage	Implemented
Objection to overall housing allocation	Not accepted as the range proposed was justified by an evidence document and the emerging Local Plan

Objections to some of the flood risk maps in the evidence base to Policy 8	Maps in question deleted
Support for affordable housing for locals	Noted
Support for the Plan	Noted
Suggestions for additional communal views (see Appendix A6)	Independently reviewed by a professional landscape consultant. That review resulted in the definition of a revised set of Key Views in the updated Plan
Parishioner rating of policies and parish action points	Among those who responded, there was almost universal support. See Appendix A7

8.14 Summary of Norfolk County Council Representations and the Responses to Them (see Appendix A4.5 for full details)

COMMENT	RESPONSE
Add supporting text concerning developer contributions towards improving local services and infrastructure	Noted that this is a topic dealt with by the Local Plan
Add a requirement for the installation of sprinklers	Implemented in the design policy
Request for more evidence for wildlife corridor map	Further research with help from Norfolk Biodiversity Information Service and updated accordingly
Proposed amendments to the wording of Policy 8	Amendments incorporated in conjunction with separate comments from Anglian Water

Heritage policy to refer to Norfolk Heritage Explorer records	Reference added
Better align heritage policy with the NPPF	Implemented with the help of Historic England

8.15 Summary of Representations from Other Statutory & Non-Statutory Consultees and the Responses to Them (see Appendix A4 for full details)

COMMENT	RESPONSE
ANGLIAN WATER: <ul style="list-style-type: none"> Suggested additional text for policy 8 and additional references for its supporting text 	<ul style="list-style-type: none"> Implemented as suggested
THE BOWES ESTATE: <ul style="list-style-type: none"> Proposal to allocate a site 	<ul style="list-style-type: none"> This comment resulted in a detailed review of the potential to allocate sites in the Plan, which was implemented. The site proposed in the comment passed the process of site assessment and selection and was allocated in the Plan
NORFOLK POLICE: <ul style="list-style-type: none"> Include reference to ‘Secured by Design’ 	<ul style="list-style-type: none"> Reference to the Police initiative ‘Secured by Design’ added to the design policy
HISTORIC ENGLAND: <ul style="list-style-type: none"> Advice on better correlating Policy 6 with the NPPF and Historic England’s guidance 	<ul style="list-style-type: none"> Advice implemented in the updated Policy 6
NORFOLK WILDLIFE TRUST: <ul style="list-style-type: none"> Support for the Plan 	<ul style="list-style-type: none"> None required

THE RAMBLERS (NORFOLK): <ul style="list-style-type: none"> Suggestion for a new footpath to be designated via the Parish Action Points 	<ul style="list-style-type: none"> None required, since the Parish Action Points were removed from the Plan
SPORT ENGLAND: <ul style="list-style-type: none"> Reference to their general guidance 	<ul style="list-style-type: none"> None required since the type of facilities referred to by the noted guidance do not form part of the Plan and are dealt with by the Local Plan
THE WOODLAND TRUST: <ul style="list-style-type: none"> Give more emphasis to the woodland and trees, including a new objective 	<ul style="list-style-type: none"> Incorporated where possible, but in some respects the comments were in conflict with those of Breckland Council and so could not be implemented

9. TESTING THE PLAN: FIRST EXAMINER'S HEALTH CHECK

9.1 Following the consultation, an independent examiner was engaged to carry out a "health check" on the Regulation 14 pre-submission Plan and all of its supporting documents. The health check was an independent review designed to identify issues that might mean that the plan could not comply with the basic conditions or other legal requirements. In particular it included consideration of:

- The overall structure and direction of travel of the Plan;
- The topics covered;
- The robustness of the policies as currently presented and written;
- The identification of any gaps in the evidence presented in the Plan;
- The planning and non-planning elements; and
- Any duplications or conflicts within the Plan.

9.2 The health check was carried out in May 2018 by Ann Skippers MRTPI FHEA FRSA AoU, who at the time of doing that had performed nearly 50 formal neighbourhood plan examinations across England.

9.3 The health check also included a review of pre-submission consultation comments made by the Breckland Council.

9.4 The principal findings of the Health Check were as follows:

- a) The Plan would benefit from presentation changes to make its structure clearer and more user friendly. Photographs and / or diagrams would help break up large tracts of text and add local flavour;
- b) Much of the policy supporting text was duplicated by supporting evidence documents. Attention should be given to the balance between these;
- c) The policy relating to housing numbers had not at that time been agreed with Breckland Council;
- d) Many of the policies were long and complex and contained detailed and prescriptive requirements. Such policies would require more robust evidence;
- e) Some of the language used came across as quite negative;
- f) The main issues were well explained;
- g) The vision and objectives were clear.

9.5 After discussion and clarification with its author, the recommendations made in the health check report were implemented in the Neighbourhood Plan.

10. IMPROVING THE PLAN: LANDSCAPE CHARACTER ISSUES

10.1 The pre-submission version of the plan included a policy defining a series of communal views (subsequently renamed "Key Views") and giving them a measure of protection. During the Regulation 14 consultation, more than 90% of villagers who responded supported the views specified. Some suggested additional views for consideration. However, in its response, Breckland Council was of the opinion that insufficient evidence had been provided to justify the views in question.

10.2 Given the high level of parishioner support for the key views policy, but recognising the validity of Breckland Council's response to that, it was decided to undertake a verification exercise. A chartered landscape architect, Lucy Batchelor-Wylam BA MA CMLI, was commissioned to undertake that task. Each view defined by the emerging policy was reviewed as was the policy itself.

10.3 Similarly the pre-submission version of the plan included a policy defining a “strategic gap” between Saham Toney and Watton. As with the key views, Breckland Council’s consultation response noted its opinion that the policy lacked sufficient evidence. Hence a review of the strategic gap was included in the scope of work for the verification exercise

10.4 The resulting report, published in May 2018, made recommendations about how to improve the wording of the two emerging policies in question, suggested that other views be considered and proposed a more detailed study to look at a broader range of issues relating to landscape.

10.5 Consideration of the Verification Report and discussion with its author led to the realisation that landscape issues warranted a more detailed and focused approach in the plan to better reflect their importance to the character of Saham Toney. Time and care were taken to research and develop a strategy for doing that and parishioners were briefed on the approach being adopted at a village presentation on 14 August 2018. In October 2018 Lucy Batchelor-Wylam was commissioned to undertake a comprehensive landscape character assessment of the neighbourhood area. In support of her work the neighbourhood plan work group prepared an historical background to development in Saham Toney, which forms part of the evidence base for the plan. After a period of desk-based study and a physical survey of the village a Parish Landscape Character Assessment Report was published in January 2019, in three parts:

- Part One: Landscape Character Assessment;
- Part Two: Fringe Sensitivity Assessment;
- Part Three: Key Views Assessment

As an adjunct, a Village Design Guide was also prepared, with detailed input and advice from Lucy Batchelor-Wylam based on her landscape assessment studies.

10.6 All four documents were subsequently formally adopted by Saham Toney Parish Council and accepted by Breckland Council as material considerations in planning decisions.

10.7 Based on the four reports the emerging policies dealing with landscape character, a rural gap (previously termed the strategic gap) and design were completely rewritten.

11. EXPANDING THE PLAN’S SCOPE: SITE ALLOCATIONS

11.1 One response to the Regulation 14 consultation was from the agent of a local landowner, suggesting a site for residential housing development be considered for inclusion in the plan (see A4.2).

11.2 Following a great deal of research of the topic it was concluded that the potential advantages of allocating sites outweighed the potential disadvantages. A strategy was prepared and a recommendation by the Neighbourhood Plan Work Group to allocate sites in the plan was approved by the Parish Council on 6 August 2018.

11.3 The reasons for allocating sites and the strategy for doing so were explained to parishioners at a village presentation on 14 August 2018 and their questions answered. The principal reasons given were as follows:

- a) To gain more certainty about where new housing would – and would not – be allowed;

- b) To avoid the emotions often aroused by individual planning applications by adopting an objective process to assess and select sites for allocation in the Plan;
- c) To give landowners and developers more certainty when making planning applications;
- d) To gain the advantage of a 3-year housing land supply rule applying for the first two years after making of the Plan;
- e) To manage the phasing of development over the entire Plan period; and
- f) In summary to help ensure the 'right' homes would be built in the 'right' places at the 'right' times.

11.4 A formal "call for sites" was published on 17 August 2018 and ran till 18 October 2018, inviting parishioners and local landowners, as well as almost 30 local and national developers and housebuilders to put forward sites for consideration. This process was widely publicised on Parish Council notice boards, posters around the village, in the village magazine, on social media sites and on the plan website, plus those of the Parish Council and Breckland Council. Additionally, Breckland Council contacted all those who had put forward sites for its own strategic housing land availability assessments of Saham Toney in 2014 and 2015, to inform them of the call for sites.

11.5 A total of sixteen sites were put forward as a result of the call for sites.

11.6 A Technical Support Package was approved by Locality in November 2018 for an independent and professional assessment of the sites to be undertaken by AECOM.

11.7 Details of the sites put forward and the next steps of the process were explained to parishioners at a village presentation on 7 December 2018, their questions answered and their initial opinions taken. The presentation was advertised on the Plan website, in the parish newsletter, 'Saham Saga' and on notices at prominent locations around the village. It was attended by 46 people.

11.8 In addition to the Locality funded work by AECOM, the Local Highways Authority, the Lead Local Flood Authority and Anglian Water agreed to carry out their own assessments of each site.

11.9 Following the completion of the site assessments and a site selection process, the work that been carried out and its provisional results were presented to villagers and landowners at a presentation, exhibition and question and answer session on 14 July 2019. Comments taken from villagers were considered during the finalisation of recommendations to the Parish Council as to which sites should be allocated in the Neighbourhood Plan. The presentation was advertised on the Plan website and on notices at prominent locations around the village. It was attended by 43 people.

12. FORMAL CONSULTATION: SECOND REGULATION 14 PRE-SUBMISSION, AUGUST 2019

12.1 As a result of the fundamental changes made to the plan subsequent to the pre-submission consultation of March-April 2018 (principally site allocations, landscape policies, changes to reflect revisions to the emerging Local Plan and the update of the National Planning Policy Framework), it was decided to make a second pre-submission of the plan.

12.2 The Neighbourhood Plan and 12 supporting evidence documents were published for a formal pre-submission consultation on 19 August 2019. The consultation ran for 8 weeks to 13 October 2019.

12.3 The full list of documents submitted at this stage is given below. All are available at www.stnp2036.org.

Document Title
Saham Toney Neighbourhood Development Plan
Assessment of the Saham Toney Neighbourhood Plan against Breckland Council's Sustainability Objectives
Reasoned Justification for Policy 6 Heritage Assets
Reasoned Justification for Policy 7C Local Green Spaces
Saham Toney Housing Needs Assessment May 2019
Saham Toney Independent Site Assessment Report
STNP Site Selection Report
Saham Toney Landscape Assessment Part One: LCA
Saham Toney Landscape Assessment Part Two: Fringe Sensitivity Assessment
Saham Toney Landscape Assessment Part Three: Key Views Assessment
Saham Toney Village Design Guide March 2019
Saham Toney Heritage Asset Register
Background Information for An Historic Area Assessment

12.4 The consultation was widely publicised by:

- a) Formal announcements on the websites of the Neighbourhood Plan, Saham Toney Parish Council and Breckland Council;
- b) Publicity posters around the Parish;
- c) Formal announcements in paper form on the Parish Council's 3 notice boards;
- d) Articles in the Parish magazine, Saham Saga, and the Wayland News; and
- e) Announcements on the Neighbourhood Plan's Facebook and Twitter pages and the "Nextdoor" social site.

12.5 A 16-page printed leaflet summarising the key aspects of the Plan was delivered to every household in Saham Toney.

12.6 A printed copy of the Plan were made available at the village community centre and paper copies were also made available for loan by parishioners.

12.7 The Plan and all its supporting evidence documents were made available on the Plan website. In addition, policies and policy maps were uploaded individually to allow consultees to more easily review material they were most interested in.

12.8 A consultation comments form was made available on the Plan website, allowing consultees to provide online responses. A printed copy of the questionnaire was available for those without access to the internet.

12.9 During the consultation period members of the Plan Work Group undertook informal conversations with various village groups to inform them of the main aspects of the Plan and encourage their involvement in the consultation. The Group also took an information and publicity stand at the village 'Harvest Fun Day' event which took place during the consultation period. Copies of the Plan documents were available at the stand, and members of the group answered questions from villagers.

12.10 A list of statutory and non-statutory consultees was agreed with Breckland Council and an email was sent to each consultee, inviting its participation in the consultation. There was a total of 139 such consultees. That consultee list is given in Appendix B1.

12.11 As a result of the consultation responses were received from the following:

- e) 88 comments by Breckland Council;
- f) 27 specific comments by 12 parishioners;
- g) Another 36 parishioner responses that simply indicated support for the Plan; and
- h) Responses by 10 statutory and non-statutory consultees.

12.12 The full set of responses and the actions taken to update the Plan where applicable are given in separate Appendices B3 to B6 to this Consultation Statement. For reader convenience only, a summary of the main concerns raised and principal amendments made to the Plan as a result is given in paragraphs 12.13 to 12.17. Tables 12.1 and 12.2 give a list of the policies that were consulted on, and of the sections of the Plan, to enable easier understanding of comments that make reference to those. It is emphasised that the summaries, by their nature do not always cover the full detail and nuances of the comments, which can only be found in the relevant appendices.

Table 12.1: List of Policies in the Second Pre-Submission Version of the Plan

1: Services, Facilities & Infrastructure
2A: Residential Housing Allocation
2B: Residential Development Within the Settlement Boundary
2C: Residential Development Outside the Settlement Boundary
2D: Affordable Housing
2E: Housing Mix
2F: Common Criteria for Allocated Sites
2G-2Q: Individual Site Allocation Policies
3A: Design
3B: Density of Residential Developments
3C: Site Access and On-Site Streets
3D: Parking
3E: Dark Skies Preservation
4: Non-Residential Development
5: Saham Toney Rural Gap
6: Heritage Assets
7A: Landscape Character Preservation & Enhancement
7B: Key Views
7C: Local Green Spaces
7D: Biodiversity & Habitats
7E: Green Infrastructure
7F: Trees & Hedges
8: Surface Water Management & Sewerage Provision

Table 12.2: List of the Sections in the Second Pre-Submission Version of the Plan

9. Foreword

10. Introduction
11. The Neighbourhood Area
12. Consultation Summary
13. Vision Statement & Objectives
14. Existing Planning Policy Context
15. The Policies
16. Parish Action Points
17. Monitoring of the Plan

12.13 Summary of Breckland Council Representations and the Responses to Them (see Appendix B3 for full details)

COMMENT	RESPONSE	COMMENT	RESPONSE
General: Some policies restrictive; see individual comments	None required, see applicable specific comments	Policy 1 evidence maps: improve readability	Map format improved
General: References to NPPF to be to 2019 version throughout	2 references required update	Policies 2A, 2G-2Q: Concern re phasing of development (3 comments)	Phasing justified and agreed
General: Line spacing inconsistent	Corrected	Policy 2A: Site allocation numbering system unclear	Clarified in Policy supporting text
General: Some maps difficult to read	Map presentation improved throughout	Policy 2A: Limit on total housing numbers too prescriptive	Overall limit justified and agreed
Front cover: Typing error	Corrected	Policy 2C: Refer to Policies 2A & 2D	References added
Table of Contents: Improve format for noting maps	Format amended accordingly	Policy 2C: Additional text re brownfield sites	Text added
Section 3: Place demographic figures where relevant to text	Optional change not implemented	Policy 2C: Hierarchy of sites inconsistent with the policy	Hierarchy amended accordingly
Section 6: Paragraph number duplicated	Numbering corrected	Policy 2C: Refer to Site Assessment Report	Reference added

COMMENT	RESPONSE	COMMENT	RESPONSE
Section 6, Policy 3B: Local Plan main modification (MM) references incorrect (2 comments)	'MM' references removed from Local Plan, so no longer relevant; also removed from Neighbourhood Plan	Policy 2D: Revise affordable housing threshold text	Text revised accordingly
Policy 1: Unnecessary wording in criterion 1	Wording moved to supporting text	Policy 2D: Affordable housing priority inconsistent with allocations policy	Policy text amended accordingly
Policy 2D: Additional affordable housing criterion	Criterion added	Policy 2G: Number of dwellings allocated to be 'approximate' rather than a maximum	Agreed that evidence justifies a limit on dwelling numbers
Policy 2D: Missing line space between paragraphs in supporting text	Corrected accordingly	Policies 2G, 2K-2M: Combine criteria dealing with similar topics (4 comments)	Agreed and implemented
Policy 2E: Requirement for affordable housing on smaller sites not permitted	Requirement removed	Policies 2G, 2I-2L, 2P, 7A: Requiring full Landscape & Visual Impact Assessment unreasonable for site size (7 comments)	By agreement, requirement relaxed to Landscape and Visual Appraisal
Optional: Combine Policies 2E and 2F	Implemented in part, but full merging of policies not appropriate	Policy 2H: Confirm exact area of STNP2 (ref. affordable housing requirement)	Site area measured and confirmed – below affordable housing threshold

COMMENT	RESPONSE	COMMENT	RESPONSE
Policy 2F: Introduction of general policy for allocated sites welcomed	None required	Policy 2H: Add requirement for ground contamination assessment for STNP2	Requirement added
Policy 2F: Add visibility spay criterion to general policy	Agreed and added	Policy 2K: Confirm exact area of STNP6 (ref. affordable housing requirement)	Site area measured and confirmed – below affordable housing threshold
Policies 2G-2Q: Rephrase opening text of each site allocation policy	Rephrased	Policy 2K: Two criteria duplicated in policy for STNP6	Duplication removed
Policies 2H, 2I-2P: Criteria stating what is not required are not policy	Criteria moved to supporting text	Policy 2L: STNP7 area > 0.5 ha, hence affordable housing required	Affordable housing requirement added
Policies 2G, 2I, 2J, 2Q: Viability constraint too prescriptive	Amended to apply unless 'exceptional circumstances' exist	Policy 2M: Concern about low density of site STNP9	Further justification added to support the site's density
Policies 2G, 2I-2L: Non-deliverable sites should not be allocated	Agreed that sites may also be allocated if developable	Policy 2O: Realignment of site STNP14 welcomed	None required
Policy 2O: One STNP14 criterion duplicates general requirements policy	Site-specific criterion deleted	Policy 3B: Number of density areas inconsistent	Erroneous comment – map and table are consistent

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

COMMENT	RESPONSE	COMMENT	RESPONSE
Policy 3B: Clarify site density criterion	Clarified accordingly	Policy 3E: Supporting text inconsistent with policy text	Policy text deleted in line with another comment
Policy 4: Amend term 'severe' to 'significant'	Amended accordingly	Policy 7B: First sentence is a statement, adds nothing to policy	Criterion amended to be applicable as policy
Policy 4: Statement in policy text should be moved to supporting text	Moved to supporting text accordingly	Policy 7B: No strategy advice provided for Key Views 2, 3, 6 and 9	Appropriate advice added
Policy 5: Concern about western extent of 'Rural Gap'	Gap reduced in size as recommended	Policy 7C: Add evidence for Local Green Spaces to supporting text	Tabulated evidence added
Policy 5: Commercial site on Evidence Map 5.4 shown incorrectly	Erroneous comment, map agreed to be correct as presented	Policy 7D: Lacks clarity between types of natural environment designations	Policy rewritten to include greater clarity re designations
Policy 6: Council will decide if archaeological field evaluations required	Added text confirming responsibility lies with Breckland Council	Policy 7D Policy map keys difficult to read	Policy maps and their keys presented at a larger scale with improved clarity
Policy 6: Clarify references to 'designated' & 'non-designated' heritage assets	Clarified accordingly	Policy 7E: Criteria 4 & 5 would be better placed in Policy 3A	Criteria moved accordingly

COMMENT	RESPONSE	COMMENT	RESPONSE
Policy 6: Amend reference to value of archaeological assets to sites and finds	Reference amended accordingly	Policy 7F: Amend root protection criterion to reflect BS5867 requirements	Criterion amended accordingly
Policy 6: Useful to have a glossary for the entire Plan, not just for heritage assets	Complete glossary of terms added to the Plan	Section 8: Amend title of plan monitoring section	Section title amended accordingly
Policy 6: Numbering of heritage assets unclear	Clarifying note added to heritage asset policy maps	Section 8: Align monitoring indicators & targets with those used by Breckland Council	Agreed in discussion that this was not required

12.14 Summary of Villager Representations and the Responses to Them (see Appendix B5 for full details)

COMMENT	RESPONSE
<p>Historic flood issues at the Hills Road, Page's Lane, Chequers Lane junction not taken into account</p> <p>(3 similar comments)</p>	<p>The potential flood risk of new development, including its potential impact on existing houses and land has been fully accounted for</p> <p>The Lead Local Flood Authority and Anglian Water assessed sites and their recommendations have been implemented</p> <p>Drainage policies split into 9 component parts and strengthened</p> <p>The Strategic Environmental Assessment of the Plan (AECOM, June 2020) concludes that the Plan's policies will help ensure that no significant adverse effects on surface water flood risk will take place as a result of the allocations taken forward through the Neighbourhood Plan, and increased resilience to flood risk is secured.</p> <p>The Lead Local Flood Authority has been supportive of the Plan's drainage policies</p>
<p>Disregarded villager wishes to limit site sizes to 4-6 houses</p> <p>(3 similar comments)</p>	<p>The Plan must conform with the Local Plan. A 5-house limit in the latter was deemed unsound by its examination and removed. It was therefore necessary to also remove the limit from the Neighbourhood Plan</p> <p>Additionally, robust site assessments and site selection processes showed larger sites to be sustainable and thus acceptable</p>

COMMENT	RESPONSE
<p>Site allocations on Pound Hill remove opportunity to enjoy open views (4 similar comments)</p>	<p>Masterplanning studies looked into this. One of the conclusions of that resulted in the deletion of two sites to the east of Pound Hill, thus retaining the open aspect to that side.</p> <p>Masterplanning also prepared a layout for the site to the west that retains long distance views across that site</p>
<p>Can the Plan solve existing village flood issues?</p>	<p>No, but it can and does ensure new development will not add to that risk. Requirements on new sites to improve and maintain ditches forming part of a site will go some way to alleviating existing problems downstream</p>
<p>Two sites on Richmond Road will result in unsafe access to and from them</p>	<p>To address various concerns related to the impact of development on village traffic and road safety, a Transport Study of all sites allocated in the Reg. 14 version of the Plan has been prepared by independent consultants. It includes indicative scale drawings of access to and from each site, and concludes such access can be safely provided in all cases</p>

COMMENT	RESPONSE
<p>The amount of new housing proposed on Pound Hill will greatly increase traffic past the school and add to danger caused by parking outside the school</p>	<p>The Transport Study noted above concluded that the impact on village traffic levels of developing 83 new homes on 11 allocated sites would be “negligible”. Full details can be found in the study report, but in summary the report concludes:</p> <ul style="list-style-type: none"> (a) There is no evidence that any existing road safety concerns could be exacerbated by the new development outlined in the Neighbourhood Plan; (b) The assessment demonstrates that the scale of change in two-way traffic flows, taking account of the current low volumes of traffic, is negligible in real terms, and that peak hour flows will remain low after development.
<p>What is being done to resolve the unsightly appearance of Page’s Place?</p>	<p>While we sympathise and tend to agree with the concerns raised, the redevelopment of Page’s Place is an ongoing process approved by a planning application supported by Historic England. While we might wish it would happen at a quicker pace, there is nothing the Neighbourhood Plan can do to achieve that.</p>
<p>What will the Plan do to protect biodiversity?</p>	<p>(i) At planning application stage, the site allocation policies require every allocated site to submit a full ecological impact assessment demonstrating any impacts remain at acceptable levels; (ii) There are specific policies in the Plan to preserve habitats and biodiversity (Policy 7D), green infrastructure (Policy 7E) and trees and hedges (Policy 7F). Where relevant these have been further strengthened following consultation</p>

COMMENT	RESPONSE
<p>Additional development will add to existing sewage overspill problems</p> <p>(3 similar comments)</p>	<p>Anglian Water assessed each site put forward for allocation in the Plan, and concluded that “Anglian Water has a statutory obligation to provide sufficient capacity for sites with the benefit of planning permission. As such this shouldn’t be viewed as an absolute constraint to additional residential development at Saham Toney.” It is further highlighted that at the time Anglian Water undertook its site assessments, sites in the area concerned had a potential capacity of 131 dwellings, whereas the number allocated in the Plan is 35.</p> <p>The problems are historic in Saham Toney and result not from lack of sewerage capacity, but the inflow of surface water to the foul sewerage system due to (the incorrect) connection of surface water drain pipes to the foul system. That is a problem neither the Neighbourhood Plan nor Anglian Water can solve: responsibility lies with those householders who allow surface water to drain into the foul system.</p> <p>It is noted that in its response to the consultation, Anglian Water raised no concerns in this respect.</p>
<p>The Plan is a high-quality document</p>	<p>Noted</p>
<p>Opposed to allocation of site STNP5 as it spoils the ‘Key View’ to Saham Mere</p>	<p>Site STNP5 has been removed from allocation in the Plan</p>

COMMENT	RESPONSE
<p>The Plan does not address traffic issues, especially speeding traffic in the Page's Lane area</p> <p>(2 similar comments)</p>	<p>The Neighbourhood Plan cannot address issues regarding vehicles exceeding the speed limit. Site assessment and a consultation response by the Local Highways Authority of the sites in question did raise some concern about the total number of houses in the area in question, and suggested a combined limit of 25 dwellings for sites STNP4, 5, 6 and 7. That limit has been adhered to in the Plan.</p> <p>Additionally, the Saham Toney Neighbourhood Plan Transport Study, AECOM, April 2020 demonstrates that both individually and cumulatively, the impact of all allocated sites on traffic flows in the village and on queue lengths at two key junctions, will be negligible compared to existing levels.</p>
<p>Site allocations will add to existing flood risk problems</p> <p>(2 similar comments)</p>	<p>The potential flood risk of new development, including its potential impact on existing houses and land has been fully accounted for.</p> <p>The Lead Local Flood Authority and Anglian Water assessed sites and their recommendations have been implemented</p> <p>Drainage policies split into 9 component parts and strengthened. Policies enforce a requirement for development not to lead to any increase in flood risk over the pre-development situation</p> <p>The Strategic Environmental Assessment of the Plan (AECOM, June 2020) concludes that the Plan's policies will help ensure that no significant adverse effects on surface water flood risk will take place as a result of the allocations taken forward through the Neighbourhood Plan, and increased resilience to flood risk is secured.</p>

COMMENT	RESPONSE
<p>Sites clustered in the Pound Hill area would impair the openness of area and village views</p>	<p>Sites STNP5 and 6 have been removed from allocation precisely because of their harmful landscape impact</p> <p>Remaining sites in the area are subject to a new masterplanning policy that includes indicative site layouts which seek to preserve openness and views</p>
<p>Against allowing development outside the settlement boundary</p>	<p>Strategic Policy HOU 04 of the emerging Breckland Local Plan specifies that new residential developments may be located “immediately adjacent to the settlement boundary”. That clause was not challenged at examination. The Neighbourhood Plan must comply with the strategic policies of the Local Plan and hence also allows residential development immediately adjacent to the settlement boundary.</p>
<p>Potential archaeological impact of proposed sites on Pound Hill</p>	<p>Sites STNP5 and 6 removed from allocation in the Plan</p> <p>No known archaeological finds in the area</p> <p>Policies for remaining sites in the area updated to include the use of planning conditions to protect any archaeological finds made during site investigations</p>

12.15 Summary of Norfolk County Council Representations and the Responses to Them (see Appendix B4.8 for full details)

COMMENT	RESPONSE
<p>LOCAL HIGHWAYS AUTHORITY (LHA):</p> <p>Representations by the LHA were clarified via post-consultation correspondence (given in Appendix B4.8), which resulted in an updated representation giving comments to each provisionally allocated site, summarised as follows:</p> <ul style="list-style-type: none"> • Sites STNP1: Acceptable subject to particular criteria being included in a site allocation policy; • Sites STNP2, 9, 13, 14: Objected to on the basis of no footway connection to the village school; • Sites STNP4 and 7: Acceptable • Sites STNP5, 6 and 15: Evidence that a suitable access can be achieved is required • Site STNP16: Acceptable subject to conditions • Additionally, the LHA proposed a reduction in the total numbers of houses allocated in the Plan to “about 33 dwellings’ (in line with the Local Plan minimum target) • Since the Plan allocates sites, it should be subject to a Strategic Environmental Assessment (SEA) 	<ul style="list-style-type: none"> • Criteria included in relevant policies • Reasons provided as to why these objections were not justified, including the conclusions of the Saham Toney Transport Study, April 2020 • Noted • Demonstrated by indicative site access drawings included in the Saham Toney Transport Study, April 2020 • Conditions reflected in site allocation policy • Justification provided as to why the Neighbourhood Plan minimum target is set at 48, and as to why additional housing in excess of 48 new dwellings is justified and sustainable • SEA of the Plan was undertaken by AECOM and identified the relative merits of the 11 sites consulted on at Regulation 14, and concluded that the Regulation 15 site selection, in combination with the Plan’s updated policies, was acceptable and would have a positive impact

COMMENT	RESPONSE
<p>LEAD LOCAL FLOOD AUTHORITY (LLFA):</p> <ul style="list-style-type: none"> Recommendations for a policy on flooding Requirements for sequential and exception tests 	<ul style="list-style-type: none"> After post-consultation correspondence with the LLFA, it was agreed that the recommended new policy overlapped to a large extent with the existing Policy 8: Surface Water Management and Sewerage Provision, and that rather than introduce a new policy, the existing and proposed new policies would be merged (Note: subsequently the merged policy was split into 9 component parts to address concerns raised by villager consultation responses) To a large extent previously addressed by the site assessment and site selection processes, which included site assessments by the LLFA. Requirement for sequential and exception tests included in policies
<p>INFRASTRUCTURE GROUP:</p> <ul style="list-style-type: none"> Sprinklers recommended in all new developments Suggested the addition of policy supporting text that development should contribute to improving local services and infrastructure 	<ul style="list-style-type: none"> Requirement for sprinklers added to Policy 3A: Design No change to the Plan required since this is covered by Local Plan Policy INF 02: Developer Contributions
<p>HISTORIC ENVIRONMENT DEPARTMENT:</p> <p>The representation rated each allocated site by a ‘traffic light’ system, although definition of the rating system was not provided. Site STNP2 was rated ‘green’. The other 10 sites were rated ‘amber’</p> <p>Concerns were understood to relate to the possible existence of below-ground archaeology on the sites</p>	<p>Asserted that establishing the presence of such archaeology as part of the Plan-making process would be impractical and onerous on landowners. Confirmed that there are no known archaeological finds on any of the sites concerned. Proposed that suitable conditions should be applied to any future planning permissions and noted measures included in Policy 6 to address any finds made during site investigations or development</p>

12.16 Summary of Representations from Organisations and the Responses to Them (see Appendix b\$ for full details)

COMMENT	RESPONSE
ANGLIAN WATER: <ul style="list-style-type: none"> Allow utility infrastructure in the rural gap if it is needed Support for Policy 8: Surface Water Drainage Management and Sewerage Provision 	<ul style="list-style-type: none"> Policy 5 updated to allow utility infrastructure in the rural gap Noted
HISTORIC ENGLAND: <ul style="list-style-type: none"> Reference to their guidance documents provided 	<ul style="list-style-type: none"> Guidance was already reflected in Policy 6: Heritage Assets, which had been prepared with the help of advice and recommendations from Historic England
NORFOLK POLICE: <ul style="list-style-type: none"> Promote crime prevention through design Include developer contributions for measures to reduce crime 	<ul style="list-style-type: none"> Confirmed that reference to the Police initiative ‘Secured by Design’ was already included in the Plan Such developer contributions are dealt with by the Local Plan and so no change to the Neighbourhood Plan is required
GLADMAN DEVELOPMENTS: <ul style="list-style-type: none"> Housing mix not flexible Policy 3A: Design over-prescriptive Advice on planning regulations, the NPPF and planning practice guidance 	<ul style="list-style-type: none"> Refuted: Policy 2e based on an up to date, parish-specific Housing Needs Assessment Refuted: The policy and accompanying village design guide allow ample flexibility Noted, but all the information had already been adhered to
SPORT ENGLAND: <ul style="list-style-type: none"> Reference to its standard guidance 	<ul style="list-style-type: none"> Reference to guidance added to policy supporting text

12.17 Summary of Representations from the Owners of Sites STNP4-7 and the Responses to Them

COMMENT	RESPONSE
<ul style="list-style-type: none"> • Site densities too low and should be approximately doubled • Increase the number of dwellings allocated on the 4 sites from 38 to 62 • All sites to be developed over a single period, rather than phased over the entire Plan period • Policy requirements for the submission of traffic impact study too onerous • Policy requirements for the submission of landscape and visual impact assessment (LVIA) too onerous • Remove single-storey limit for houses on Site STNP5 • Disputed impact on the Key View from Pound Hill towards Saham Mere 	<ul style="list-style-type: none"> • Not accepted. Reasoning behind objection flawed, and densities compliant with the NPPF and consistent with the findings of the Saham Toney Landscape Character Assessment • Not accepted. Allocations justified by a rigorous process of site assessment and selection, and further supported by the Saham Toney Masterplanning Study and the landscape impact assessment included therein • Not accepted: Village infrastructure inadequate for a condensed development timeframe • Requirement deleted based on the findings of a Transport Study • Requirements 'softened' to a landscape and visual appraisal on the advice of a landscape consultant and with the agreement of the LPA • Not accepted: Comment flawed as no such limit was included in the site policy • Not accepted: Impact on the Key View evidenced by the Saham Toney Landscape Character Assessment and the Saham Toney Masterplanning Study

13. CONSULTATIONS ON ENVIRONMENTAL ASSESSMENTS OF THE NEIGHBOURHOOD PLAN

13.1 Screening of the Regulation 14 version of the Plan at the time of the first pre-submission of the latter, in March 2018, concluded that neither Habitats Regulations Assessment (HRA) nor Strategic Environmental Assessment (SEA) of the Plan were required at that stage.

13.2 Subsequently site allocations were added to the Plan and a second Regulation pre-submission of it was made. In parallel, that updated version of the Plan was screened (by Norfolk County Council, acting on behalf of Breckland Council) for SEA and HRA.

13.3 The SEA Screening Report (September 2019, available at: <https://www.stnp2036.org/sea--hra-screenings.html>) concluded that a Strategic Environmental Assessment of the Neighbourhood Plan was not required.

13.4 Breckland Council then arranged a statutory consultation on the SEA Screening Report. Scans of the original consultee email responses are included in the screening report, available as noted in 13.3; but they are of poor reproduction quality and hence in the interests of readability, are duplicated in 13.4.1 to 13.4.4.

13.4.1 Response from the Environment Agency:

We agree with the conclusions that have been reached.

Neville Benn

Senior Planning Advisor

Sustainable Places

East Anglia Area (West)

18 September 2019

13.4.2 Response from Natural England:

Thank you for your consultation on the above dated and received by Natural England on 16 September 2019.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Screening Request: Strategic Environmental Assessment

It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.

Neighbourhood Plan

Guidance on the assessment of Neighbourhood Plans, in light of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended), is contained within the National Planning Practice Guidance. The guidance highlights three triggers that may require the production of a SEA, for instance where:

- A neighbourhood plan allocates sites for development

- The neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- The neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

We have checked our records and based on the information provided, we can confirm that in our view the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect.

We are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan. It remains the case, however, that the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected.

Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result, the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether a SEA is necessary.

Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third-party appeal against any screening decision you may make.

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk

Yours sincerely

Joanne Widgery

Consultations Team

18 September 2019

13.4.3 Response from Norfolk County Council

(1) Thank you for circulating the Saham Toney SEA screening, I have attached comments to the document.

Our main comments relate the site allocations included in the Reg 14 neighbourhood plan which would trigger the requirement for a SEA, but the SEA screening does not refer to the site allocation. Therefore, it is suggested that the site allocations in the neighbourhood plan are referenced in the SEA screening.

Naomi Chamberlain, Trainee Planner

Community & Environmental Services

2 October 2019

(2) The comments sent earlier still stand. However, I would like to add that NCC considers that a SEA is required for the Saham Toney Neighbourhood Plan due to the neighbourhood plan allocating sites and the potential that some of the site allocations may not have been appraised through the local plan sustainability appraisal process.

Naomi Chamberlain, Trainee Planner

Community & Environmental Services

2 October 2019

13.4.4 Response from Historic England

RE: Saham Toney Neighbourhood Plan SEA Screening

Thank you for your email of 13th September regarding the above consultation. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is taken fully into account at all stages and levels of the local planning process. Therefore, we welcome this opportunity to review the Saham Toney Neighbourhood Plan Screening report, as well as the Regulation 14 Neighbourhood Plan, and its supporting documents. This includes the Site Assessment report prepared by AECOM. For the purposes of this consultation, Historic England will confine its advice to the question: "Is it (the Saham Toney Neighbourhood Plan (STNP)) likely to have a significant effect on the historic environment?" Our comments are based on the information supplied with the Screening Opinion.

The supporting information (screening report and draft neighbourhood plan) supplied with the consultation indicates that within the plan area there is a range of designated historic environment assets. There is also likely to be other features of local historic, architectural or archaeological value, and consideration should also be given to the wider historic landscape.

The documentation indicates that the Saham Toney Neighbourhood Plan proposes to allocate eleven sites for housing. We note that Sites STNP1, STNP2, STNP9, STNP13, STNP14 and STNP15 have been allocated as part of Breckland's Local Plan and will therefore have been subject to appropriate assessment as part of that process. **(STNP Note: This comment was in error, no Saham Toney sites are allocated in the Local Plan)**, These sites will deliver up to 33 residential units, which would meet the area's housing targets. In our previous response to the SEA Screening Request for the earlier version of the STNP (May 2018) we considered that a SEA was not required, owing to the fact the STNP did not propose to allocate any sites not already included in the Local Plan.

We note, however, that the updated STNP now proposes to allocate a further five sites for development over the plan period (Sites STNP4, STNP5, STNP6, STNP7 and STNP16), to deliver up to another 50 residential units. We are aware that the SEA Screening Report incorrectly states that it would be an additional 33 units, rather than 50.

These sites have not been subjected to assessment through either a Sustainability Assessment, or a Strategic Environmental Assessment. They have been considered as part of the AECOM Site Assessment Document, but this document does not satisfy the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 in terms of assessment.

We note that Sites STNP5, STNP6 and STNP7 have the potential – as identified in the AECOM assessment – to have a detrimental effect upon the setting of Page's Place (Grade II). In particular, the impact is likely to be related to the erosion of setting caused by the loss of Page's farmstead's historic open, rural character. In addition, the development of STNP4 is also highlighted as having the potential to erode the settlement character of Saham Toney in historic landscape terms, which can also contribute to questions of setting.

We highlight the NPPF requirement for plans to set out a positive strategy for the historic environment, and for new development to make a positive contribution to local character and distinctiveness (paragraph 185), as well as the requirement to avoid or minimise any conflict between the conservation of heritage assets and any aspect of a proposed development (paragraph 190). Given that the neighbourhood area includes sufficient land, as allocated by the Local Plan **(STNP Note: Again, this comment was in error, no Saham Toney sites are allocated in the Local Plan)**, to meet its identified housing needs (stated as 33 units), there appears to be insufficient justification for allocating additional development (up to 83 units) above that number **(STNP Note: This comment was in error, the total number of dwellings allocated exceeded the Local Plan minimum target by 50, not 83)**, where it would lead to harm to the historic environment.

Given the likely significant effects upon the historic environment, and the lack of SEA or SA assessment for these additional sites, Historic England hence considers that a Strategic Environmental Assessment will now be required to fully determine the level and nature of that harm, and develop appropriately detailed avoidance or mitigation strategies.

I should be pleased if you send a copy of the determination as required by Reg 11 of the Environmental Assessment of Plans and Programmes Regulations 2004.

Historic England strongly advises that the conservation and archaeological staff of the relevant local authorities are closely involved throughout the preparation of the plan and its assessment. They are best placed to advise on local historic environment issues and priorities, including access to data held in the Historic Environment Record (HER), how the allocation, policy or proposal can be tailored to minimise potential adverse impacts on the historic environment, the nature and design of any required mitigation measures and opportunities for securing wider benefits for the future conservation and management of heritage assets.

We should like to stress that this opinion is based on the information provided by you with your correspondence dated 13th September 2019. To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of the SEA process and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the plan / guidance) where we consider that, despite the SEA, these would have an adverse impact upon the environment.

Edward James
Historic Places Advisor, East of England
22 October 2019

13.5 It will be seen above, that two of the statutory consultees made representations on the report requesting that SEA be undertaken. Breckland Council concluded that SEA was required. Its email confirming that, dated 6 November 2019 is included below. Additionally, the Neighbourhood Plan Steering Committee felt the report was flawed in a way that gave rise to doubt about its conclusion. As a result of both of these factors, the Neighbourhood Plan Steering Committee arranged for SEA to be undertaken and in November 2019 applied for a Locality technical support package to do that. That was approved in January 2020 and AECOM was appointed to carry out the SEA.

Subject: Saham Toney NP SEA & HRA screening
Date: Wednesday, 6 November 2019 at 15:22:52 Greenwich Mean Time
From: Heinrich, Susan
To: 'Andrew Walmsley'

Andrew,

This is to formally confirm the results of the SEA & HRA Screening work that has been carried out in relation to the second Reg.14 version of the Saham Toney Neighbourhood Plan.

The SEA screening on this plan advised that the *“emerging NP is not likely to have any significant environmental effect and accordingly will not require a Strategic Environmental Assessment”*. This view was not supported by Historic England and the County consultees, therefore we now considered it necessary for a full Strategic Environmental Assessment to be commissioned.

Also as a result of the HRA screening, we were advised that a full HRA was required, because *“By allocating more dwellings than what is contained within the emerging LP, it means that we can’t rely on the HRA for the local plan as our evidence base – essentially that HRA didn’t assess this quantum of housing in this location”*.

This work was completed and Natural England were consulted, and although they were *“...in general agreement with the conclusions of the Appropriate Assessment in section 6”*, they also felt that there are a couple of matters that still need addressing, in addition to my initial concerns, as outlined in yesterday’s email to you. In light of this, we recommend that this work also needs to be commissioned to be independently reviewed, and possibly revised.

Please let me know if you require any further clarification.

Susan

Susan Heinrich | Neighbourhood Planning Co-Ordinator MSc MRTPI | Breckland Council

13.6 Following preparation of a SEA Scoping Report (available at: <https://www.stnp2036.org/sea--hra.html>) a 5-week consultation on that report was undertaken between 5 February and 11 March 2020, with the three statutory consultees (Historic England, Natural England and the Environment Agency) and in addition Norfolk County Council. Natural England and the Environment Agency did not respond. The invitation to consult is given below (using the email to Historic England – other than addressee name, all consultees received the same email). The consultation responses from Historic England and Norfolk County Council are given in 13.6.1 and 13.6.2 respectively.

Note: Identical emails to the one provided below were sent to the Environment Agency, Natural England and Norfolk County Council

Putt, Ryan <email withheld>

5 Feb
2020,
16:01

to eastofengland@HistoricEngland.org.uk, me, Nick

Dear Historic England,

The Saham Toney Neighbourhood Plan Steering Group is currently preparing a Neighbourhood Development Plan for the Saham Toney Neighbourhood Plan area, in Breckland District.

To accompany the development of the Neighbourhood Plan, a Strategic Environmental Assessment is currently being undertaken to inform and influence the plan-making process.

A Scoping Report has now been prepared for the SEA.

On this basis, please find attached the Scoping Report for your comment. The consultation period will begin today (5th February 2020) and ends on the 11th March 2020. This incorporates the statutory five-week period for scoping consultation.

We look forward to Historic England's comments. In the meantime, if you have any questions on the SEA process currently being carried out for the Saham Toney Neighbourhood Plan, please do not hesitate to get in touch.

Best regards,

Ryan

Ryan Putt BSc (Hons), MSc
Environmental Consultant, Policy & Appraisal

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Plumer House
Tailyour Road
Plymouth
PL6 5DH
United Kingdom
T +44-(0)1752-676700
aecom.com

13.6.1 Response from Historic England

Ref: Scoping Opinion Saham Toney Report

Thank you for your email requesting a scoping/screening opinion for the Saham Toney Neighbourhood Plan SEA.

We would refer you to the guidance in Historic England Advice Note 8: *Sustainability Appraisal and Strategic Environmental Assessment*, which can be found here:

[<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/)

This advice sets out the historic environment factors which need to be considered during the Strategic Environmental Assessment or Sustainability Appraisal process, and our recommendations for information you should include.

Historic England strongly advises that the conservation and archaeological staff of the relevant local planning authorities are closely involved throughout the preparation of the plan and its assessment. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the Historic Environment Record (HER), which should be consulted as part of the SEA process. In addition, they will be able to advise how any site allocation, policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

Please note that the Heritage Gateway is not an appropriate source of Historic Environment Record data for the purposes of this assessment, owing to the fact that it is not as regularly updated as the Historic Environment Record for the area you will be assessing. The Norfolk HER should be consulted directly.

To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of the SA/SEA process and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the plan/guidance) where we consider that, despite the SA/SEA, these would have an adverse effect upon the environment.

If you have any further questions, please contact the Partnerships Team who can be reached on 01223 582749.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'E. James', is written over a faint, repeating watermark of the word 'electronic'.

Edward James
Historic Places Advisor, East of England

Norfolk County Council Comments on the: Saham Toney Neighbourhood Plan SEA Scoping Report

11 March 2020

1. Preface

1.1. The officer-level comments below are made without prejudice, the County Council reserves the right to make to any further comments the County Council may have on future iterations of the emerging Neighbourhood Plan.

2. Lead Local Flood Authority

2.1. The Lead Local Flood Authority (LLFA) welcome that the Neighbourhood Plan is subject to an SEA due to potential environmental effects and welcome that the impacts of flooding, including specific references to surface water, has been included as a criteria.

2.2. The LLFA also welcomes the following:

- the references made to NPPF throughout the document, specifically that of directing development away from areas of high-risk flooding.
- references made to The Flood and Water Management Act (2010) and the encouragement of utilising alternative engineering to flood risk management, namely in implementation of SuDS.
- the inclusion of the RoFSW Environment Agency Map (Figure 4.3).
- the inclusion of a map highlighting local reports of surface water flooding in the Saham Toney taken from the 'Flood Investigation Report into flooding in Watton and the surrounding area on 23 June 2016' (Figure 4.4.).
- references made to the number of properties at risk of surface water flooding in Saham Toney, relevant to the date provided in the text (Section 4.16).
- references made to sustainably manage surface water run-off within the plan area.
- references made to main watercourses flowing through the Neighbourhood Plan Area.

2.3. References to water quality measures are very few. In terms of sustainable drainage, water quality is a fundamental component of the SuDS philosophy and acts as one of four key pillars in their use and application.

2.4. The LLFA would recommend, in terms of an SEA screening for the Neighbourhood Plan, that further references to water quality measures are included in the report to ensure water quality measures are adopted when designing sustainable drainage strategies for the area of Saham Toney.

2.5. Should you have any queries with the above comments please contact the Lead Local Flood Authority at llfa@norfolk.gov.uk.

3. Minerals and Waste

3.1. We are pleased to note that one of the focuses of section 7 (pages 42-43) is Mineral Safeguarding Areas. However, paragraph 7.3 (page 42) does not include the relevant paragraph from the NPPF about mineral safeguarding. The relevant paragraph is: 206. "Local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working."

3.2. Paragraph 7.8 (page 43), which refers to local level policies, does not refer to the relevant policies of the adopted Norfolk Minerals and Waste Core Strategy and Development Management Policies DPD. The document is available on our website at: <https://www.norfolk.gov.uk/what-we-do-and->

[how-we-work/policy-performance-and-partnerships/policies-and-strategies/minerals-and-waste-planning-policies/adopted-policy-documents](#), the Mineral Safeguarding Policy within the Minerals and Waste Core Strategy is Policy CS16.

3.3. The baseline summary (pages 37-39) does not include any information on minerals and should refer to the location of safeguarded sand and gravel resource within Saham Toney. The summary of future baseline does not include any information on minerals and should refer to the potential for safeguarded mineral resource to be affected by non-mineral development. A map is attached showing the location of safeguarded mineral in the parish.

3.4. The section on key sustainability issues (page 33) does not make any reference to minerals or waste. We would expect both of these issues to be included as they are included in the SEA objectives and appraisal questions which we would expect to relate to the key sustainability issues.

3.5. We welcome the SEA objectives and appraisal questions relating to mineral safeguarding and waste production /management.

3.6. Should you have any queries with the above comments please contact Caroline Jeffrey (Principal Planner, Minerals and Waste Policy) at

[email withheld](#) or call 01603 222193.

4. Sustainability

4.1. Page 16 (para 4.3) of the report contains an error as the Government's target is net zero emissions by 2050, not 80%. That latter was the original target, amended by statute last year. On the same page the footnotes might need to be amended to reference the change itself, and reference could be made to the Committee on Climate Change's report that led to this

(<https://www.theccc.org.uk/publications/>).

4.2. Given the location of Saham Toney, any development is going to be a challenge in addressing many of the climate change linked issues - sustainable travel (given likely continued reliance on the car), renewable energy sources, sustainable, low/zero carbon design etc.

4.3. Irrespective of the next stages in the process, the issues been well captured in the statement on page 33 (para 5.9).

4.4. The data included in section 8 could be updated using the up to date information available at Norfolk Insight:

<https://www.norfolkinsight.org.uk/population/report/view/286efa84892b46e1aba60a1cd3853e3d/E05010254/>.

4.5. Should you have any queries with the above comments please contact Dominic Allen (Sustainability Manager) at [email withheld](#) or call 01603 224463.

13.7 The comments made during the Scoping Report consultation were addressed during the preparation of the SEA. The SEA environmental report was published for an eight-week consultation by statutory consultees and other stakeholders that ran from 20th June to 14th August 2020. That consultation ran in parallel with consultation on the Regulation 14 pre-submission version of the Plan. The emerging policies which the SEA has evaluated, were also made available to all consultees. To

account for Saham Toney parishioners who might not have access to a computer or internet, arrangements were made to allow them access to the consultation documents should they wish.

13.8 Consultation was invited on the SEA Report by the three statutory consultees (the Environment Agency, Historic England and Natural England) and Norfolk County Council. The letter of invitation is given below.

This email confirms a formal consultation on the SEA environmental report for the STNP will run for eight weeks from Wednesday 24th June until Friday 14th August 2020.

The Saham Toney Neighbourhood Plan (STNP) Steering Group is currently preparing a Neighbourhood Development Plan on behalf of the Parish Council, for the Saham Toney Neighbourhood Plan area, in Breckland District.

To accompany the development of the Neighbourhood Plan, a Strategic Environmental Assessment (SEA) is currently being undertaken to inform and influence the plan-making process.

An Environmental Report has now been prepared for the SEA and will undergo an 8-week consultation with statutory consultees and other stakeholders.

The Neighbourhood Plan underwent a Regulation 14 consultation from August to October 2019, on which you were invited to comment. That version of the Plan is available to view or download at: <https://www.stnp2036.org/archived-versions.html>

Since this consultation took place, the STNP Group has been considering all comments that have been made on the Plan and are considering what changes may subsequently need to be made to the Plan. Meanwhile the SEA assessment has been underway. A SEA scoping report was produced and consulted on from 5 February to 11 March 2020. The purpose of the SEA scoping report was to engage the three statutory environmental bodies (Natural England, the Environment Agency and Historic England) on how the SEA assessment would be undertaken. Norfolk County Council was also consulted at that stage. The SEA scoping report is available to view at: <https://www.stnp2036.org/sea--hra-screenings.html>

A key purpose of the SEA is to identify, describe and evaluate the likely significant effects on the environment of implementing the Neighbourhood Plan, and of the reasonable alternatives available.

SEA is a process which takes place alongside plan development. Whilst the SEA assesses alternatives to those presented in the Regulation 14 plan, it also takes into account the content of the next iteration of the Neighbourhood Plan; in other words, the updated emerging Regulation 14 plan which, itself has been influenced by the SEA assessment process.

Hence in parallel with this consultation, the Neighbourhood Plan is published for a Regulation 14 consultation, and you will receive a separate letter inviting you to participate in that consultation. That version of the Neighbourhood Plan is available at <https://www.stnp2036.org/regulation-14-3-consultation-documents.html>

For the avoidance of doubt, the Neighbourhood Plan being made available for consultation is the third such Regulation 14 pre-submission. Any comments you made previously on either the first or second Regulation 14 pre-submission versions of the Neighbourhood Plan are not negated by this stage of consultation.

Following the consultations on both the Neighbourhood Plan and the SEA, the Regulation 15 version of the Plan will be informed by this consultation on the SEA report, and you will be given full opportunity to comment on it when it is published at Regulation 16 by the Local Planning Authority.

The SEA Environmental Report is available for comment at:

<https://www.stnp2036.org/sea-consultation-june-july-2020.html>

We look forward to your comments. In the meantime, if you have any questions on the SEA process currently being carried out for the Saham Toney Neighbourhood Plan, please do not hesitate to get in touch.

Kind Regards,

Chris

Chris Blow, Leader, Saham Toney Neighbourhood Plan Steering Committee Work Group

Sent on behalf of, and with the full approval of Saham Toney Parish Council:

Nick

Nick Creek, Chairman

Jill

Mrs Jill Glenn, Parish Clerk

13.9 The same letter of invitation was sent to all other consultees, a list of whom is given below.

LOCAL PLANNING AUTHORITY	
Breckland Council	email withheld
ORGANISATIONS WHICH RESPONDED TO THE REGULATION 14 CONSULTATION ON THE NEIGHBOURHOOD PLAN, AUGUST-OCTOBER 2019 (Other than the statutory consultees noted in 13.8)	
Anglian Water	email withheld
Gladman Developments	email withheld
Norfolk Police	email withheld
Sport England	email withheld
OWNERS, DEVELOPERS & AGENTS OF SITES ALLOCATED IN THE NEIGHBOURHOOD PLAN	
Agent for the owners of site STNP1	email withheld
Owner of site STNP2	email withheld
Agent for the owners of sites STNP4 and 7	email withheld
Developer of site STNP9	email withheld
Owner of sites STNP13 & 14	email withheld
Owner of site STNP15	email withheld
Owner of site STNP16	email withheld
12 SAHAM TONEY PARISHIONERS WHO RESPONDED WITH COMMENTS TO THE REGULATION 14 CONSULTATION ON THE NEIGHBOURHOOD PLAN, AUGUST-OCTOBER 2019	
Names and email addresses withheld for privacy reasons, but can be made confidentially available to the Local Planning Authority and /or examiner only, on request	
The Parish announcement included information on how those without internet access could view the document should they wish	
COUNTY & DISTRICT COUNCILLORS	
Councillor E Connolly	email withheld
Councillor H Crane	email withheld
Councillor T Birt	email withheld
ALL OTHER CONSULTEES TO THE REGULATION 14 PRE-SUBMISSION OF THE NEIGHBOURHOOD PLAN, CONSULTATION ON WHICH ALSO TOOK PLACE FROM 24 JUNE TILL 14 AUGUST 2020	

13.10 To ensure information about the consultation was brought to the attention of all who live, work or carry out business in Saham Toney, consultation details were publicised as follows:

- On the Neighbourhood Plan website, www.stnp2036.org, with an announcement on the home page, linking to the detailed information;
- On the Parish Council website, <https://sahamtoneyparishcouncil.co.uk/>;
- Hard copy invitations to consult on the Parish notice boards (these were the same as the letter given in 13.8, with the following addition: “Anyone who wishes to see the documents, but lacks access to the internet, is invited to contact the STNP Work Group at (*telephone number withheld in this report for privacy reasons*) and we will make mutually convenient and safe (in light of Covid-19) arrangements to allow that.”;
- Articles in the monthly Parish magazine, Saham Saga and the local community newspaper, The Wayland Times;
- Publicity on the Neighbourhood Plan Facebook page, <https://www.facebook.com/search/top/?q=stnp2036>;
- Publicity on the ‘Nextdoor’ social site;

13.11 SEA Report Consultation responses are given in Appendix D. Those responses are summarised as follows:

13.11.1 Statutory Consultees

- The Environment Agency confirmed it had no comments;
- Historic England confirmed it had no comments;
- Natural England confirmed it had no comments.

13.11.2 Other Consultees

Norfolk County Council confirmed it had no comments. No other consultees made responses during the consultation period.

13.12 Late Response from Breckland Council

13.12.1 On 24 September 2020, 41 days after the close of the consultation period (which had exceeded the statutory minimum period), Breckland Council provided comments on the SEA Report. Those comments are given in Appendix D3. In providing its response, although aware that Historic England had confirmed it had no comments on the SEA, Breckland Council had further consulted Historic England. That was done without informing the Parish Council or Neighbourhood Plan group, who were only made aware of the comments on 24 September 2020. The email Breckland Council received from Historic England is included in Appendix D3.

13.12.2 The late comments from Breckland Council and Historic England were considered jointly by the Parish Council and AECOM, the consultants responsible for carrying out the SEA, and although under no obligation to do so due to the late response, the SEA report was updated to address the late comments.

13.13 The HRA Screening Report (September 2019, available at: <https://www.stnp2036.org/sea--hra-screenings.html>) concluded that a Habitats Regulations Assessment of the Neighbourhood Plan was required.

13.14 Norfolk County Council, which prepared the HRA screening assessment on behalf of Breckland Council, went on to undertake an appropriate assessment. A report including both assessments (September 2019, available at: <https://www.stnp2036.org/sea--hra-screenings.html>) concluded that the Regulation 14 Neighbourhood Plan would “not result in adverse impacts on the integrity of the qualifying features of any internationally-designated site, either on its own or in combination with other plans or projects”.

13.15 The HRA screening and appropriate assessments report was consulted on by Natural England on and its response is given below:

Habitats Regulations Appropriate Assessment for Saham Toney Neighbourhood Plan

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England does not consider that this Habitats Regulations Appropriate Assessment poses any likely risk or opportunity in relation to our statutory purpose.

The impact from each individual housing allocation alone is likely to be negligible, given the increase in new dwellings across all allocation sites in the neighbourhood plan is 50, giving a revised total of 83 new dwellings. We note that incorrect figures for the numbers of new dwellings have been used in the HRA, and advise that these errors need to be corrected in the document.

Whilst this has not been explicitly stated in the HRA, the risk to designated sites lies in the potential in-combination effects, which the HRA has examined and ruled out (for the reasons provided in section 5 of the HRA). Whilst in general agreement with the conclusions of the Appropriate Assessment in section 6, we advise that the following matters should be addressed in the preceding section 5:

- An explanation about why housing allocations have been assessed as a whole rather than individually; and
- The NP proposes an increase in the number of dwellings over and above that already assessed in the HRA of Breckland Council’s emerging new Local Plan. As a result the additional number of new dwellings should be assessed in-combination with the Local Plan for the four pathways identified in section 5, particularly Pathway 4: ‘Urban effects’ including recreational disturbance; and

The lack of further comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.

If the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

If you have any questions, please contact me.

Yours sincerely

Louise Oliver

Lead Adviser – Norfolk & Suffolk Team, Natural England

13.16 In the light of the consultation representation on the report by Natural England, and the view of the Neighbourhood Plan Steering Committee that the report was flawed in a way that gave rise to doubt about its conclusion, the Steering Committee decided to arrange for another HRA to be undertaken and in November 2019 applied for a Locality technical support package to do that. That was approved in January 2020 and AECOM was appointed to carry out the HRA.

13.17 During the initial stage of the assessment, likely significant impacts were identified and an 'appropriate assessment' of those impacts on the applicable designated sites was undertaken by AECOM. In accordance with regulations the report at that stage was consulted on by Natural England over a three-week period, and that organisation confirmed it had no comments at that stage. The invitation to consult and Natural England's response are given below.

From: Riley, James D (Basingstoke)
Sent: 21 February 2020 14:14
To: consultations@naturalengland.org.uk
Subject: HRA of Saham Toney Neighbourhood Plan

Dear Sir/Madam

Please find attached the HRA of the Saham Toney Neighbourhood Plan. There will be a formal consultation on the next version of the Neighbourhood Plan but we would be interested in receiving any comments Natural England may have on this draft report.

If you do have any comments to make, we would appreciate receiving them by 13th March 2020.

Regards

Dr James Riley CEnv MCIEEM
Technical Director (Ecology and Habitat Regulations Assessment)

Environment & Ground Engineering, UK & Ireland
D +01256-310367-(internal-short-dial-7066367)

AECOM
Midpoint
Alencon Link
Basingstoke, Hampshire RG21 7PP
T +01256-310200
aecom.com

From: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>
Sent: 03 April 2020 09:02
To: Riley, James D (Basingstoke) <[email withheld](#)>
Subject: [EXTERNAL] HRA of Saham Toney Neighbourhood Plan - Natural England response 309941

Please accept our apologies for the late reply.

Our ref. 309941

Dear Dr Riley

Habitats Regulations Assessment of Saham Toney Neighbourhood Plan

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England agrees with the conclusions of the Habitats Regulations Assessment and have no further comments no comments to make.

Should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

Yours sincerely

Jacqui Salt
Consultations Team
Natural England
Hornbeam House, Electra Way
Crewe, Cheshire, CW1 6GJ

13.18 Recommendations made as the result of the appropriate assessment were included in relevant policies of the Neighbourhood Plan and their supporting text. Those were principally concerned with providing necessary protection to the local population of stone curlews.

13.19 Subsequently a full habitats regulations assessment was undertaken by AECOM, based on the policies of the update Regulation 14 Toney Neighbourhood Development Plan (as it stood at 2 May 2020). The Saham Toney Habitats Regulations Assessment, AECOM, June 2020 concludes "...it is determined that the Plan has an extensive policy framework to protect the conservation objectives of European sites".

13.20 Given Natural England's comment on the earlier appropriate assessment "*Should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.*", and the fact that the updated assessment report concludes the amendments in the draft and updated Regulation 14 Neighbourhood Plan do not result in such impact, it was deemed unnecessary to consult Natural England again.

13.21 The updated HRA report, June 2020, made no additional recommendations relating to the policies and supporting text of the Neighbourhood Plan.

13.22 The report was sent to Breckland Council on 19 June 2020, with a request for the Council to discharge its duty under regulations 105 and 106 of the conservation of Habitats and Species Regulations 2017. Confirmation of regulatory compliance is anticipated to follow Regulation 16 consultation.

13.23 During its review of such regulatory compliance, in a telephone discussion, an officer of Breckland Council raised concern that Natural England had not been consulted on the updated HRA report, despite

that organisation's earlier comment (see paragraph 13.20). As a result, Natural England was invited to consult on the updated report as shown below:

From: Chris Blow [<mailto:stnp2036@gmail.com>]

Sent: 27 August 2020 12:27

To: SM-NE-Enquiries (NE) <enquiries@naturalengland.org.uk>; Hack, Richard <[email withheld](#)>; SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>

Subject: Saham Toney Neighbourhood Plan Habitats Regulations Assessment

Dear Natural England,

You recently advised in a letter dated 23 July, that you had no specific comments on our Neighbourhood Plan or its Strategic Environmental Assessment.

At the time we did not ask you to comment on our Habitats Regulations Assessment, because you were consulted on that report at an earlier stage by AECOM (who prepared it for us) and in a letter dated 3 April 2020 Jacqui Salt advised that Natural England agreed with the HRA's conclusions at that stage, had no further comments to make, and only wished to be consulted on it again if our proposal was amended in a way that significantly affected the natural environment. Since that was not the case in the version of the neighbourhood plan you recently consulted on, we did not feel it necessary to invite your further review of the HRA.

However, during its own review as to the legal compliance of our HRA, our local planning authority has raised concern that in doing this, we were procedurally incorrect and should in fact have consulted Natural England again, regardless of there being no significant change in the proposal with respect to environmental impact.

As a result I now invite Natural England to consult on the most up to date version of our HRA report, which may be downloaded from <https://www.stnp2036.org/sea--hra.html>

Should you need it for reference, the version of the neighbourhood plan on which you recently consulted remains available at <https://www.stnp2036.org/regulation-14-3-consultation-documents.html>

Could I please request that you provide any comments on the HRA by Friday 18 September 2020?

Kind Regards,
Chris

[Chris Blow](#)
[Work Group Leader](#)
[Saham Toney Neighbourhood Plan Committee](#)

13.24 In response Natural England advised that it agreed with the conclusions of the updated HRA report, as shown below:

SM-NE-Consultations (NE)

4:46 PM (02
September
2020)

to me

Our ref. 326345

FAO Chris Blow,

Saham Toney Neighbourhood Plan updated Habitats Regulations Assessment

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England agrees with the conclusions of the updated HRA Report.

Should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

Yours sincerely

Jacqui Salt
Natural England
Consultation Service
Hornbeam House
Crewe Business Park, Electra Way,
Crewe, Cheshire, CW1 6GJ

14. FORMAL CONSULTATION: THIRD REGULATION 14 PRE-SUBMISSION, JUNE 2020

14.1 A third pre-submission of the Plan ran from 24 June till 14 August 2020 for the following reasons:

- 1) To ensure that there was appropriate and adequate opportunity for the SEA process to influence the development of the Plan up to its Regulation 15 submission;
- 2) To ensure all stakeholders had chance to make comment on it in parallel with a concurrent consultation on a Strategic Environmental Assessment (SEA) of the Plan; and
- 3) To make available additional evidence for the Plan that has resulted from a number of new and updated studies undertaken since the previous consultation.

14.2 The formal announcement of the consultation is included below. It was published on the Plan website, and in paper form, on three Parish notice boards and at pinned to telegraph poles at other prominent locations around the village.

A third consultation on the Saham Toney Neighbourhood Plan in line with Regulation 14 of the Neighbourhood Planning Regulations (2012), will run from:

Wednesday 24th June 2020 up to and including Friday 14th August 2020.

Consultation is open to all who live, work or carry on business in the civil parish of Saham Toney, together with a range of statutory and other interested organisations.

The Neighbourhood Plan and its supporting documents can be found online at **www.stnp2036.org**

Comments may be returned via an online form at www.stnp2036.org (where comment forms may also be downloaded), by email to stnp2036@gmail.com, or by telephoning 01953 884759 between 9am and 8pm on weekdays. Comment forms will also be delivered on request to the above number.

Calls to formally make comments on the Plan will be recorded in order to provide a record of comments, but those recordings will remain completely confidential; other calls will not be recorded,

but a confidential written note of callers' names and addresses will be made for subsequent audit purposes.

All valid comments received by midnight on **Friday 14th August** will be considered by the Saham Toney Neighbourhood Plan Steering Committee and may contribute to the subsequent update of the Plan, prior to its Regulation 15 submission to Breckland District Council and its subsequent examination.

This is a repeat consultation on an updated version of the Plan, in order to:

- 1) Ensure all stakeholders have chance to make comment on this version of the Plan in parallel with a concurrent consultation on the latest Strategic Environmental Assessment (SEA) of the Plan. The latter looks at the potential impact of the Plan on the natural and built environment;
- 2) Ensure that there is appropriate and adequate opportunity for the SEA process to influence the development of the Plan up to its Regulation 15 submission; and
- 3) To make available additional evidence for the Plan that has resulted from a number of new and updated studies undertaken since the previous consultation.

Also, for those who made comments on previous versions of the Plan, those may be seen, together with details of how they were addressed, in a draft version of the Consultation Statement that is available during this consultation. That statement will subsequently be updated where appropriate to include responses to the present consultation and its final version will be available to all parishioners, businesses and other bodies at the time of the Regulation 16 publication of the Plan by Breckland District Council.

Due to Covid-19 restrictions, at present a paper copy of the Plan will not be available at a public location. Instead anyone who lacks internet access but wishes to see the Plan, should contact us at **01953 884759** between 9am and 8pm Mondays to Fridays, and we will make mutually safe and convenient arrangements for you to do that, designed to maintain social distancing and avoid cross-contamination. This offer will be available throughout the consultation period. Similarly, with the Plan's supporting documents. A 16-page paper information pamphlet about the Plan is also available to villagers on request and a 4-page leaflet will be delivered to all households in the Parish with the July edition of 'Saham Saga'.

Should restrictions be eased sufficiently during the course of the consultation, a further announcement will be published advising of a public venue at which the Plan may then be viewed.

A variety of slide-shows may also be viewed / downloaded at www.stnp2036.org giving general information about the Plan in a concise form.

During the consultation a number of online 'drop-in' meetings will be arranged; their frequency will be dependent on demand. These meetings will use Zoom, and because of its restrictions of use, each session will be limited to 40 minutes and a maximum of 100 participants. Full details will be published at least a week in advance at: www.stnp2036.org

Issued by the Saham Toney Neighbourhood Plan Work Group, with the approval, and on behalf of, Saham Toney Parish Council

14.3 Public engagement measures during the consultation have been guided by planning practice guidance on neighbourhood planning in the light of Covid-19, as set out in paragraph 107 of that guidance, and were as follows:

- a) First and foremost, everything we do will be with the safety of ourselves, our families and villagers in mind;
- b) With (a) in mind, our process is intended to be as flexible as possible, and may be tailored to suit individual and specific needs;
- c) A formal consultation announcement and a publicity poster will be displayed at the most of the external locations as for the previous locations, but naturally not indoors at venues

presently closed. **The announcement will be explicit about where and when the Plan can be viewed;**

- d) Additionally, people's attention will be directed to the announcement by an article in the Parish magazine at the start of July, and a little later in the Wayland Times (subject to available space being confirmed in the latter); and by mention at the Parish Council meeting of 6 July 2020;
- e) The announcement, the poster and the articles will include Andrew's telephone contact, and will invite anyone who wishes to view the Plan, other than via the internet, to call that number, between 9am and 8pm on weekdays, to make mutually safe and convenient arrangements. Those will include, but not be limited, to the following offers:
 - 1) The loan of a paper copy of the Plan. We will obtain 5 copies from our printers at the start of consultation, ensuring they are available for a minimum of 6 weeks. We would deliver the document(s) in a bag or container, while maintaining social distancing. While we will not set a time limit, we will ask for how long people wish to borrow a copy. At the end of each loan, again, maintaining social distancing, we would collect the documents, in a bag or container. The bag or container would then be destroyed and the document(s) would not be loaned again within a period of 5 days, to allow dispersion of any contamination. If necessary, to meet demand, additional copies will be printed with a lead time of 2-3 days;
 - 2) To make available a laptop loaded with all documents, to be delivered and collected in the same manner as paper copies, and cleaned with disinfectant wipes before and after loan. For personal security reasons, internet access will be disabled;
 - 3) For those who may not be computer literate, we will agree suitable and safe arrangements to demonstrate how to access the files on the laptop. This would include providing step by step instructions in paper form;
 - 4) We will take questions and comments on the Plan via telephone. Should it be necessary, Andrew will pass on caller's details to me and I will ring them back. Such calls will not be recorded;
 - 5) Andrew will take time to establish if callers have specific topic interests rather than general. If so, we will offer paper copies of relevant short sections of documents, delivered as above;
 - 6) A 4-page A5 leaflet will be prepared and made available informing villagers of the fundamental aims and contents of the Plan. It will be noted on the consultation announcement. If funds permit, copies will be printed and distributed to every household with the July parish magazine. Additionally, the leaflet will be attached to all emails inviting parishioners to participate and made available on the Plan website;
 - 7) A 16-page information pamphlet about the Plan will also be available and will be publicised on the consultation announcement. We will make it available on request to anyone who doesn't choose to read the whole Plan. Copies may be collected from us, or will be delivered in the safe manner outlined in item (1), though there would be no need for subsequent collection. Additionally, pamphlets will be attached to all emails inviting people / organisations to participate.
 - 8) If none of the above methods suit a person, we will explore other options with them, making all reasonable efforts to provide them with document access. Of course, since those options will be individual and ad hoc, they cannot be specified in advance;
 - 9) We will arrange to deliver blank comment forms on request, and collect any comments people wish to make in paper form, using the same precautionary measures as for (1);
 - 10) We will accept comments by phone providing people give their name and address and agree to the conversation being recorded;
 - 11) During weeks 3-7 of consultation, we will arrange at least once-weekly 40-minute online Zoom 'drop-in' and publish the access details on the announcement;

12) Additionally, should access to public venues become available again during the consultation period we will consider making a copy of the Plan available at the community centre, but that would depend on the timing and conditions of its opening.

Items (a) to (e) apply to non-internet accessibility. In addition to those measures:

- The consultation will be publicised on the home page of our website with links to all the relevant information (including the formal announcement and poster, pamphlet and leaflet) and documents, which will be uploaded to dedicated pages on our site;
- Via the website people will be able to use an online form to submit comments, or simply click a button to indicate support for the plan without comments;
- It will also be made clear that we will accept email comments via the plan's email address;
- The consultation will also be publicised electronically by:
 - An email to all those on our mailing list;
 - An announcement on the Parish Council website;
 - An announcement on 'Nextdoor' social site;
 - An announcement on the Plan's Facebook page;
 - An announcement on George Freeman MP's website and/or Facebook or Twitter pages;
 - Formal emails to all consultees at the start of the consultation period, inviting their participation. The list of consultees will be as used at the last consultation, so will comprise about 120 statutory and non-statutory organisations, owners of allocated sites or their agents, other prominent local landowners, and Breckland Council. Those emails will make reference to the concurrent consultation on the SEA (which all consultees will get a separate email invitation for).

14.4 The Neighbourhood Plan and 19 supporting evidence documents were published for a third formal pre-submission consultation on 24 June 2020. The consultation ran until 14 August 2020.

14.5 The full list of documents submitted at this stage is given below. All are available at www.stnp2036.org.

Document Title
Saham Toney Neighbourhood Development Plan
Justification of a Minimum Housing Target for the Saham Toney Neighbourhood Plan
Reasoned Justification for Policy 6 Heritage Assets
Reasoned Justification for Policy 7C Local Green Spaces
Saham Toney Housing Needs Assessment, 3 rd Edition, April 2020
Saham Toney Independent Site Assessment Report, June 2019
STNP Site Selection Report, 2 nd Edition, May 2020
Saham Toney Masterplanning Report, AECOM, February 2020
Saham Toney Landscape Assessment Part One: LCA
Saham Toney Landscape Assessment Part Two: Fringe Sensitivity Assessment
Saham Toney Landscape Assessment Part Three: Key Views Assessment
Saham Toney Parish Design Guide, 2 nd Edition, May 2020
Saham Toney Flood Risk Study, Create Consulting, May 2020
Saham Toney Neighbourhood Plan Strategic Environmental Assessment Scoping Report, AECOM, February 2020
Saham Toney Neighbourhood Plan Strategic Environmental Assessment Report, AECOM, June 2020
Saham Toney Neighbourhood Plan Habitats Regulations Assessment, AECOM, June 2020
Saham Toney Neighbourhood Plan Equality Impact Assessment

14.6 In addition a draft version of the Saham Toney Neighbourhood Plan Consultation Statement was made available for reference only during the consultation on the Neighbourhood Plan.

14.7 The consultation was widely publicised by:

- a) Formal announcements on the websites of the Neighbourhood Plan and Saham Toney Parish Council;
- b) Publicity posters around the Parish;
- c) Formal announcements in paper form on the Parish Council's 3 notice boards;
- d) Articles in the Parish magazine, Saham Saga, delivered by hand to every household in the Parish during the first week of July 2020 and again during the first week of August 2020, and the Wayland News;
- e) Announcements on the Neighbourhood Plan's Facebook page and the "Nextdoor" social site;
- f) Publicity on G Freeman MP's website (<https://www.georgefreeman.co.uk/content/saham-toney-neighbourhood-plan-5>).

14.8 A 4-page leaflet summarising the key aspects of the Plan was delivered to every household in Saham Toney. It included details of how to make comments. A 16-page pamphlet giving more detail was made available on the Plan website, and in paper form to villagers on request.

14.9 Printed copies of the Plan and its supporting documents were made available on telephone request to a member of the Neighbourhood Plan Work Group. Delivery, collection and decontamination measures complied with all Covid-19 measures in force.

14.10 The Plan and all its supporting evidence documents were made available on the Plan website. In addition, policies and policy maps were uploaded individually to allow consultees to more easily review material they were most interested in.

14.11 A consultation comments form was made available on the Plan website, allowing consultees to provide online responses. A printed copy of the questionnaire was available on request for those without access to the internet.

14.12 During weeks 3-6 of the consultation period twice-weekly online 'drop-in' meetings were organised using 'Zoom', and information on how to join a meeting was published on www.stnp2036.org in advance.

14.13 An email was sent to each statutory and non-statutory consultee, inviting its participation in the consultation. There was a total of 132 such consultees, the list of which is given in Appendix C1.

14.14 An email was sent to each parishioner on the Neighbourhood Plan's mailing list, and / or who had made comments on the first or second Regulation 14 consultations. This comprised a total of 129 parishioners. Both the leaflet and pamphlet noted in 14.8 were attached to the emails.

14.15 As a result of the consultation responses were received from the following:

- i) 183 comments by Breckland Council;

- j) Comments by 16 parishioners;
- k) Another 56 parishioner responses that simply indicated support for the Plan; and
- l) Responses by 10 statutory and non-statutory consultees, 4 of which simply expressed support or advised no comments.

14.16 The full set of responses and the actions taken to update the Plan where applicable are given in separate Appendices C3 to C6 to this Consultation Statement. For reader convenience only, a summary of the main concerns raised and principal amendments made to the Plan as a result is given in paragraphs 14.17 to 14.20. Tables 14.1 and 14.2 give a list of the policies that were consulted on and of the sections of the Plan, to enable easier understanding of comments that make reference to those. It is emphasised that the summaries, by their nature do not always cover the full detail and nuances of the comments, which can only be found in the relevant appendices.

Table 14.1: List of Policies in the Third Pre-Submission Version of the Plan

1: Services, Facilities & Infrastructure
2A: Residential Housing Allocation
2B: Residential Development Within the Settlement Boundary
2C: Residential Development Outside the Settlement Boundary
2D: Affordable Housing
2E: Housing Mix
2F: Common Criteria for Allocated Sites
2G: Masterplanning
2H-2P: Individual Site Allocation Policies
2Q: Amenity Land at Richmond Hall
3A: Design
3B: Density of Residential Developments
3C: Site Access and On-Site Streets
3D: Parking
3E: Dark Skies Preservation
3F: Climate Change Adaptation & Mitigation
4: Non-Residential Development
5: Saham Toney Rural Gap
6: Heritage Assets
7A: Landscape Character Preservation & Enhancement
7B: Key Views
7C: Local Green Spaces
7D: Biodiversity & Habitats
7E: Green Infrastructure
7F: Trees & Hedges
8A: Surface Water Management General Provisions
8B: Surface Water Runoff (Discharge) Rate & Volume
8C: Infiltration Testing
8D: Surface Water Flood Risk & Climate Change
8E: Surface Water Drainage & Water Quality
8F: Management & Maintenance of Sustainable Drainage Systems
8G: Resistance & Resilience of Sustainable Drainage Systems

Table 14.2: List of the Sections in the Pre-Submission Version of the Plan

1. Foreword
 2. Introduction
 3. The Neighbourhood Area
 4. Consultation Summary
 5. Vision Statement & Objectives
 6. Existing Planning Policy Context
 7. The Policies
 8. Parish Action Points
 9. Monitoring and Update of the Neighbourhood Plan
 10. Glossary
- Appendix A: Guiding Principles of the Saham Toney Parish Design Guide

14.17 Summary of Breckland Council Representations and the Responses to Them (see Appendix C3 for full details)

COMMENT	RESPONSE	COMMENT	RESPONSE
General: Streamline policies to avoid examiner changes	In this respect, the recommendations of that check have been incorporated where deemed appropriate	Policy 2D: Amend local lettings criteria	Amended as recommended
General: Some terminology is incorrect	Amended where applicable, but noted that comments are not always themselves correct	Policy 2G: Application of masterplanning	Clarified, but not accepted as 'illustrative only'
General: Improve the format of some maps	Implemented where applicable	Policies 2H, J and K: Confirm deliverability	Confirmed with landowners or their agents
Policy 1: Applicability	Not accepted. Addressed by actions taken in response to the health check	Policy 3A: Relax emissions targets	Not accepted. Moved to new policy 3F and further justified
Policies 1, 2A, 2H-2P: Remove phasing of development	Not accepted. Additional justification for phasing provided	Policy 3A: Ordering of supporting text	Rationalised, with sub-headers for each main topic
Policy 2A: Remove upper limit on housing to be delivered by site allocations	Not accepted. Additional justification for housing numbers provided	Policy 3B: Site densities and density guidelines too low	Not accepted. Further justification added to Policy 3B and to site allocation policies 2H – 2P
Policies 2A & 2C: Means of managing level of housing delivery	Clarified	Policies 8A – 8H: Reduce number and extent of surface water management policies	Reduction in number of policies not accepted. Policies edited and rationalised. SuDS Design Manual created

14.18 Summary of Villager Representations and the Responses to Them (see Appendix C5 for full details)

COMMENT	RESPONSE
Objection to site STNP7 on grounds of perceived additional flood risk to downstream property, and general concern about the existing surface water drainage system	Not accepted. The way in which the requirements of Policies 8A - 8H were explained to show how such flood risk will be avoided
Objection to development of STNP1, 4, 7 and 16 on the basis of the village already being 'over developed'	Not accepted. Rigorous processes of site assessment and site selection, and robust policy requirements explained to demonstrate the sites' suitability
Request to add a building to the list of non-designated heritage assets	Declined as it did not satisfy the selection criteria
Proposal that the Plan do more to improve walking and cycling routes	Not implemented as this would not be a use of land matter
Various objections to the allocation of site STNP7	Not accepted. The objections confused a site allocation with a planning application, and judged it as the latter, which is incorrect. No valid reasons provided to justify the site's removal
Understanding of the proposed boundary of site STNP14	Clarified to the satisfaction of the respondent

14.19 Summary of Norfolk County Council Representations and the Responses to Them (see Appendix C4.8 for full details)

COMMENT	RESPONSE
Local Highway Authority objections to sites STNP2, 9, 13, 14 and 15	Not accepted. Additional justification provided in response to identical comments on the second Regulation 14 consultation, 2019 and the conclusions of a Parish Transport Study appear to have been overlooked. Reference made to earlier responses (see Appendix B4.8). Considered that sufficient justification has been provided for these sites
Local Highway Authority recommended requirements for sites STNP1 and 16	Incorporated

14.20 Summary of Representations from Other Statutory & Non-Statutory Consultees and the Responses to Them (see Appendix C4 for full details)

COMMENT	RESPONSE
SPORT ENGLAND: <ul style="list-style-type: none"> Duplication of comments made at the previous consultation 	<ul style="list-style-type: none"> No action required as the comment was a repeat of that given during the second Regulation 14 consultation (see section 12 and Appendix B4.1)
NORFOLK POLICE: <ul style="list-style-type: none"> Promote crime prevention through design 	<ul style="list-style-type: none"> Confirmed that reference to the Police initiative 'Secured by Design' was already included in the Plan, with wording amended to reflect a similar comment made during the second Regulation 14 consultation. Hence no action required
GEORGE FREEMAN MP: <ul style="list-style-type: none"> Expression of support for the Plan 	<ul style="list-style-type: none"> None required

THE ENVIRONMENT AGENCY: <ul style="list-style-type: none"> Confirmation of no comments 	<ul style="list-style-type: none"> None required
NORFOLK CONSTABULARY: <ul style="list-style-type: none"> Comments exactly duplicate those provided by Norfolk Police in response to the second Regulation 14 consultation, 2019 	<ul style="list-style-type: none"> See Appendix B4.3 for previous responses which were identical to those given at the second consultation. Also see response to Norfolk Police above
NATURAL ENGLAND: <ul style="list-style-type: none"> Confirmation of no comments 	<ul style="list-style-type: none"> None required
ANGLIAN WATER <ul style="list-style-type: none"> Recognition of previous consultation comments having been incorporated Minor rewording of some surface water management policies recommended 	<ul style="list-style-type: none"> None required Implemented as recommended
HISTORIC ENGLAND <ul style="list-style-type: none"> Objection to the allocation of site STNP15 on grounds of potential heritage impact General comment on site access roads in a rural context 	<ul style="list-style-type: none"> Not accepted. Such potential impact may only be assessed when a future planning application (including a Heritage Statement) is decided and removal of the site at this stage is not justified Noted, but to be decided by the Local Highways Authority

15. TESTING THE PLAN: SECOND EXAMINER’S HEALTH CHECK, JULY 2020

15.1 In parallel with the third Regulation 14 consultation on the Neighbourhood Plan, an independent examiner was engaged to carry out a “health check” of that version of the Plan and all of its supporting documents. The health check was an independent review, designed to identify any issues preventing the Plan from complying with the Basic Conditions or other legal requirements.

15.2 The health check was carried out between 22 June and 16 July 2020 by Andrew Seaman BA (Hons) MA MRTPI, of Intelligent Plans and Examinations Ltd.

15.3 The health check report does not form part of the Plan’s Regulation 15 submission, but can be made available to an examiner on request.

15.4 A précised summary of every health check recommendation, and the action taken to address each is given in Table 15.1.

Table 15.1: Summary of the Health Check Recommendations and the Actions Taken to Address Them		
Comment (showing report paragraph number)	Summary description	Action taken to address the comment
Section 1: Process		
1.1 Plan designation	Confirms the statutory requirements have been met	Closed. No action required
1.2 Qualifying body	Confirms Saham Toney Parish Council is the Qualifying Body	Closed. No action required
1.3 Appropriate consultation	Confirms consultation activity to date has been satisfactory	Closed. No action required
1.4 Community engagement	Confirms there has been a satisfactory level of community engagement to date	Closed. No action required
1.5 Arrangements for exam	Advice re discussing selection of an examiner with Breckland Council	Closed. Such discussions have previously taken place and arrangements have been agreed
1.6 Arrangements for referendum	Advises discussion with Breckland Council electoral services team as the Plan advances, on arrangements for a referendum	Deferred, such discussions are not appropriate until examination is under way
1.7 Project plan for making the plan	Recommends developing a process with Breckland Council for bringing the Plan into force, taking into account Council committee cycles	Deferred. The Council has declined to share such information to date, but this will be further discussed when examination commences
1.8 SEA screening	Confirms satisfactory screening has been undertaken and acted upon	Closed. No action required
1.9 HRA screening	Confirms satisfactory screening has been undertaken and acted upon	Closed. No action required
Section 2: Content		

2.1 Rationale and justification for policies	<p>a) Recommends explaining the derivation of the Plan's objectives and vision and how they link to the policies</p> <p>b) Provides a high-level overview of some issues with the policies (and refers to section 3 for details of those)</p>	<p>a) Closed. Text added to this document to explain the derivation of objectives and vision and links to policies</p> <p>b) Closed. See specific actions in section 3</p>
2.2 Clarity as to what constitutes the Neighbourhood Plan and what will be examined	<p>a) Sufficient clarity confirmed.</p> <p>b) Length of Plan questioned</p>	<p>a) Closed. No action required</p> <p>b) Closed. The Plan has been edited to some extent as a result of the specific comments in section 3, but that has been offset by the need to provide additional supporting text to justify policies. In general, it is not considered appropriate to reduce policy content, and policy deletion has not been implemented as it would weaken the Plan</p>
2.3 Conflicts with the NPPF	Refers to section 3 for details	Closed. Specific actions are addressed in section 3
2.4 Explanation of contribution to sustainable development	<p>a) Confirms the Basic Conditions Statement explains this</p> <p>b) A specific comment about text on page 37 is unclear</p>	<p>a) Closed. No action required</p> <p>b) Closed. This comment was withdrawn in response to a clarification query, which confirmed that together, the Plan and the Basic Conditions Statement adequately address the issue of sustainable development</p>
2.5 Human rights issues	Suggests adding reference to the "articles", thought to be the 30 UN articles	Closed. Following advice received in response to a clarification query, reference to the relevant articles of the UN Declaration of Human Rights was added to the Equalities Impact Assessment, and that fact noted in the Basic Conditions Statement
2.5 Human rights issues	Suggests obtaining a statement from the LPA that there are no Plan issues regarding human rights	Closed. This is included in a Statement of Common Ground that Breckland Council has been asked to sign
2.6 Excluded development	Confirms the Plan does not deal with excluded development	Closed. No action required
2.7 LPA agreement that Plan meets the basic conditions	Recommends confirming with the LPA a consensus that the Plan meets the basic conditions	Closed. This is included in a Statement of Common Ground that Breckland Council has been asked to sign
2.8 Any obvious errors in plan	Refers to specific comments in section 3	Closed. See section 3 for specific actions to correct errors

2.9 Are policies clear, unambiguous and reflective of community aspirations. 'Sense check' the Plan	Refers to specific comments in section 3 Recommends a 'sense check' of the Plan before its submission	Closed. See section 3 for specific policy actions STNP's consultant will undertake a full review before Plan submission
Section 3: Detailed Comments		
3.1 Introductory remark	Self-explanatory	Closed. No action required
3.2 Typo	Plan page 7	Closed. Typo corrected
3.3 Figure numbers out of sequence	Applies to figures 7, 8 and 10	Closed. Sequence of figure numbers corrected
3.4 Grammatical error	Para. 3.6.5	Closed. Error corrected
3.5 Paragraph numbering in Plan section 3.7	Self-explanatory	Closed. Numbering amended to provide consistency throughout section 3.7
3.5 Clarify Table 3.7.2	Refers to dates and time periods dealt with	Closed. Necessary information added
3.6 Update reference	Refers to health check date	Closed. Reference updated
3.7 Summarise derivation of vision	Self-explanatory	Closed. Text added to this Consultation Statement to explain how the Plan's vision statement was derived
3.7 Make 2 nd sentence of vision more succinct	Self-explanatory	Closed. Sentence reduced whilst maintaining its meaning and intent
3.8 Summarise rationale for objectives	Self-explanatory	Closed. Text added to this Consultation Statement to explain the rationale for the Plan's objectives
3.8 Explain how objectives influence policies	Self-explanatory	Closed. Text added to this Consultation Statement to explain how the Plan's objectives influenced the policies
3.9 Missing word	Penultimate sentence of para. 6.1.1	Closed. Missing word added
3.9 Simplify aspiration for pre-application dialogue with PC	Review, clarify and simplify para. 6.2	Closed. Updated as recommended
3.10 Clarify to which development Policy 1 applies and better explain terminology	Self-explanatory	Closed. Policy criterion P1.1 reworded as recommended. Policy applicability and terminology interpretation were addressed in additional supporting text
3.10 Does Policy 1 apply to allocated sites?	Self-explanatory	Closed. Applicability to allocated sites confirmed with additional supporting text
3.10 Reword P1.3	Self-explanatory	Closed. Updated as recommended
3.10 Reword P1.4 regarding phasing	Self-explanatory	Closed. Updated but reference to phasing maintained and further justified
3.11 Policy 2A: 70 house limit	Recommends review of justification	Closed. Further supporting text added This topic is included in a Statement of Common Ground that the Local Planning Authority has been requested to sign

3.11 Typo	In third sentence of Policy 2A	Closed. Typo corrected (however text subsequently replaced when the point above (70 house limit) was addressed
3.11 Justification for phasing	Recommends clarification	Closed. More flexibility included in Policy 2A. Further justification added to supporting text
3.12 Applicability of Policy 2B	Recommends clarification that this applies to new housing	Closed. Policy clarified in this respect
3.12 Density justification	As referred to in Policy 2B	Closed. Reference to supporting text for Policy 3B added (which gives an updated justification for site densities)
3.12 Amenity wording	Recommends rewording criterion 2B.1 c	Closed. Criterion reworded as recommended
3.13 Applicability of Policy 2C	Recommends clarification that this applies to new housing	Closed. Policy clarified in this respect
3.13 Consistency of Policy 2C with Local Plan HOU 04	Considers that the Policy 2C restricts development whereas the Local Plan policy does not	Closed. Supporting text added to remove inconsistency, make clearer the relationship between Local Plan Policy HOU 04 and STNP policies 2A and 2C, and provide further justification for the Plan's housing numbers
3.13 Grammatical error	Last line of P2C.3	Closed. Error corrected
3.13 Rural worker term	Amend reference to 'agricultural workers' to 'rural workers'	Closed. Amended as recommended
3.14 Policy 2D: correlation of local lettings policy with LP	Self-explanatory	Closed. Correlation clarified
3.14 Inconsistency between T2D.2 and T2D.4	Self-explanatory	Closed. Clarified to eliminate the apparent inconsistency
3.15 Policy 2E grammatical change	Para. 2E.2	Closed. Error corrected
3.16 Applicability of Policy 2E	Self-explanatory	Closed. Need to address housing needs clarified as recommended
3.17 Policy 2F: requirement for ecological assessments too prescriptive	Self-explanatory	Closed. Requirement relaxed
3.17 Policy 2F: visibility splay requirements too prescriptive	Self-explanatory	Closed. Requirement clarified, and relaxed where appropriate
3.18 Define major development	Self-explanatory	Closed. Reference to NPPF definition added
3.19 Site allocation policies too prescriptive	Self-explanatory	Closed. In response to a clarification query, using Policy 2J as an example, guidance was provided on how allocation policies could be edited. That guidance was implemented in all allocation

		policies as applicable, with additional supporting text provided to explain details deleted from policy text
3.20 Low site densities and site options	Review and confirm that justification for site densities is adequate or revise Policy 3B	Closed. Additional justification provided in supporting text of allocated sites and Policy 3B
3.21 LVA requirement not justified for all sites	Self-explanatory	Closed. Confirmed the requirement does not apply to all sites so comment is invalid in that respect. Some relaxation of requirement added for allocated sites that have been masterplanned and professional reviewed for landscape impact
3.22 Ground contamination risk assessments	Self-explanatory	Closed. Requirements relaxed as recommended
3.23 Replace term 'highway conditions' with 'highway requirements'	Self-explanatory	Closed. Term amended as recommended
3.24 Justification for phasing	Self-explanatory	Closed. Additional justification provided in Policies 2A and 2H-2P
3.25 Policy 2H justification for phasing	Self-explanatory	Closed. Additional justification provided
3.25 Policy 2H Ground contamination risk assessment	Self-explanatory	Closed. Requirements relaxed as recommended
3.26 Typo	Para. T2J.5	Closed. Typo corrected
3.26 Landscape sensitivity inconsistency	Para. T2J.10	Closed. Confirmed that there is no inconsistency, and the addition of a reference to Table P7A.1 clarifies this
3.27 Policy 2K: Potential impact of STNP7 on Page's Place setting	Recommends confirmation that impact can be feasibly avoided and to recognise that impact with sufficient public benefit is permissible	Closed. Recommendations incorporated
3.28 STNP9 density justification vs highway concerns	Self-explanatory	Closed. Justification for site density with regard to highway concerns clarified in supporting text
3.28 Clarify STNP9 house sizes	Self-explanatory	Closed. Clarification added
3.28 Potential heritage impact of STNP9	Recommends confirmation that impact can be feasibly avoided and to recognise that impact with sufficient public benefit is permissible	Closed. Recommendations incorporated
3.29 Change reference to LHA to LPA	Self-explanatory	Closed. Reference amended
3.29 Clarify intended implementation of P2M.2	Concerns amenity impact of site STNP13	Closed. Amenity criterion and accompanying supporting text deleted
3.30 Change reference to LHA to LPA	Self-explanatory	Closed. Reference amended
3.31 STNP15: clarify number of houses	Comment queries whether the 6 dwellings allocated are net of the existing dwelling	Closed. Text added to clarify that the 6 allocated homes replace the existing dwelling

3.31 STNP15 potential heritage impact	Recommends confirmation that impact can be feasibly avoided and to recognise that impact with sufficient public benefit is permissible	Closed. Recommendations incorporated
3.32 Amenity land justification	Recommends a better explanation of how and when the amenity land in Policy 2Q will be brought forward and its link to Policy 2P	Closed. Text added to policy
3.33 Policy 3A too long, too prescriptive	Self-explanatory	Closed. Policy reduced by about 30% in length. Not agreed that its requirements are too prescriptive, and that fact has already been justified in response to LPA comments of 29 May 2020, which is included in this document
3.33 Policy 3A: delete reference to design guide	Self-explanatory	Closed. Neither agreed nor implemented. Both the Local Plan and other made neighbourhood plans make similar references in policy so there is no basis to conclude that STNP may not
3.33 Requirement to provide and landscape and visual appraisal for any development exceeding 2 storeys	Self-explanatory	Closed. Requirement deleted
3.33 Redraft P3A.8b re public benefit with regard to harm to a heritage asset	Self-explanatory	Closed. Possibility for impact to be deemed acceptable if in the public benefit added
3.33 Clarify or delete phrase re principles of sustainable construction	Self-explanatory	Closed. Text replaced with more specific text
3.33 P3A.9k & l (climate change targets) too prescriptive	Self-explanatory	Closed. Not agreed. Additional justification provided in supporting text (note: climate change has been removed from Policy 3A and a dedicated policy (3F) on the subject added
3.33 Delete P3A.9f (covered by Building Reg's)	Self-explanatory	Closed. Criterion deleted
3.34 Site densities (Policy 3B)	Recommends a review of the robustness of the policy and supporting text	Closed. Additional justification provided in supporting text to Policy 3B and individually for each allocated site
3.35 Highway safety terminology, Policy 3C	Recommends making clear that 'detrimental impacts' are referred to	Closed. Amended as recommended
3.35 Amend reference to LHA to LPA, Policy 3C	Recommends reference to LPA, rather than LHA requirements	Closed. Neither agreed nor implemented, since the LPA does not publish such requirements
3.36 Parking provision, Policy 3D	Recommends clarifying requirements and making reference to the Local Plan	Closed. Amended as recommended

3.37 Light spillage caveat	Recommends relaxing the requirement to avoid light spillage	Closed. Amended as recommended
3.38 Amenity terminology	As given in P4.1 c	Closed. Amended as recommended
3.38 Road traffic increases	Recommends amending P4.1 d	Closed. Amended as recommended
3.38 Move P4.2 and 3 to supporting text	Self-explanatory	Closed. Amended as recommended
3.38 Delete T4.2	Self-explanatory	Closed. Amended as recommended
3.39 Evidence for rural gap, Policy 5	Notes that the policy is supported by adequate evidence	Closed. No action required
3.39 Design & Access Statement requirement, Policy 5	Relax the requirement to a Planning Statement for small-scale developments	Closed. Amended as recommended
3.39 Landscape and Visual Appraisal to be 'where applicable' in the rural gap, Policy 5	Self-explanatory	Closed. Neither agreed nor implemented, since the requirement applies to any development in the Rural Gap, other than that explicitly excluded by the policy
3.39 Policy 5 criterion c terminology	Recommends clarifying 'impact' as 'adverse impact'	Closed. Amended as recommended
3.40 Reduce Policy 6 to one paragraph	Recommends considering policy simplification and moving much of the policy text to supporting text	Overall comment not accepted. The policy has been cross-checked against the NPPF and Local Plan policies ENV 07 & 08, and some edits made, including moving some criteria to supporting text
3.41 Policy 7A lengthy and prescriptive. Edit to a shorter form	Self-explanatory	Closed. Policy length reduced. Not agreed that policy is too prescriptive: additional supporting text provided to demonstrate that. Some editing of policy length implemented
3.41 Policy 7A: Landscape and Visual Appraisal for all sites is unwarranted and onerous for small sites	Self-explanatory	Closed. Confirmed the requirement does not apply to all sites so comment is invalid in that respect. Some relaxation of requirement added for allocated sites that have been masterplanned and professional reviewed for landscape impact
3.41 Policy 7A: option to replace LVA	Recommendation option would relax the requirement	Closed. Neither agreed nor implemented
3.42 Policy 7B impact terminology	Recommends replacing 'adversely' with 'unacceptably'	Closed. Amended as recommended
3.43 Policy 7C: Notify landowners of Local Green Space designations	Self-explanatory	Closed. Confirmed that respective landowners have been informed
3.44 Edit Policy 7D to be more succinct	Self-explanatory	Closed. Policy edited where appropriate
3.45 Delete term 'per se'	P7D.3	Closed. Term deleted

3.46 P7E.2 requirement unclear	Self-explanatory	Closed. P7E.2 deleted. P7E.1 updated to clarify requirement
3.46 Terminology	P7E.4. Recommends replacing 'Wherever possible' with 'Wherever practical'	Closed. Amended as recommended
3.47 Move P7F.3 to supporting text and additionally refer to Local Plan Policy ENV 06	Self-explanatory	Closed. Not agreed to move P7F.3 from policy since it adds to Local Plan policy requirement. Reference to Local Plan Policy ENV 06 added to supporting text
3.48 Local Plan and NPPF deal with surface water management	Self-explanatory	Closed. The fact that the NPPF and Local Plan deal with surface water management is not contended, but the issue is that their requirements have not been shown to prevent inappropriate development in Saham Toney in this respect.
3.48 Too many surface water policies, and they are too prescriptive and too detailed	Self-explanatory	Closed. Not agreed in full. Policy addressing all relevant issues is necessary and by providing individual policies to cover each main sub-topic, it avoids a single policy being too long. It is our judgement that the number of policies in itself should not be a concern. Furthermore, the seriousness of documented flooding issues in Saham Toney requires a robust approach. Policies 8A-8H have been edited to the extent deemed acceptable. Some policy text has been moved to supporting text, and more technical requirements have been moved to a newly created SuDS Design Manual, the guiding principles of which have been added as an appendix to the Plan
3.48 Edit number and extent of policies and rely on other guidance	Self-explanatory	Closed. This overall principle not agreed, but individual policies have been reviewed against the more specific comments that follow
3.48 Requirement for Drainage Strategy and FRA not sufficiently justified	Self-explanatory	Closed. Requirements for Drainage Strategies clarified and further justified. Justification for FRA's already exists in supporting text by reference to NPPF para. 163 and footnote 50
3.48 Further justify P8A.4, 5 and 7 or move to supporting text	Self-explanatory	Closed. Flexibility added to P8A.4. P8A.5 already justified by T8A.10 which refers to LLFA guidance on the topic. Justification for P8A.7 moved to supporting text. Not agreed to move these criteria to supporting text as they would then carry little weight
3.48 Edit policies 8B, C, D, F, G & H as covered by Local Plan, Building Reg's and best practice, and move to supporting text	Self-explanatory	Closed. Not agreed. A key purpose of a neighbourhood plan is to provide greater detail at the local level to that given in the NPPF or Local Plan and that is precisely what the noted policies,

		<p>together with Policy 8E, do. The LPA development management team has confirmed in writing that they will give greater weight to policy criteria than to supporting text or best practice guidance documents as follows (with specific reference to LLFA guidance): <i>“This is a guidance document that is taken into consideration by officers when determining applications but this is not a requirement as it is not detailed in Policy – If they (i.e. STNP) put it in policy then it would hold more weight.”</i> Given the village’s flood issues, it is important that the topics covered are given full weight. Planning decisions are made without consideration of Building Regulations or best practice, which only come into play during post-approval detailed design and construction. Additional supporting text has been provided in each policy noted to explain this and further justify the level of detail included in each policy Policies 8A-8H have been edited to the extent deemed acceptable. Some policy text has been moved to supporting text, and more technical requirements have been moved to a newly created SuDS Design Manual, the guiding principles of which have been added as an appendix to the Plan</p>
3.48 Reduce Policy 8E to just P8E.1, with remaining criteria moved to supporting text	Self-explanatory	Closed. Not accepted. Neither the NPPF nor the Local Plan address this topic. The HRA requires sensitive habitat protection with respect to water quality to be a policy requirement, so to move that criterion to supporting text would undermine the HRA
3.48 Document that policies 8A-H have been informed by dialogue with BC	Self-explanatory	Closed. Not accepted. Breckland Council has no technical specialists in this field with whom to liaise and itself refers to the LLFA and Anglian Water. The Plan’s drainage policies have been developed in close liaison with the LLFA and Anglian Water, and have additionally been justified by the Flood Risk Study review of them. Supporting text to explain this has been added to drainage policies 8A-8H and 9.
3.49 Policy 9 overly detailed. Reduce to just P9.1-3, with remainder in supporting text	Self-explanatory	Closed. Not accepted. The NPPF does not address foul sewerage. The Local Plan addresses it only with respect to sites allocated in that plan. Furthermore, it can be accepted that a policy with 6 requirements is too long, nor that it is overly detailed, since

		villager consultation responses have highlighted foul sewerage problems as a serious problem in some parts of the village, a fact acknowledged by the LLFA, Anglian Water and the Environment Agency. Additional justification added to supporting text
3.50 Plan monitoring	Confirms this aspect is satisfactorily addressed	Closed. No action required
3.51 Arrange a proof read and sense check	Self-explanatory	Closed. Undertaken before Regulation 15 submission
3.52 Closing summary comment	Self-explanatory	Closed. No action required

APPENDIX A

Responses to the First Regulation 14 Pre-Submission Consultation

22 MARCH – 29 APRIL 2018



APPENDIX A1. Pre-Submission Consultation March-April 2018: List of Statutory and Non-Statutory Consultees

The following organisations and individuals, were invited, by letters attached to emails, to submit comments on the Neighbourhood Plan during its first pre-submission consultation:

Organisation
Age UK Norfolk 1
Age UK Norfolk 2
Airport operator's association
Ancient Monuments Society
Anglian Water 1
Anglian Water 2
Ashill Parish Council 1
Ashill Parish Council 2
Bradenham Parish Council
Breckland District Council
Broom Hall Hotel
BT Openreach
Cadent (gas network)
CCG South Norfolk
Church of England
Claire Bowes
Community Action Norfolk 1
Community Action Norfolk 2
Councillor Cliff Jordan
CPRE Norfolk 1
CPRE Norfolk 2

Crime Prevention and Architectural Liaison Officer (Stephanie Segens)
Design Council
Diocese of Norwich - Education
Disabled Persons Transport Advisory Committee
Ed Buscall
Environment Agency
Environment Agency
Equal Lives (Norfolk Coalition of Disabled People)
Equality and Human Rights Commission
Federation of Small Businesses - East of England 1
Federation of Small Businesses - East of England 2
Fields in Trust
Forest Enterprise
Frank Sharpe
Friends of the Earth 1
Friends of the Earth 2
Friends, Families and Travellers (FFT) 1
Friends, Families and Travellers (FFT) 2
George Freeman Local
George Freeman MP
Graham Tweed
Great Cressingham Parish Council 1
Great Cressingham Parish Council 2
Greater Norwich Development Partnership
Hastoe Group
Highways England

Historic England 1
Historic England 2
Holme Hale Parish Council 1
Holme Hale Parish Council 2
Home Builders Federation
Homes England
John Rogers
Keith Gilbert
Keystone Development Trust
Little Cressingham and Threxton Parish Council
Local rail operator
Lynda Turner
Methodist Chapel (Warden)
Michael Wassell
Mobile Operators Association
National Farmers Union East Anglia
National Federation of gypsy liaison groups
National Grid 1
National Grid 2
National Grid 3
National Grid 4
National Trust 1
National Trust 2
Natural England 1
Natural England 2
Network Rail Infrastructure Ltd

New Anglia Local Enterprise Partnership
NHS England Midlands and East
NHS Norfolk
NHS Property Services Ltd 1
NHS Property Services Ltd 2
NHS2
Nigel Wilkin
Norfolk Archaeological Trust
Norfolk Biodiversity Partnership
Norfolk Chamber of Commerce
Norfolk Colonial Homes / Wispy Meadows
Norfolk Community Foundation
Norfolk Constabulary Community Engagement Officer
Norfolk County Council 1
Norfolk County Council 2
Norfolk County Council Historic Environment Service
Norfolk Deaf Association
Norfolk Geodiversity Partnership
Norfolk Landscape Archaeology
Norfolk Local Access Forum
Norfolk Rivers Trust
Norfolk Rural Community Council
Norfolk Wildlife Trust 1
Norfolk Wildlife Trust 2
Norwich Diocesan Board of Finance Ltd
Ovington Parish Council

Parkers Church of England Primary School
Paul Hewett
Ramblers Association 1
Ramblers Association 2
Richmond Park Golf Club
RSPB
Shipdham Parish Council
Sport England
St George's Church
The Council for British Archaeology
The Norfolk and Norwich Association for the Blind
The Society for the Protection of Ancient Buildings
The Traveller Movement
The Wayland Partnership
Theresa Hewett
UK Power Networks 1
UK Power Networks 2
Visit Norfolk
Water Management Alliance
Watton & Wayland Tourist Info Centre
Watton Town Council
Watton Town Council
Wayland Chamber of Commerce
Wells Cole Community Centre
Wild Anglia 1
Wild Anglia 2

Woodland Trust 1
Woodland Trust 2
Woodland Trust 3

In addition, all those living, working or running a business in the Parish of Saham Toney were invited to take part in the consultation, of which they were informed, by a formal announcement and posters displayed around the Parish, by articles in the Parish magazine and local community newsletter and by announcement on the Plan website (www.stnp2036.org).

APPENDIX A2. Pre-Submission Consultation March-April 2018: Consultation Questionnaire

This questionnaire was also available online for electronic return.

Regulation 14 Consultation Questionnaire

Introduction & Instructions

Consultation on the Saham Toney Neighbourhood Plan in line with regulation 14 of the Neighbourhood Planning Regulations (2012), will run for six weeks from 12 March 2018 up to and including 22 April 2018.

Consultation is open to all who live, work or carry out business in the civil parish of Saham Toney, together with a range of statutory bodies we will contact separately.

All comments received by 22 April 2018 (*note: subsequently extended to 29 April 2018*) will be considered by the Saham Toney Neighbourhood Plan Steering Committee and may contribute to the subsequent update of the Plan, prior to its Regulation 15 submission to Breckland District Council who will subsequently arrange its independent examination at regulation 16. Although there will be a further six-week consultation at that later stage, only the independent examiner can decide if any of those comments should be included, and will only do so if they relate to the legal requirements for a plan.

Hence this is the last full opportunity to influence the Plan.

Following receipt of all comments a Consultation Statement will be prepared summarising all comments and stating how each was addressed. That statement will be available to all parishioners, businesses and other bodies at the time of the Regulation 15 submission to Breckland District Council.

At the first Parish Council meeting after the end of the consultation period a prize draw will be made from all returns from parishioners which include an address and contact details and gift tokens to the value of £50, £25 and £10 will be awarded to the first three drawn by the Chairman of the Parish Council.

Should you have any questions please email them to stnp2036@gmail.com. Alternatively, you can call: 01953 880915

Please note: Anonymous comments or those without a postcode will not be accepted. Your comments may be made public when the Consultation Statement is issued but your personal details will not be included in that document and will not be made public in any way.

This questionnaire has three main parts:

1. First we'd like to know who is giving us comments, so we need you to fill in a few details about yourself.
2. A set of simple "tick box" questionnaires where you can give your overall opinion about key aspects of the Plan.
3. Response forms that allow you to give more detailed comments on individual sections of the Plan and its supporting documents.

If you answer only parts 1 and 2 the questionnaire will take about 5 minutes to complete.

If you also answer part 3 time will depend on how many comments you wish to make.

Issued by the Saham Toney Neighbourhood Plan Work Group, with the approval, and on behalf of Saham Toney Parish Council

Part 1: Your Details

* Required information

Your Name*:

Which of the following are you answering as*?

Please tick only one box.

<input type="checkbox"/>	Someone who lives in the parish of Saham Toney
<input type="checkbox"/>	Someone who works, but does not live in the parish of Saham Toney
<input type="checkbox"/>	Someone who owns a business* based in the parish of Saham Toney
<input type="checkbox"/>	Someone who runs an organisation* based in the parish of Saham Toney
<input type="checkbox"/>	On behalf of a consultation body
<input type="checkbox"/>	Other

Your business / organisation / consultation body name if applicable:

If you work but don't live in the Parish, where do you work?

If "other" in what capacity are you responding?

Email address*:

First line of your address*:

Your postcode*:

Your telephone number (optional):

Your age *:

Under 16	17-24	25-35	36-55	56-65	Over 65	Prefer not to say

Part 2: How You Rate Key Aspects of the Plan

Rate the Policies *

Please read the policies and their supporting text then tell us if you agree or disagree with them. For each policy please tell us by ticking the box that best matches your opinion (only tick one box per policy)

*

	Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree
Policy 1: Area Classification & Housing Allocation					
Policy 2A Scale & Location of Residential Development					
Policy 2B Housing Mix					
Policy 3 Design of Residential Developments					
Policy 4A Community Facilities					
Policy 4B Non-Residential Development					
Policy 4C Design of Non-Residential Development					
Policy 5 Strategic Gap to Watton					
Policy 6 Heritage Assets					
Policy 7A Local Green Spaces					
Policy 7B Communal Views					
Policy 7C Trees, Hedges & Green Infrastructure					
Policy 8 Surface Water Management & Sewerage Provision					

Rate the Communal Views*

Please consider the views included under Policy 7B and tell us if you agree they are important to the community and should be protected.

You can also suggest additional views you think should be added to the Plan.

The following public views are highly valued by the community of Saham Toney and are important to preserve. Do you agree or disagree? For each view check the box that best corresponds to your opinion - only tick one box per view.

	Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree
View CV1 Pound Hill towards the Mere					
View CV2 Broom Hall estate					
View CV3 South from near Su-Bridge					
View CV4 South west from Ploughboy Lane					
View CV5 South west towards Page's Place					
View CV6a Saham Wood from the north					
View CV6b Saham Wood from the west					
View CV7 Saham Hall estate					
View CV8 From Cley Lane north west					
View CV9 From Pages Lane towards Ashill					
View CV10 Willow Bushes Plantation from the north					

Your Suggested Additional View(s), If Any:

Please give as much information as possible to help us understand which view you are proposing and why. If you are suggesting more than one view, please number each in your answers. If possible, please attach a photo to your answer.

Where is the viewpoint located?

In which direction is the view looking?

Why do you feel the view should be protected by Policy 7B?

Section 7: Parish Action Points*

Please read the parish action points in Section 7 of the Plan, then tell us if you agree or disagree with them. For each parish action point please tell us by checking the box that best matches your opinion (only tick one box per item).

	Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree
Parish Action Point 1: Roads & Traffic					
Parish Action Point 2: Footpaths & Pedestrian Access					
Parish Action Point 3: Public Transport Provision					
Parish Action Point 4: Access to Healthcare					
Parish Action Point 5: Education Provision for Parish Children					
Parish Action Point 6: Leisure Facilities					
Parish Action Point 7: Housing Priority for Locals					

Part 3: Your Specific Comments on the Plan and Its Supporting Documents

If you have no specific comments please skip to the final page, where you can give general comments if you wish.

Sections 1, 2 and 3 of the Plan

Foreword, Introduction to the Plan and background information about the Neighbourhood Area

Do you have comments on sections 1, 2 or 3? Yes / No {Delete as applicable}

Comments to Sections 1, 2 and 3

For each comment please state the page and paragraph number(s) concerned

Please give your comments on Sections 1, 2 and/or 3 below (use continuation sheets as necessary):

Please give any suggested amendments to Sections 1, 2 and/or 3 below (use continuation sheets as necessary):

Section 4 of the Plan

Preliminary consultation summary and the issues that arose

Do you support or oppose section 4? Support / Oppose / No opinion {Delete as applicable}

Do you have comments on section 4? Yes / No {Delete as applicable}

Comments to Section 4

For each comment please state the page and paragraph number(s) concerned

Please give your comments on Section 4 below (use continuation sheets as necessary):

Please give any suggested amendments to Section 4 below (use continuation sheets as necessary):

Section 5: Vision Statement and Objectives

Do you support or oppose section 5? Support / Oppose / No opinion {Delete as applicable}

Do you have comments on section 5? Yes / No {Delete as applicable}

Comments to Section 5

For each comment please state the page and paragraph number(s) concerned

Please give your comments on Section 5 below (use continuation sheets as necessary):

Please give any suggested amendments to Section 5 below (use continuation sheets as necessary):

Policy 1: Neighbourhood Area Classification and Housing Allocation

Do you support or oppose Policy 1? Support / Oppose / No opinion {Delete as applicable}

Do you have comments on Policy 1? Yes / No {Delete as applicable}

Comments to Policy 1

For each comment please state the page and paragraph number(s) concerned

Please give your comments on Policy 1 below (use continuation sheets as necessary):

Please give any suggested amendments to Policy 1 below (use continuation sheets as necessary):

Policy 2A: Scale & Location of Residential Developments

Do you support or oppose Policy 2A? Support / Oppose / No opinion {Delete as applicable}

Do you have comments on Policy 2A? Yes / No {Delete as applicable}

Comments to Policy 2A

For each comment please state the page and paragraph number(s) concerned

Please give your comments on Policy 2A below (use continuation sheets as necessary):

Please give any suggested amendments to Policy 2A below (use continuation sheets as necessary):

Policy 2B: Housing Mix

Do you support or oppose Policy 2B? Support / Oppose / No opinion {Delete as applicable}

Do you have comments on Policy 2B? Yes / No {Delete as applicable}

Comments to Policy 2B

For each comment please state the page and paragraph number(s) concerned

Please give your comments on Policy 2B below (use continuation sheets as necessary):

Please give any suggested amendments to Policy 2B below (use continuation sheets as necessary):

Policy 3: Design of Residential Developments

Do you support or oppose Policy 3? Support / Oppose / No opinion {Delete as applicable}

Do you have comments on Policy 3? Yes / No {Delete as applicable}

Comments to Policy 3

For each comment please state the page and paragraph number(s) concerned

Please give your comments on Policy 3 below (use continuation sheets as necessary):

Please give any suggested amendments to Policy 3 below (use continuation sheets as necessary):

Policy 4A: Non-Residential Development - Community Facilities

Do you support or oppose Policy 4A? Support / Oppose / No opinion {Delete as applicable}

Do you have comments on Policy 4A? Yes / No {Delete as applicable}

Comments to Policy 4A

For each comment please state the page and paragraph number(s) concerned

Please give your comments on Policy 4A below (use continuation sheets as necessary):

Please give any suggested amendments to Policy 4A below (use continuation sheets as necessary):

Policy 4B: Non-Residential Development - Business or Tourism Related

Do you support or oppose Policy 4B? Support / Oppose / No opinion {Delete as applicable}

Do you have comments on Policy 4B? Yes / No {Delete as applicable}

Comments to Policy 4B

For each comment please state the page and paragraph number(s) concerned

Please give your comments on Policy 4B below (use continuation sheets as necessary):

Please give any suggested amendments to Policy 4B below (use continuation sheets as necessary):

Policy 4C: Design of Non-Residential Developments

Do you support or oppose Policy 4C? Support / Oppose / No opinion {Delete as applicable}

Do you have comments on Policy 4C? Yes / No {Delete as applicable}

Comments to Policy 4C

For each comment please state the page and paragraph number(s) concerned

Please give your comments on Policy 4C below (use continuation sheets as necessary):

Please give any suggested amendments to Policy 4C below (use continuation sheets as necessary):

Policy 5: Strategic Gap to Watton

Do you support or oppose Policy 5? Support / Oppose / No opinion {Delete as applicable}

Do you have comments on Policy 5? Yes / No {Delete as applicable}

Comments to Policy 5

For each comment please state the page and paragraph number(s) concerned

Please give your comments on Policy 5 below (use continuation sheets as necessary):

Please give any suggested amendments to Policy 5 below (use continuation sheets as necessary):

Policy 6: Heritage Assets

Do you support or oppose Policy 6? Support / Oppose / No opinion {Delete as applicable}

Do you have comments on Policy 6? Yes / No {Delete as applicable}

Comments to Policy 6

For each comment please state the page and paragraph number(s) concerned

Please give your comments on Policy 6 below (use continuation sheets as necessary):

Please give any suggested amendments to Policy 6 below (use continuation sheets as necessary):

Policy 7A: Local Green Spaces

Do you support or oppose Policy 7A? Support / Oppose / No opinion {Delete as applicable}

Do you have comments on Policy 7A? Yes / No {Delete as applicable}

Comments to Policy 7A

For each comment please state the page and paragraph number(s) concerned

Please give your comments on Policy 7A below (use continuation sheets as necessary):

Please give any suggested amendments to Policy 7A below (use continuation sheets as necessary):

Policy 7B: Communal Views

Do you support or oppose Policy 7B? Support / Oppose / No opinion {Delete as applicable}

Do you have comments on Policy 7B? Yes / No {Delete as applicable}

Comments to Policy 7B

For each comment please state the page and paragraph number(s) concerned

Please give your comments on Policy 7B below (use continuation sheets as necessary):

Please give any suggested amendments to Policy 7B below (use continuation sheets as necessary):

Policy 7C: Trees, Hedges & Green Infrastructure

Do you support or oppose Policy 7C? Support / Oppose / No opinion {Delete as applicable}

Do you have comments on Policy 7C? Yes / No {Delete as applicable}

Comments to Policy 7C

For each comment please state the page and paragraph number(s) concerned

Please give your comments on Policy 7C below (use continuation sheets as necessary):

Please give any suggested amendments to Policy 7C below (use continuation sheets as necessary):

Policy 8: Surface Water Management & Sewerage Provision

Do you support or oppose Policy 8? Support / Oppose / No opinion {Delete as applicable}

Do you have comments on Policy 8? Yes / No {Delete as applicable}

Comments to Policy 8

For each comment please state the page and paragraph number(s) concerned

Please give your comments on Policy 8 below (use continuation sheets as necessary):

Please give any suggested amendments to Policy 8 below (use continuation sheets as necessary):

Section 7: Parish Action Points

Do you support or oppose Section 7? Support / Oppose / No opinion {Delete as applicable}

Do you have comments on Section 7? Yes / No {Delete as applicable}

Comments to Section 7

For each comment please state the page and paragraph number(s) concerned

Please give your comments on Section 7 below (use continuation sheets as necessary):

Please give any suggested amendments to Section 7 below (use continuation sheets as necessary):

Section 8: Monitoring and Update of the Plan

Do you support or oppose Section 8? Support / Oppose / No opinion {Delete as applicable}

Do you have comments on Section 8? Yes / No {Delete as applicable}

Comments to Section 8

For each comment please state the page and paragraph number(s) concerned

Please give your comments on Section 8 below (use continuation sheets as necessary):

Please give any suggested amendments to Section 8 below (use continuation sheets as necessary):

General Comments on the Plan and Its Supporting Documents

Finally, if you have any comments not covered in the previous sections, please give them below:

Thank you for completing this questionnaire! Your comments will be taken into account when the Plan is updated, and providing you have given us your full contact details, you will be entered in the prize draw which will take place at the May Parish Council meeting. Watch the website, stnp2036.org for further news.

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>
----	--	--	--	--

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 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	“ <i>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;</i> ”
<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.	“ <i>Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe</i> ” . Para 32, NPPF.	“ <i>Where applicable access links successfully to and from public roads does not impede local traffic or reduce parking provision for existing neighbouring residents</i> ”;
<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.	“ <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>
<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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STNP Response: Agreed Amendment to the Neighbourhood Plan: 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.
STNP Response: Agreed Amendment to the Neighbourhood Plan: 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.
STNP Response: 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):

Dear Mr Blow,

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

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

So with this in mind, I would like to take this opportunity to 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 or 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  The Woodland Trust Grantham Lincolnshire NG31 6LL Telephone 08452 935798 Email withheld 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-veterandtrees.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:	

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.

Again I feel this needs more definition and more weight in planning terms.

- 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.

With these major exceptions above, I feel the plan is good. Thank you to all who contributed.

RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:

Policy 2A / Policy 2B

REACTION TO REPRESENTATION(S):

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.

It is highly unlikely that the Plan would be allowed to specify an exact ratio so that suggestion will not be pursued.

The definition of "Affordable" is given in the National Planning Policy framework and cannot be varied in the Neighbourhood Plan

ACTION TO BE TAKEN:

Baseline data on dwelling sizes at 31 March 2019 has been added to section 8 of the Plan

RESPONDENT NUMBER: 7

Comment 11

DATE: 17th April 2018

REPRESENTATION:

Compliments on a well presented and well documented case report. Thank you all for your work, and time given to this

RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:

General

REACTION TO REPRESENTATION(S);

Support noted

ACTION TO BE TAKEN:

None required

RESPONDENT NUMBER: 8

Comment 12

DATE: 17th April 2018

REPRESENTATION:

Regarding 7(2)

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.

RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:

Section 7, Parish Action Point 2

REACTION TO REPRESENTATION(S)

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

ACTION TO BE TAKEN:

None required

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

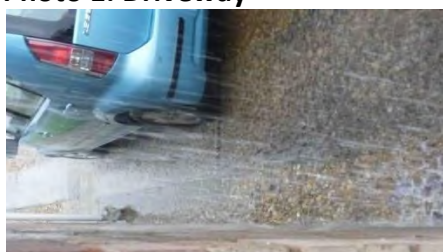


Photo 2: Drive-Water 40mm deep



Photo 3: South of boundary



Photo 4: At parish boundary

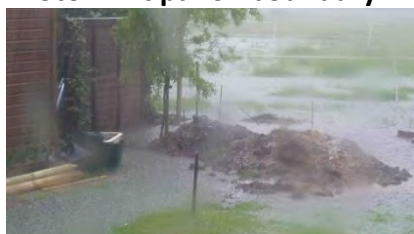


Photo 5: At parish boundary



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.	

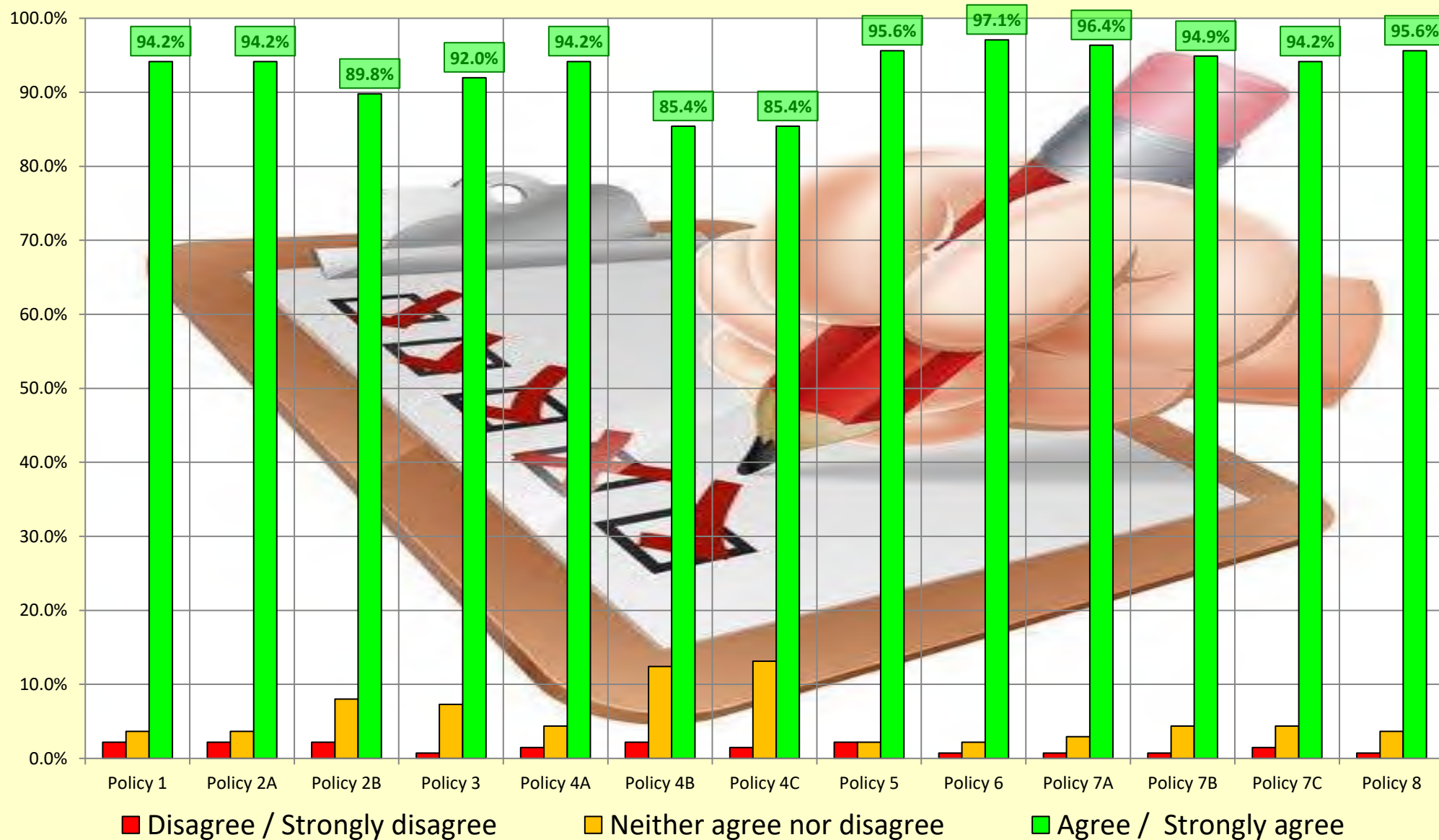
APPENDIX A7. Pre-Submission Consultation March-April 2018: Summary of Parishioner Rating of Policies, Communal Views and Parish Action Points

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.

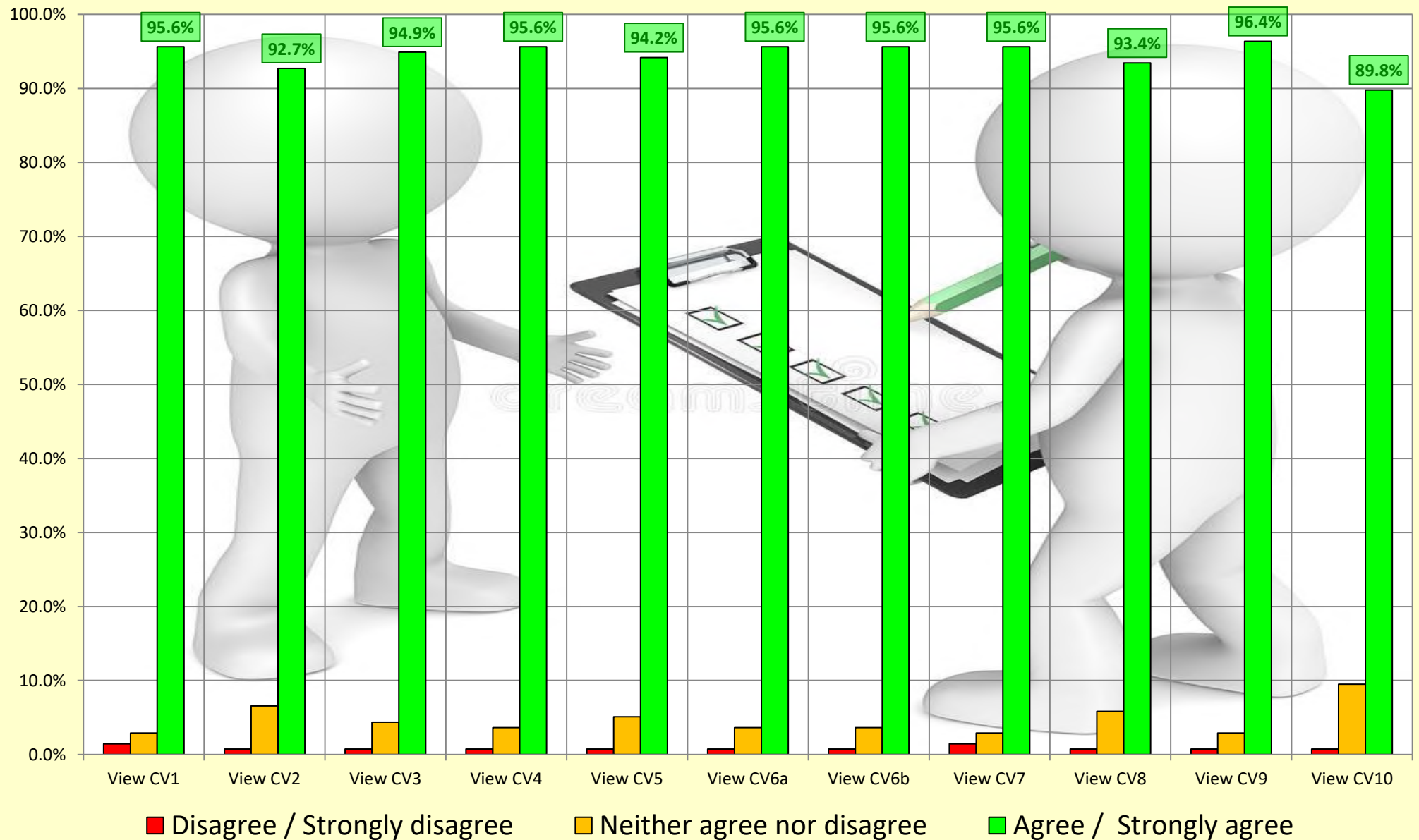
Villager Rating of Policies

Overall 64 times as many agree with the policies than disagree



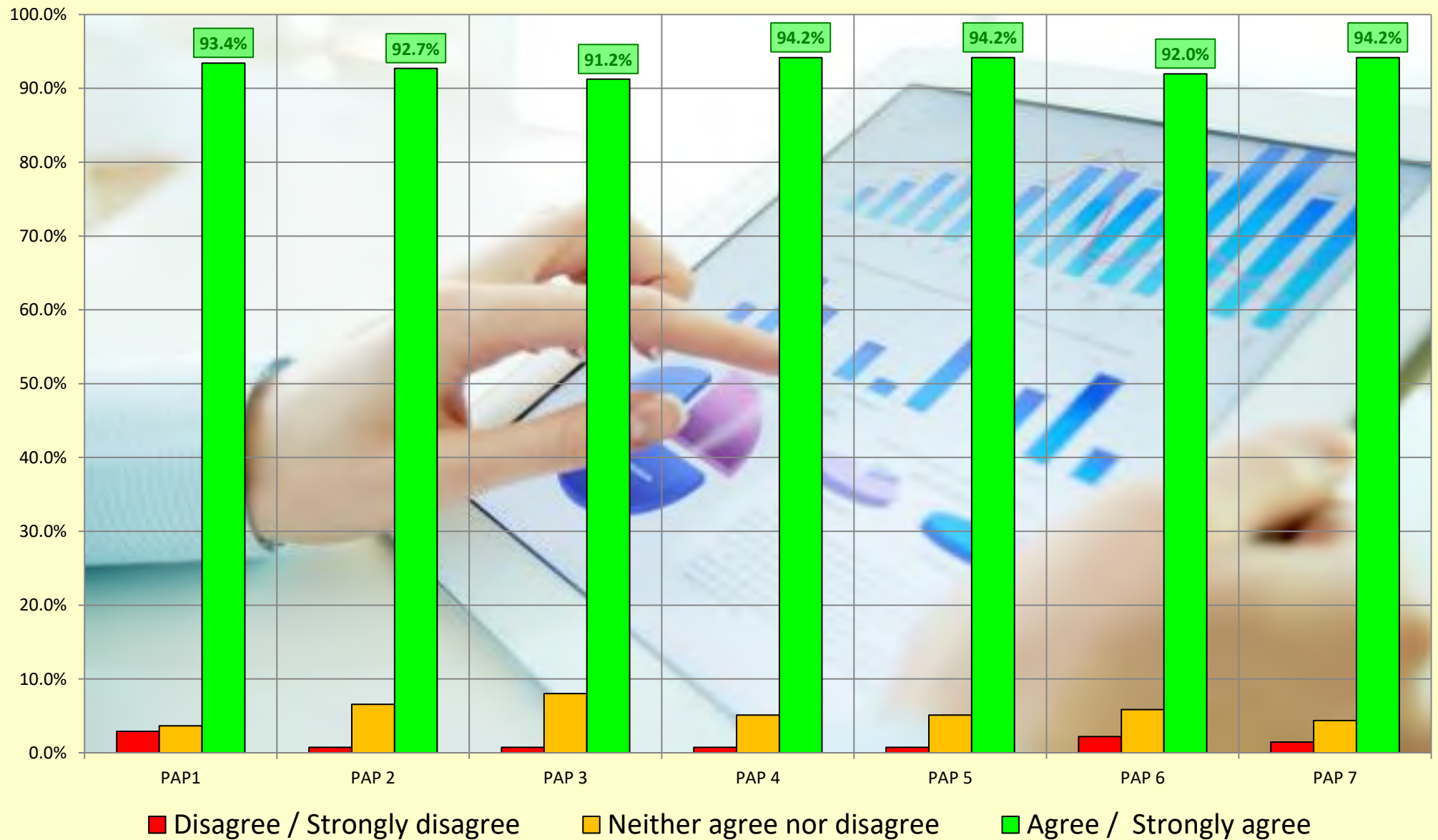
Villager Rating of Protected Communal Views

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



APPENDIX B

Responses to the Second Regulation 14 Pre-Submission Consultation

21 AUGUST – 13 OCTOBER 2019



APPENDIX B1. Pre-Submission Consultation August-October 2019: List of Statutory and Non-Statutory Consultees

The following organisations were invited to submit comments on the Neighbourhood Plan during its second pre-submission consultation:

Organisation
Abel Homes
Age UK Norfolk 1
Airport operator's association
Ancient Monuments Society
Andy Johnson (Local landowner)
Angela Calton (Local landowner)
Anglian Water 1
Anglian Water 2
Architech Design & Planning
Ashill Parish Council
Attleborough Building Services Ltd
Barratt Developments plc
Bennett Homes
Bovis Homes Group plc
Bradenham Parish Council
Breckland District Council
BT Openreach
Bullen Architectural Ltd
Burgess Homes
Cadent (gas network)
CCG South Norfolk
Church of England
Clayland Estates Ltd
Colin Smith (development consultant)
Community Action Norfolk 1
Councillor Edward Connolly
Councillor Helen Crane
Councillor Timothy Birt
CPRE Norfolk
Crime Prevention and Architectural Liaison Officer
Diocese of Norwich - Education
Disabled Persons Transport Advisory Committee
Ed Buscall (Local landowner)
Environment Agency 1
Environment Agency 2
Equal Lives (Norfolk Coalition of Disabled People)
Erica Whettingsteel on behalf of the Bowes Estate
Erica Whettingsteel on behalf of Jenny & Mike Sinclair (Local landowners)
Federation of Small Businesses - East of England 2
Fields in Trust
Forest Enterprise
Friends of the Earth 1
Friends of the Earth 2

Friends, Families and Travellers (FFT) 1
FW Properties
George Freeman MP (via constituency office manager)
Gladman Developments Ltd
Goodfellow Homes
Graham Tweed (Local landowner)
Great Cressingham Parish Council 1
Great Cressingham Parish Council 2
Greater Norwich Development Partnership
Halsbury Home Ltd
Hastoe Group
Highways England
Historic England 1
Historic England 2
Holme Hale Parish Council
Home Builders Federation
Homes England
Hopkins Homes Ltd
Ingram Homes
Jamie Bird (Local developer)
Jeff Hazel (Local landowner)
Keystone Development Trust
Little Cressingham and Threxton Parish Council
Local rail operator
McCarthy & Stone Retirement Lifestyles
Methodist Chapel (Warden)
Mobile Operators Association
National Farmers Union East Anglia
National Federation of gypsy liaison groups
National Grid 1
National Trust 1
National Trust 2
Natural England 1
Natural England 2
Network Rail Infrastructure Ltd
New Anglia Local Enterprise Partnership
NHS England Midlands and East
NHS Norfolk
NHS Property Services Ltd 1
NHS2
Norfolk Archaeological Trust
Norfolk Biodiversity Information Service
Norfolk Biodiversity Partnership
Norfolk Chamber of Commerce
Norfolk Colonial Homes / Wispy Meadows
Norfolk Community Foundation
Norfolk Constabulary Community Engagement Officer
Norfolk County Council 1
Norfolk County Council 2
Norfolk County Council 3 (Local Highways Authority)

Norfolk County Council 4 (Lead Local Flood Authority)
Norfolk County Council Historic Environment Service
Norfolk Deaf Association
Norfolk Homes
Norfolk Local Access Forum
Norfolk Rivers Trust
Norfolk Rural Community Council
Norfolk Wildlife Trust 1
Norfolk Wildlife Trust 2
Norwich Diocesan Board of Finance Ltd
Orbit Homes
Orchard Homes East
Ovington Parish Council
Parker Planning Services
Parkers Church of England Primary School
Patterson Design Ltd
Persimmon plc
Ramblers Association 1
Richmond Park Golf Club
Roger Baldwin (Local landowner)
RSPB
S&A Jones Developments Ltd
Seamans Building
Shipdham Parish Council
Small Fish
SMG Architects
Sport England
SSA Planning
St George's Church
Studio Thirty Five
Taylor Wimpey plc
The Norfolk and Norwich Association for the Blind
The Traveller Movement
The Wayland Partnership
Tim Goddard (Local landowner)
UK Power Networks 1
UK Power Networks 2
Visit Norfolk
Water Management Alliance
Watton & Wayland Tourist Info Centre
Watton Town Council
Wayland Chamber of Commerce
Wells Cole Community Centre
Wild Anglia 2
Willow Builders
Woodland Trust 1

In addition, all those living, working or running a business in the Parish of Saham Toney were invited to take part in the consultation, of which they were informed, by a formal announcement and posters

displayed around the Parish, by articles in the Parish magazine and local community newsletter and by announcement on the Plan website (www.stnp2036.org).

APPENDIX B2. Pre-Submission Consultation August-October 2019: Consultation Questionnaire

This questionnaire was also available online for electronic return.

SAHAM TONEY NEIGHBOURHOOD PLAN REGULATION 14 CONSULTATION 19th AUGUST - 13th OCTOBER 2019

Your Details (Please print legibly)

* Required information

Your Name*:

Which of the following are you answering as*? (Please tick only one box)

☐

Someone who lives in the parish of Saham Toney

☐

Someone who works, but does not live in the parish of Saham Toney

☐

Someone who owns a business based in the parish of Saham Toney

☐

Other (please state):

Your business name if applicable:

If you work but don't live in the Parish, where do you work?

Email address*:

First line of your address*:

Your postcode*:

Your telephone number (optional):

Your age *:

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Under 16

17-24

25-35

36-55

56-65

Over 65

Prefer not
to say

Your Response (Please tick only one box)

☐

I support the Plan without comment

☐

I support the Plan, subject to the comments overleaf

☐

I do not support the Plan, for the reasons given overleaf

Please give any comments overleaf

Your Comments (please use a continuation sheet if necessary)

APPENDIX B3. Pre-Submission Consultation August-October 2019: Breckland Council Comments with STNP Responses

Saham Toney Neighbourhood Plan

Breckland Council comments for 2ND Regulation 14 Consultation

Page and Policy/ Paragraph No	Comment	Justification	Suggested Amendments
	STNP RESPONSE		STNP ACTION
Whole Plan	While it is evident that the plan has been subject to a significant level of research, there remains concern that some policies are too restrictive and will have negative implications for viability. See individual responses to specific comments	Viability.	See individual comments. See individual actions noted against specific comments
Whole Plan	All references to NPPF (2018) should be NPPF (2019). See separate table at the end of these comments for checks The Plan makes 40 references to the NPPF. One of those (non-paragraph specific) requires correction to 2019, and one other while correct, will benefit from the addition of an NPPF paragraph reference. As agreed in discussion it will be noted that the Plan takes account of the June 2019 update to the NPPF (no specific changes are required for that)	Factual update.	As advised. P6.2 text amended from “NPPF (2018) or any of its successors” to “the most up to date version of the NPPF” T7D.6: The general reference to the NPPF has been improved by adding a reference to paragraph 170d
Whole Plan	Format — a number of paragraph's look like they have narrower line spacing (1 rather than 1.15) than the rest of the plan e.g.; T2H.3; T2L.6-7; T2P.6-10 (also worth checking throughout the plan. Will check and update as necessary	Consistency.	As advised. Complete document has been checked in this respect and standardised at 1.15 line spacing with 6pt interval

Whole Plan	<p>Maps — a few include text that is too small to easily read and the font size varies throughout.</p> <p>Will check and update as necessary but where maps are taken from other sources, it is not possible to amend text</p>	Clarity.	<p>Review format to standardise for the Reg.16 version.</p> <p>Following review, the following changes have been made to various maps:</p> <p>Policy Maps 1a and 1b: Instead of 3 maps to one (landscape) page these have been presented as one map per (portrait) page. A note has been added to each to clarify that the hard to read text at the bottom right of each map is present on the original Ordnance Survey map used as a background and relates to that map's copyright.</p> <p>Evidence Map 3B.1 Image sizes increased.</p> <p>Policy Map 5: Text size increased for inset map.</p> <p>Policy Map 7B: Text size of Key increased.</p> <p>Policy Map 7C.1: Clarity of text identifying Local Green Spaces improved.</p> <p>Policy Map 7D.1: Legend text size increased; note about Ordnance Survey map copyright text added as maps 1a and 1b.</p> <p>Policy Maps 7D.2a, b, c, 7D.3a, b and 7D.4 Replaced by a new set of maps 7D,1a/b,</p>
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			<p>2a/b, 3a/b and 4a/b with larger legends and better readability</p> <p>All other maps are considered adequately readable and have not been amended in that respect.</p>
Page Cover	<p>Format — Typo on front cover regarding the name of the Parish.</p> <p>Agreed</p>	Clarity.	<p>As advised.</p> <p>Corrected</p>
Contents Page	<p>The format of the previous Reg.14 presented better and is easier to use than the current version e.g. Maps in a smaller font size.</p> <p>Agreed</p>	Clarity.	<p>Revert to previous Reg.14 format.</p> <p>Contents list updated accordingly</p>
p14, Figure 8	<p>Format -breaking up of text - it would look better if these graphics were placed where they were relevant in the preceding three pages.</p> <p>This is an optional change that may improve readability, and if so, it will be incorporated</p>	Better presentation.	<p>As advised.</p> <p>Placing the graphics 'where' relevant would simply result in the whole figure being "broken up" in a fashion that would read less well.</p> <p>As a result, this optional change was not implemented, but the figure has been moved nearer the start of section 3</p>
p19, 6.3.4	<p>Format -This para No appears twice.</p> <p>Agreed</p>	Typo.	<p>Amend remaining 5 para no's in the chapter.</p> <p>Paragraph numbers corrected accordingly</p>

p19, 6.3.6 (c)	<p>MM 15 refers to HOU 03 and there is no MM162. Policy HOU 02 does not give ST its own target. MM159 provides ST with the 33 figure as a modification to Appendix 5 of the Plan.</p> <p>Agreed</p>	Factual update.	<p><i>"c) Main modification 159 to Appendix 5 of the emerging Local Plan sets out a housing target of 33 additional dwellings in Saham Toney between the date the Local Plan is approved and 2036";</i></p> <p>While the comment was agreed, subsequently Breckland Council published a 'clean' version of the Local Plan, with all 'MM' numbers removed (https://www.breckland.gov.uk/media/15825/Appendix-4-Breckland-District-Council-Local-Plan-Text/pdf/Appendix_4_-_Breckland_District_Council_Local_Plan_text.pdf?m=637195326545430000)</p> <p>Therefore all 'MM' references have also been removed from the Neighbourhood Plan</p>
POLICY 1: SERVICES, FACILITIES & INFRASTRUCTURE			
p21, P1.1	<p>Policy contains unnecessary wording.</p> <p>Agreed.</p>	Tautology.	<p><i>"... proposals will be supported where there is or is provided as part of the proposal sufficient social..."</i></p> <p>Unnecessary wording deleted from policy text, but as agreed during discussion of comments, it was moved to supporting text, as was P1.3</p>

p25, Evidence Map 1	<p>Format — Would recommend removing text on Map (B) & (C) as it can't be read or add as a footnote to the maps.</p> <p>Agreed.</p>	Clarity.	<p>As advised.</p> <p>For readability the three maps will be presented on separate pages.</p> <p>For better readability the three maps have been given separately as maps 1a, 1b and 1c.</p> <p>In discussion it was clarified that the comment refers to copyright text on the OS map original used as a background. There is no text on Maps B & C other than that on the OS original, which cannot be removed, but a note has been added in the map key to explain that</p> <p>A general note has been added at the start of the Plan thus: "Copyright: The Saham Toney Neighbourhood Plan uses Ordnance Survey copyrighted material as backgrounds to its maps and is entitled to do so by the Parish Council's PSMA registration No. 0100057926"</p>
POLICY 2A: RESIDENTIAL HOUSING ALLOCATION			
p26	<p>Concern over phasing of the developments e.g. If an application that is acceptable in planning terms, is submitted on STNP15 a refusal solely on the grounds of phasing would be difficult to sustain at appeal.</p> <p>This also applies to references to phasing in subsequent housing allocation policies.</p> <p>Development of all allocated sites without phasing is not sustainable, for example if that were to be 83 houses in the first 3 years of the plan</p>	<p>There is no national guidance that would permit the phasing of small sites to be delivered in this way.</p>	<p>Amend to simply set out the housing allocations in the neighbourhood plan i.e. remove phasing from the policy.</p> <p>This could however be listed as a Parish preference in the support text for individual sites.</p> <p>In a meeting to discuss the comments on 15 October 2019, it was agreed that paragraph 73 of the NPPF allows a Neighbourhood Plan to phase</p>

	<p>Considering both of the above, some allocated sites must remain developable, but not confirmed as deliverable at the start of the plan period</p> <p>Allocation policies provide flexibility by stating “development is expected between ...”</p>		<p>development, hence phasing of sites was retained.</p> <p>As also agreed in discussion, Policy 1 has been amended to highlight the need for phasing to allow delivery of adequately improved infrastructure, and a need to include checks as to whether there are capacity / planned upgrades for gas, electricity, water and sewerage services</p>
P2A.1	<p>Allocation numbering system is unclear. Why are there no STNP3, 8, 10, 11, 12.</p> <p>Agreed.</p>	Numbering issue.	<p>Requires clarification in the supporting text.</p> <p>It has been clarified in supporting text that 16 sites were put forward, of which only 11 were identified as suitable for allocation following a rigorous process of site assessment and site selection, but that for consistency between documents the original site numbering has been maintained. A direct reference to the Site Assessment and Site Selection Reports has been added to supporting text</p>
T2A.2	<p>The use of 'within' is too prescriptive.</p> <p>Not fully agreed</p>	Suggests that the 83 figure is a maximum.	<p>"....controlled, within the number allocated in this</p> <p><i>Plan in accordance with Policy P2A.1."</i></p> <p>In a meeting to discuss the comments on 15 October 2019, it was agreed that the extensive site assessment and selection work and the fact STNP allocates approximately 2.5 times more housing than required by the Local Plan, justify limiting the total allocation, and that greater flexibility of allocation numbers is more</p>

			<p>appropriate to a Local rather than Neighbourhood Plan.</p> <p>As a result, as agreed, the limit on numbers will apply when implementing the Plan.</p> <p>Text has been revised to be less overtly prescriptive, thus: "...the level of new residential development permitted will be managed within the number allocated in this Plan"</p>
POLICY 2C: RESIDENTIAL DEVELOPMENT OUTSIDE THE SETTLEMENT BOUNDARY			
p29, P2C.1	<p>a) It would be more appropriate to refer to Policy 2a, which already lists these sites.</p> <p>Agreed</p>	Duplication of policy.	<p><i>"Outside the settlement boundary, in addition to those sites listed in Policy 2A, the following residential developments will be supported:."</i></p> <p>& delete a) (as covered above).</p> <p>Text amended as suggested. P2C.1a deleted.</p>
	<p>b) What is meant by 'for people with a Saham Toney connection'?</p> <p>Agreed</p>	Clarity.	<p>Refer to Policy 2D to clarify this approach.</p> <p>Reference to Policy 2D added</p>
p30, P2C.3	<p>It would be better if such brownfield sites were also 'immediately adjoining' the settlement boundary, as it could be seen as supporting less sustainable sites.</p> <p>Agreed</p>	Consistency to reflect P2C.2.	<p>"In circumstances described in P2C.2, proposals</p> <p>for the development of brownfield sites proposals</p> <p>on land outside the sites but immediately adjoining the settlement boundary, will be looked....".</p> <p>Text amended as suggested</p>

p30, T2C.2	The reference to a hierarchy is not consistent with the policy as this currently gives equal weighting to criteria a.—c. and P2C.2 & 3 are 'exceptional'. Agreed	Consistency.	Amend text to reflect the approach to be consistent with the policy. Hierarchy in T2C.2 amended accordingly
p31, T2C.7	It would be useful to make reference to the site assessment documentation. It is referenced below the supporting text where relevant evidence base documents are listed, but could be added more explicitly if required. Please advise	Clarity.	As advised. A specific reference to the Site Assessment and Site Selection Reports has been added to supporting text
POLICY 2D: AFFORDABLE HOUSING			
p31, P2D.1	Revised wording is required to include reference to mix and type and the threshold for affordable housing. Agreed	To be consistent with national guidance.	Replace 1 st part of sentence with “ Affordable housing provided as part of the development of additional sites On allocated sites comprising 10 or more dwellings, where affordable housing of an appropriate mix and type to meet the identified local need, is to be provided, this shall be made available by preference...” Reworded in line with the suggested text, but with the addition of “or any other non-allocated sites that come forward” after “...allocated sites...”
P2D.2	This should follow Breckland's allocations policy. Agreed	Allocation of affordable housing is not a matter that should be left to discretion when there is an adopted policy in place.	Amend final line to ‘ ...prioritisation of other candidates will be at the discretion of the Local Housing Authority. in accordance with Breckland Council’s allocations policy’. Reworded as suggested

P2D.3 [AD]	Suggest additional criterion. Agreed	To ensure that a qualifying allocated site provides affordable housing.	<i>"Where a site is, or has been, in a single ownership, artificial sub-division to avoid provision of affordable housing will not be permitted".</i> Criterion added as suggested
p342, T2D.78 & 89	Format - A line space is missing between these two paragraphs. Agreed, but with reference to corrected paragraph numbers as indicated	Presentation.	As advised. Format corrected accordingly
POLICY 2E: HOUSING MIX			
p33, P2E.1	Cannot require affordable housing on smaller allocated sites as suggested in criterion d. Agreed	Although para 63 (NPPG) makes reference to 'designated' rural areas of 5 units or less providing affordable	<i>"On qualifying sites, social and affordable housing for those who cannot afford market prices".</i> Criterion d amended as suggested
POLICY 2E: HOUSING MIX /POLICY 2F: COMMON CRITERIA FOR ALLOCATED SITES			
p33/37	It is not clear how this policy and P2F.1 be applied to STNP 2 for only 4 dwellings and other smaller allocations? These would appear to need to: <ul style="list-style-type: none"> • Include smaller homes of 3 bedrooms or less (2F) • include housing specifically designed for the older adults, suitable for independent living • include one, two and three-bedroom homes for parishioners who wish to downsize • include higher proportion of one and two-bedroom starter homes for first time buyers • include social and affordable housing for those who cannot afford market prices 		2E and 2F would benefit by being combined into a single policy. <i>"All residential development proposals shall have regard to the following considerations:</i> <i>P2FE.31 Dwellings shall be drained by an adequate individual and/or communal sustainable drainage system.</i> <i>P2FE.42 A full ecological appraisal shall be provided with the planning application, and shall include details of any mitigation measures necessary to preserve biodiversity on the site.</i>

	<p>There also appears to be some duplication on housing size in both b policies.</p> <p>See discussion points below</p> <p>In a meeting to discuss the comments on 15 October 2019, it was clarified that this comment is an optional suggestion</p> <p>It was agreed that Policy 2E, as worded, does not require a proposal to meet each and every criterion, but rather to address each in the application</p>		<p>P2FE.53 <i>Satisfactory biodiversity and wildlife-friendly measures shall be incorporated into the design of the dwellings, gardens and public areas.</i> P2FE.64 <i>Each dwelling shall have off-road parking in accordance with the guidance given in Appendix 2 of the emerging Local Plan and the most up to date version of Norfolk County Council's document "Parking Standards for Norfolk".</i></p> <p>P2FE.75 <i>Development shall include positive measures commensurate with the site size to enhance green infrastructure.</i></p>
P33/37 (continued)			<p>P2E.46 <i>"Residential development proposals shall A housing mix and tenure which responds to local housing need having particular regard to the demographic characteristics of the Parish of Saham Toney, and as set out in the Saham Toney Housing Needs Assessment, May 2019. The</i></p> <p>following.....proposals. including:</p> <p>I. a. <i>Housing specifically designed for the older adults, suitable for independent living, in accordance with Lifetime Home Standards;</i></p> <p>II. b. More a majority of <i>one, two and three-bedroom homes for parishioners who wish to downsize but to continue to live in the Neighbourhood Area, and others</i> c. a higher proportion of <i>one and two-bedroom starter homes for first time buyers, and others;</i></p>

			<p><i>P2E.7 Standards shall meet those set out in emerging Local Plan Policy HOU 10, or any future update to that policy.</i></p> <p>2FE.28 a For sites that will deliver On sites of <i>10 or more dwellings & social and affordable housing for those who cannot afford market prices.</i></p> <p>STNP do not consider it appropriate to merge Policies 2E and 2F, as they deal with different topics</p> <p>Given the optional nature of the suggestion to merge Policies 2E and 2F, it has been decided to do that only in part. Elements of Policy 2F relating to housing mix and tenure have been moved to Policy 2E with the relevant suggested amendments incorporated. Policy 2E thus remains a single-subject policy.</p> <p>All other general criteria for new housing remain in Policy 2F, with the relevant suggested amendments generally incorporated, but adapted to reflect the findings of an updated Housing Needs Assessment. To make clear that Policy 2F applies to both allocated housing sites and any other housing sites that may come forward, its title has been amended to “Common Criteria for Residential Development Sites”.</p> <p>P2F.6 has been deleted as it is dealt with in Policy 3D.</p>
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DISCUSSION POINTS FOR STNP MEETING WITH S HEINRICH 15 OCTOBER 2019:

Saham Toney housing needs are for more 1, 2 or 3-bedroom houses to offset the current imbalance of houses with 4, 5 or more bedrooms. That is set out in the Parish Housing Needs Assessment

Policy 2E sets out and summarises the overall needs and states they “shall be addressed”, but not that all must be included in any one development. If this is unclear, we are willing to discuss better wording. It is a general policy applicable to all housing development that may come forward, not just the allocated sites.

Policy 2F applies specifically to the allocated sites, for which the identified housing needs have been addressed when agreeing policies with site owners. Hence all of the smaller allocated sites will be for houses of 3 or less bedrooms (whereas if say a non-allocated site for 5 houses came forward, its proposal would have to include details of an appropriate housing mix and may be able to make a case for an element of larger houses)

While the two policies could be merged, we would wish then to apply P2F.1 and 2 to all sites and perhaps move all or most of the present Policy 2E to supporting text

POLICY 2F: COMMON CRITERIA FOR ALLOCATED SITES			
p37	Welcome the introduction of Policy 2F. Noted		No action required
	Reference to "visibility splays" could also be included in this policy as it is included in all of them. Agreed	Consistency.	"P2E.x - Visibility splays no less than 2.4m x 59m to each side of the access where it meets the highway". A new criterion has been added accordingly to the general policy 2F.
POLICY's 2G -2Q			
	All these site allocate policies would benefit from re phrasing as policy, rather that statements, at the start & criteria a) of the policy. Agreed Also requiring all the criteria to be complied with could be considered too restrictive. Not agreed	Clarity.	"Development at (site name) & include ref No & Map ref in brackets for x new dwellings, will be permitted subject to meeting the following criteria..." A modified version of the suggested revised text has been implemented, as follows: "Development of (brown/greenfield) land amounting to approximately x hectares at (site name) designated as Site STNP(x), and as shown on Policy Map 2x for up to x new dwellings, will

			<p>be permitted subject to meeting the following criteria:"</p> <p>In a meeting to discuss the comments on 15 October 2019, it was agreed that since these are site specific policies, a requirement to comply with all criteria is relevant and acceptable and hence no change was made in this respect</p>
All site based policies (P2*.2)	<p>See comments re Policy 2A re phasing.</p> <p>In a meeting to discuss the comments on 15 October 2019, it was agreed that para 73 of the NPPF allows phasing in a Neighbourhood Plan</p>	Ability to enforce.	<p>As advised.</p> <p>No change to policy text required</p> <p>For consistency with actions taken in response to other comments regarding the phasing of development, supporting text has been added to each site allocation policy as follows "T2x.x Phasing of development is justified by paragraph 73 of the National Planning Policy Framework."</p>
P2H.3; P2K.3; P2L.3; P2M.3; P2N.3; P2O.3; P2P.3.	<p>All these criteria outline what is not required, rather than was is, and therefore should be removed from the policy criteria. This applies to all policies where there is a reference to this.</p> <p>Agreed</p>	Consistency.	<p>Either moved to the supporting text for each site or make a general statement made under POLICY 2F: COMMON CRITERIA FOR ALLOCATED SITES.</p> <p>The common criteria were removed from all noted policies except 2K (was 2L at the Reg. 14 stage). There was no need to move it to supporting text or Policy 2F since criteria for the provision of affordable housing are already covered in Policy 2D.</p>

			In the case of Policy 2K affordable housing is required as the site area is greater than 0.5 hectares as noted in the comment to P2L.1, page 53 of the Plan
P2G.3; P2I.3; P2J.3; P2Q.3	<p><i>"Therefore, under no circumstances shall viability be accepted as a reason to vary those criteria".</i></p> <p>This is considered to be prescriptive as there may be unforeseen changes to costs / market conditions etc. This applies to all policies where there is a reference to this.</p> <p>Agreed (but noted this applies to all site allocation policies 2G-2Q, and to point T2x.2 of supporting text rather than to policy text as noted in this comment</p>	Not in line with the NPPF.	<p><i>"Therefore, under no only under exceptional circumstances will be viability be..."</i></p> <p>Supporting text of site allocation policies changed as suggested</p>
T2G.1; T2I.1; T2J.1; T2K.1; T2L. 1; & T2J.1	<p>If there is an issue about the deliverability of these sites, they should not be allocated.</p> <p>In discussion it was agreed that the NPPF allows "developable" sites outside the first 5 years of a Plan</p>	Para 16 requires sites to be deliverable (NPPF).	<p>Remove allocation if not deliverable.</p> <p>No change required</p>
POLICY 2G: SITE ALLOCATION STNP1: GRANGE FARM, CHEQUERS LANE			
p40, P2G.1	<p>Suggest 'maximum' be replaced with 'approximately'.</p> <p>In discussion it was agreed that given the weight of evidence provided for the allocated sites, the flexibility implied by use of "approximately" is not appropriate. Hence it will not be added. It was further agreed that the word "maximum" is superfluous</p>	Policy is too prescriptive.	<p><i>"...for the provision of a maximum approximately 10 new dwellings on predominantly brownfield land at Grange Farm..."</i></p> <p>Amended to "...Development of predominantly brownfield land amounting to approximately x hectares at Grange Farm, Chequers Lane, designated as Site STNP1, and as shown on Policy Map 2H, for up to 10 new dwellings ..."</p>
	<p>e) — g) could these not be combined as they are not separate issues?</p> <p>Agreed</p>	Addresses similar issues.	<p>As advised.</p> <p>Combined as suggested.</p>

<p>P2G.1 h)</p>	<p>A full LVIA would not be reasonable on a development of 6 units; a landscape impact compliance statement would be more appropriate.</p> <p>It is that although the site is for 10 rather than 6 dwellings and therefore constitutes “Major development”, it is not of a size that would require Environmental Impact Assessment (EIA) and hence a full LVIA may not be appropriate, notwithstanding that its cost should not be an issue: STNP has obtained a quotation from a qualified landscape consultant to perform individual and cumulative LVIA of a group of 5 sites including this one at a cost of £5400 + VAT.</p> <p>It is not relevant if a development is for 6 or 60 dwellings; it could still have harmful landscape impact if not sited / designed in an acceptable way</p> <p>STNP requested a template and examples of a landscape impact compliance statement, as suggested by the comment. In an email dated 6 December 2019, Breckland Council advised it was unable to provide either and instead suggested reference to the evaluation section of the Breckland Settlement Fringe Landscape Assessment 2007 as a guide. A review of that section shows that it sets out a method based on the guidelines for landscape and visual impact assessment that were current at the time of its preparation. Hence STNP is unwilling to specify a requirement for a landscape impact compliance statement.</p> <p>In accordance with the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition, for developments not subject to EIA, it is reasonable to request a</p>	<p>Viability.</p>	<p>Breckland Council will provide this.</p> <p>The requirement for a full LVIA has been replaced by a requirement for a proportionate LVA</p>
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	proportionate Landscape and Visual Appraisal (LVA), which is a less onerous assessment of effects)		
POLICY 2H: SITE ALLOCATION STNP2: DISUSED PIGGERY, OFF HILLS ROAD			
p43 P2H.1	<p>An exact measurement of the site should be undertaken.</p> <p>Agreed, ref NPPF paragraph 63 which defines “major development” as being one for 10 or more dwellings, or where the site is “0.5 hectares or more in area”. The owner of site STNP2 has provided measurements of the part of the site to be used for housing of 63 x 43m. In addition, the site access road will be approximately 70m long by 4.5m wide. Hence the total site area = to be 0.30 hectares. Therefore, the affordable housing criterion does not apply</p>	If the site is over 0.5ha then in line with current NPPF, affordable housing will be required.	<p>Determine for certainty whether the site is under or over 0.5ha.</p> <p>Site area amended in Policy</p>
T2H.5	<p>If there is a risk of asbestos why is there no requirement for a Ground Contamination Risk Assessment, when this is required for other sites with this issue?</p> <p>It has been agreed with the site owner that a Ground Contamination Risk Assessment will be added</p>	Consistency	<p>As advised.</p> <p>Criterion added to Policy as follows:</p> <p>“A Ground Contamination Risk Assessment shall be provided with the planning application, based on a full intrusive ground investigation, and shall set out in detail all measures required to eliminate identified risks;”</p>
POLICY 21: SITE ALLOCATION STNP4: LAND AT THE JUNCTION OF POUND HILL AND PAGE'S LANE			

p45, P2I.1 f)	<p>A full LVIA would not be reasonable on a development of 13 units; a landscape impact compliance statement would be more appropriate.</p> <p>See P2G.1h)</p>	Viability.	<p>Breckland Council can provide this.</p> <p>The requirement for a full LVIA has been replaced by a requirement for a proportionate LVA</p>
POLICY 2J: SITE ALLOCATION STNPS: LAND TO THE EAST OF POUND HILL			
p48, P2J.1 g)	<p>A full LVIA would not be reasonable on a development of 12 units; a landscape impact compliance statement would be more appropriate.</p> <p>See P2G.1h), but note this site has subsequently been removed from allocation following independent masterplanning studies and a professional review of its landscape impact</p>	Viability.	<p>Breckland Council can provide this.</p> <p>Site removed from allocation so comment is no longer applicable. Hence no action is required on it</p>
POLICY 2K: SITE ALLOCATION STNP6: LAND AT THE JUNCTION OF POUND HILL AND PAGE'S LANE			
p50 P2K.3 [JH]	<p>An exact measurement of the site should be undertaken.</p> <p>A survey confirmed the exact site area to be 0.488 hectares (see drawing below), therefore affordable housing is not required, but note this site has subsequently been removed from allocation following independent masterplanning studies and a professional review of its landscape impact</p>	<p>If the site is over 0.5ha then in line with current NPPF, affordable housing will be required.</p>	<p>Determine for certainty whether the site is under or over 0.5ha.</p> <p>No change to policy required (also policy deleted for other reasons)</p>

p50, P2K.1 d)	<p>A full LVIA would not be reasonable on a development of 6 units; a landscape impact compliance statement would be more appropriate.</p> <p>See P2G.1h), but note this site has subsequently been removed from allocation following independent masterplanning studies and a professional review of its landscape impact</p>	Viability.	<p>Breckland Council can provide this.</p> <p>Site removed from allocation so comment is no longer applicable. Hence no action is required on it</p>
	<p>e) & f) could these not be combined as they are not separate issues?</p> <p>Agreed, but note this site has subsequently been removed from allocation following independent masterplanning studies and a professional review of its landscape impact</p>	Addresses similar issues.	<p>As advised.</p> <p>Combined as suggested, but policy subsequently deleted for other reasons</p>
TP2K.6 & 9	<p>Are duplicate, with the latter containing more information.</p> <p>Agreed. Note that the comment applies to T2K.6 & 9</p>	Duplication.	<p>Delete para TP2K.6.</p> <p>T2K.6 deleted. Following points renumbered accordingly, but policy subsequently deleted for other reasons</p>
POLICY 2L: SITE ALLOCATION STNP7: PAGE'S FARM			
p53 P2L.1	<p>The site is over 0.5ha. It is therefore required to deliver affordable homes in line with NPPF, as are all sites of over 0.5ha.</p> <p>Agreed</p>	Para 63 (NPPG) states affordable housing should not be sought on sites that are not major (0.5 hectares or more.	<p>Change paragraph to reflect that affordable housing will be required on this site.</p> <p>A requirement for no fewer than two affordable homes has been added</p>

P2L.1 i)	A full LVIA would not be reasonable on a development of 8 units; a landscape impact compliance statement would be more appropriate. See P2G.1h)	Viability.	Breckland Council can provide this. The requirement for a full LVIA has been replaced by a requirement for a proportionate LVA
	f) — h) could these not be combined as they are not separate issues? Agreed	Addresses similar issues.	As advised. Combined as suggested
POLICY 2M: SITE ALLOCATION STNP9: OVINGTON ROAD			
p57, P2M.1	Concern has been previously expressed about the low density of this site. In response mention was made about <i>"part of the site being at high risk of surface water flooding"</i> . Agreed. Also note this is a developer proposal and therefore must be deemed viable		Reference to the low density should be made in para T2M.6. Supporting text has been added as follows: “The low housing density on this site is justified by the following underlying factors: a) Part of the site is at high risk of surface water flood risk; b) Concerns raised by the Local Highways Authority with regard to highway access for a greater number of dwellings and a need to provide a pedestrian pavement in that circumstance where land is not readily available for that purpose; c) The developer’s wish to provide houses with larger gardens.”

	g) & h) could these not be combined as they are not separate issues? Agreed	Addresses similar issues.	As advised. Combined as suggested
POLICY 2N: SITE ALLOCATION STNP13: HILL FARM			
POLICY 20: SITE ALLOCATION STNP14: CROFT FIELD			
p60	We welcome the realignment of this site. Noted		No action required
P20.1	Criteria g) is also found in Policy 2F. Agreed (noted that comment also applies to criteria (e) (f) and (k))	Duplication.	Delete Criteria g). Criteria (e), (f), (g) and (k) deleted
POLICY 2P: SITE ALLOCATION STNP15: 8 RICHMOND ROAD			
P2P.1 f)	A full LVIA would not be reasonable on a development of 8 units; a landscape impact compliance statement would be more appropriate. See P2G.1h) Note: Development is for a total of 17 houses rather than 8	Viability.	Breckland Council can provide this. The requirement for a full LVIA has been replaced by a requirement for a proportionate LVA
POLICY 2Q: SITE ALLOCATION STNP16: RICHMOND HALL			
p64	The Plan may need to say more about the future management and maintenance of the large tract of amenity land (i.e.: who and for how long etc). This could result on viability challenges if combined with Affordable housing and other necessary developer contributions. as well as the mix and type of housing required by other policies in this Plan. See discussion points below.	Clarity.	As advised. Following discussion and further review by Breckland Council's legal team, no planning measures to enforce the provision of the amenity land by a developer of site STNP16 who was not the owner of the amenity land could be established Instead the allocation policy includes a requirement not to prejudice provision of the

	<p>In discussion it was clarified that the amenity land will not be linked to the sale of the land allocated for housing, nor will it be gifted to the Parish Council. It will remain in the ownership of the landowner who will continue to live adjacent to the development site. As such continuance of public access could only be achieved via the deeds of the landowner's property.</p> <p>At present access to the amenity land is limited to pedestrian access, no provisions are made for parking</p> <p>Designation as a Local Green Space was agreed to be inappropriate due to the amenity land area (approximately 9 hectares) and the fact that it does not currently function as a Local Green Space</p>		amenity land, and the latter is now covered separately in a new policy
<p><u>DISCUSSION POINTS FOR STNP MEETING WITH S HEINRICH 15 OCTOBER 2019:</u> The land will stay in the ownership pf the present owner, whereas STNP16 itself will most likely be sold to a developer.</p> <p>The amenity land is thus linked with the existing property rather than the development site and so presumably conditions would have to apply to the deeds of the property / land, which the Plan cannot dictate. What conditions, if any, could be applied to planning permission?</p> <p>The Parish Council would not take on responsibility for the land, even were it to be offered to it (which it is not)</p> <p>Please advise possible solutions to this and how we might suggest the landowner resolves it</p>			
	<p>Criteria b) — reference has been made to the wrong Map.</p> <p>Agreed</p>	Typo.	<p>Amend Map reference to 2Q, not P.</p> <p>Amended accordingly as have been several other incorrect references</p>

P2Q.3	<p>Subject to viability.</p> <p>Clarified that this refers to the viability requirement in T2Q.2</p>	Not in line with the NPPF.	<p>Add, unless it is otherwise proven through a detailed and substantiated viability appraisal that this is proved unviable.</p> <p>Paragraph has been amended as for comment to P2G.3; P2I.3; P2J.3; P2Q.3, i.e. "Therefore, under no only under exceptional circumstances will be viability be..."</p>
POLICY 3A: DESIGN			
p68	<p>While we support the principal of a design policy, concern remains about the lack of detail applicable to Saham Toney. This policy needs to be more self-contained e.g. include reference in the plan to Saham's actual '<i>distinctive character</i>' and '<i>vernacular styles</i>'. As a minimum, this should be provided in the supporting text rather than reference to supporting documents, which do not have the same planning status e.g. not part of the 'development plan'.</p> <p>Agreed</p> <p>This was discussed further at a meeting Breckland Council's Neighbourhood Planning Coordinator and a Policy officer on 17 January 2020 to discuss comments they made to a provisional update of Policy 3A</p>	Clarity.	<p>In the policy "... <i>in a manner that reflects the varied local context...</i>" and supporting text make reference to either the range or predominant styles in the villages to provide a context for the policy in the development plan itself.</p> <p>N.B. Guidance on material types is provided in the supporting text.</p> <p>Design policy and supporting text revised accordingly. In doing so the National Design Code published 1st October 2019 and accompanying planning practice guidance have been taken into account</p> <p><u>Note:</u> As a result of post-consultation comments received from the Council's officers and subsequent discussion of those, the Village Design Guide was also updated. Those additional comments are included at the end of this set of comments and responses</p>

	<p>Also it has been accepted that there is an overlap with the Local Plan policy, (GEN 2 Promoting High Quality Design Policy and Policy COM 01 Design).</p> <p>This should be removed so that the policy focuses on the unique elements that are relevant to the plan area.</p> <p>Agreed</p>	<p>Para 16 f) "... <i>avoiding unnecessary duplication of policies that apply to a particular area....</i>" (NPPF).</p>	<p>As advised.</p> <p>Design policy and supporting text revised accordingly. In doing so the National Design Code published 1st October 2019 and accompanying planning practice guidance have been taken into account</p>
P3A.1	<p>The policy should make it clear that this will be achieved how by the requirement in para T3A.2, 1st sentence. However, will the requirements of the rest of this policy, except those in P3A.5 & P3A.8, be expected to be achieved?</p> <p>Agreed</p>		<p>Move requirement for a statement in the 1st sentence, from the supporting text to the policy.</p> <p>Requirement for a statement moved to the policy as advised</p>
T3A.1	<p>A summary of the 'guiding principals' of the Saham Toney Village Design Guide (April 2019) should be included in the Plan to have more weight.</p> <p>Agreed</p>	Clarity.	<p>Include in an Appendix to the Plan.</p> <p>Added as Appendix A to the Plan</p>
T3A.4	<p>Format: Amendment to the text is required.</p> <p>Agreed</p>		<p>Reference should be made to 'Policy 3A'.</p> <p>Amended accordingly</p>
POLICY 3B: DENSITY OF RESIDENTIAL DEVELOPMENTS			
p71, P3B.1	<p>1st sentence has a word missing.</p> <p>Should it also clarify the density shall reflect the density of the areas adjacent to the site as identified in table and map 3B.1 of the policy?</p> <p>Agreed</p>	Clarity.	<p>Add 'area' after 'immediately surrounding'; and "... <i>and shall reflect the data on existing densities as set out in Table 3B.1 and Density Areas Map 3B.1.</i> "</p> <p>Missing word added</p>

Table, [AD]	The number of areas here is less than on the subsequent table T3B.5 and Map 3B.1 and it is not clear why? It was confirmed that as published, there are 19 areas in both tables and on the map.	Clarity.	Requires clarification. To assist readers' understanding P3B.1 has been amended to "...existing densities provided for the 19 areas listed below in Table 3B.1"
T3B.1a	See earlier comment on MM159 (p19, 6.3.6 (c)). Agreed		Although the comment was agreed, Breckland Council subsequently published a 'clean' version of the Local Plan, with all 'MM' references removed. Hence such references were also removed throughout from the Neighbourhood Plan
POLICY 3C: SITE ACCESS AND ON-SITE STREETS			
	The title appears incomplete. The title is as intended but we are willing to modify it	Clarity.	Add 'Layout' to the end of the title. Title amended as suggested
T3C.9 10	Reference to use of conditions would be more appropriate if it was located in the implementation section (T3C.1-4). Agreed	Clarity.	As advised. Two points moved to the implementation section as suggested and other points renumbered accordingly
POLICY 3D: PARKING			
p78, P3D.1 d)	This would benefit from further clarification. Agreed	Clarity.	"Each individual bay in a cluster of parking bays should be designed for no more than be sized for a maximum of 4 or 5 vehicles Wording amended as suggested
P3D.1 j)	This incorrectly appears to give equal status to both documents, and does not clarify that the emerging Local Plan holds more weight. Delete reference to County Council document in the policy & move to supporting text. Agreed	Clarity.	"...incorporated in accordance with the guidance given in Appendix 2 of the emerging Local Plan and the most up to date version of Norfolk County Council's document "Parking Standards for Norfolk";

			Amended as suggested
T3D.9	FORMAT - There is an extra line space in the para. Agreed		As advised. Line space deleted
POLICY 3E: DARK SKIES PRESERVATION			
P3E.1 c.	c) This is not appropriate to include in a development plan as this is an operational matter which the county has responsibility for. Agreed N.B. This will have implications for the text in T3E.2 b) & c). Not agreed. Text in T3E.2.b) &c) does not refer to lighting-up times but relates to specific times of day/night regardless of dusk/dawn times	Enforceability.	Delete criteria. Criterion (c) deleted
	Format - to be consistent with the rest of the plan, in the criteria, replace the full stops with a right hand side bracket. Agreed	Format.	As advised. Format amended as suggested
T3E.6	N.B. This text is not consistent with, and less restrictive than, Policy 3E c). Agreed		Policy text P3E.1 c deleted as comment above. T3E.6 moved to the implementation section as it refers to a potential planning condition. Other points renumbered accordingly
POLICY 4: NON-RESIDENTIAL DEVELOPMENT			
p81, P4.1	The use of the word 'severe' is not typical planning phrasing, so it is not clear what this means. Agreed	Clarity.	Replace with 'significant'. Wording changed as suggested Note: Additionally, outside the Council's comments the following has been added to the policy's implementation text as a result of a suggestion to the Council by "Planning for Pubs"

			“Regarding the Old Bell Inn, from 23rd May 2017, under the General Permitted Development (England) (No 2) (Amendment) Order (SI 2017/619) all Permitted Development Rights for public house changes to non-pub uses and demolition were removed, and now require specific permission.”
P4.4	<p>This is a statement, not policy and should be moved to the supporting text.</p> <p>Agreed</p>	Phrasing.	<p>As advised.</p> <p>P4.4 moved to supporting text as suggested</p>
POLICY 5: SAHAM TONEY RURAL GAP			
p83, P5.1	<p>While we support the principal of the Strategic Gap, there remains concern about the extent of the gap on the west side in relation to the evidence provided.</p> <p>Agreed. Note the terminology used is “Rural Gap” rather than “Strategic Gap”</p>	There is limited no development pressure in this area.	<p>Reduce Strategic Gap on the west side to the commercial site on Brandon Road.</p> <p>Rural Gap reduced as suggested</p>
Evidence Map 5.4	<p>The Commercial site (in blue) on Brandon Road extends further north (³/₄ up the site) rather than half way up as indicated on the map — see site on Google Maps.</p> <p>In discussion of the comments it was agreed that the Plan map is correct as shown below</p>	Accuracy.	<p>Amend as advised.</p> <p>No change required</p>



From Google Earth (Parish boundary: _____)

POLICY 6: HERITAGE ASSETS			
p92, P6.5	Clarification is required regarding who makes the decision. Agreed	Clarity.	<i>"Where a need for field evaluation is identified by Breckland Council, a planning condition shall be agreed..."</i> Text amended as suggested

p93,16.1-4	The text needs to be clear about what type of heritage asset is being referred to as occurs in T6.6 e.g. designated or non-designated or both. Agreed	Clarity.	As advised. Wording of P6.1-4 clarified as suggested
p95, T6.11	The archaeological interest of an asset is already known; but not that of a site or area, as it may not have been previously assessed. Agreed	Clarity.	<i>"Where an asset a site or area, is thought to have archaeological interest, the potential knowledge..."</i> Text amended as suggested
p95, T6.16 Glossary of terms	'Heritage Asset' should read 'non-designated heritage asset'. Agreed Also it would be useful to have a Glossary for the whole plan and not just the Heritage assets. Will consider this	Clarity.	Amend as advised. Term amended as advised A glossary for the whole plan has been added as section 9 (and the Heritage glossary deleted as a result, since its terms are now included in the main glossary)
p99, Policy Map 6A-C	Why is numbering 52 -59 and 22 - 258 etc? Does this reflect the County Council register? This matches the Saham Toney Heritage Asset Register, which has blocks of unused numbers set aside for possible additions in future		Requires clarification. A clarification note as to the source of the numbering system has been added to each of the 4 policy maps
POLICY 7A: LANDSCAPE CHARACTER PRESERVATION AND ENHANCEMENT			
p101, P7A.5	A full LVIA would not be reasonable for small developments in this location. On small sites a landscape impact compliance statement would be more appropriate. See P2G.1h)	Viability.	Breckland Council can provide this. The requirement for a full LVIA has been replaced by a requirement for a proportionate LVA in policy text, with additional supporting text
POLICY 7B: KEY VIEWS			

p108, P7B.1	1" sentence is a statement and add nothing to the policy. <i>Agreed</i>	Phrasing.	"Key views shall be respected." First sentence deleted as advised, but to provide a framework for proposals which adversely impact key views, the following text has been adopted: "Development proposals shall seek opportunities to preserve, incorporate and where possible enhance the Key Views listed below and shown on Policy Map 7B, and their landscape setting. Development proposals which adversely impact on these key views will not be supported."
T7B.2	Why has no strategy been provided for views 2, 3, 6 & 9; are they less significant? <i>Will make additions</i>	Clarity.	Consider providing advice. <i>Advice added for Key Views 2, 3, 6 and 9 as suggested</i>
POLICY 7C: LOCAL GREEN SPACES			
p121	Include the evidence for the Local Green Spaces against the requirements in para 100 (NPPF) in a table in the supporting text. <i>Agreed</i>	Previous independent examiners requirement.	As advised. <i>Table of summary evidence added with reference to the Evidence Base for further detail</i>
POLICY 7D: BIODIVERSITY AND HABITATS			
p124	N.B. There is concern that there should there be a greater clarity between the different types of natural environment designation and the protection awarded. <i>Agreed to add clarification to supporting text (Ref NPPF para 171)</i>	Clarity.	As advised. <i>Implementation text has been added as follows: "Regarding the hierarchy of designated sites: a) There are no internationally designated sites in the Neighbourhood Area;</i>

			<p>b) There are no nationally designated sites in the Neighbourhood Area;</p> <p>c) A small area in the south-west of the Neighbourhood Area forms part of a locally designated 1500m buffer zone for a Breckland stone curlew Special Protection Area. In accordance with the emerging Local Plan, Policy ENV03 development within this zone will not normally be permitted.</p> <p>T7D.5 The remainder of the Neighbourhood Area is undesignated and therefore the requirements of P7D.3 apply equally to all other locations. It is not the intention of P7D.3 to prevent development per se, but rather to ensure that suitable mitigations and compensatory measures are included in proposals where biodiversity and habitats may be adversely affected. Where necessary this shall be ensured by planning conditions.”</p>
p126-32, Maps	<p>Most of the Keys on these maps are too small to read and need increasing in size.</p> <p>Agreed</p>	Clarity.	<p>As advised.</p> <p>All maps replaced by new ones at a larger scale and with larger, clearer legends</p>
POLICY 7E: GREEN INFRASTRUCTURE			
p133, P7E.4	<p>Criterion P7E.4 & 5 would be better placed in Policy 3A Design.</p> <p>Agreed</p>	Clarity.	<p>As advised.</p> <p>Criteria P7E.4 & 5 moved to Policy 3A Design as advised</p>
POLICY 7F: TREES AND HEDGES			

p135, P7C.6	<p>All parts of the retained trees should be protected, not just the roots.</p> <p>Agreed</p>	As Per recommendations BS5837:2012.	<p><i>"All retained trees and hedges that could be implicated by the development shall be protected as defined in item 5.5 of BS5837:2012 Trees in relation to design, demolition and construction".</i></p> <p>Text amended as suggested, but with specific reference to the whole of sections 5-7 and Appendix A, rather than just item 5.5 of the British Standard, since the whole of those sections of the standard deal with protection, while 5.5 relates specifically to preparation of a tree protection plan.</p>
MONITORING AND UPDATE OF THIS NEIGHBOURHOOD PLAN			
	<p>Title would benefit from amending.</p> <p>Agreed</p>		<p>MONITORING AND UPDATE OF THEIS NEIGHBOURHOOD PLAN</p> <p>Amended as advised</p>
	<p>N.B. As monitoring is the responsibility of Breckland Council, it would be useful if the Indicators and Targets were checked to be consistent with those in the Annual Monitoring Report.</p> <p>See discussion points below</p> <p>The objective of monitoring is to establish the effectiveness of the Neighbourhood Plan policies. Indicators and targets must therefore be specific to the Neighbourhood Plan policies, not those of the Local Plan.</p> <p>Breckland Council already monitors on a district-wide basis to the AMR indicators and targets, so it is unclear how doing the same specifically for Saham Toney would add value.</p>	Consistency.	<p>As advised.</p> <p>Text has been added to clarify the difference between the monitoring proposed and that already carried out by the Council:</p> <p>"The effectiveness of this Plan's policies and the manner in which they are applied by the Local Planning Authority will be monitored by Saham Toney Parish Council against the indicators listed in 8.4. Such monitoring will be carried out on an ad hoc basis, and is not intended to duplicate the annual monitoring undertaken by Breckland Council, which has a somewhat different purpose and focuses on district-wide topics."</p>

	<p>Even if Saham Toney Parish Council wished to use the AMR indicators and targets it would not have the resources to gather and collate much of the information included in the AMR.</p> <p>In a meeting to discuss the comments on 15 October 2019, it was agreed that STNP may monitor the Plan to criteria it deems appropriate and that the Council will continue its own work with respect to its Annual Monitoring Report</p>		
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APPLICABILITY OF NPPF REFERENCES (2nd comment to whole plan)

6.2 (concerned with consultation with the Parish Council), para's 39-46: correct to 2019 (pre-application engagement)

6.3.4 General reference to NPPF principles, no specific paragraphs note, so correct to 2019

T2C.1 (concerned with residential housing exceptions), para. 79: correct to 2019 (deals with rural home exceptions)

T2E.3 General reference to the NPPF for definition of affordable housing: worded to refer to the most up to date version, therefore correct

T2E.10 (concerned with housing mix), section 5 of NPPF: correct to 2019, (deals with delivering a sufficient supply of homes which includes requirements relating to size, type and tenure of housing)

T2G.1, T2H.4, T2I.1, T2J.1, T2K.1, T2L.1, T2M.3, T2N.3, T2O.3, T2P.3, T2Q.3, T3A.4, reference to NPPF glossary: worded to refer to the most up to date version, therefore correct

T3A.6 (concerned with design), para 124 and the whole of section 12: correct to 2019 (deals with good design and in general achieving well designed places)

T3A.9 (concerned with "Building for Life"), para 126: correct to 2019 (deals with design guides and codes)

T3C.12 (concerned with site access and on-site streets), para 102(e): correct to 2019 (deals with patterns of movement, streets)

T3D.2 (concerned with parking), para 105: correct to 2019 (deals with local parking standards)

T3B.1 (concerned with site densities), para's 122c & d, 123: correct to 2019 with reference to achieving appropriate densities

P6.2 General reference to "NPPF (2018) or any of its successors": although "successors" covers the 2019 version; this will be corrected to state "the most up to date version of the NPPF"

P6.3 General reference to the NPPF, no specific paragraph or section noted: correct as by definition it refers to the most up to date version

T6.12 (concerned with heritage assets, specifically archaeological records), para 199: correct to 2019 (deals with recording the significance of heritage assets)

T7C.1 (concerned with managing development in Local Green Spaces): correct to 2019 (deals with managing development in Local Green Spaces)

T7C.3 (concerned with Local Green Spaces), para 100: correct to 2019 (deals with Local Green Space designation)

T7D.5 (concerned with impact on biodiversity and habitats), para 175: correct to 2019 (deals with harm to habitats and biodiversity)

T7D.6 (concerned with wildlife corridors), general reference to NPPF aims with respect to maintaining a coherent ecological network: correct to 2019 (see para 170d, which will be added to the reference)

T7E.6 (concerned with provision of green infrastructure), para 20: correct to 2019 (deals with conservation and enhancement of green infrastructure)

T7E.7 (concerned with the provision of safe and accessible green infrastructure), para 91: correct to 2019 (deals with supporting healthy lifestyles, citing access to green infrastructure as one example)

T7E.8 (concerned with the contribution of green infrastructure to tackling climate change), para 150: correct to 2019 (notes green infrastructure planning as one means to manage climate change risks)

T7E.9 (concerned with a strategic approach to green infrastructure), para 171: correct to 2019 (deals with taking a strategic approach to green infrastructure)

T7E.10 (concerned with green infrastructure's contribution to improving air quality), para 181: correct to 2019 (notes the contribution of green infrastructure to improving air quality)

T7F.8 (concerned with the loss of ancient woodland or ancient or veteran trees), para 175: correct to 2019 (deals with the loss of ancient woodland or ancient or veteran trees)

T8.11 (concerned with flood risk assessments), para 163 and 164: correct to 2019 (deals with flood risk assessments)

T8.22 (concerned with directing development away from high flood risk areas), para 155: correct to 2019 (deals with directing development away from high flood risk areas)

T8.23 (concerned with development not increasing flood risk elsewhere), para 163: correct to 2019 (deals with development not increasing flood risk elsewhere)

8.1 general reference to the NPPF with respect to future reviews of the Neighbourhood Plan: correct as by definition it refers to the most up to date version

ADDITIONAL COUNCIL COMMENTS ON POLICY 3A: DESIGN (AND THE VILLGE DESIGN GUIDE) RECEIVED 24 DECEMBER 2019:

Approach

Your approach was to create a Landscape and Character Appraisal leading to:

- Village Design Guide written based on the Landscape and Character Appraisal
- Design Policy drawn from the Village Design Guide.

The Landscape and Character Appraisal is very thorough and the Village Design Guide is very detailed and a great deal of work and consideration has gone in to it, but it reads as a prescriptive list of dos and don'ts. It is also not an easy document for a potential developer to follow and to gauge what sort of development you actually want to see in Saham Toney as there is more about what you don't want to see.

A review of the design guides in light of the National Design Guides would help to bring out the most salient points and discard those over-prescriptive or negative aspects.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/843468/National_Design_Guide.pdf

(N.B. There are a number of illustrations to demonstrate a “good” or “bad” example within the Design Guide - it might be better if the “bad” examples are not from the village, but to use anonymous examples or drawings to illustrate those design examples which you feel have failed)

Overall

As you will be aware, the policies in the Neighbourhood plan have to be in line with the Strategic policies in the Breckland Local Plan and take account of the NPPF. They should also be relevant and specific Saham Toney policies, but some of them are a bit generic. As previously advised, if the policies already exist in the local plan or NPPF, there is no need to repeat them in the Neighbourhood plan.

Have a look at the Neighbourhood plan for Histon and Impington in Cambridgeshire to see how they made their village central to the design policy and what they wanted to achieve from it.

<https://www.scambs.gov.uk/media/13438/histon-impington-neighbourhood-plan-submission-version-31-may-19.pdf>

Language: It needs to be clear and precise and backed up by evidence from your public engagement and evidence. Avoid over generalised statements e.g. “All proposals shall be guided by the Village Design Guide...” Not all proposals would be covered by the design guide e.g. Change of Use. Also, a reference to ‘where appropriate’ offers some flexibility (para11 a) NPPF).

P3A.1 General. Set the context of the policy regarding what you want to achieve in design of new development in Saham Toney.

- Set out requirements for new development in Saham Toney
 - Inform and guide those decisions for Saham Toney
 - Ensure multitude of individual decisions add up to something coherent for the whole of Saham Toney
- The Village Design Guide is not policy or carry the weight of policy; it’s evidence which has the status of a ‘material consideration’.

P3A.2 Local Context: Set the actual scene of Saham Toney in terms of its core design principles. What are these? Which design principles are most important? Your landscape appraisal talks about how the character of the village has been diluted somewhat by 20th century and the “better quality maybe more distinctive character” designs are being lost amongst more recent designs.

P3A.3 Local Vernacular: *“Design proposals shall be locally distinctive and incorporate the Neighbourhood Area’s vernacular styles and materials”*. There are 6 village character areas with very different architectural styles within them so you need to be more precise on what you are asking for here e.g. VCA 2 Bell Lane is very different from VCA3- Do you want more of the same in VCA2?

P3A.4a Local Integration: This needs to be expanded here. Explain why this is important and the reasoning for this in the supporting text.

P3A.4b Local Integration: *“Provide good connectivity with the existing neighbourhood for pedestrians and cyclists”*. Do you have any information/maps on the current connectivity within the village that can be added to the supporting text?

P3A.5: Built Form: Better to put in a policy about height and massing and to relate to surrounding character rather than talk about the number of storeys.

P3A. 6 Layout and Landscaping: State what particular issue of layout and landscaping you wish to address which is relevant to Saham Toney.

P3A.6b Incorporate attractive and coherent boundary treatments which reflect the local vernacular: The design guide doesn't state exactly what local vernacular boundary treatments are. Need to give examples to follow so it is clear what you are asking for in the supporting text.

P3A.6c In case of residential proposals include appropriate rear garden spaces: Need to state what is an appropriate rear garden space and why is this important to Saham Toney in the supporting text.

P3A.7 Quality and Security of Design: There are two separate points here which would be better as separate policies.

Building for Life 12 covers a wide range of areas. This should be in a general policy unless you are referring to a particular aspect here - perhaps under P3A.9 Sustainability and design and why is this important to Saham Toney refer back to your evidence gained from public engagement or expert report

Crime and Community Safety- Is there a problem with crime and safety in Saham Toney? If so what type? Need to provide the context in the supporting text.

P3A.8 Respect for the historic environment:

a) *"Make use of opportunities there may be to enhance or better reveal the significance and setting of the historic environment"*. Need to be clearer and more precise about what you want to achieve in this policy.

b) *"Not materially impact the significance of any building defined"*. I am unclear about the aim of this policy. If it is a listed building it will require separate Listed Building planning permission.

P3A.9 Sustainable construction and design: Look at Resources chapter of the National Design Guide to help with this section.

P3A.10 A safe, healthy and inclusive environment: These points seem to have been lifted from elsewhere and are not connected to each other. Have a look at 'Homes and Buildings' chapter in National Design Guide to help you. Think what the significance of this is for Saham Toney.

Supporting Text - Implementation:

T3A.2 - What do you want to see included in a design and access /planning statement? The Village Design Guide needs to guide the design process for a development in the village, consequently this process and the resulting design needs to have a rationale which is shown in the design and access statement.

T3A.4 - You seem to state here that you want more developments to mimic pre 20th century design, which could lead to pastiche development. Reword this to *"enhance"* the immediate surrounding area.

T3A.5 - Is there a need for a specific policy on 3 storey housing? Has Saham Toney suffered from a number of inappropriately tall building applications? Would be better to add a policy about height and massing.

T3A6 - If there are particular heritage assets within the village, you may wish to write a policy for them, with regards to any potential development near to it.

T3A.7 - Any S106 developer contributions is decided at council level and contributions should normally relate to the provision of facilities and not services.

Supporting Text - Key facts:

T3A.8 - This contradicts policy P3A.3 where it asks for development to be locally distinctive and respond to the local vernacular style. However, here it states there is no distinctive style but a variety of styles – this needs clarifying.

T3A.9 - Pattern of Development. This is better explained pictorially for each of the Village Character areas and write a policy which corresponds to it. Also a separate policy for infill development would be useful.

T3A.10 and 11 and 12 - are descriptive and provides context to your policies, but this needs to be better reflected in the policies.

The design policy/guide comments were discussed the Breckland Council's Neighbourhood Planning coordinator and a planning policy officer at a meeting on 17 January 2020, and the comments and discussion points were addressed in the updates of Policy 3A, appendix of the Plan and the Village Design Guide

That updated version of Policy 3A was informally reviewed by Breckland Council planning officers. Comments to the updated policy were received on 29 May 2020. Those comments, STNP's responses to them and the actions taken to address them are given in the table below, which for reference, is followed by the version of the policy reviewed.

Page and Policy/ Paragraph No	Comment and suggested amendments	Suggested Amendments
General comments	The use of the word 'shall' – as previously advised, this is very prescriptive and does not provide the flexibility required by planning e.g. "11 a) plans should ... be sufficiently flexible to adapt to rapid change;..." (NPPF)	Amend to 'should', except in para P3A.9 and z) where 'will' is more appropriate, but delete 'as a minimum'.
STNP RESPONSE: It is disputed that in the context of a design policy, use of the word "shall" prevents the Plan from being 'sufficiently flexible to adapt to rapid change' in accordance with NPPF para. 11a It is disputed that use of the word "shall" in the context of a design policy is 'very prescriptive' Each use of the word "shall" in the policy (as reviewed), is analysed below: <u>P3A.1</u> "All proposals shall be guided by the most up to date version of the Saham Toney Village Design Guide": Read in its full context 'shall be <u>guided</u> ...' is non-prescriptive because 'guided' provides ample flexibility		STNP ACTION TAKEN: The following policy wording changes will be implemented: P3A.6 b) Design and layout shall: <u>Wherever possible</u> , increase the area of habitats that sequester and store

<p><u>P3A.2a</u> <i>“New development shall respond positively to, and where possible...”</i>: Both ‘respond positively’ and ‘where possible...’ are non-prescriptive and provide ample flexibility</p> <p><u>P3A.2b</u> <i>“New development shall retain rural spaces between existing village settlement clusters to avoid their coalescence.”</i>: Since no specific areas or distances to be retained are specified, flexibility exists. The requirement is based on the findings of the Saham Toney Parish Landscape Character Assessment, 2019, which highlights the spaces between existing settlement clusters as crucial to the retention of village character. Hence to specify that they only ‘should’ be retained would be inappropriate, and would not provide the level of character preservation required by the NPPF. ‘Shall’ ensures they are retained, but the remainder of the criterion leaves flexibility in doing that</p> <p><u>P3A.3</u> <i>“Design proposals shall be locally distinctive and incorporate Saham Toney’s character vernacular”</i>: Reflects the findings of the Saham Toney Parish Landscape Character Assessment, 2019. If amended from ‘shall’ to ‘should’ design that were neither locally distinctive nor reflective of the character vernacular might be permitted but that would not provide the level of character preservation required by the NPPF.</p> <p><u>P3A.4a</u> <i>“Proposals shall, in the case of settlement edge proposals, give careful consideration to their integration and interface with the surrounding countryside”</i>: ‘...give careful consideration...’ is non-prescriptive and provides ample flexibility</p> <p><u>P3A.4b</u> <i>“Proposals shall where opportunities exist, provide...”</i>: ‘...where opportunities exist...’ is non-prescriptive and provides ample flexibility</p> <p><u>P3A.4c</u> <i>“Proposals shall respect the special rural character of the village lanes...”</i>: “...respect...” is non-prescriptive and provides ample flexibility</p> <p><u>P3A.5</u> <i>“...Any proposal exceeding two storeys shall be accompanied by a proportionate Landscape and Visual Appraisal that demonstrates that no significant visual harm will result.”</i>: It has been agreed in response to consultation comments (see above) that a Landscape and Visual Appraisal is appropriate and acceptable where there is reason to consider there may be harmful landscape impact. Since no buildings in the Neighbourhood Area currently exceed two storeys, any proposal exceeding that would potentially have such impact, and only an appraisal as specified could demonstrate that not to be the case. The criterion states this need only be ‘proportionate’; hence although the requirement is mandatory, it is not prescriptive</p> <p><u>P3A.6a</u> <i>“Design and layout shall: Make use of opportunities to mitigate surface water flood risk by the incorporation of appropriate natural features”</i>: “...opportunities... and appropriate...” are non-prescriptive and provides ample flexibility</p> <p><u>P3A.6b</u> <i>“Design and layout shall: Increase the area of habitats that sequester and store carbon, including through an increase of tree cover”</i>: Agreed, this may be too prescriptive. Revised wording given in the action taken column</p>	<p>carbon, including through an <u>appropriate</u> increase of tree cover</p> <p>P3A.6 d) Where applicable <u>and where opportunities exist</u>, contribute to the enhancement of Key Views</p> <p>P3A.9 Sustainable construction and design: Developments meeting the following criteria <u>will</u> be encouraged and supported:</p> <p>P3A.9 I) Development that gives rise to zero emissions to air <u>will</u> be strongly encouraged, and as a minimum:</p> <p>P3A.9 I) Further evidence will be added to policy supporting text to justify use of “...as a minimum”</p> <p>P3A.10 e) <u>Wherever opportunities exist</u>, incorporate design features that provide flexibility and adaptability for all potential residents at all stages of their lives, in line with the ‘Lifetime Homes’ standard</p>
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P3A.6c *“Design and layout shall: Incorporate attractive and coherent boundary treatments which reflect the local vernacular”*: There is no prescription in the details of boundary treatments to be incorporated, nor in the manner in which they reflect local vernacular. Adequate flexibility exists as worded.

P3A.6d *“Design and layout shall: Where applicable, contribute to the enhancement of Key Views”*: ‘Where applicable indicates where covered by Policy 7B, which is not prescriptive in the way such views are to be preserved. ‘...contribute to..’ is also flexible. Amending “Where applicable...” to “Where applicable, and where opportunities exist...” will add further flexibility

P3A.6e *“Design and layout shall: In the case of residential proposals include appropriate rear garden spaces”*: “...appropriate...” is non-prescriptive and provides ample flexibility

P3A.7a See response to specific comment below

P3A.7b *Proposals shall be in accordance with the principles...*: ‘in accordance with the principles...’ is non-prescriptive and provides ample flexibility

P3A.8a *“Design and layout shall: Make use of opportunities there may be to enhance or better reveal the significance and setting of the historic environment”*: ‘Make us of opportunities...’ is non-prescriptive and provides ample flexibility

P3A.8b *“Design and layout shall not materially impact the significance of any building defined in Policy 6 as a heritage asset or its setting; or if such impact would occur, be justified by a proportionate impact assessment and mitigation proposal.”*: It would not be appropriate to potentially permit material impact of a heritage asset’s significance or setting by amending ‘shall’ to ‘should’; nor would that be in accordance with the aims of the NPPF to preserve the historic environment

P3A.9 Use of “will” instead of “shall be agreed (note that “...encouraged and supported...” is non-prescriptive and provides ample flexibility)

P3A.9I Use of “will” instead of “shall agreed

P3A.9I Deletion of “...as a minimum” not agreed. Instead further evidence will be provided to justify this wording

P3A.10a *“New developments shall: Create places where people feel safe and that are easily accessible to all”*: There is complete flexibility in how this criterion is applied, but it is not appropriate to ‘soften’ a requirement for safety and accessibility

P3A.10b *“New developments shall: Incorporate safe and attractive pedestrian routes. Wherever possible, opportunities should be taken to provide pedestrian routes through a development to reduce the need for people to walk along existing roads”*: “Wherever possible, opportunities should be taken...” is non-prescriptive and provides ample flexibility

P3A.10c *“New developments shall: Where practical, along the rural lanes where there is no existing footway in place, provide solutions sensitive to the rural setting and to pedestrian safety (e.g. trod paths)”*: “Where practical” is non-prescriptive and provides ample flexibility

<p>P3A.10d <i>"New developments shall: Be designed, where viable, to be suitable for independent living and built to the accessible and adaptable dwellings M4(2) standard, and take into account the mobility needs of likely building occupants and visitors": "...where viable..."</i> is non-prescriptive and provides ample flexibility</p> <p>P3A.10e <i>"New developments shall: Incorporate design features that provide flexibility and adaptability for all potential residents at all stages of their lives, in line with the 'Lifetime Homes' standard":</i> Agree to prefix this criterion with "Wherever opportunities exist,"</p> <p>P3A.10f <i>"New developments shall: To promote social inclusion, social housing shall not be distinguishable from private housing by its design, nor should it be located in separate blocks or the least attractive part of a site":</i> To allow social housing to be distinguishable by its design by the use of the word "should" would harmfully detract from social inclusion and therefore be unacceptable. As worded, there is complete flexibility as to how this criterion is satisfied</p> <p>P3A.10g <i>"New developments shall: Incorporate an adequate number of suitably located sprinklers":</i> This is a fundamental safety requirement that will not be relaxed. "...adequate number.." provides suitable flexibility</p> <p>P3A.10h <i>"New developments shall: Where applicable and relevant, incorporate adaptations that address specific needs for increased public and individual safety in the face of Covid-19":</i> "Where applicable and relevant..." is non-prescriptive and provides ample flexibility</p> <p>Those criteria that it is agreed to modify are noted in the actions column</p>		
<p>P3A.3 <i>"Local Vernacular: Design Proposals shall be locally distinctive and incorporate Saham Toney's Character Vernacular".</i></p>	<p>From the notes of the meeting last year the aim was to bring to the fore the best architecture in the village and dampen the not so good, equally to avoid pastiche architecture.</p>	<p><i>'Design proposals should be locally distinctive and respond to Saham Toney's Character Vernacular whilst demonstrating chronological progression.'</i></p>
<p>STNP RESPONSE:</p> <p>Substitution of "shall" by "should" is not accepted, for the reason given in response to the previous comment. The additional wording at the end of the paragraph is agreed and will be added, but with the further addition of "where appropriate" since that may not be appropriate or desirable in every case and so, as suggested, could be seen as prescriptive</p>		<p>STNP ACTION TAKEN:</p> <p>Criterion revised as follows:</p> <p>Local vernacular: Design proposals shall be locally distinctive and incorporate Saham Toney's character vernacular, <u>whilst demonstrating chronological progression where appropriate</u></p>
<p>P3A.5 <i>"Built Form..... Any proposal exceeding two storeys shall be accompanied by a proportionate Landscape and Visual Appraisal that</i></p>	<p>Specifying exceeding two storeys above ground as within the design guide at paragraph 7.7 on page 22 - there is reference to sloping sites and creating levels without cut a fill (Fig 22 page 23), this would enable a three storey house with one level underground.</p>	

<i>demonstrates that no significant visual harm will result”.</i>		
<p>STNP RESPONSE: Both the policy criteria and the design guidance have been misinterpreted. Figure 22 of the guide clearly shows a two-storey dwelling with the lower floor ‘cut into’ the slope. If such a solution were adopted with three storeys, one of which was cut into the slope, in accordance with the policy a Landscape and Visual Appraisal would be required as on three elevations the dwelling would be three-storey. To clarify this, the policy will be reworded as shown in the actions column, and additional explanation of policy will be added the design guide will It is noted that the design policy takes precedence over the design guide should such questions of interpretation arise</p>		<p>STNP ACTION TAKEN: Amended policy criterion: P3A.5 Built form: The height, scale and layout of proposals should respond sensitively and complement positive features in the surrounding built form. Any proposal exceeding two storeys <u>above ground level at any of its elevations</u>, shall be accompanied by a proportionate Landscape and Visual Appraisal that demonstrates that no significant visual harm will result.</p>
<i>P3A.6 h) “Incorporate attractive and coherent boundary treatments which reflect the local vernacular”.</i>	Suggest a minor amendment.	<i>‘Incorporate attractive and coherent boundary treatments which reflect or enhance the local vernacular’.</i>
<p>STNP RESPONSE: Amendment agreed. Note the criterion in question is actually P3A.6 c)</p>		<p>STNP ACTION TAKEN: P3A.6 c) Incorporate attractive and coherent boundary treatments which reflect <u>or enhance</u> the local vernacular</p>
<i>P3A.7“Quality and security of design: Proposals shall: k) be assessed and show to perform positively against Building for Life 12;”</i>	Building for Life 12 contains 12 design principles and a development is attributed how well it performs against each by a traffic light system of red, amber and green with the aim of achieving 9 out 12 greens (although this criteria varies) It is mainly used at pre-app stage for developments of 10 or more houses to aid discussion about improving the design rather than a judging tool for the final design i.e. it’s a process tool.	Need to be more specific in its use.
<p>STNP RESPONSE: Criterion in question is actually P3A.7 a) We note that in response to the first Regulation pre-submission of the of the Plan (March 2018) Breckland Council required deletion of reference to ‘Building for Life 12’ when a policy criterion referred to achieving the maximum number of ‘greens’ against it</p>		<p>STNP ACTION TAKEN: Policy criterion P3A.7 a) will be deleted and replaced by:</p>

<p>That notwithstanding, we disagree that Building for Life is intended for use mainly at a pre-application stage. Included in the text on its first page, are the following statements:</p> <p>“Building for Life 12 is a government-endorsed industry standard for well-designed homes and neighbourhoods.”</p> <p>“BfL12 is also designed to help local planning authorities assess the quality of proposed and completed developments”</p> <p>‘Built for Life™’ accreditation is a quality mark available immediately after planning approval”</p> <p>“the ambition of the Built for Life partnership is to encourage hundreds of developments built across the country to use this standard for their design.”</p> <p>All of the above indicate that Building for Life 12 is intended for use, not only at pre-application stage, but to guide proposals that come forward</p> <p>Additionally, paragraph 129 of the NPPF guides local planning authorities towards making use of Building for Life 12 when assessing planning applications</p> <p>All of the above notwithstanding, after careful review, we consider that the other criteria of Policy 3A, amended only as show in the actions arising from these comments, other relevant policies of the Neighbourhood Plan, and the Parish Design Guide, adequately deal with the topics covered by Building for Life 12, and hence withdraw this criterion</p>		P3A.7 a) Demonstrate high quality design that results in attractive developments that have a positive impact on the local environment and community
<p>P3A.9 p) <i>“Ideally use locally sourced materials of low ecological/environmental impact and which are thermally efficient”.</i></p>	<p>There are very few locally sourced materials and am not aware that bricks are manufactured in Norfolk. Equally, most wood is exported to Norfolk.</p>	<p><i>‘Ideally use locally sourced materials of low ecological/ environmental impact and which are thermally efficient’.</i></p>
<p>STNP RESPONSE:</p> <p>Agreed</p>		<p>STNP ACTION TAKEN:</p> <p>Revised thus:</p> <p>P3A.9 b) Ideally use locally sourced materials of low ecological / environmental impact, and which are thermally efficient</p>
<p>t) <i>“Demonstrate a low carbon footprint by including a statement setting out the measures taken to achieve that and describing how design and layout minimises anticipated carbon emissions”.</i></p>	<p>How would this be demonstrated? Energy and Sustainability assessments are quite complex and expensive, which would have viability implications.</p>	<p>As a result of the viability implications this should only be applicable to major development e.g. 10 units or more.</p>
<p>STNP RESPONSE:</p> <p>Criterion is actually (f).</p>		<p>STNP ACTION TAKEN:</p> <p>P3A.9 f) amended thus:</p>

<p>Were we to restrict this requirement to major development, it would only apply to 29 of 70 new dwellings allocated by the Plan – i.e. about 60% of new homes in the parish would not be required to demonstrate a low carbon footprint. This would not be a good contribution to the Government’s stated intention of achieving carbon neutrality, and would be inconsistent with the fact that Breckland Council declared a climate emergency in 2019. The criterion as written does not stipulate use of an energy and sustainability assessment. That notwithstanding, viability is a short-term economic consideration, whereas climate change is a long-term global emergency. Having declared a climate emergency, Breckland Council should be expected to implement policies that tackle that. Criterion will be amended as given in the actions column. Policy implementation text will be added to describe how it might be applied</p>		<p>Demonstrate a low carbon footprint by including a statement <u>of proportionate detail</u> setting out the measures taken to achieve that and describing how design and layout minimises anticipated carbon emissions</p> <p>New implementation text: A flexible approach may be taken to demonstrating a low carbon footprint. For major development an energy and sustainability may be appropriate, but suitable alternate approaches will be acceptable. For minor development a simpler statement describing measures that will be implemented to reduce carbon footprint will suffice.</p>
<p><i>“z ii Non-residential development that exceeds 500m2 in floor area shall meet the relevant design category of Building Research Establishment BREEAM building standard “Excellent” and additionally...”</i></p>	<p>Would this require the developer to use BREEAM Assessment? This can be expensive, which would have viability implications.</p>	<p>It is unlikely that an examiner will accept standards lower or higher than the Building Regulations due to their legal status.</p>
<p>STNP RESPONSE:</p> <p>P3A.9 I) ii: We do not agree that viability should be used to block attenuation and mitigation of climate change, but will update the criterion as noted in the action column to address the concern over use of the BREEAM standard</p> <p>P3A.9 I) i: All residential development shall achieve emission rates lower than the target set by Building Regulations Part L 2013, and</p> <p>P3A.9 I) iii: All developments of 10 dwellings or more, or over 1,000 square metres of floorspace, (including conversion) where feasible, shall provide a 20% reduction in CO₂ emissions over Part L Building Regulations requirements (2013)</p>		<p>STNP ACTION TAKEN:</p> <p>P3A.9 I) ii revised as follows: Non-residential development that exceeds 500m² in floor area shall meet the relevant design category of Buildings Research Establishment BREEAM building standard “<u>excellent</u>”, <u>unless an open-book assessment shows that to have severe impact on viability,</u></p>

<p>Under the Climate Change Act, the Government has set ambitious targets for the reduction of carbon emissions. There have been many developments and much research relating to this topic since the Building Regulations were updated in 2013. It is widely accepted that measures that go beyond those regulatory requirements are required to achieve the necessary reduction in emissions. STNP seeks to be forward-looking in this respect, and we would respectfully refer Breckland Council to the NPPF requirement for a Plan to be “sufficiently flexible to adapt to rapid change”, since we would contend that climate change is a major area of rapid change, to a degree that cannot wait for regulations to “catch up” with measures widely accepted as necessary. Local planning authorities are bound by the legal duty set out in Section 19 of the 2004 Planning and Compulsory Purchase Act, as amended by the 2008 Planning Act, to ensure that, taken as whole, plan policy contributes to the mitigation of, and adaptation to, climate change. NPPF paragraph 149 requires that “Plans should take a proactive approach to mitigating and adapting to climate change...”. The requirements of (i) and (iii) are compatible with the targets of the Climate Change Act.</p> <p>Paragraph 148 of the NPPF states “The planning system should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions”</p> <p>During the passage of the Neighbourhood Planning Bill through the House of Lords on 6 February 2017, Baroness Parminter asked in relation to carbon dioxide emissions reductions: ‘... <i>can the Minister confirm that the Government will not prevent local councils requiring higher building standards? There is some lack of clarity about whether local authorities can carry on insisting in their local plans on higher standards. ... Will the Government confirm that they will not prevent local authorities including a requirement for higher building standards?</i>’ To which Lord Bourne replied: ‘<i>The noble Baroness asked specifically whether local authorities are able to set higher standards than the national ones, and I can confirm that they are able to do just that.</i>’ Subsequently, the draft revised NPPF consultation document gave the following signal: ‘The Clean Growth Strategy sets out the Government’s plans for consulting on energy performance standards in Building Regulations later this year. Local authorities can play an important role in improving the energy performance of buildings, in line with the ambitions of the Clean Growth Strategy, and this will be considered further as the Government develops its consultation proposals.’ ii It then specifically asked for feedback on whether paragraph 149b (relating to building standards) needed further amendment to reflect the ambitions in the Clean Growth Strategy to reduce greenhouse gas emissions from buildings. Furthermore, a 19% energy improvement standard (equivalent to Code for Sustainable Homes level 4) was adopted in Ipswich last year and by Brighton in 2016</p> <p>In consequence of the above, we consider that the Neighbourhood Plan is justified in setting standards above the building regulatory minimum, and that the targets set are modest in the context of the climate emergency and not onerous on developers.</p>	<p><u>in which case an alternate reduction in emission levels shall be proposed</u></p> <p>Policy supporting text will be added to justify P3a.9 (i) and (iii), in line with the response given</p>
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P3A.10 A safe, healthy and inclusive environment:	Suggest a minor amendment as current wording would suggest that such an approach is not required for existing residents.	gg) Incorporate design features for us potential residents at all stages of their lives
STNP RESPONSE: Agree to delete the word 'potential'		STNP ACTION TAKEN: Revised P3A.10 e) Incorporate design features that provide flexibility and adaptability for all potential residents at all stages of their lives, in line with the 'Lifetime Homes' standard

POLICY 3A: DESIGN (Draft update May 2020)

P3A.1 General: All proposals shall be guided by the most up to date version of the Saham Toney Village Design Guide, and demonstrate they are well-designed in a manner that reflects the varied local context and contributes positively to Saham Toney's distinctive rural character (as described in the Saham Toney Landscape Character Assessment). Planning applications will be expected to be accompanied by a statement which explains how the design principles underpinning a scheme complies with this Policy and the Saham Toney Village Design Guide.

P3A.2 Local context: New development shall:

- a) Respond positively to, and where possible, reinforce and enhance the best features of the local built environment; and
- b) Retain rural spaces between existing village settlement clusters to avoid their coalescence.

P3A.3 Local vernacular: Design proposals shall be locally distinctive and incorporate Saham Toney's character vernacular.

P3A.4 Local integration: Proposals shall:

- a) In the case of settlement edge proposals, give careful consideration to their integration and interface with the surrounding countryside;
- b) Where opportunities exist, provide good connectivity with the existing neighbourhood for pedestrians and cyclists and improve and extend the existing pedestrian footway and cycle network; and
- c) Respect the special rural character of the village lanes, which are generally bordered by grass verges with hedges which form important landscape features in the Parish, are valuable as wildlife habitats and are historically noteworthy.

P3A.5 Built form: The height, scale and layout of proposals should respond sensitively and complement positive features in the surrounding built form. Any proposal exceeding two storeys shall be accompanied by a proportionate Landscape and Visual Appraisal that demonstrates that no significant visual harm will result.

P3A.6 Layout and landscaping: Design and layout shall:

- a) Make use of opportunities to mitigate surface water flood risk by the incorporation of appropriate natural features;
- b) Increase the area of habitats that sequester and store carbon, including through an increase of tree cover;
- c) Incorporate attractive and coherent boundary treatments which reflect the local vernacular;
- d) Where applicable, contribute to the enhancement of Key Views; and
- e) In the case of residential proposals include appropriate rear garden spaces.

P3A.7 Quality and security of design: Proposals shall:

- a) Be assessed and shown to perform positively against Building for Life 12; and

- b) Be in accordance with the principles set out in the Police initiative "Secured by Design", and development proposals aimed at improving community safety will be supported.

P3A.8 Respect for the historic environment: Design and layout shall:

- a) Make use of opportunities there may be to enhance or better reveal the significance and setting of the historic environment; and
- b) Not materially impact the significance of any building defined in Policy 6 as a heritage asset or its setting; or if such impact would occur, be justified by a proportionate impact assessment and mitigation proposal.

P3A.9 Sustainable construction and design: Developments meeting the following criteria shall be encouraged and supported:

- a) Based on established principles of sustainable construction;
- b) Ideally use locally sourced materials of low ecological / environmental impact, and which are thermally efficient;
- c) Utilise paved surface materials that are appropriate to the setting and which are preferably permeable;
- d) Be sensitive to the use and conservation of water;
- e) Demonstrate how climate change adaptation and mitigation measures have been incorporated in the design;
- f) Demonstrate a low carbon footprint by including a statement setting out the measures taken to achieve that and describing how design and layout minimises anticipated carbon emissions;
- g) As far as practical, be oriented to optimise passive solar gain;
- h) Promote rainwater capture for re-use;
- i) Deliver the highest viable energy efficiency;
- j) Be in accord with the energy hierarchy;
- k) Where possible, secure at least 10% of their total unregulated energy from renewable or low carbon sources;
- l) Development that gives rise to zero emissions to air shall be strongly encouraged, and as a minimum:
 - i. All residential development shall achieve emission rates lower than the target set by Building Regulations Part L 2013;
 - ii. Non-residential development that exceeds 500m² in floor area shall meet the relevant design category of Buildings Research Establishment BREEAM building standard "excellent"; and additionally
 - iii. All developments of 10 dwellings or more, or over 1,000 square metres of floorspace, (including conversion) where feasible, shall provide a 20% reduction in CO₂ emissions over Part L Building Regulations requirements (2013);
- m) Maximise the use of renewable energy and energy conservation measures; and
- n) Adhere to the requirements of Policy 8H, Design of Sustainable Drainage Systems.

P3A.10 A safe, healthy and inclusive environment: New developments shall:

- a) Create places where people feel safe and that are easily accessible to all;

- b) Incorporate safe and attractive pedestrian routes. Wherever possible, opportunities should be taken to provide pedestrian routes through a development to reduce the need for people to walk along existing roads;
- c) Where practical, along the rural lanes where there is no existing footway in place, provide solutions sensitive to the rural setting and to pedestrian safety (e.g. trod paths);
- d) Be designed, where viable, to be suitable for independent living and built to the accessible and adaptable dwellings M4(2) standard, and take into account the mobility needs of likely building occupants and visitors;
- e) Incorporate design features that provide flexibility and adaptability for all potential residents at all stages of their lives, in line with the 'Lifetime Homes' standard;
- f) To promote social inclusion, social housing shall not be distinguishable from private housing by its design, nor should it be located in separate blocks or the least attractive part of a site; and
- g) Incorporate an adequate number of suitably located sprinklers; and
- h) Where applicable and relevant, incorporate adaptations that address specific needs for increased public and individual safety in the face of Covid-19.

APPENDIX B4. Pre-Submission Consultation August-October 2019: Statutory and Non-Statutory Consultee Comments and STNP Responses

B4.1. Representation by Sport England

RESPONDING ORGANISATION: Sport England	DATE: 19 August 2019
<p>REPRESENTATION(S):</p> <p>Thank you for consulting Sport England on the above neighbourhood plan.</p> <p>1) Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>2) It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document. http://www.sportengland.org/playingfieldspolicy</p> <p>3) Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded. http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</p> <p>4) Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>5) Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work. http://www.sportengland.org/planningtoolsandguidance</p>	

6) If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

7) Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

8) In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, 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 planning policies and developing or assessing individual proposals.

9) Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

Link a) NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

Link b) PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Link c) 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.)

If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Yours sincerely,

Planning Administration Team
Planning.central@sportengland.org



RELEVANT SECTION(S) OF PLAN:

Policies 3A, 4 and 7C

REACTION TO REPRESENTATION(S)

This is a very general and perhaps standard comment. Other than the protection of existing sports facilities there are no specific measures in the Plan for sports facilities. For anything else that arises in

respect of sport and recreation, the Neighbourhood Plan defers to, and does not duplicate, the relevant policies of the Breckland Local Plan

Para 1: Noted

Para 2: Saham Toney has a recreational area, including children's play area and adult fitness equipment, at the Wells Cole Community Centre, and a separate sports field. Both are protected in the Plan against development by their designation as community facilities in Policy 4 and as Local Green Spaces in Policy 7C. An assessment of the need for open space, sport and recreation facilities in line with Para. 96 of the NPPF was undertaken as part of the evidence for the Breckland Local Plan and did not specify additional needs for Saham Toney. Para. 97 of the NPPF is satisfied with by Policies 4 and 7C.

Para 3: Noted

Para 4: As Para 2

Para 5: As Para 2

Para 6: The Neighbourhood Plan does not propose new or improved sports facilities

Para 7: The Neighbourhood Plan defers to the Breckland Local Plan in this respect

Para's 8, 9 and links a, b, c: Addressed by the National Planning Policy Framework, Planning Practice Guidance and the Local Plan. There is no need to replicate this information in the Neighbourhood Plan

ACTION TAKEN:

None required

Para 1: None required

Para 2: None required

Para 3: None required

Para 4: None required

Para 5: None required

Para 6: None required

Para 7: None required

Para's 8, 9 and links a, b, c: Noted. We agree with the principles stated and consider that the Neighbourhood Plan as a whole, through its policies will assist in facilitating more active and healthy lifestyles for parishioners. Reference to Sport England's Active Design guidance has been added to policy supporting text.

B4.2. Representation by Highways England

RESPONDING ORGANISATION: Highways England	DATE: 20 August 2019
REPRESENTATION(S): Thank you for consulting Highways England on the draft Saham Toney Neighbourhood Plan. Highway England is responsible for the Strategic Road Network (SRN) which in this area of Norfolk is the A11 and the A47. The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. Saham Toney is somewhat remote from the SRN and consequently the policies set out in the neighbourhood plan are unlikely to have a significant impact on our network. We therefore have no comments to offer on this consultation. Yours sincerely Connor Adkins Connor Adkins Highways England Woodlands Manton Lane Bedford MK41 7LW	

Tel: +44 (0) 300 4704744
Web: <http://www.highways.gov.uk>
GTN: 0300 470 4744

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Highways England Company Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF | <https://www.gov.uk/government/organisations/highways-england> | info@highwaysengland.co.uk

Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ

RELEVANT SECTION(S) OF PLAN:

Not applicable

REACTION TO REPRESENTATION(S)

Noted

ACTION TAKEN:

None required

B4.3. Representation by Norfolk Police

RESPONDING ORGANISATION: Norfolk Police	DATE: 21 August 2019
REPRESENTATION(S): <u>Saham Toney– Neighbourhood Plan – Response to Consultation</u> I refer to the above matter and the consultation. Norfolk Constabulary has the responsibility for policing making Norfolk a safe place where people want to live, work, travel and invest in. Central Government place great emphasis on the role of the Police. Furthermore, National Planning Policy Framework (NPPF) gives significant weight to promoting safe communities (in section 8 of the NPPF). This is highlighted by the provision of paragraph 91 which states Planning policies and decisions should aim to achieve healthy, inclusive and safe places which..... b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high-quality public space, which encourage the active and continual use of public areas; Nationally the Police have sought to provide advice and guidelines to support and create safer communities, most notably reflected in their Secured By Design initiative which seek to improve the security of buildings and their immediate surroundings to provide safe places to live.	

In terms of creating and maintaining safer communities, there are a number of measures that should be included in the Neighbourhood Plan to ensure that it satisfactorily addresses NPPF provisions and the needs of the Neighbourhood Plan area.

1. The Neighbourhood Plan should include the specific objective to 'create and maintain a safer community and reduce crime and disorder'.
2. The Neighbourhood Plan should clearly support the principles of crime prevention through good design as the design and layout of the built environment plays an important role in designing out crime and reducing the opportunities for anti-social behaviour. The Neighbourhood Plan should include a policy that 'All new developments should conform to the 'Secured by Design' principles and the Neighbourhood Plan will support development proposals aimed at improving community safety'. This would be supported by the objective to 'create and maintain a safer community and reduce crime and disorder'.
3. The Neighbourhood Plan should include clear reference to the use of developer contributions and / or CIL monies to deliver local initiatives that create safer communities (and reduce crime). This should include measures identified by Norfolk Constabulary, along with County and District Council's infrastructure studies and infrastructure delivery plans, to contribute to the finance of police / bluelight infrastructure (including premises, vehicles, operational equipment and communication equipment).

I trust that these elements will be incorporated into Neighbourhood Plan objectives and policies to reduce the opportunities for crime and disorder (and also help reduce the fear of crime in the Neighbourhood Plan area) to ensure that the Plan is consistent with the emphasis that Government places on creating safer communities.

Kind regards,

Penny

Penny Turner

Architectural Liaison & Crime Reduction Officer

Broadland and North Norfolk

Community Safety Neighbourhood Policing Team

Email: [email withheld](#)

RELEVANT SECTION(S) OF PLAN:

Comment 1 applies to section 5.2

Comment 2 applies to Policy 3A: Design

Comment 3 applies to Policies 1 and 3A.

REACTION TO REPRESENTATION(S)

Comment 1: Noted. We agree with the proposed objective, but do not consider it appropriate to include it as a principal objective in the Neighbourhood Plan, which is primarily addressing land-use matters at Parish level. The current objective C1: "To maintain and enhance the village's community facilities and improve access to them", is relevant and would cover matters relating to community safety.

Comment 2: Policy 3A as published at Regulation 14 states: "Proposals shall be in accordance with the principles set out in the Police initiative "Secured by Design", which covers the first suggestion in the comment. The addition of a further criterion under P3A.7 to reflect the suggested "All new developments should conform to the 'Secured by Design' principles and the Neighbourhood Plan will

support development proposals aimed at improving community safety”, will be considered in conjunction with comment 1, but may be unnecessary since that is an inherent requirement of “Secured by Design” which the policy already references. There is no need to create a new policy to deal with this.

Comment 3: Noted. It is considered that this aspect is covered by Breckland Local Plan Policy INF 02 ‘Developer Contributions’ and paragraph 8.11 of that Plan, and hence does not require duplication in the Neighbourhood Plan. It is further noted that under the Town and Country Planning Act and Planning Practice Guidance, planning obligations may only constitute a reason for granting planning permission if they meet the tests that they are necessary to make the development acceptable in planning terms.

They must be:

- a) necessary to make the development acceptable in planning terms;
- b) directly related to the development; and
- c) fairly and reasonably related in scale and kind to the development.

General contributions to deliver local initiatives, including those identified by Norfolk Police (who in this representation have not actually identified any Parish-specific measures) would not meet these tests and so cannot be included in the Neighbourhood Plan.

ACTION TAKEN:

Comment1: None required.

Comment 2: Policy 3A criterion P3A.7g (previously sub-item b) amended from “Be in accordance with the principles set out in the Police initiative “Secured by Design.” to “Be in accordance with the principles set out in the Police initiative “Secured by Design”, and include appropriate measures aimed at improving community safety”.

Comment 3: None required.

B4.4. Representation by Natural England

RESPONDING ORGANISATION: Natural England	DATE: 29 August 2019
REPRESENTATION(S): Our ref: 292319 Thank you for your consultation. Natural England has previously commented on this proposal, our ref. 241150, and made comments to the authority in our letter dated 26 April 2018. I enclose a copy of the response for your reference. The advice provided in our previous response applies equally to this proposal although we made no objection to the original proposal. Yours sincerely Clare Foster Natural England Consultation Service Operations Delivery Hornbeam House Crewe Business Park Electra Way, Crewe Cheshire, CW1 6GJ Tel: 0300 060 3900 Email: consultations@naturalengland.org.uk www.gov.uk/natural-england	

The above response references an earlier response to the previous Regulation 14 consultation (March-April 2018) which Neighbourhood Plan Work Group has no record of. However, its text was attached to the above response as follows:

Dear Mr Blow

Thank you for consulting Natural England on the Saham Toney Draft Neighbourhood Plan. As you will be aware, Saham Toney is near Breckland Special Protection Area (SPA), Breckland Farmland Site of Special Scientific Interest (SSSI) and Wayland Wood SSSI.

However, we are not concerned about these sites in this case due to the fact the plan does not propose housing that is not allocated within the local plan (which will be subject to ecological assessment and HRA where appropriate). However, note that even 5-10 houses within the 1.5km Breckland SPA buffer put in place to protect stone curlew, a qualifying species of Breckland SPA and Breckland Farmland SSSI, can result in significant effects on the species population (particularly when considered in-combination) so we would advise you not to encourage residential development within this zone.

We welcome the policies concerning, the environment, green infrastructure and landscape.

Best wishes

Francesca Shapland

RELEVANT SECTION(S) OF PLAN:

None specifically

REACTION TO REPRESENTATION(S)

Noted

ACTION TAKEN:

None required, no housing allocated in the Breckland SPA buffer zone

B4.5. Representation by The National Grid

RESPONDING ORGANISATION: Wood plc on behalf of The National Grid	DATE: 20 September 2019
<p>REPRESENTATION(S): <u>Saham Toney Neighbourhood Plan Consultation</u></p> <p>National Grid has appointed Wood to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.</p> <p>About National Grid</p> <p>National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales and National Grid Electricity System Operator (NGESO) operates the electricity transmission network across the UK. The energy is then distributed to the eight electricity distribution network operators across England, Wales and Scotland.</p> <p>National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.</p> <p>National Grid previously owned part of the gas distribution system known as 'National Grid Gas Distribution limited (NGGDL). Since May 2018, NGGDL is now a separate entity called 'Cadent Gas'.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect National Grid's assets.</p> <p>Specific Comments</p>	

An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines.

National Grid has identified that it has **no record** of such apparatus within the Neighbourhood Plan area.

Electricity Distribution

The electricity distribution operator in Breckland Council is UK Power Networks. Information regarding the transmission and distribution network can be found at: www.energynetworks.org.uk

Appendices - National Grid Assets

Please find attached in:

- Appendix 1 provides a map of the National Grid network across the UK.

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database.

Lucy Bartley

Consultant Town Planner

Spencer Jefferies

Development Liaison Officer, National Grid

n.grid@woodplc.com box.landandacquisitions@nationalgrid.com

Wood E&I Solutions UK Ltd

Nicholls House

Homer Close

Leamington Spa

Warwickshire

CV34 6TT

National Grid House

Warwick Technology Park

Gallows Hill

Warwick

Warwickshire

CV34 6DA

I hope the above information is useful. If you require any further information, please do not hesitate to contact me.

Yours faithfully

[via email]

Lucy Bartley

Consultant Town Planner

cc. Spencer Jefferies, National Grid

Appendix 1: National Grid's UK Network

Where we operate
Our UK network



RELEVANT SECTION(S) OF PLAN:

General

REACTION TO REPRESENTATION(S)

There are no comments specific to the Neighbourhood Plan

ACTION TAKEN:

None required

B4.6 Representation by Gladman Developments Ltd

RESPONDING ORGANISATION:

Gladman Developments Ltd

DATE:

25 September 2019

REPRESENTATION(S):

1) Re: Saham Toney Neighbourhood Plan – Regulation 14 consultation

This letter provides Gladman Developments Ltd (Gladman) representations in response to the draft version of the Saham Toney Neighbourhood Plan (STNP) under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012. This letter seeks to highlight the issues with the plan as currently presented and its relationship with national and local planning policy. Gladman has considerable experience in neighbourhood planning, having been involved in the process during the preparation of numerous plans across the country, it is from this experience that these representations are prepared.

2) Legal Requirements

Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the STNP must meet are as follows:

(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.

- (d) The making of the order contributes to the achievement of sustainable development.
- (e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
- (f) The making of the order does not breach, and is otherwise compatible with, EU obligations.
- (g) The making of the neighbourhood plan does not breach the requirements of Chapter 8 of part 6 of the Conservation of Habitats and Species Regulations 2017.

3) National Planning Policy Framework

On 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the Revised National Planning Policy Framework (NPPF2018). This publication forms the first revision of the Framework since 2012 and implements changes that have been informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and the draft NPPF2018 consultation. This version was itself superseded on the 19th February 2019, when MHCLG published a further revision to the NPPF (2019) which implements further changes to national policy, relating to the Government's approach for Appropriate Assessment as set out in Paragraph 177, clarification to footnote 37 and amendments to the definition of 'deliverable' in Annex 2.

4) National Planning Policy Framework and Planning Practice Guidance

The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role they play in delivering sustainable development to meet development needs.

At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through plan-making and decision-taking. This means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. This requirement is applicable to neighbourhood plans.

The recent Planning Practice Guidance (PPG) updates make clear that neighbourhood plans should conform to national policy requirements and take account of and most up-to-date evidence of housing needs in order to assist the Council in delivering sustainable development, a neighbourhood plan basic condition.

The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 13 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.

Paragraph 15 further makes clear that neighbourhood plans should set out a succinct and positive vision for the future of the area. A neighbourhood plan should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.

Paragraph 29 of the Framework makes clear that a neighbourhood plan must be aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.

5) Planning Practice Guidance

Following the publication of the NPPF (2018), the Government published updates to its Planning Practice Guidance (PPG) on 13th September 2018 with further updates being made in the intervening period. The updated PPG provides further clarity on how specific elements of the Framework should be interpreted when preparing neighbourhood plans.

Although a draft neighbourhood plan must be in general conformity with the strategic policies of the adopted development plan, it is important for the neighbourhood plan to provide flexibility and consider the reasoning and evidence informing the emerging Local Plan which will be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested against. For example, the neighbourhood planning body should take into consideration up-to-date housing needs evidence as this will be relevant to the question of whether a housing supply policy in a neighbourhood plan contributes to the achievement of sustainable development. Where a neighbourhood plan is being brought forward before an up-to-date Local Plan is in place, the qualifying body and local planning authority should discuss and aim to agree the relationship between the policies in the emerging Neighbourhood Plan, the emerging Local Plan and the adopted Development Plan¹. This should be undertaken through a positive and proactive approach working collaboratively and based on shared evidence in order to minimise any potential conflicts which can arise and ensure that policies contained in the neighbourhood plan are not ultimately overridden by a new Local Plan.

It is important the neighbourhood plan sets out a positive approach to development in their area by working in partnership with local planning authorities, landowners and developers to identify their housing need figure and identifying sufficient land to meet this requirement as a minimum.

Furthermore, it is important that policies contained in the neighbourhood plan do not seek to prevent or stifle the ability of sustainable growth opportunities from coming forward.

¹ PPG Reference ID: 41-009-20160211

6) Relationship to Local Plans

To meet the requirements of the Framework and the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan.

Saham Toney Neighbourhood Plan Area falls within the administration of Breckland District Council and therefore will be tested against the 'Core Strategy and Development Control Policies Document', adopted in 2009, and the 'Site Specifics Policies and Proposals', adopted in 2012. The Core Strategy outlines the vision and overall objectives for development in the district up to 2026 and details where new housing and other development should be focused. Saham Toney is identified as a Service Centre Village, it is noted that the settlement '...will not see a positive housing allocation for the remainder of the plan period, but will see between them at least 100 homes developed from existing commitments'. Whilst, the Site Specific Policies and Proposals document allocates areas of land for different uses to deliver the requirement of the Breckland Core Strategy and thus meet the development needs of the District up to 2026 but does not refer to the settlement of Saham Toney.

Breckland Council are currently working towards producing a new Local Plan which will replace the Core Strategy and documents making up the adopted Local Plan. The emerging Local Plan (2011-2036) was submitted for examination on 30th November 2017 with Jonathan Manning appointed by the Secretary of State to carry out an independent examination of our Local Plan. Following hearing sessions into the new Local Plan, a final round of consultations on the main modifications took place between 30th May and 12th July 2019.

The emerging plan sets out a housing target of 5,069 dwellings over the plan period to 2036 with 50% of the housing growth located in 'Key Settlements', including, Attleborough and Thetford. Saham Toney is

identified as a tier 4 'Village with boundaries' settlement with no specific housing growth target set for individual settlements, rather, 150 dwellings are set for the tier to 2036.

It is likely that the Local Plan will be adopted prior to the examination of the STNP therefore the neighbourhood plan should be sufficiently aligned with the strategic policies of the emerging Local Plan, to avoid risk of the STNP failing at examination. Should this not be the case, policies within the STNP should be drafted with sufficient flexibility to ensure conflicts are minimised and ensure the STNP is capable of being effective over the duration of its plan period and not ultimately superseded by s38(5) of the Planning and Compulsory Purchase Act 2004, which states that:

"if to any extent, a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approached, or published (as the case may be)."

7) Saham Toney Neighbourhood Plan

This section highlights the key issues that Gladman would like to raise with regards to the content of the STNP as currently proposed. It is considered that some policies do not reflect the requirements of national policy and guidance, Gladman have therefore sought to recommend a series of alternative options that should be explored prior to the Plan being submitted for Independent Examination.

8) Policy 2E: Housing Mix

Gladman support the general thrust of Policy 2E which seeks to ensure an appropriate mix of new housing types and tenures to meet the housing needs of the local community. However, housing mix will inevitably change over a period of time and this policy should seek to secure a greater degree of flexibility going forward.

As local housing needs can change over time, there is a risk that Policy 2E will become outdated as new evidence of local need comes to light and the neighbourhood plan should contain suitable measures, so it can positively respond to changes in circumstance which may arise over the plan period. Gladman suggest that a modification to this element of the policy is included which takes account of 'the most up-to-date housing needs evidence available'.

9) Policy 3A: Design

Policy 3A sets out a range of design principles which development proposals should seek to meet. While the government has shown support for development incorporating good design principles, Gladman would note that the Framework also states:

'To provide maximum clarity about design expectations at an early stage, plans or supplementary planning documents should use visual tools such as design guides and codes. These provide a framework for creating distinctive places, with a consistent and high-quality standard of design. However, their level of detail and degree of prescription should be tailored to the circumstances in each place and should allow a suitable degree of variety where this would be justified.'⁴ (NPPF – Paragraph 126)

Whilst Gladman recognise the importance of high-quality design, in accordance with the above Framework requirements, design policies should not aim to be overly prescriptive and require some flexibility in order for schemes to respond to site specific issues and the character of the local area. In essence, there should not be a 'one size fits all' solution in relation to design, and sites should be considered on a site-by-site basis with consideration given to various design principles.

It is acknowledged that the policy seeks to encourage applications to be in accordance with Building for Life 12. These elements are considered more of an aspiration of the policy and should there not be referred to in the policy wording itself and it would be more suitable if these principles were referred to solely in the supporting text.

10) Conclusions

Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has sought to clarify the relation of the Saham Toney Neighbourhood Plan as currently proposed with the requirements of national planning policy and the strategic policies for the wider area.

Gladman hopes you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team.

Yours faithfully,

Josh Plant

Gladman Developments Ltd.

RELEVANT SECTION(S) OF PLAN:

- 1: General
- 2: General
- 3: General
- 4: General
- 5: General
- 6: General; site allocation policies
- 7: General
- 8: Policy 2E
- 9: Policy 3A
- 10: General

REACTION TO REPRESENTATION(S)

- 1: Noted
- 2: Noted. National and local planning rules and guidance have been taken fully into account when preparing the Neighbourhood Plan and the Basic Conditions Statement that will be prepared for the Regulation 15 submission of the Plan will demonstrate that without a need to make any changes to the present plan.
- 3: Noted. The Neighbourhood Plan takes account of the most up to date version of the NPPF at the time of its publication for Regulation 14 pre-submission consultation (19 August 2019), including all amendments noted in the comment.
- 4: Noted. The Neighbourhood Plan conforms to national policy requirements and by its use of the Saham Toney Housing Needs Assessment, May 2019, makes use of the most up to date and relevant evidence of housing needs. The Neighbourhood Plan supports strategic development needs set out in the Breckland Local Plan and plans positively to support local development by allocating sites for a total of 83 new houses; set against the Local Plan target of 33 for Saham Toney. Section 5.1 of the Plan sets out a succinct and positive vision for the future of the area.
- 5: Noted. The Neighbourhood Plan conforms with the strategic policies of both the adopted development plan and the emerging Local Plan, and by its use of the Saham Toney Housing Needs Assessment, May 2019, makes use of the most up to date and relevant evidence of housing needs. The Plan has been developed in very close consultation and cooperation with the Local Planning Authority. The housing needs target in the Local Plan is 33; the Neighbourhood Plan allocates sites for 83 new houses, which shows a very positive approach.
- 6: The Plan fully complies with both 'Core Strategy and Development Control Policies Document', adopted in 2009, and the 'Site Specifics Policies and Proposals', adopted in 2012. It also fully complies with the emerging Local Plan, including all relevant Main Modifications raised during examination and confirmed in the Local Plan examination report as published October 2019. An error in the representation is noted with respect to the housing allocation made in the emerging Local Plan for Saham Toney. That allocation is not in fact a share of 150 dwellings with other Villages with Boundaries

as stated; but rather a specific allocation of 33 new dwellings, as set out in the confirmed examination main modifications. By its site allocations the Saham Toney Neighbourhood Plan promotes 83 new dwellings, which is clearly in excess of the Local Plan target, demonstrating that the Plan very positively meets Saham Toney’s housing needs.

7: Noted

8: With respect to Policy 2E the representation proposes a policy modification to include reference to ‘the most up-to-date housing needs evidence available’. In fact, this is already covered in “Supporting Text – Implementation” under T2E.2 (subsequently merged with T2E.1), which allows for the use of more up to date information should it be available, but emphasizes that must be data relevant to the Neighbourhood Area specifically.

9: With respect to Policy 3A the representation suggests that the Policy adopts a “one size fits all” approach and is over prescriptive. That is not the case as the policy fully allows design to be tailored to suit the area in which any site is located and consists of general principles rather than overly strict requirements. Additionally, the Saham Toney Village Design Guide covers a range of design options and sets them out in a way that is clearly not prescriptive, but allows ample flexibility. This aspect of the representation is not accepted as valid. The representation further seeks to portray reference to “Building for Life 12” as an aspiration that should thus be moved to supporting text. In fact, that is not an aspiration but a formal policy requirement that is fully supported by the latest version of the National Planning Policy Framework (particularly paragraph 129). As such it will remain a policy criterion rather than a supporting text aspiration.

10: Noted

Additionally, to the representations made, it is pleasing to note that no comments are made on the Plan’s site allocation policies, which if they are acceptable to a major developer, must add to the evidence that those policies are sound, fair and reasonable.

ACTION TAKEN:

1: None required

2: None required

3: None required

4: None required

5: None required

6: None required

7: None required

8: None required or justified

9: None required or justified

10: None required

B4.7. Representation by EJW Planning

<p>RESPONDING ORGANISATION: EJW Planning, on behalf of Mr & Mrs Sinclair, owners of allocated sites STNP4, 5, 6 and 7</p>	<p>DATE: 01 October 2019</p>
<p>REPRESENTATION(S): I am instructed by Mr and Mrs Sinclair owners of site STNP 4,5,6 and 7 to make representations in respect of the draft allocations and supporting policies. Having reviewed the policies I am concerned that as currently drafted these are generally too restrictive and place onerous burdens on any potential developer, to provide a level of supporting information that cannot be justified for the scale of development proposed. That said, the suggested level of development for each site is very low. I note that the AECOM study indicates that 22 dwph would provide an appropriate form of development. However, in most cases the policies are showing a density of closer to 10 dwph. This means that developments would not be making best use of available land, particularly those sites that are previously</p>	

developed (see NPPF). The proposed sites would provide for small-scale developments. I note that in each case you have requested that applications are supported by Transport Statements. The scale of development proposed would not, either individually, or cumulatively generate an increase in vehicle movements sufficient to warrant a transport assessment. It is unreasonable therefore to request the applicant to provide such information. Whilst it is important that any new development makes a positive contribution to the local character and distinctiveness of Saham Toney, it is not necessary for a Landscape and Visual Impact Assessment to be prepared in respect of the individual sites. The level of supporting documentation should be proportionate to the scale of development proposed and no more than is sufficient to understand the potential impact of the proposal on the site and its surroundings. I also note with regard to timing that the developments are phased across the Plan Period to 2036. It is likely that some, or all of these sites will be developed by a single developer. If this is the case then it would not be desirable or viable for a developer to build out a few units, complete the site removing their equipment, site compound and mobilising resources to come back and start again at a later date. A better planned development can be achieved if these sites are taken together and masterplanned to provide a cohesive form of development that is phased to be delivered over a single time period. Policy Map 21.1 STNP5 shows approximately 20% of the site as remaining undeveloped and the remainder of the site limited to single storey development. In my view the topography of the land limits any long-distance views of The Mere as what is seen is just the top of the trees that screen The Mere. I have further reviewed the Saham Toney Parish Landscape Assessment and note that does not suggest any restriction on development of the southern part of this site. There is therefore no 'reasoned justification' to exclude the southern portion of the site and no need to limit development to single storey dwellings. If all of the dwellings were to be single storey the resulting development could appear rather a homogeneous in the context of existing development to the south east. It would be better to have some variety of house types ranging from single storey, to one and half storey and two-story houses, carefully laid out making best use of the topography and landscape in this part of Pound Hill.

RELEVANT SECTION(S) OF PLAN:

Site allocation policies 2F, 2I, 2J, 2K and 2L

REACTION TO REPRESENTATION(S)

1. Regarding overly restrictive policies and burdensome level of supporting information required from site developers:

This comment lacks clarity as to which criteria are considered restrictive or onerous and is thus impossible to respond to specifically. However, in its comments on the Plan, Breckland Council (the Local Planning Authority) has made specific representations on certain policy aspects that it considers to be restrictive or onerous. Those comments have been discussed and resolved with the Council, and it is considered that if the Local Planning Authority is satisfied with revisions agreed to be made to the Plan, that will adequately address these very general comments.

2. Regarding the scale of development:

Firstly, it is pointed out that the site capacities are entirely in line with the proposals put forward by the owners of the four sites in question in response to a Call for Sites in August 2018.

The AECOM study referred to (i.e. The Saham Toney Neighbourhood Plan Site Assessment Report, July 2019) has been misunderstood / misinterpreted / taken out of context. It does not state that “22 *dwph* would provide an appropriate form of development” as noted in the comment: instead it refers to Policy DC2 of the Breckland Core Strategy by noting “*Policy DC2 of the Core Strategy provides that for rural areas a density range of 22-30 dwellings should be considered whereas the Local Plan refers to applying densities in line with the surrounding context. On this basis 22 dwellings per hectare has been applied within our calculations/ The indicative housing capacities have been calculated so that the sites can be compared and because it is useful to have an idea of capacity when planning to meet an identified requirement.*” It goes on to say “*Different densities than suggested in this report may be appropriate to apply to the sites in the NDP (resulting in different capacities) due to the rural nature of the Neighbourhood Area and given site specific circumstances. It is recommended that the number of houses allocated per site responds approximately to the existing density of the village’s built up area*”

and appropriate for the context and setting of the site, considering the site-specific characteristic and constraints. Finally, the report states ***“The site capacities stated are for illustrative purposes only.”***

The latter clearly shows that AECOM in no way intended to indicate that 22 dph was an appropriate density for any or all sites.

Furthermore, reference to the Core Strategy requirement is irrelevant: The Neighbourhood Plan will be submitted for examination only after adoption of the Local Plan, which does not include such numeric criteria for site capacity. {Note: The Local Plan was adopted on 28 November 2019, thus verifying this response}

Additionally, with regard to site density, Breckland Council has made no comments objecting to the provisions of Policy 3D: Density of Residential Developments, which is justified in the policy’s supporting text, including by reference to relevant paragraphs of the NPPF, which support the approach taken. The policy is also supported by the fact that infrastructure, landscape and flood risk constraints limit the level of housing that may be delivered.

Both the Saham Toney Site Assessment Report and Site Selection Report rigorously (and in the case of the former, independently) examine a wide range of criteria in reaching conclusions about whether a site is suitable for development and if it is, to what capacity. Of particular note in this respect for the 4 sites in question are impact on area of high visual landscape sensitivity, surface water flood risk and heritage impact.

Furthermore, the Local Highways Authority assessment of sites put forward for allocation in the Neighbourhood Plan stated that the Authority would only support development of only one of the 4 sites coming forward for a maximum of 25 dwellings. The landowners were made aware of this constraint several months before pre-submission of the Plan, and declined to offer mitigating measures to this Highways constraint. The Plan does offer such measures and in doing so at the pre-submission stage, via the Site Selection Report, justified a maximum of 38 dwellings on the 4 sites. The pre-submission version of the Site Selection Report demonstrated that that level of development was only borderline acceptable in terms of landscape impact. Subsequently, Locality-funded technical support was secured by the Neighbourhood Plan Group in order to undertake masterplanning studies to accompany the larger proposed site allocations. Those masterplanning studies and a professional review of landscape impact showed sites STNP5 and 6 to be unacceptable in terms of landscape impact (see the submission version of the Site Selection Report for details). As a result, those two draft site allocations have been removed from the Plan, and a total of 25 houses are now being proposed to be allocated on sites STNP4 and 7.

The Local Highways Authority repeated its previous comment (regarding the cumulative impacts of the four sites) in its pre-submission consultation response (see section B.4.8)

In follow-up correspondence clarifying its pre-submission consultation response (see B4.8) the Local Highways Authority “softened” its restriction on overall capacity for sites STNP4-7, (revised comments on “numbers and cumulative impacts, see B4.8); as explained in the reaction to those revised comments, it was not appropriate to apply that relaxation in the context of other more suitable site allocations and unresolved concerns about junction safety, which the Local Highways Authority clarifications did not explicitly remove.

Taking into account all of the above, there is no justification to increase the capacity of any of the 4 sites. Indeed, because of the identified harmful landscape impact of sites STBP5 and 6, those have been removed from allocation. In conjunction with that the capacity of site STNP4 has been increased to 17 dwellings.

3. Regarding the policy requirement for Traffic Impact Reports (referred to as Transport Statements in the representation)

This requirement was added to the site policies in an attempt to mitigate the capacity constraint identified by the Local Highways Authority (see item 2). That constraint related to junction capacity; hence a Transport Statement offered an applicant the opportunity to demonstrate to both the Local Highways Authority and Local Planning Authority that a proposal could be satisfactorily accommodated by the highway network and that cumulatively a higher capacity for the 4 sites than the Highways limit of 25 would be acceptable. In its pre-submission consultation response and subsequent clarification

thereof, the Highways Authority rescinded that limit and advised that they would not require junction capacity assessments of any of the allocated sites. In addition, a transport study was commissioned and showed the individual and cumulative impact of all allocated sites to be acceptable. For both reasons the requirement for Traffic Impact Reports has been deleted.

4. Regarding the policy requirement for the provision of Landscape and Visual Impact Assessments

All 4 sites are in an area of high visual sensitivity and medium-high combined landscape sensitivity, as defined by the Saham Toney Parish Landscape Character Assessment of January 2019. That assessment highlights how sensitive the area in question is to development (relevant extracts of the Assessment can also be found in section 13.7 of the Site Selection Report).

The combined landscape impact assessment of the 4 sites included in the pre-submission Site Selection report showed that impact to be only borderline acceptable for the number of dwellings allocated for the 4 sites. Any increase would change that result to unacceptable. Subsequent masterplanning studies and a professional review of landscape impact showed sites STNP5 and 6 to be unacceptable in terms of landscape impact (see the submission version of the Site Selection Report for details) and hence they were removed from allocation. Given those deletions, an increase to the capacity of site STNP4 was deemed acceptable in landscape terms and has been incorporated in the Plan.

Single plots of development land in Saham Toney currently sell for £175 – 200,000. As allocated at pre-submission, there were 38 such plots on the 4 sites, illustrating that the potential land value is significant. The Parish Council's landscape consultant has advised that for the preparation of a Landscape and Visual Impact Assessment for one site she would expect to charge in the order £1500-2000. On request by the Saham Toney Neighbourhood Plan work group, in December 2019 the planning consultants AECOM quoted a cost of £5400 +VAT to undertake Landscape and Visual Impact Assessments of these 4 sites plus site STNP1, and to undertake combined impact assessments for two options (all five sites, and limited to STNP1, 4 and 7). In the context of the potential land value, which has significantly increased by virtue of being allocated in the Plan, such charges are insignificant.

The representation seeks to avoid the policy requirement by focusing on the size of individual sites, and the landowners have to date declined requests to treat all 4 sites as one combined site in a single policy. This precludes the Plan making a requirement for a combined Landscape and Visual Impact Assessment, the need for which would be more difficult to argue against.

However elsewhere the representation seeks to have all 4 sites considered together (see response 5), making it difficult to understand the logic of objecting to a Landscape and Visual Impact Assessment for the 4 sites combined.

It is noted that as a result of comments to the Plan by Breckland Council the requirement for a full Landscape and Visual Impact Assessment has been amended to a proportionate Landscape and Visual Appraisal, to be in accordance with the approach given in Guidelines for landscape and Visual Impact Assessment 3rd Edition. It is considered this measure adequately addresses the comment in this respect as the new requirement is fully in accordance with best practice as defined by the Landscape Institute.

5. Regarding treating all 4 sites together in a cohesive manner

The Plan would be willing to do this: indeed, it is a suggestion that was made to landowners in early 2019 and put forward in an earlier informal version of the Plan, which gave a single policy for all 4 sites. That was rejected by the landowners, who themselves insisted on having 4 separate policies, which they are now objecting to.

The phasing proposed in the Plan is a result of two factors:

- a) A general need to avoid too much development happening over a particular period of the Plan's life, since it has been evidenced that due to limitations of infrastructure and services that would not be sustainable;
- b) The fact that the landowners did not agree draft site policies before pre-submission of the Plan, meant at that time their sites could not be considered deliverable, but were developable and hence under NPPF requirements could not be allocated in the first 5 years of the Plan's period.

The representation suggests masterplanning of the sites. In August 2019, via Locality the Neighbourhood Plan Group commissioned AECOM to carry out masterplanning of the 4 sites concerned together with

another adjacent site (STNP1) in different ownership. That study examined 3 different options for the combined sites. The results of that study have been used to inform and provide further evidence for the further update of the Plan. The base case for that study was 48 houses; one option reduced that total to 35 and a further option increased it to 72 houses (to match this representation). As a result of masterplanning studies and a professional landscape impact assessment the option for 35 houses on 3 sites was selected, and sites STNP5 and 6 removed from allocation in the Plan. Phasing of site development remains appropriate, given village infrastructure and services constraints.

6. Regarding the view towards Saham Mere from Pound Hill

Policy 7B defines a series of Key Views to be respected, preserved, incorporated and enhanced. Key View 4 is from Pound Hill towards Saham Mere and further. That view was identified as the result of assessment by a professional and qualified Landscape Consultant. Contrary to the assertion in the representation, that view is not defined as being “*of Saham Mere*”, but rather “*towards Saham Mere*”. Understanding this fact is crucial to assessing the representation, since it is irrelevant whether the Mere itself can be seen. This invalidates the comment in this respect. The fact that a Key View exists across Site STNP5 both justifies the requirement for an area of undeveloped land and reinforces the need for a Landscape and Visual Impact Assessment of that site.

That notwithstanding this will be addressed in greater detail by the aforementioned AECOM masterplanning study, which itself will be reviewed by our Landscape Consultant.

It is pointed out that the Saham Toney Parish Landscape Character Assessment does not specifically refer to site STNP5 because that assessment was completed 8 months prior to sites being allocated and addressed impact on a parish-wide rather than site specific basis. However, the assessment clearly identifies the high sensitivity of the area in which Site STNP5 is located and the need to take great care when putting forward development proposals. The presence of a Key View amplifies this concern. It is also noted that site specific assessment would come from a Landscape and Visual Impact Assessment, but the representation argues against the need for that.

The professional landscape impact review of sites STNP4-7 (plus STNP1) undertaken in response to the masterplanning study performed by AECOM, considered in greater depth the potential impact on sites on the Key View in question. The review concluded that the harmful impact of site STNP5 on that view was a contributory factor in its overall harmful landscape impact, which resulted in the site being removed from allocation.

7. Regarding building heights

Policy 2J does not limit development to single storey dwellings on Site STNP5; it states them as “expected” but allows the possibility of two storey dwellings subject to that being shown to be acceptable by a Landscape and Visual Impact Assessment. However again it is noted that the representation objects to the requirement for such an assessment. Note: Site STNP5 was deleted for other reasons hence this comment is redundant.

Conclusion


Most of the issues raised by the representation have been shown above to lack substance or validity with the exception of policy requirements for landscape and visual impact assessment and transport studies. The representation attempts to have the sites treated as just another development on just another tract of land and fails to recognise key issues in the area concerned relating to a lack of infrastructure and services, surface water flood risk, and landscape and heritage impact. The Plan’s policies address all those issues and those were fully accounted for in a holistic manner in the Site Assessment and Site Selection Reports. The Plan and its extensive supporting evidence provide ample justification for the policies and the representation does not make a valid case for changing the Plan, with the exception of policy requirements for landscape and visual impact assessment and transport studies.

ACTION TAKEN:

Requirement for full Landscape and Visual Impact Assessments amended to proportionate Landscape and Visual Appraisals

Requirement for transport studies deleted from site allocation policies

B4.8. Representation by Norfolk County Council

RESPONDING ORGANISATION: Norfolk County Council	DATE: 02 / 04 / 07 October 2019
REPRESENTATION(S):  Norfolk County Council Norfolk County Council Comments on the: Saham Toney Neighbourhood Plan (Reg 14) 2 October 2019 1. Preface 1.1 The officer-level comments below are made without prejudice, the County Council reserves the right to make to any further comments the County Council may have on future iterations of 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 There is a spelling error in paragraph T8.10 'Sham Toney'. 3. Infrastructure Delivery 3.1 The Plan could contain supporting text referencing the following; <ul style="list-style-type: none">• 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 developments. 3.2 Should you have any queries with the above comments please contact Naomi Chamberlain (Trainee Planner) at email withheld or call 01603 638422. 4. Lead Local Flood Authority (LLFA) 4.1 It is noted that there is widespread mention of surface water flood risk within the neighbourhood plan, particularly within the site allocation criteria, which is welcomed. 4.2 The LLFA would suggest the following specific policy with regards to surface water flooding to augment the neighbourhood plan POLICY: FLOODING The Plan requires that any future development (or redevelopment) proposals show there is no increased risk of flooding from an existing flood source and mitigation measures are implemented to address surface water arising within the development site. Any new development or significant alteration to an existing building within the Saham Toney area should be accompanied by an appropriate assessment which gives adequate and appropriate consideration to all sources of flooding and proposed surface water	

drainage. Any application made to a local planning authority will be required to demonstrate that it would:

- Not increase the flood risk to the site or wider area from fluvial, surface water, groundwater, sewers or artificial sources.
- Have a neutral or positive impact on surface water drainage.
- Proposals must demonstrate engagement with relevant agencies and seek to incorporate appropriate mitigation measures manage flood risk and to reduce surface water run-off to the development and wider area such as:
 - Inclusion of appropriate measures to address any identified risk of flooding (in the following order or priority: assess, avoid, manage and mitigate flood risk).
 - Where appropriate undertake sequential and /or exception tests.
 - Locate only compatible development in areas at risk of flooding, considering the proposed vulnerability of land use.
 - Inclusion of appropriate allowances for climate change.
 - Inclusion of Sustainable Drainage proposals (SuDS) with an appropriate discharge location.
 - Priority use of source control SuDS such as permeable surfaces, rainwater harvesting and storage or green roofs and walls. Other SuDS components which convey or store surface water can also be considered.
 - To mitigate against the creation of additional impermeable surfaces, attenuation of greenfield (or for redevelopment sites as close to greenfield as possible) surface water runoff rates and runoff volumes within the development site boundary.
 - Provide clear maintenance and management proposals of structures within the development, including SuDS elements, riparian ownership of ordinary watercourses or culverts, and their associated funding mechanisms.

4.3 ALLOCATION OF SITES

The LLFA expect that the Neighbourhood Planning process provides 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 are required to be undertaken. This would be in line with Planning Practice Guidance to ensure that new development is steered to the lowest areas of flood risk. However, any allocated sites will also be required to provide a flood risk assessment and / or drainage strategy through the development management planning process.

4.4 Should you have any queries with the above comments please contact the Lead Local Flood Authority at llfa@norfolk.gov.uk.

5. **Transport**

5.1 Appendix 1 contains the schedule of comments on each of the proposed site allocations.

Sites coloured red in the schedule are considered unsuitable and it is highly unlikely that a satisfactory highway solution can be found.

The sites coloured orange raise significant highway concerns and based on the evidence available and the judgement of the highway authority they will not be able to meet highway safety requirements, however, if the site is to remain in the plan then further evidence will be required to demonstrate that a satisfactory highway solution can be delivered.

The green sites are acceptable, as it is considered likely that the required access and off site requirement can be met. Further evidence to demonstrate a suitable highway solution will be required at the application stage.

The requirements for a safe access can be found in the County Councils Safe and Sustainable Development guidance. The link can be found on this page:

<https://www.norfolk.gov.uk/rubbish-recycling-and-planning/planning->

[applications/highway-guidance-for-development/publications](#), visibility requirements can be found on page 27.

5.2 NCC is able to advise the Neighbourhood Plan Team what evidence would need to be gathered to tackle the issues raised.

5.3 Should you have any queries with the above comments please contact Richard Doleman (Principal Infrastructure Development Planner) at [email withheld](#) or call 01603 223263.

6. Historic Environment

6.1 It is noted that policies 6.3 – 6.7 have been altered in line with the previous advice and there are no further comments to make on these policies.

6.2 In relation to the site allocations it is noted that the supporting documents contain an assessment of impacts on heritage assets in terms of the settings of listed buildings, but no reference is made to potential impacts on below-ground archaeology.

The Historic Environment assessment of impact on below-ground archaeology and undesignated historic buildings is tabulated in appendix 2.

6.3 Should you have any queries with the above comments please call John Percival (Historic Environment Officer) on 01362 869275 or email withheld.

Appendix 1 (Note: the following comments of the Local Highways Authority were followed up in correspondence leading to the Authority providing amended responses – hence the reaction to the initial responses is given first, followed by the amended responses, reaction to them and a description of actions taken as a result)

Saham Toney Neighbourhood Plan Reg 14 Proposed Site Allocations

Site	Highway Authority Comments
STNP1	Object Unless evidence can be provided that a safe access can be formed to the satisfaction of the Highway Authority.
STNP2	Object There are no footpaths to school on Hills Road and no opportunity to provide There is no evidence that a safe access can be formed to the satisfaction of the Highway Authority.
STNP4*	Accept.
STNP5*	Accept.
STNP6*	Accept Subject to evidence to demonstrate that sufficient visibility can be achieved at the junction with a sufficient distance from Pound Hill Lane or accessed through STNP5.
STNP7*	Accept Subject to off-site works required to widen Pages Lane to 6m and provide a frontage footpath.
STNP9	Object Unless evidence can be provided that a safe access can be formed to the satisfaction of the Highway Authority.

STNP13	Object There are no footpaths to school on Hills Road and no opportunity to provide.
STNP14	Object There are no footpaths to school on Hills Road and no opportunity to provide.
STNP15	Object Unless evidence can be provided that a safe access can be formed to the satisfaction of the Highway Authority.
STNP16	Object Unless evidence can be provided that a safe access can be formed to the satisfaction of the Highway Authority.

*Highways would only support one of these coming forward with a max of 25 dwellings to avoid more traffic using the Pound Hill/ Richmond Road junction.

Appendix 2

Historic Environment Comments on the Saham Toney Neighbourhood Plan

Reg 14 Proposed Site Allocations

	Traffic light rating	
STNP1	Amber	We have commented on previous applications for this site
STNP2	Green	Due to nature of existing buildings and hardstanding
STNP4	Amber	
STNP5	Amber	
STNP6	Amber	
STNP7	Amber	Nature and significance of historic buildings on the site unclear
STNP9	Amber	
STNP13	Amber	
STNP14	Amber	
STNP15	Amber	
STNP16	Amber	We have commented on previous applications for this site

Appendix 3

Councillor Comments

I fully support the Saham Toney neighbourhood plan.

CLlr Edward Connolly

RELEVANT SECTION(S) OF PLAN:

1. General
 2. Supporting text to Policy 8
 3. Policy1, Policy 3A
 4. Site allocation policies 2F-2Q, Policy 8
 5. Site allocation policies 2F-2Q
 6. Site allocation policies 2F-2Q, Policy 6
- App. 3: General

REACTION TO REPRESENTATION(S)

1.1 and 1.2: Noted

2.1 Agreed

3.1, first bullet: Noted. We consider this is covered in Breckland Local Plan Policy INF 02: Developer Contributions and paragraph 8.11 of the Local Plan. No change to the Neighbourhood Plan is required in this respect.

3.1, second bullet: A new criterion will be added to Policy 3A: Design.

3.2: Noted. Clarification to comments by the LLFA and Local Highways Authority were sought and are given below in the sections dealing with representation section 4 and 5 respectively.

4. General: It shall be noted that as part of the Plan submission version update, Policy 8 was split into component parts (Policies 8A-8H and 9) and each expanded to better deal with the topic of surface water management. References below are to the pre-submission policy on the topic, Policy 8.

4.1: Noted

4.2 The principle of new policy requirements is accepted and welcomed, but since some elements of the proposed new policy duplicate existing requirements of Policy 8, the latter will be updated to include non-duplicated items, rather than introducing a new policy. This approach has been agreed in post-consultation correspondence with the Lead Local Flood Authority, as given below:

STNP query regarding LLFA comments, 03 October 2019:

Dear Naomi,

Reference the comments you sent yesterday, could you please clarify the following with your colleague who commented on behalf of the LLFA:

A new policy dealing with flooding has been proposed. While we very much welcome the guidance it provides, in many ways it does seem to overlap / duplicate our existing Policy 8: Surface Water Management & Sewerage Provision (in which we had incorporated previous LLFA comments). Is the intention to suggest:

- a) Complete replacement of Policy 8 with the LLFA's wording; or*
- b) A new policy in addition to Policy 8?*

Alternatively does the LLFA have any objection if we appropriately merge the non-duplicating aspects of its proposed policy wording with the existing Policy 8?

LLFA response, 08 October 2019:

Many thanks for your email query via Naomi Chamberlain.

Please feel free to appropriately merge any non-duplicated points into your document. It is recognised and welcomed that the current version contains many references to surface water flood risk throughout and these non-duplicated elements would augment your document.

Kind regards

Dean

Dean Shelton, Senior Flood Risk Officer

Lead Local Flood Authority

4.3 The LLFA carried out assessment of all sites put forward for allocation in the Neighbourhood Plan. Sites not supported by the LLFA's assessment have not been allocated in the Plan. The selection process used to decide which sites to allocate included full consideration of flood risk and the potential to

implement flood risk mitigation measures and may be considered as a sequential test (as indicated by Planning Practice Guidance regarding the sequential test and site allocations). Requirements for a Flood Risk Assessment and / or Drainage Strategy are already given in Policy 8

4.4: Noted.

5.1 and App. 1: The highways constraints noted in Appendix 1 were previously identified in site assessments provided by the Local Highways Authority in support of the Neighbourhood Plan's site allocation process. Mitigations were described in the Site Selection Report which formed part of the Regulation 14 consultation. It was not clear that the Authority had taken into account those mitigations when making its representations. Hence the mitigation evidence was re-sent to the Authority on 9th October 2019 with a request for it to advise as to its acceptability, or otherwise advise what further evidence might justify allocation of particular sites. The text of that enquiry was as follows:

Site	Highway Authority Representation
STNP1	Object Unless evidence can be provided that a safe access can be formed to the satisfaction of the Highway Authority.
EVIDENCE FOR SITE STNP1: Highways response to an earlier planning application for the site, ref. 3PL/2015/1430/F (<i>see Figures A1 and B2 of Site Selection Report</i>), which indicated that development of the site was acceptable to the LHA, subject to conditions. The required visibility splays have been made a condition of Site Allocation Policy 2G. The other conditions could be incorporated in the policy or its supporting text, with the agreement of the LPA, but it is considered it would be more rational for them to be applied as conditions when a new application for the site comes forward.	

STNP2	Object There are no footpaths to school on Hills Road and no opportunity to provide There is no evidence that a safe access can be formed to the satisfaction of the Highway Authority.
EVIDENCE FOR SITE STNP2: Highways response to an earlier planning application for the site, ref. 3PL/2015/0009/F (<i>see Figures B3 and B4 of Site Selection Report</i>), which indicated that development of the site was acceptable to the LHA, subject to conditions. The required visibility splays have been made a condition of Site Allocation Policy 2H. The other conditions could be incorporated in the policy or its supporting text, with the agreement of the LPA, but it is considered it would be more rational for them to be applied as conditions when a new application for the site comes forward. With regard to the lack of footpaths to the village school, the approximate distance of the site from the school is 1330m, of which approximately 770m lacks a footway. The cost of providing a footpath linking the two would be disproportionate to the size of the proposed development. Moreover, paragraph 109 of the NPPF states " <i>Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.</i> " Aim 1 of Norfolk County Council's aims in development management relates to transport sustainability, and is: " <i>Minimising travel to ensure people can access facilities they need by appropriate transport modes, encouraging walking, cycling and public transport use and reducing the use of private cars especially for shorter journeys.</i> " (Ref: Norfolk County Council Safe Sustainable Development, Aims & Guidance Notes for Local Highway Requirements in Development Management, December 2018).	

The County Council document goes on to explain that whilst Paragraph 109 of the National Planning Policy Framework provides useful clarification of national policy in relation to highway safety, supporting the position that highway safety is an important material consideration which should properly be taken into account and given due weight, it does not offer a formal definition of 'severe', but rather leaves it to Local Authorities to produce their own interpretation. In Norfolk, a 'severe' impact is deemed occur when: -

- a) Queue lengths (and blocking back to previous junctions), delay and locational context, the Degree of Saturation, Practical Reserve Capacity, or Ratio of Flow to Capacity are unacceptable;
- b) Junctions do not conform to modern day standards and improvements cannot be made to bring them up to standard, or;
- c) A **major residential development** does not maximise the opportunity to travel by sustainable modes, in particular if it cannot provide a safe walking route to school or is outside of the nationally recognised acceptable walking distances to catchment schools (Department for Education - Home to School Travel and Transport Guidance).

Point (c) is relevant: it specifically refers to “major development” (i.e. development of 10 or more dwellings). Site STNP2 is for 4 dwellings and so cannot be classed as major. Hence by the Council’s definition, impact on the road network due to lack of a footpath cannot be considered severe, and therefore in accordance with the NPPF that is not a reason for preventing or refusing development on highways grounds.

STNP4*	Accept.
STNP5*	Accept.
STNP6*	Accept Subject to evidence to demonstrate that sufficient visibility can be achieved at the junction with a sufficient distance from Pound Hill Lane or accessed through STNP5.
EVIDENCE FOR SITE STNP6: Visibility splays no less than 2.4 x 59m to each side of the highway access point are a condition of Site Allocation Policy 2K. The western site boundary is approximately 22m from the junction of Page’s Lane with Pound Hill. The eastern site boundary is approximately 55m from the junction of Page’s Lane / Chequers Lane with Hills Road. The site frontage is approximately 77m long. Hence it is clear that an access point may be provided that is at least 59m from each noted junction.	
STNP7*	Accept Subject to off-site works required to widen Pages Lane to 6m and provide a frontage footpath.
EVIDENCE FOR SITE STNP7: It is a condition of Site Allocation Policy 2L that provision shall be made to widen Page’s Lane to an extent agreed with the LHA. Given the above comment, we will update the policy to state a required width of 6m. It is also a condition of Site Allocation Policy 2L that a pedestrian footpath shall be provided along the full length of the widened section of the highway (from the western most point at which the site adjoins the highway east to the junction of Page’s Lane and Pound Hill.	

CLARIFICATIONS FOR SITES STNP4-7:

It is noted that Highways would only support one of these coming forward with a maximum of 25 dwellings.

- a) The Neighbourhood Plan seeks to justify a higher number (38 in total) by phasing delivery of the sites over a 16-year period, and requiring future planning applications for the sites to include a professional transport impact report, including a traffic survey of the use of the Pound Hill / Richmond Road junction, to demonstrate that use of the junction would remain at an acceptable level following development.

What additional evidence / measures would be required to overcome the constraint on the amount of traffic using the Pound Hill / Richmond Road junction; such that a maximum of 38 dwellings could be allocated?

- b) It is the intention to allocate more than one of these sites. Please explain why the LHA requires development to be limited to one site only? It is not clear why 2, 3 or 4 sites developed to the same limit stated (or a higher number given additional measures) would impact the Pound Hill / Richmond Road junction to a greater degree than if just one site is developed.
- c) If 2, 3 or 4 of the sites came forward as planning applications at different times (either as allocated sites or outside the Neighbourhood Plan) how would the LHA react to their cumulative impact on the junction of Pound Hill / Richmond Road?

STNP9

Object

Unless evidence can be provided that a safe access can be formed to the satisfaction of the Highway Authority.

EVIDENCE FOR STNP9:

Pre-application correspondence between the site developer and the LHA in 2014 shows that the preliminary scheme put forward, as given in Appendix A (*i.e. Figures B5 and B6 of the Site Selection Report*), was acceptable to the LHA. That scheme remains the basis of the site allocation of this site

STNP13

Object

There are no footpaths to school on Hills Road and no opportunity to provide.

STNP14

Object

There are no footpaths to school on Hills Road and no opportunity to provide.

EVIDENCE FOR SITES STNP13 & STNP14:

The approximate distance of the two sites from the school are 2015m (STNP13) and 1950m (STNP14). The cost of providing a footpath linking the two would be disproportionate to the size of the proposed developments (each is for 5 dwellings). Moreover, paragraph 109 of the NPPF states "*Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*" Aim 1 of Norfolk County Council's aims in development management relates to transport sustainability, and is: "*Minimising travel to ensure people can access facilities they need by appropriate transport modes, encouraging walking, cycling and public transport use and reducing the use of private cars especially for shorter journeys.*" (Ref: Norfolk County Council Safe Sustainable Development, Aims & Guidance Notes for Local Highway Requirements in Development Management, December 2018).

The County Council document goes on to explain that whilst Paragraph 109 of the National Planning Policy Framework provides useful clarification of national policy in relation to highway safety, supporting the position that highway safety is an important material consideration which should properly be taken into account and given due weight, it does not offer a formal definition of 'severe', but rather leaves it to Local Authorities to produce their own interpretation. In Norfolk, a 'severe' impact is deemed occur when: -

- d) Queue lengths (and blocking back to previous junctions), delay and locational context, the Degree of Saturation, Practical Reserve Capacity, or Ratio of Flow to Capacity are unacceptable;
- e) Junctions do not conform to modern day standards and improvements cannot be made to bring them up to standard, or;
- f) A **major residential development** does not maximise the opportunity to travel by sustainable modes, in particular if it cannot provide a safe walking route to school or is outside of the nationally recognised acceptable walking distances to catchment schools (Department for Education - Home to School Travel and Transport Guidance).

Point (c) is relevant: it specifically refers to "major development" (i.e. development of 10 or more dwellings). Sites STNP13 & 14 are each for 5 dwellings and so cannot be classed as major. Hence by the Council's definition, impact on the road network due to lack of a footpath cannot be considered severe, and therefore in accordance with the NPPF that is not a reason for preventing or refusing development on highways grounds.

STNP15

Object

Unless evidence can be provided that a safe access can be formed to the satisfaction of the Highway Authority.

EVIDENCE FOR SITE STNP15:

Site Allocation Policy 2P specifies that visibility splays no less than 2.4 x 59m shall be provided to each side of the highway access point. This may be achieved by creating a new access point close to the western boundary of the site, which has been measured to confirm it would be more than 59m from the start of the bend in Richmond Road to the east of the site. This differs from the proposal the LHA undertook a site assessment of, because at that time the proposal was to use the driveway to the existing property at 8 Richmond Road, but that did not satisfy the 59m splay requirement.

STNP16

Object

Unless evidence can be provided that a safe access can be formed to the satisfaction of the Highway Authority.

EVIDENCE FOR SITE STNP16:

The development of site STNP16 will be combined with that of an adjacent plot of land in the same ownership which benefits from outline planning permission, granted under planning application 3PL/2018/0563/O. That application included details of the proposed highway access. LHA comments on the application were limited to the provision of a footpath northwards from the site access point, and subsequent applicant submissions satisfied the Authority on this topic. The application was granted outline planning permission and the only Highways conditions related to the required footpath, indicating that other aspects of highways access were acceptable.

Site Allocation Policy 2Q includes requirements that access to the combined site utilises the same access as that proposed under the permitted planning application, with the same conditions that applied to that permission. This includes the new footpath northwards along Richmond Road (as shown on the policy map).

The response of the Local Highways Authority to the above post-consultation clarification request, dated 22 November 2019, was as follows:

COMMENT A:

Thank you for your email regarding the Highway Authority comments on proposed site allocations in the Saham Toney Neighbourhood Plan.

I'm sorry that it has taken some time to collate our further response. We do not usually provide a follow up to our formal consultation response, but given the number of allocations and the highway issues they raise the following response has been collated.

The responses have taken into consideration the evidence proved to support the allocations, previous planning history (formal and informal), plan making guidance, the policies of the Highway Authority, and the development plan.

REACTION: Noted

COMMENT B:

Firstly, taking the proposed allocations in turn.

STNP1

The requirements for the site will be

- a) A visibility splay of 59x2.4
- b) Footway across the frontage of the site and linking to the existing provision on the south side of Pages Lane
- c) The site will require an adopted Road
- d) The site should made provision for access to STNP6

These requirements need to be in the STNP1 allocation policy and evidence will be required to support a planning application.

Subject to all the above points being identified in the allocation policy the site would be acceptable for inclusion in the plan.

REACTION:

- a) A 59 x 2.4m visibility splay is already specified by Policy 2F for this and other allocated sites. The Saham Toney Neighbourhood Plan Transport Study (AECOM, March 2020) shows that in principle, appropriate access widths and adequate visibility splays can be achieved at the site, in accordance with Local Highway Authority standards and guidelines, and includes an indicative drawing showing the visibility splays;

- b) A footway across the site frontage is not practical owing to narrow verge width and the presence of an important drainage ditch. Instead Policy 2H for this site already requires a footway from the site entrance to the existing provision on Page's Lane without dictating it must be across the site frontage (i.e. it may be through the site). Such a footway was shown to be achievable by the Saham Toney Neighbourhood Plan Masterplanning Study (AECOM, February 2020), and is illustrated on Policy Map 2G.1;
- c) Agreed, and requirement will be added to Policy 2H;
- d) There is no justification for this, because:
- e) Site STNP1 does not adjoin site STNP6;
- f) Sites STNP1 and STNP6 are in different ownership;
- g) Site STNP6 has been deleted from the Plan for other reasons.

COMMENT C:

STNP2

The County Council as Highway Authority cannot support this site. It is remote from the school and has no footway connection and the proposal is detrimental to highway safety. The issues of cost and deliverability of required infrastructure should not be taken as a reason to remove the requirement for a footway but must result in the site not being allocated. The proposed reasoning for allocation is flawed and not based on positive plan-making as the allocation would be contrary to The Local Transport Plan, NPPF and Local plan that all promote highway safety and walking as a sustainable means of travel. For these reasons it does not meet Basic Conditions a, d and e

- a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).
- d) the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.
- e) the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).

The objection is maintained and the site should be removed from the proposed plan.

REACTION:

- h) The comment that this development would be "detrimental to highway safety" cannot be accepted, given the fact that in its representation to a previous planning application for this site (with exactly the same boundary and number of houses), an officer of the Local Highway Authority commented "The details indicated on the revised drawing 9813/2A overcome my concerns and I would therefore raise no objections..." This was subject to a condition requiring vehicular access to the site to be widened to 4.5m for the first 10 metres measured back from the near channel edge of the adjacent carriageway. Such an arrangement was indicated on the noted drawing, which is reproduced in Figure B3 of the Site Selection Report.
- i) In the light of (a), considering paragraph 109 of the NPPF: "*Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*", it cannot be considered there is "an unacceptable impact on highway safety". There remains the question of whether any residual cumulative impacts on the road network would be severe. As explained in the additional evidence of 9th October 2019, using Norfolk County Council's own definition, the impact of developing this site would not be considered "severe". Hence neither of the NPPF conditions for refusing development on highway grounds apply to site STNP2, and as a result the objection in this respect is not accepted.
- j) Requiring a development of 4 dwellings to fund a footpath approximately 770m in length is disproportionate. We do not have evidence that this proposed site allocation would be

detrimental to highway safety and do not consider it to contravene the basic conditions required of neighbourhood plans.

- k) While it is accepted that the Local Transport Plan, NPPF and Local Plan all promote highway safety and walking as a sustainable means of travel, it is not the case that any of those documents dictate that infrastructure to facilitate walking must be provided for all new developments, nor that use of vehicles is not expected, especially in rural areas. The Local Plan notes "...travel by car will still be an essential option for many people living in remote rural areas." In section 4.8 of the Local Transport Plan, it is stated "In rural areas, where there are fewer local services and employment opportunities, it is recognised that the car will be a key mode of transport." It is unreasonable to suggest that the provision of 4 single-storey dwellings on this site will add to vehicle use in anything other than an insignificant manner.
- l) It is not accepted that a development of 4 houses would add to highway issues in anything other than the most negligible way as the number of new journeys generated, particular at school journey times, would be insignificant. This fact is clearly proven by the Saham Toney Neighbourhood Plan Transport Study (AECOM, April 2020), which analyses the individual and cumulative impact of future traffic flows due to the allocated sites, and concludes that will be negligible.
- m) The following is extracted from an assessment of site STNP2 in the Saham Toney Neighbourhood Plan Transport Study, AECOM, April 2020: With regards to the absence of footways on Hills Road, it is considered that:
 - 1. Hills Road is currently lined with existing dwellings, the residents of which do not currently have access to a footway providing access towards the village centre/ primary school. No collisions have been recorded within the study period along Hills Road and therefore there is no evidence to suggest that there are any existing safety concerns relating to pedestrians travelling along Hills Road.
 - 2. Hills Road is characterised by sections of maintained verge and driveway accesses providing ample opportunity for pedestrians to step away from the carriageway in the event of an approaching vehicle.
 - 3. Based on the Census 2011 data provided in table 3-4 of the report, approximately 4% of residents are likely to be of primary school age, equating to a likelihood of less than one child of primary school age living on site STNP 2 in association with the four allocated dwellings.
- n) The introduction of footways along Hills Road would negatively impact the landscape character of the area and thereby contravene Policy 7A of the Neighbourhood Plan. The Saham Toney Landscape Character Assessment, January 2019, notes "Saham Toney has a distinctive and extensive pattern of roads and lanes that are key to its character". That character is in part defined by the grass verges and hedges that line many roads, including Hills Road, which add to the rural feel of the area.
- o) "Planning for Walking" by the Chartered Institution of Highways and Transport, 2015, states "Most people will only walk if their destination is less than a mile away." This does not imply that those living further away do not use the services and facilities: they will still do so but would clearly be more likely to use other forms of transport to do so; and it is this that should be taken into account. This is further recognised in the Local Plan which notes "travel by car will still be an essential option for many people living in remote rural areas."
- p) A lack of a footway linking a residential housing site to a local school is not against the Basic Conditions.
- q) The decision on planning appeal Ref: APP/F2605/W/17/3176900, 13 September 2017, related to a development of 10 houses in another part of the parish not served by footways to the school. Although the Local Highways Authority had requested a footway be provided from the site, the Inspector for that appeal concluded that the extra walking journeys likely to be generated by the development alone would be sufficient to warrant the provision of a footway, and concluded that the conflict between traffic and pedestrians would be minimal and hence the development would provide safe and secure access as set out in the NPPF. It is also noted that the Local

Highways Authority has repeatedly used that decision to support a conclusion that footways do not need to be provided to a number of sites subsequently proposed in the parish.

- r) In addition to the appeal decision described in (e), since 2011 there have been planning permissions for a total of 42 houses outside and not adjacent to the settlement boundary, remote from the school and for which there is no footway provision, to which the Local Highways Authority have raised no objection on grounds of remoteness from the school or lack of footways. Although in correspondence the Authority has noted that there are different considerations for plan-making and responding to a planning application (the former being about the promotion of appropriate sites that meet wider plan making objectives, and the latter about meeting minimum requirements), it has supported a significant amount of additional housing development over an extended period with seemingly no attention to the cumulative effects on plan-making that cause it concern in the case of this allocated site. This is inconsistent since it implies that were the site to be withdrawn from allocation in the neighbourhood plan, but then put forward via an individual planning application, the Authority would not object to it.
- s) **Therefore, based on the information reviewed it is not considered that there is sufficient evidence to justify the requirement of a footway from the proposed development site along Hills Road to the south.**
- t) For all of the above reasons it is considered that the allocation of site STNP2 would not contravene Basic Conditions a, d and e.

COMMENT D:

STNP4

The policy as drafted is acceptable to the Highway Authority for inclusion in the Plan.

STNP5

The site is acceptable for inclusion in the plan. If the site is required to provide access to STNP6 this will need to be in the allocation policy – See Highway advice on STNP6

STNP6

There is sufficient doubt that a suitable access can be achieved therefore evidence is required prior to highway support for the allocation. If evidence that a safe and suitable access can be formed is not available, then the site allocation needs to either require access through STNP1 or STNP5 OR restrict development to frontage only.

STNP7

The policy as drafted is acceptable to the Highway Authority for inclusion in the Plan.

REACTION:

STNP4: Noted

STNP5: It is not required to provide access to STNP6 via this site

STNP6: The plan below demonstrates that it would be possible to form a safe access. Furthermore, the Saham Toney Neighbourhood Plan Transport Study (AECOM, March 2020) provides a scale drawing that verifies a safe and suitable access could be achieved. That notwithstanding Site STNP6 has been removed from allocation in the Neighbourhood Plan for other reasons.



STNP7: Noted

COMMENT E:

STNP9

The pre-application advice referred to indicates that an access could be formed. However, it states that the main concern is the lack of footway. The Highway Authority cannot support the allocation of this site. It is remote from the school and has no footway connection and the proposal is detrimental to highway safety. The proposed reasoning for allocation is flawed and not based on positive plan-making as the allocation would be contrary to the Local Transport Plan, NPPF and Local plan that all promote highway safety and walking as a sustainable means of travel. For these reasons it does not meet Basic Conditions a, d and e

- a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).
- d) the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.
- e) the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).

The highway objection is maintained and the site should be removed from the proposed plan.

REACTION:

- a) The pre-application advice given in the Site Selection Report and referred to both in additional evidence and the Highway Authority's updated comments states (with regard to internal discussion within the Authority) "The outcome was that we are happy for the development of the area of land that is within the settlement boundary (2-3 properties) subject to a footway being provided along the site frontage." The advice only requires an additional footway linking with Millview if further development (i.e. more than 3 dwellings) is required. Policy 2M allocates a maximum of 3 dwellings on site STNP9, and requires the provision of a site frontage footway. In respect of the Local Highway Authority's pre-application advice the Policy is fully compliant.

- b) The decision on planning appeal Ref: APP/F2605/W/17/3176900, 13 September 2017, related to a development of 10 houses in another part of the parish not served by footways to the school. Although the Local Highways Authority had requested a footway be provided from the site, the Inspector for that appeal concluded that the extra walking journeys likely to be generated by the development alone would be sufficient to warrant the provision of a footway, and concluded that the conflict between traffic and pedestrians would be minimal and hence the development would provide safe and secure access as set out in the NPPF. It is also noted that the Local Highways Authority has repeatedly used that decision to support a conclusion that footways do not need to be provided to a number of sites subsequently proposed in the parish
- c) In the light of (b), considering paragraph 109 of the NPPF: *“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”*, it cannot be considered there is “an unacceptable impact on highway safety”. There remains the question of whether any residual cumulative impacts on the road network would be severe. As explained in the additional evidence of 9th October 2019, using Norfolk County Council’s own definition, the impact of developing this site would not be considered “severe”. Hence neither of the NPPF conditions for refusing development on highway grounds apply to site STNP9, and as a result the objection in this respect is not accepted.
- d) While it is accepted that the Local Transport Plan, NPPF and Local Plan all promote highway safety and walking as a sustainable means of travel, it is not the case that any of those documents dictate that infrastructure to facilitate walking must be provided for all new developments, not that use of vehicles is not expected, especially in rural areas. The Local Plan notes “...travel by car will still be an essential option for many people living in remote rural areas.” In section 4.8 of the Local Transport Plan, it is stated “In rural areas, where there are fewer local services and employment opportunities, it is recognised that the car will be a key mode of transport.” It is unreasonable to suggest that the provision of 3 dwellings on this site will add to vehicle use in anything other than an insignificant manner.
- e) It is not accepted that a development of 3 houses would add to highway issues in anything other than the most negligible way as the number of new journeys generated, particular at school journey times, would be insignificant. This fact is clearly proven by the Saham Toney Neighbourhood Plan Transport Study (AECOM, March 2020), which analyses the individual and cumulative impact of future traffic flows due to the allocated sites, and concludes that will be negligible.
- f) We do not have evidence that this proposed site allocation would be detrimental to highway safety and do not consider it to contravene the basic conditions required of neighbourhood plans.
- g) The following is extracted from an assessment of site STNP9 in the Saham Toney Neighbourhood Plan Transport Study, AECOM, April 2020: With regards to the absence of a footway on Ovington Road and along part of Bell Lane, it is considered that:
 1. Ovington Road and Bell Lane are currently lined with existing dwellings, the residents of which do not currently have access to a footway providing access towards the primary school. No collisions have been recorded within the study period along Ovington Road or the relevant section of Bell Lane and therefore there is no evidence to suggest that there are any existing safety concerns relating to pedestrians travelling along either road.
 2. Ovington Road and Bell Lane are characterised by sections of maintained verge and driveway accesses providing ample opportunity for pedestrians to step away from the carriageway in the event of an approaching vehicle.
 3. Based on the Census 2011 data provided in in table 3-4 of the report, approximately 4% of residents are likely to be of primary school age, equating to a likelihood of less than one child of primary school age living within site allocation STNP9 in association with the three allocated dwellings.

- h) The introduction of footways along Ovington Road would negatively impact the landscape character of the area and thereby contravene Policy 7A of the Neighbourhood Plan. The Saham Toney Landscape Character Assessment, January 2019, notes "Saham Toney has a distinctive and extensive pattern of roads and lanes that are key to its character". That character is in part defined by the grass verges and hedges that line many roads, including Ovington Road, which add to the rural feel of the area.
- i) "Planning for Walking" by the Chartered Institution of Highways and Transport, 2015, states "Most people will only walk if their destination is less than a mile away." This does not imply that those living further away do not use the services and facilities: they will still do so but would clearly be more likely to use other forms of transport to do so; and it is this that should be taken into account. This is further recognised in the Local Plan which notes "travel by car will still be an essential option for many people living in remote rural areas."
- j) A lack of a footway linking a residential housing site to a local school is not against the Basic Conditions.
- k) In addition to the appeal decision described in (b), since 2011 there have been applications for a total of 42 houses outside and not adjacent to the settlement boundary, remote from the school and for which there is no footway provision, to which the Local Highways Authority have raised no objection on grounds of remoteness from the school or lack of footways. Although in correspondence the Authority has noted that there are different considerations for plan-making and responding to a planning application (the former being about the promotion of appropriate sites that meet wider plan making objectives, and the latter about meeting minimum requirements), it has supported a significant amount of additional housing development over an extended period with seemingly no attention to the cumulative effects on plan-making that cause it concern in the case of this allocated site. This is inconsistent since it implies that were the site to be withdrawn from allocation in the neighbourhood plan, but then put forward via an individual planning application, the Authority would not object to it.
- l) **Therefore, based on the information reviewed it is not considered that there is sufficient evidence to justify the requirement of a footway from the proposed development site along Ovington Road to link with the existing footway on Bell Lane.**
- m) For all of the above reasons it is considered that the allocation of site STNP9 would not contravene Basic Conditions a, d and e.

COMMENT F:

STNP13

The County Council as Highway Authority cannot support this site. It is remote from the school and has no footway connection and the proposal is detrimental to highway safety. The issues of cost and deliverability of required infrastructure should not be taken as a reason to remove the requirement for a footway but must result in the site not being allocated. The proposed reasoning for allocation is flawed and not based on positive plan-making as the allocation would be contrary to The Local Transport Plan, NPPF and Local plan that all promote highway safety and walking as a sustainable means of travel. For these reasons it does not meet Basic Conditions a, d and e

- a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).
- d) the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.
- e) the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).

The highway objection is maintained and the site should be removed from the proposed plan.

STNP14

The County Council as Highway Authority cannot support this site. It is remote from the school and has no footway connection and the proposal is detrimental to highway safety. The issues of cost and deliverability of required infrastructure should not be taken as a reason to remove the requirement for a footway but must result in the site not being allocated. The proposed reasoning for allocation is flawed and not based on positive plan-making as the allocation would be contrary to The Local Transport Plan, NPPF and Local plan that all promote highway safety and walking as a sustainable means of travel. For these reasons it does not meet Basic Conditions a, d and e

- a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).
- d) the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.
- e) the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).

The objection is maintained and the site should be removed from the proposed plan.

REACTION:

- a) The decision on planning appeal Ref: APP/F2605/W/17/3176900, 13 September 2017, related to a development of 10 houses in another part of the parish not served by footways to the school. Although the Local Highways Authority had requested a footway be provided from the site, the Inspector for that appeal concluded that the extra walking journeys likely to be generated by the development alone would be sufficient to warrant the provision of a footway, and concluded that the conflict between traffic and pedestrians would be minimal and hence the development would provide safe and secure access as set out in the NPPF. It is also noted that the Local Highways Authority has repeatedly used that decision to support a conclusion that footways did not need to be provided to a number of sites subsequently proposed in the parish.
- b) In addition to the appeal decision described in (e), since 2011 there have been applications for a total of 42 houses outside and not adjacent to the settlement boundary, remote from the school and for which there is no footway provision, to which the Local Highways Authority have raised no objection on grounds of remoteness from the school or lack of footways. Although in correspondence the Authority has noted that there are different considerations for plan-making and responding to a planning application (the former being about the promotion of appropriate sites that meet wider plan making objectives, and the latter about meeting minimum requirements), it has supported a significant amount of additional housing development over an extended period with seemingly no attention to the cumulative effects on plan-making that cause it concern in the case of this allocated site. This is inconsistent since it implies that were the site to be withdrawn from allocation in the neighbourhood plan, but then put forward via an individual planning application, the Authority would not object to it.
- c) In the light of (a) and (b), considering paragraph 109 of the NPPF: *“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”*, it cannot be considered there is “an unacceptable impact on highway safety”, there remains the question of whether any residual cumulative impacts on the road network would be severe. As explained in the additional evidence of 9th October 2019, using Norfolk County Council’s own definition, the impact of developing this site would not be considered “severe”. Hence neither of the NPPF

conditions for refusing development on highway grounds apply to sites STNP13 or 14, and as a result the objection in this respect is not accepted.

- d) Although the comment considers that cost and deliverability of required infrastructure should not be taken as a reason to remove the requirement for a footway, the NPPF does not support policies in a neighbourhood plan that restrict development by undermining viability or which are disproportionate to the size of a proposed development. Requiring a development of 4 dwellings to fund a footpath exceeding 1400m in length is disproportionate.
- e) It is not accepted that a development of 5 houses on each site would add to highway issues in anything other than a negligible way as the number of new journeys generated, particular at school journey times, would be insignificant. This fact is clearly proven by the Saham Toney Neighbourhood Plan Transport Study (AECOM, March 2020), which analyses the individual and cumulative impact of future traffic flows due to the allocated sites, and concludes that will be negligible.
- f) We do not have evidence that this proposed site allocation would be detrimental to highway safety and do not consider it to contravene the basic conditions required of neighbourhood plans.
- g) The following is extracted from assessments of sites STNP and STNP14 in the Saham Toney Neighbourhood Plan Transport Study, AECOM, April 2020: With regards to the absence of footways on Hills Road, it is considered that:
 - 1. Hills Road is currently lined with existing dwellings, the residents of which do not currently have access to a footway providing access towards the village centre/ primary school. No collisions have been recorded within the study period along Hills Road and therefore there is no evidence to suggest that there are any existing safety concerns relating to pedestrians travelling along Hills Road.
 - 2. Hills Road is characterised by sections of maintained verge and driveway accesses providing ample opportunity for pedestrians to step away from the carriageway in the event of an approaching vehicle.
 - 3. Based on the Census 2011 data provided in Table 3-4 of the report, approximately 4% of residents are likely to be of primary school age, equating to a likelihood of less than one child of primary school age living within site allocation STNP 13 or STNP14 in association with the five allocated dwellings.
- h) The introduction of footways along Hills Road would negatively impact the landscape character of the area and thereby contravene Policy 7A of the Neighbourhood Plan. The Saham Toney Landscape Character Assessment, January 2019, notes "Saham Toney has a distinctive and extensive pattern of roads and lanes that are key to its character". That character is in part defined by the grass verges and hedges that line many roads, including Hills Road, which add to the rural feel of the area.
- i) A lack of a footway linking a residential housing site to a local school is not against the Basic Conditions.
- j) While it is accepted that the Local Transport Plan, NPPF and Local Plan all promote highway safety and walking as a sustainable means of travel, it is not the case that any of those documents dictate that infrastructure to facilitate walking must be provided for all new developments, not that use of vehicles is not expected, especially in rural areas. The Local Plan notes "...travel by car will still be an essential option for many people living in remote rural areas." In section 4.8 of the Local Transport Plan, it is stated "In rural areas, where there are fewer local services and employment opportunities, it is recognised that the car will be a key mode of transport." It is unreasonable to suggest that the provision of 10 additional dwellings on this site will add to vehicle use in anything other than an insignificant manner. The sites are approximately 2150 yards (1 ¼ miles) from the primary school. "Planning for Walking" by the Chartered Institution of Highways and Transport, 2015, states "Most people will

only walk if their destination is less than a mile away." This is likely to be especially so for children of primary school age, and so indicates that even were footways to be provided, they would be unlikely to be used for school journeys. This does not imply that those living further away do not use the services and facilities: they will still do so but would clearly be more likely to use other forms of transport to do so; and it is this that should be taken into account. This is further recognised in the Local Plan which notes "travel by car will still be an essential option for many people living in remote rural areas."

- k) **Therefore, based on the information reviewed it is not considered that there is sufficient evidence to justify the requirement of a footway from the proposed development site along Hill Road to the south.**
- l) For all of the above reasons it is considered that the allocation of sites STNP13 and 14 would not contravene Basic Conditions a, d and e

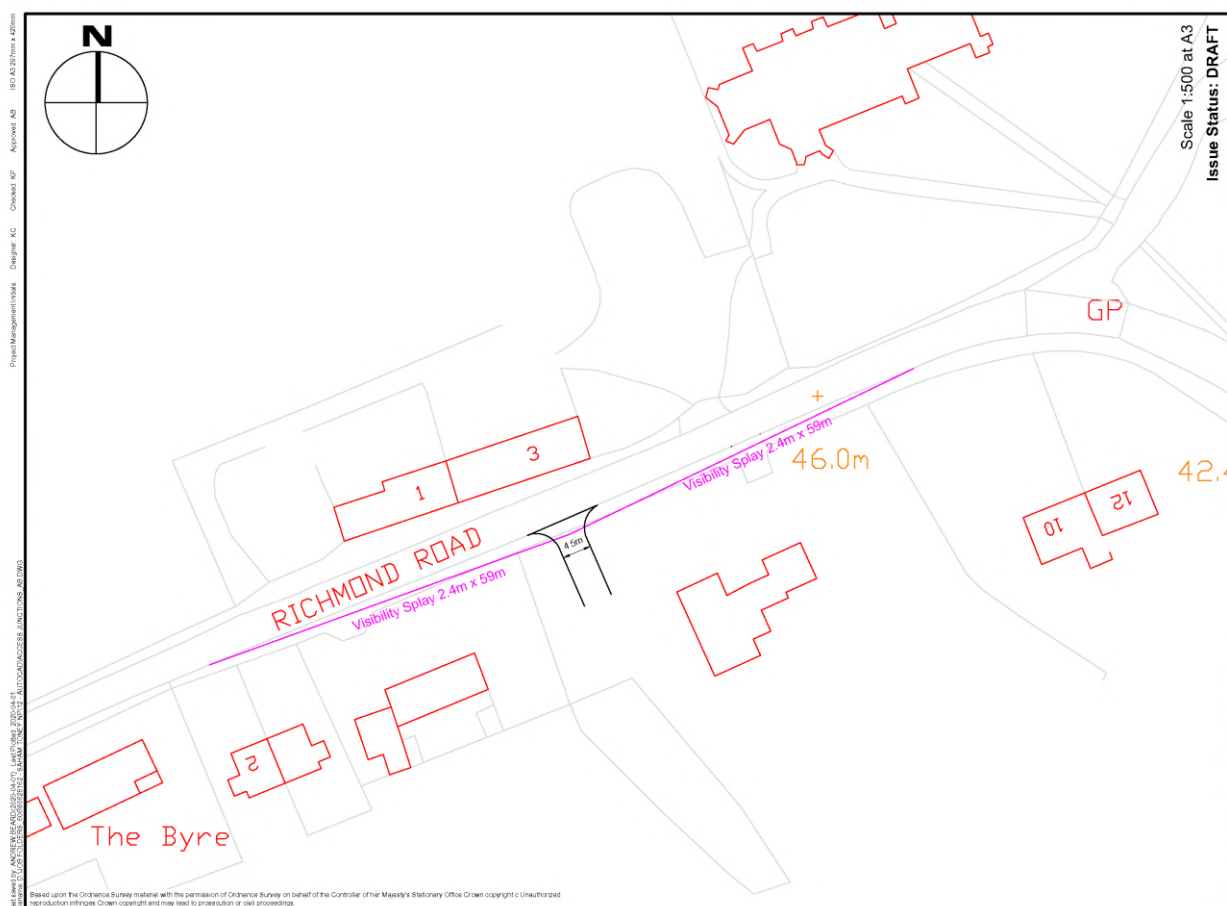
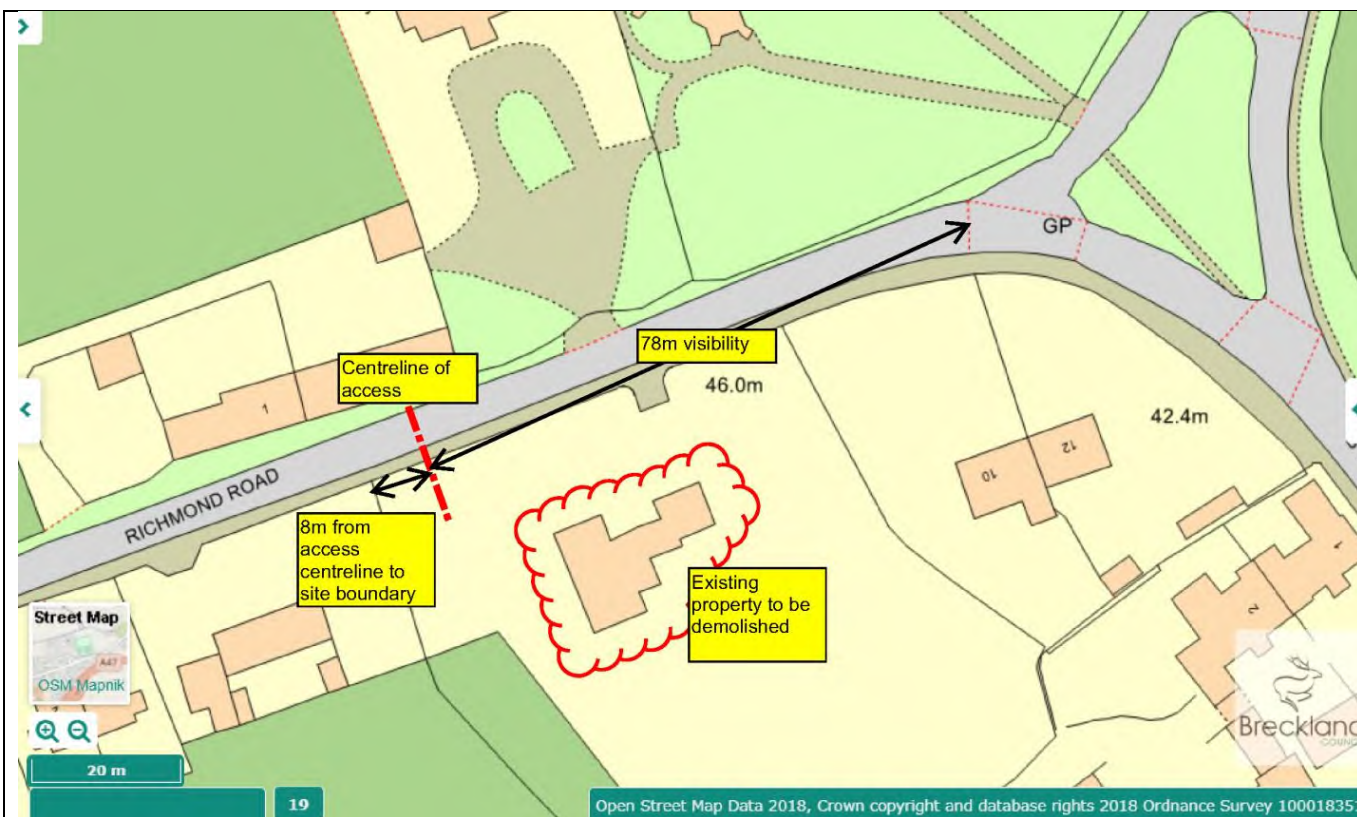
COMMENT G:

STNP15

There is sufficient doubt that a suitable safe access can be achieved therefore evidence is required prior to highway support for the allocation. If allocated without that evidence it will be unclear whether the site could ever be delivered. The site has an existing dwelling and it is not clear whether that would remain as it will have a significant bearing on the ability to deliver a safe access. A scale plan is required and until such time there is a highway objection to the site.

REACTION:

- a) There is no lack of clarity regarding removal of the existing dwelling. Criterion P2O.2 of the site allocation Policy 2P already states "As part of the development, the existing residential property will be demolished."
- b) A scale plan demonstrating safe access is given below and has been added to the supporting text of the site allocation Policy for STNP15. A new policy requirement has also been added as follows to more specifically reinforce the requirements of Policy 2F with regard to site access: "A scale plan of the proposed site access and visibility splays in accordance with Policy 2F and to the satisfaction of the Local Highways Authority shall be submitted with a planning application for this site." That scale plan would be professionally prepared and more detailed. It is noted that the quoted cost (January 2020) of preparing such a plan is £1400 plus VAT, and it is considered that would be an unreasonable cost for either the Neighbourhood Plan or site owner to bear to support the allocation at this stage. That notwithstanding an indicative scale drawing of a suitable and achievable site access is included in the Saham Toney Neighbourhood Plan Transport Study (AECOM, April 2020), and shown below, which was professionally prepared by specialists, adds weight to the fact that suitable access may be achieved for this site.



COMMENT H:

STNP16

Subject to the highway requirements set out in 3PL/2018/0563/O being included in the allocation policy the site is acceptable to the Highway Authority for allocation.

REACTION:

The existence of highways conditions to planning permission 3PL/2018/0563/O is already noted in criterion P2Q.1 (e). The policy supporting text can be extended to specify those conditions if the Local Planning Authority agrees that is necessary, as opposed to a simple reference to the existence of conditions.

COMMENT I:**Numbers and cumulative impacts**

The Emerging Local Plan to be adopted 28 Nov sets out the approach to numbers in Saham Toney as a rural settlement with a boundary. *Criteria 2 of Policy HOU 04 sets out for rural settlements with boundaries development should not lead to the number of dwellings in the settlement increasing by significantly more than 5% from the date of adoption of the plan. This includes proposals inside and outside of the settlement boundary. This methodology sets out how the baseline level of dwellings have been calculated for each settlement with boundaries. This methodology provides the most accurate, up to date information for each of the settlements regarding residential dwellings and planning permissions. This data, as set out in the table below, provides the basis for the 5% calculation, which sets a target for the number of dwellings to be built in each of the settlements.*

For Saham Toney this works out to be 33 dwellings. The proposed allocations total 83 dwellings, which is significantly above the requirement set out in the development plan. There is no compelling evidence that the village can and should accommodate this level of growth. There are very few facilities within the settlement and significant growth will lead to an unsustainable approach to growth increasing the need to travel and reliance on the private car.

The highway authority would support a combination of sites that total about 33 dwellings. Any significant uplift would not be supported.

In terms of the comments made in relation to sites STNP4, STNP5, STNP6 and STNP7, it is agreed that a combination of these sites could be brought forward, provided that:

- The total allocation in the village does not significantly exceed 33;
- The combination of sites allows the interrelated access requirements set out in the individual site comments to be met.

REACTION:

- a) The Saham Toney Neighbourhood Plan Transport Study (AECOM, March 2020) includes an analytical assessment of the individual and cumulative impact of additional traffic likely to be generated by the site allocations in the Neighbourhood Plan. It reviews traffic flows due to each site and also assesses queue lengths at two key road junctions. The study report concludes that the individual and cumulative impact of the site allocations can be accommodated without detriment to the local highway network.
- b) It is not accepted that the methodology set out in Local Plan Policy HOU 04 for defining a housing target is the most accurate, nor the most up to date, nor the most appropriate; for the following reasons:
 - 1) It applies a 5% limit uniformly to each of 17 “Villages with Boundaries”, rather than examining the unique development opportunities and constraints of each.
 - 2) Part of the reasoning for the 5% growth limit, given in paragraph 3.10 of the Local Plan, is that it is evidenced “through representations by landowners and developers that demonstrates that sites are available and developable.” In 2014 Breckland Council prepared a Strategic Housing Land Availability Assessment which concluded in its Table 8.2 that based on sites put forward, Saham Toney had a constrained capacity of 90 dwellings on 6 suitable sites. To date only 29 of those dwellings have been delivered. A 2015 update to the Strategic Housing Land Availability Assessment subsequently identified a capacity of 185 houses. The results of both

assessments show that Saham Toney has significantly more development capacity than that calculated in Appendix 5 of the Local Plan.

- 3) That fact was evidenced by the more up to date (July 2019) assessment of 16 sites put forward in response to a call for sites for allocation in the Neighbourhood Plan. That assessment and the subsequent site selection report included a detailed review of each proposed site's sustainability, including criteria relating to highways constraints. As a result, prior to pre-submission, it was concluded that 11 sites were sustainable with the potential for development of 83 houses. This represented the most thorough and up to date assessment of development capacity in the Neighbourhood Area and fully justified an increase to the limit proposed by Local Plan Policy HOU 04.
- 4) The Saham Toney site assessment and site selection processes are the only examination of ability to deliver the housing levels set out in Local Plan Policy HOU 04 for any of the 17 villages covered by that policy. There is no evidence that any of the other 16 villages can deliver 5% growth. Additional, justified growth in Saham Toney may offset any delivery failure in other villages.
- 5) Breckland Council's document "Locational Strategy, Level, Location of Growth and Rural Areas", 11 July 2016 proposed the use of a criteria-based approach for development proposals immediately adjacent to the settlement boundary. That is precisely what the Saham Toney Neighbourhood Plan Site Assessment and Site Selection Reports do.
- 6) In contrast to its Strategic Housing Land Availability Assessments of 2014 and 2015, Breckland Council did not undertake any objective assessment of potential development capacity in Saham Toney when setting a 5% growth limit for the village. Local Plan Policy HOU 04 was not subject to a detailed sustainability assessment, and is considered to set an arbitrary limit on growth.
- 7) Policy HOU 04 of the adopted 2019 Local Plan allows for development 'immediately adjacent' to Saham Toney's existing settlement boundary, so long as overall numbers of dwellings in the settlement do not significantly exceed 5% over the number as at adoption of the Local Plan. Appendix 5 to the Local Plan provides guidance as to what a 5% increase would be, and in Saham Toney specifies that as 33 new dwellings. applies to development outside, but immediately adjacent to the settlement boundary.
- 8) Planning officers at Breckland Council reviewed the pre-submission version of the Neighbourhood Plan, including its site allocation policies, and made no representations opposing the total allocation of 83 dwellings. They have informally advised that they would not consider 83 to be "significantly more" than 33 when considering future planning applications.
- 9) In setting a housing target for Saham Toney of 33 dwellings, the Local Plan omits two important factors, the effect of which is described below:
- 10) An increased household projection for the Breckland District via projections published by the Government in September 2018, accounted for as follows:
 - i. The 33 new dwellings allocated to Saham Toney are part of Breckland Council's overall "Objectively Assessed Need" (OAN) of 15298 dwellings. That is derived from a previous Government household projection estimate, published in 2016 and based on 2014 data, which showed there would be 67,797 dwellings in the district in 2036. The latest projection estimate, published in September 2018 and based on 2016 data, showed an increase in that total to 68,588 dwellings. Using the later estimate the projected increase over the period of the Local Plan (2011-2036) has risen from 13,053 to 14,066.
 - ii. Applying adjustments to the new figure in the same way as done in the Central Norfolk Strategic Housing Market Assessment 2017, Breckland's full OAN would now be 16,311. Based on the previous OAN of 15,298, Policy HOU 02 of the Local Plan, which allocates a total of 16,630 new dwellings, shows an 8.7% buffer against the OAN. Measured against a potentially increased OAN, the buffer is reduced to 1.9%. It can reasonably be assumed that were the increased OAN to be applied, the buffer should not be less than

- it is for the present OAN. Applying an 8.7% buffer to a potentially revised OAN of 16,311 results in a total allocation across the district of 17,730. To be conservative it is proposed that a 10% buffer should be applied, as being more in accord with planning guidance. Applying that buffer results in a total allocation across the district of 17,942.
- iii. A simple, but reasonable way to determine how this might affect Saham Toney's allocation is to make a pro-rata increase. Hence a revised minimum allocation is:
 - iv. $(33 \times 17942) / 16630 = 35.6$; set at 36.
 - v. The application of an adjustment factor of approximately 1.33 to reflect the disparity between average salaries and average house prices in the Breckland District (the affordability factor set by Planning Practice Guidance), as calculated below:
 - vi. Government Planning Practice Guidance, as updated in February 2019, sets out an adjustment factor to be applied to household projections to account for market signals. Due to the timing of the Local Plan's submission for examination, that Plan is covered by transition arrangements for the application of revised NPPF requirements and is thus not required to apply the adjustment. However, when the Local Plan is subsequently updated (planned for 2021), it will be required to do so.
 - vii. The Neighbourhood Plan is not covered by the same transition arrangements, and hence it is prudent to apply the adjustment from the outset.
 - viii. The potentially amended Breckland household projection 2011-2036 = 16,311 (as set out in point 1).
 - ix. The adjustment factor = $1 + \{[(\text{Local affordability ratio} - 4) \div 4] \times 0.25\}$
 - x. The median local affordability ratio for Breckland is 9.17 (source: Office for National Statistics online dataset "Ratio of House Price to Workplace Based Earnings", March 2019), resulting in an adjustment factor of 1.323.
 - xi. Applying this increase to the result obtained from consideration of updated household projections gives a revised minimum housing allocation:
 - xii. $36 \times 1.323 = 47.63$; set at 48.
- c) As a result of the above calculations it is suggested that any consideration of a minimum development capacity for Saham Toney, outside but adjacent to the settlement boundary, should be based on the adjusted figure of 48, rather than 33 dwellings. Furthermore, since the representation was made, the number of dwellings allocated has been reduced from 83 to 70, of which 9 are within the settlement boundary. Hence the comparison that should be made between Local Plan policy and pre-submission Neighbourhood Plan allocations is actually 48 versus 61 dwellings, rather than 33 versus 83.
- d) The Local Plan sets a minimum target of 33 new dwellings in Saham Toney, set against a minimum target of 15,298 new dwellings for the whole Breckland District. Allocating 70 dwellings (amendment to allocations made after this representation) in Saham Toney, being 37 more than the Local Plan target would therefore represent an increase of only 0.2%, clearly an insignificant number in the context of strategic housing policies. In fact, that percentage drops to 0.12% when the corrected figures set out above in point (c) is applied.
- e) The clarification amends the initial limit of only one of sites STNP4-7 coming forward with a maximum of 25 dwellings, and instead agrees that a combination of these sites could be brought forward, provided that:
- 1) The total allocation in the village does not significantly exceed 33;
 - 2) The combination of sites allows the interrelated access requirements set out in the individual site comments to be met.
- f) However, implementation of the first of these requirements by allowing a higher level of development for sites STNP4-7 would be inappropriate, because it would unfairly prejudice other sites that have been shown to be more or equally suitable for development. Furthermore, the original comments placed a limit of 25 dwellings on the four sites due to concerns of impact on junction safety (reference Site Selection Report, Local Highways Authority site assessments). The

clarification does not explicitly remove that concern. Hence it is not intended to allocate the bulk of new dwellings in the Plan to sites STNP4-7.

- g) For other reasons (the harmful landscape impact of sites STNP5 and 6), the total number of houses to be allocated will be reduced to 70, of which 61 are outside but adjacent to the settlement boundary. Given that, an increase of 13 over the corrected minimum total of 48 cannot be considered “significant”.
- h) A Strategic Environmental Assessment of the Neighbourhood Plan has been carried out (AECOM, June 2020) in the context of the Plan’s draft Regulation 15 policies, including the allocation of 9 sites that will deliver a total of 70 dwellings. The assessment report concludes that the Plan will have a positive impact, including on transportation.
- i) For all of the above reasons it is justified to allocate a greater number of new dwellings than the limit suggested by the Local Highways Authority, without harmful effect on the highway network.

COMMENT J:

As the plan allocates it should be subject to Strategic Environmental Assessment (SEA) to identify the relative merits of the sites and evidence site selection. The SEA also needs to consider the scale of growth appropriate for Saham Toney if the Neighbourhood Plan is not going to maintain conformity with the approach to housing numbers set out in the development plan.

REACTION:

Following completion of screening options, the Plan has been subject to both a Strategic Environmental Assessment and a Habitats Regulations Assessment by an independent body, and those assessments consider all aspects of the Plan, including those noted in this comment. The assessments conclude that the Plan’s site allocations are acceptable in the context of its draft Regulation 15 policies.

COMMENT K:

I hope this is helpful in shaping the development of your Neighbourhood Plan.

Regards
Richard

Richard Doleman, Infrastructure Development

Community and Environmental Services

Tel: 01603 223263 | Dept: 0344 800 8020

[email withheld](#) County Hall, Martineau Lane, Norwich, NR1 2SG



Norfolk County Council



REACTION: Noted

The Saham Toney Neighbourhood Plan Transport Study (AECOM April 2020) includes a professional assessment of the Local Highways Authority consultation representations and gives additional explanation as to why those relating to highway access and lack of footways do not justify amendments to the Neighbourhood Plan.

5.2 and 5.3: Noted. See 5.1 for details of advice and clarification sought and the subsequent response received.

6.1: Noted.

6.2 and App. 2: It would be impractical and onerous to require landowners of sites put forward for allocation to provide information on any below-ground archaeology on their sites in advance of any future planning application, and likewise beyond the scope of the site assessments to do that. Reference

has been made to Policy Maps 6C and 6D (which include all finds identified in the County's Historic Environment records for Saham Toney), and confirms there are no known archaeological finds on land allocated for development.

Policy 6 includes measures to be taken should archaeological assets be uncovered during site investigations or development. With specific regards to the notes in App. 2:

STNP1: The County's Historic Environment Service's comments to previous application 3PL/2015/1430/F for the site requested three conditions be applied were planning permission to have been granted, relating to an archaeological written scheme of investigation prior to development. Similar conditions could be requested again at the time of a future application for the site.

STNP4-6: Although no prior archaeological investigations are available for these sites, given their proximity to STNP1, the same considerations would appear appropriate and County should request similar conditions at the time of future planning applications.

STNP7: The buildings on the site are not historic, but rather dilapidated, unused 20th century farm buildings. Given that STNP2 has been rated "green" and has unused farm buildings in a much better state of repair than those on STNP7, it is considered the latter should also be rated "green". Should the County have ongoing concern it should raise them at the time of a future planning application, but the comment made is insufficient to justify policy amendment.

STNP9, 13, 14, 15: No reasons have been given for these sites being rated "amber" rather than "green", but since there are no known archaeological assets on any of them, concern must be limited to the general possibility of finds being made during the course of development. That could be true for any site in Saham Toney and does not warrant revision of the site policies. However, the County could request planning conditions be applied in respect of archaeology at the time of any future planning applications.

6.3: Noted

App. 3: Noted

ACTION TAKEN:

1.1 and 1.2: None required

2.1 Text corrected

3.1, first bullet: None required

3.1, second bullet: Criterion added to Policy 3A: "An adequate number of suitably located sprinklers shall be installed in all new developments."

3.2 None required.

4.1: None required

4.2: Non-duplicated measures proposed incorporated in an update to Policy 8.

4.3: A requirement has been added to Policy 2F regarding sequential and exception tests, with explanation given in implementation text as to how they should be applied to allocated sites.

4.4: None required

5.1: The following actions relate to the post-consultation clarification and update of its comments by the Local Highways Authority, as described above:

Comment A: None required

Comment B: A requirement for site roads to be adopted will be added, not only for site STNP1, but as a general requirement for all applicable allocated sites in the applicable allocation policies.

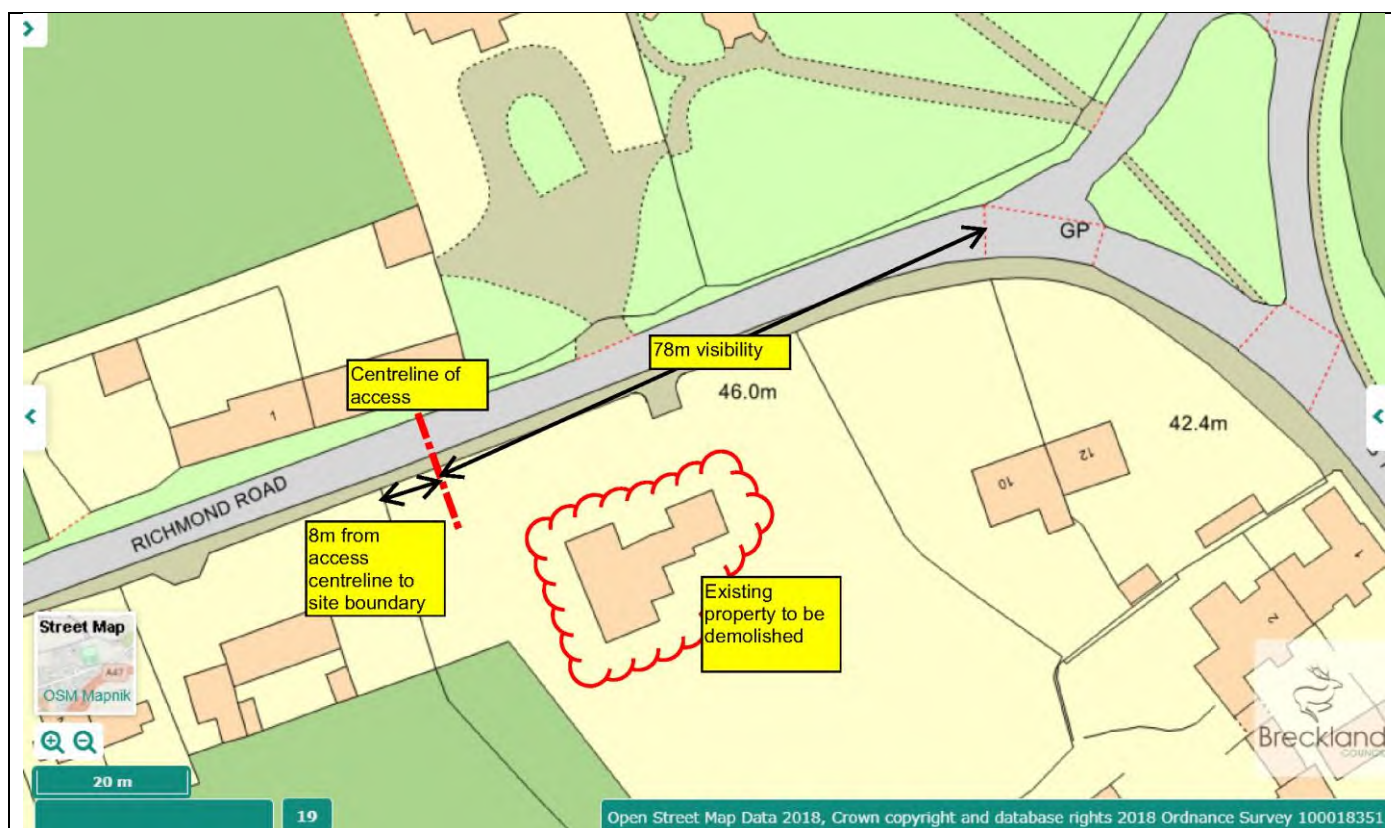
Comment C: It has been demonstrated that allocation of site STNP2 would not be contrary to Basic Conditions. STNP2 will remain an allocated site. No action required.

Comment D: No action is required for sites STNP4-7 with regard to the Local Highway Authority's comments, but it is noted that sites STNP5 and 6 are removed from allocation for other reasons.

Comment E: It has been demonstrated that allocation of site STNP9 would not be contrary to Basic Conditions. STNP9 will remain an allocated site. No action required.

Comment F: It has been demonstrated that allocation of sites STNP13 and 14 would not be contrary to the Basic Conditions. STNP13 and 14 will remain allocated sites. No action required.

Comment G: The scale plan below demonstrates that safe access may be provided for site STNP15, and has been included in the supporting text of the site allocation Policy.



Comment H: Of the 22 conditions that apply to the planning permission granted under 3PL/2018/0563/O, 3 apply to highways matters (conditions 7, 8 and 16) as listed below. They will be noted in the supporting text to the Site Allocation Policy for Site STNP16.

7.	Notwithstanding the details indicated on the submitted drawings, no works above slab level shall commence on site until detailed drawings for the off-site highway improvement works as indicated on Drawing No.1534/03/001 Rev A have been submitted to and approved in writing by the Local Planning Authority.
8.	Prior to the first occupation of the development hereby permitted, the off-site highway improvement works referred to in Part A of this condition shall be completed to the written satisfaction of the Local Planning Authority.
16.	It is an OFFENCE to carry out any works within the Public Highway, which includes a Public Right of Way, without the permission of the Highway Authority. This development involves work to the public highway that can only be undertaken within the scope of a Legal Agreement between the Applicant and the County Council. Please note that it is the Applicant's responsibility to ensure that, in addition to planning permission, any necessary Agreements under the Highways Act 1980 are also obtained and typically this can take between 3 and 4 months. Advice on this matter can be obtained from the County Council's Highways Development Management Group based at County Hall in Norwich. Please contact Kay Gordon 01362 656211. Public Utility apparatus may be affected by this proposal. Contact the appropriate utility service to reach agreement on any necessary alterations, which have to be carried out at the expense of the developer. If required, street furniture will need to be repositioned at the Applicants own expense.

Comment I: It has been demonstrated that a reduction in the total number of houses to be allocated to 33 is unwarranted. No action required.

Comment J: The Plan has been subject to a Strategic Environmental Assessment prior to submission.

Comment K: None required.

5.2 and 5.3: Clarification of the consultation representation was requested and received as described above. Other than that, no specific action required is required to these two comments

6.1, 6.2 and 6.3: None required

App. 3: None required

B4.9. Representation by Historic England

RESPONDING ORGANISATION: Historic England	DATE: 03 October 2019
REPRESENTATION(S): <div style="text-align: right;">By e-mail to: Chris Blow Saham Toney Neighbourhood Plan Cttee Our ref: PL00616464 Your ref: Date: 03/10/2019 Direct Dial: 01223 582746</div> Dear Mr Blow, Ref: Saham Toney Neighbourhood Plan Regulation 14 Consultation Thank you for inviting Historic England to comment on the Regulation 14 Pre-Submission Draft of the Saham Toney Neighbourhood Plan. We welcome the production of this neighbourhood plan, but do not wish to make any comments at this time. We would refer you to our detailed guidance on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here: https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/ . For further advice regarding the historic environment and how to integrate it into your neighbourhood plan, we recommend that you consult your local planning authority conservation officer, and if appropriate the Historic Environment Record at Norfolk County Council. To avoid any doubt, this letter 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 plan, where we consider these would have an adverse effect on the historic environment. Please do contact me, either via email or the number above, if you have any queries. Yours sincerely, Edward James Historic Places Advisor, East of England	
RELEVANT SECTION(S) OF PLAN: General	
REACTION TO REPRESENTATION(S) Historic England's detailed guidance has been used in the preparation of Policy 6: Heritage Assets and is referred to throughout that policy and supporting text, following earlier advice and information provided informally by the responent	
ACTION TAKEN:	

None required

B4.10. Representation by Anglian Water

RESPONDING ORGANISATION: Anglian Water	DATE: 09 October 2019
REPRESENTATION(S): Thank you for the opportunity to comment on the Saham Toney Pre-submission Neighbourhood Plan. The following response is submitted on behalf of Anglian Water. I would be grateful if you could confirm that you have received this response. Policy 5: Saham Toney Rural Gap We note Policy 5 as drafted would require utility infrastructure (unlike other types of development) which requires planning permission to demonstrate a need for being located within the designated Rural Gap. Anglian Water's existing infrastructure is often located in the countryside at a distance from existing settlements as such the policy would place an unintended restriction on our ability to serve our customers under the provisions of the Water Industry Act 1991. In addition, it is unclear on what basis Anglian Water would demonstrate that alternative sites outside of the designated Rural Gap are not available. It is therefore proposed that Policy 5 is amended as follows: 'Proposals for essential utility infrastructure will be permitted in the rural gap where no other feasible site is available ' Policy 8: Surface water management and sewerage provision P8.2 - We note that changes have been made to the wording of Policy 8 in response to comments made by Anglian Water as part of the earlier consultation which are fully supported. P8.7 - Anglian Water is also supportive of the text relating to the public sewerage network as drafted. Supporting text paragraphs T8.1 and T8.3 We note that changes have been made to the supporting text of Policy 8 in response to comments made by Anglian Water as part of the earlier consultation which are fully supported. Should you have any queries relating to this response please let me know. 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: Policies 5 and 8	
REACTION TO REPRESENTATION(S) The comment on the wording of Policy 5 is accepted The support for the revisions made to Policy 8 and its supporting text is noted	
ACTION TAKEN:	

Policy 5: Updated as suggested

Policy 8: None required

APPENDIX B5. Pre-Submission Consultation August-October 2019: Parishioner Comments and STNP Responses

RESPONDENT NUMBER: 1	DATE: 19 August 2019
<p>Comment 1: The plan does not take into account the historic flooding issues at the junction of Pages Lane, Hills Road and Chequers Lane. Despite constant reminders from villagers in this area, many of whom have been flooded, the group have approved five main sites all in one tight area of the village which will contribute to further problems. One of the sites has been the subject of previous planning applications with over 60 letters of objection.</p> <p>Comment 2: The plan has disregarded the wishes of the village, as returned in the village questionnaire. The village overwhelmingly said developments should be restricted to between 4 and 6 houses.</p> <p>Comment 3: It is unusual for a village not to have any footpaths for walkers. Many years ago, the Parish Council prepared leaflets showing three walks, taking into account the rural ambiance of the village as opposed to just walking through housing developments. Two of the three walks go down Pound Hill so the farmland views can be enjoyed - these are still used by many villagers. The proposals by the Group destroy this opportunity, as the Group fails to acknowledge the open aspect and views across the total length and both sides of Pound Hill which should be protected.</p>	
<p>RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:</p> <p>Comment 1: Site allocation policies; policy 8</p> <p>Comment 2: Policy 2A, Policy 2C, site allocation policies</p> <p>Comment 3: Site allocation policies 2I and 2J (sites STNP4 and 5)</p>	
<p>REACTION TO REPRESENTATION(S):</p> <p>Comment 1: The Plan has taken full account of flood risk at the locations noted in the response and throughout the whole of the Neighbourhood Area. A rigorous and independent site assessment process included assessment of each potential site by both the Lead Local Flood Authority and the Statutory Water Operator (Anglian Water). The recommendations of both those assessments were adopted without modification when sites were selected for allocation.</p> <p>Policy 8 makes detailed and comprehensive provisions to avoid development of allocated sites (or any others that may come forward) increasing existing flood risk, and where relevant for allocated sites, specific measures are included in the site allocation policies to reinforce the requirements of Policy 8. Nevertheless, measures will be taken to further reinforce those provisions.</p> <p>The respondent is mistaken apparently suggesting the Neighbourhood Plan can resolve existing surface water flood issues. I cannot do that; in line with the NPPF and emerging Local Plan, it can only apply measures to prevent an increase in existing flood risk, and it does that in a stringent and robust manner. The site noted that was the subject of a previous planning application (allocated site STNP1) includes measures to avoid increased flood risk that were not included in that application.</p> <p>It is noted that some of the flood problems in the area are caused by the poor maintenance of ordinary watercourses. This is the responsibility of riparian owners. Policy 8 has been split into component parts that significantly reinforce the single pre-submission policy. New policy 8F explicitly deals with requirements for future management and maintenance of such watercourses on new development sites, but other householders who hold riparian rights on watercourses are encouraged to ensure they are regularly maintained. Guidance on riparian owner's rights and responsibilities can be found in a Breckland Council guide on the subject which can be downloaded from https://www.stnp2036.org/the-neighbourhood-plan--flood-risk.html</p> <p>The Saham Toney Strategic Environmental Assessment, AECOM, June 2020, includes among its conclusions <i>"In light of the area's surface water flood risk and recent flooding events, the Neighbourhood Plan provides a close focus on policies which aim to reduce that risk as far as possible. This includes</i></p>	

through an emphasis on the inclusion of climate change allowances within flood risk assessments, drainage scheme proposals and through seeking to ensure that new development effectively considers its impacts on surface water flood risk. This will help ensure that no significant adverse effects on surface water flood risk will take place as a result of the allocations taken forward through the Neighbourhood Plan, and increased resilience to flood risk is secured.” This supports the view that the Plan adequately addresses flood risk.

In its response to the publication of the Saham Toney Flood Risk Study, Create Consulting, May 2020, the Lead Local Flood Authority stated *“It is really welcome and encouraging to see the attention to surface water flooding and flood risk within the document and through the conversations we have had. If only all Neighbourhood Plans we see were like this.”* This supports the view that the Plan adequately addresses flood risk.

Comment 2: The Neighbourhood Plan must conform to the requirements of the Breckland Local Plan. At the time of the questionnaire noted by the respondent (July 2016 and October 2016) the emerging Local Plan set a criterion for rural villages such as Saham Toney, limiting development size to 5 dwellings. That policy criterion was not accepted as sound by the Government Inspector who examined the Local Plan and was deleted from the Local Plan (Policy HOU 04).

Therefore, the Neighbourhood Plan cannot include a criterion that would contravene the Local Plan, regardless of villager’s earlier expressed preferences.

Additionally, over the period August 2018 to July 2019, a comprehensive and robust process of site assessment and site selection has been undertaken to identify sites suitable for allocation in the Plan. That process is documented in great detail in the Site Assessment and Site Selection Reports, and demonstrates that some of the sites allocated are suitable for the provision of more than 5 dwellings and can be sustainably developed to a higher level: the largest allocation on a single site being 13 dwellings. The NPPF has a fundamental requirement for sustainable development to be supported and the Neighbourhood Plan does that. It is also pointed out that 6 of the 11 sites allocated in the pre-submission Plan were for 6 or fewer dwellings, as earlier supported by villagers. The suggestion that the Plan disregarded the wishes of the village is strongly refuted.

Comment 3: Since the Regulation 14 submission of the Neighbourhood Plan, independent site masterplanning studies have been undertaken by the Government appointed consultants, AECOM. Those studies included three options for the settlement cluster formed by sites STNP1, STNP4, STNP5, STNP6 and STNP7. As a result of the studies and a professional review of the landscape impact of the sites, sites STNP5 and 6 have been shown to have unacceptable landscape impact and will be removed from allocation. This is fully explained in the Saham Toney Neighbourhood Plan Masterplanning Report and the second edition of the Saham Toney Neighbourhood Plan Site Selection Report. As a result, the existing open aspect and views across the land to the east of Pound Hill will be retained. The landscape impact review of masterplanning studies for STNP4 showed that site’s impact to be acceptable and hence it is retained as an allocated site. Given that professional conclusion there is no justification for the respondent’s suggestion to retain the open aspect and views across that site to the west of Pound Hill. Masterplanning for site STNP4 has been done in a way that retains some part of the long vista north-west from Pound Hill across the site.

It is noted that should the decision not to allocate sites STNP5 and 6 be overturned in future, masterplanning for those sites specifically includes a footway to the south and east of the sites that would have a completely open aspect.

Two of the three circular village walks noted in the comment, do indeed include Pound Hill, but rather than highlight the open landscape at the northern end of Pound Hill, the walk notes concentrate on the buildings to be seen along that section of the route. It was not the intention of the walks to preserve those routes in an unchanged state, and since the walks were published, a range of development has taken place along their routes without preventing the enjoyment they offer.

It is respectfully pointed out that the comment is incorrect in stating there is an open aspect along the total length and both sides of Pound Hill: most of the west side is already developed as is the east side from the Primary School southwards.

ACTION TAKEN:

Comment 1: Pre-submission Policy 8 split into component parts (new policies 8A-8H and 9) and significantly reinforced

Comment 2: None required

Comment 3: Sites STNP5 and 6 have been removed from allocation in the Plan due to their landscape impact. A new masterplanning policy has been introduced requiring future proposals for site STNP4 to broadly adhere to its indicative master-planned design and layout.

RESPONDENT NUMBER: 2	DATE: 19 August 2019
REPRESENTATION: In the note to the Nilefields site correct “The AECOM assessment <u>as</u> taken that appraisal” to “The AECOM assessment <u>has</u> taken that appraisal”	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Site Selection Report, Table 6, page 19.	
REACTION TO REPRESENTATION(S): Agreed	
ACTION TAKEN: Report corrected accordingly	

RESPONDENT NUMBER: 3	DATE: 31 August 2019
REPRESENTATION: I have spent some time reading the Neighbourhood Plan, and I have been very impressed with all the effort that has gone into this high-quality document. I am a resident of Cley Lane and just wanted to thank you for the many hours of hard work you have put in on our behalf. It is very much appreciated.	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: General	
REACTION TO REPRESENTATION(S): Support noted	
ACTION TAKEN: None required	

RESPONDENT NUMBER: 4	DATE: 2 September 2019
REPRESENTATION: Hi to all the team. First up, massive congratulations on completing what must have been a mammoth task! 12 volumes of 'stuff' to wade through, surely enough to satisfy even a 'Lord of the Rings' (re-reader like me). No promises, but I will try to wade through as much as I can in the coming weeks (and probably months!!). The Saham community is very lucky to have such a dedicated, knowledgeable team willing to devote so much time and effort in order to try to preserve for later generations the ambience and history of this beautiful village. Hopefully, Breckland Council will adopt at least the majority of the conclusions you have reached in the report when they come to finalise their housing plans for the area. As I have already mentioned, I have only had a cursory glance at the 'headlines' and some of the back-up information and would raise the following comments and queries based on my rapid initial perusal: Comment A: Flooding: if I am reading the map correctly, between 15 and 27 houses seem to be in the Pound Hill area almost exactly opposite the old Manor, our major architectural site of national importance. The bottom of the Hills Road area does seem to suffer flooding every time we have a 'weather event' and, as such, any large-scale building on this green-field site could, possibly, only	

exacerbate the problem thanks to water 'run off' surely? I note that you have mentioned an 'on-site water storage... to store long term surface water run off up to a stated limit'. I have no idea what that may entail but, whatever it may be, it does sound like a very large storage unit, presumably sited underground? If so, will there be installations of these 'storage' tanks in all the areas which flood regularly, including the bridge areas of Richmond Road and Cley Lane? I also note the aims of the plan are to 'ensure new development does not result in higher flood risk than existed before it was approved'. Can we not aim to actually reduce the flooding altogether, irrespective of new development? Our last 'weather event' saw us trying to reach our home from every single entrance to the village unsuccessfully, until two high speed Range Rovers provided a path through the waters!!

Comment B: Richmond Road: There appears to be 6 houses planned for between, say, the Church and the turn off to Threxton. This is sandwiched between two very severe and blind bends and, as such, could make an already dangerous stretch of road even more so. A dozen houses also appear to be planned for the Broom Hall area. Again, a presumed new entrance would be on to a stretch of road which is blind through both an incline and the bends at both ends of the incline.

Comment C: Housing density: 21 of the proposed 83 houses (25%) appear to be 'added on' to The Oval area with, as already mentioned, a further 27 sited almost directly opposite (giving a total of 58%). This will greatly increase road traffic past the school surely? Parking is already a problem on this road and any extra traffic will make this even more dangerous.

Comment D: Heritage: The Old Manor.... just what, if anything, is happening? I have had some low-key discussions with Breckland Council, English Heritage, Natural England and others who all seem to be unable to offer any concrete suggestions as to how or if any improvements could be made to the sad unsightly blot at the entrance to our village. At the time of this e-mail, as usual the 'protective' covering is in tatters and work on the new 'gatehouse' appears to be at a standstill. Will even that become a 'white elephant' thanks to insufficient funds I wonder? I am always dismayed when entering the village from Ashill and seeing this once (quite recent) magnificent building on an inexorable downward slope to oblivion with no-one apparently able to apply any pressure to save it.

Comment E: Work has also started recently on a new build in the woodland adjoining Broom Hall. Trees have already been cut down in order to facilitate this build. I'm sure no-one wants to lose even more of the wonderful variety of woodland in the village unnecessarily. Was a survey done I wonder? What surveys will be done on the other (greenfield) sites. I have knowledge that, before the start of the huge development on Newmarket Road, Swaffham, a full bio-diversity study was completed which entailed a survey of all animal, plant and arboreal life in the affected area.

Comment F: Well, that's my observations. Again, as I mentioned originally, the team have prepared a wonderful plan overall for the village and I only hope my comments are taken in the spirit in which they have been raised. I would hate to see our village spoilt, by either over or incorrect development, as a result of a lack of interest or, hopefully, constructive comments from the local populace.

RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:

Comment (A): Site allocation policies 2F, 2G, 2I, 2J, 2K and 2L, Policy 8

Comment (B): Site allocation policies 2P and 2Q

Comment (C): Site allocation policies 2G, 2I, 2J, 2K and 2L

Comment (D): Policy 6

Comment (E): Applies to a planning application that was approved on appeal, rather than a specific aspect of the Plan

Comment (F): General

REACTION TO REPRESENTATION(S):

Comment (A): The Plan has taken full account of flood risk at the locations noted in the response and throughout the whole of the Neighbourhood Area. A rigorous and independent site assessment process included assessment of each potential site by both the Lead Local Flood Authority and the Statutory Water Operator (Anglian Water). The recommendations of both those assessments were adopted without modification when sites were selected for allocation.

Policy 8 makes detailed and comprehensive provisions to avoid development of allocated sites (or any others that may come forward) increasing existing flood risk, and where relevant for allocated sites,

specific measures are included in the site allocation policies to reinforce the requirements of Policy 8. Nevertheless, measures will be taken to further reinforce those provisions.

The respondent is mistaken apparently suggesting the Neighbourhood Plan can resolve existing surface water flood issues. I cannot do that; in line with the NPPF and emerging Local Plan, it can only apply measures to prevent an increase in existing flood risk, and it does that in a stringent and robust manner. With regard to flood issues on Richmond Road and Cley Lane the Plan can only address the development of land, not the rectification of existing problems, so the Plan is not in a position to specify underground surface water storage tanks, or other measures, at locations where development is not proposed. Likewise, a Neighbourhood Plan cannot require a reduction in existing flood risk nor its complete elimination, as to do so would contravene the NPPF. A Parish Action Point dealing with such flood risk that was previously part of the Plan, has subsequently been formally handed over to the responsibility of the Parish Council for implementation and the respondent and other villagers are encouraged to engage with Parish Councillors in that implementation.

It is noted that some of the flood problems in the area are caused by the poor maintenance of ordinary watercourses. This is the responsibility of riparian owners. Policy 8 has been split into component parts that significantly reinforce the single pre-submission policy. New policy 8F explicitly deals with requirements for future management and maintenance of such watercourses on new development sites, but other householders who hold riparian rights on watercourses are encouraged to ensure they are regularly maintained. Guidance on riparian owner's rights and responsibilities can be found in a Breckland Council guide on the subject which can be downloaded from <https://www.stnp2036.org/the-neighbourhood-plan--flood-risk.html>

The Saham Toney Strategic Environmental Assessment, AECOM, June 2020, includes among its conclusions *"In light of the area's surface water flood risk and recent flooding events, the Neighbourhood Plan provides a close focus on policies which aim to reduce that risk as far as possible. This includes through an emphasis on the inclusion of climate change allowances within flood risk assessments, drainage scheme proposals and through seeking to ensure that new development effectively considers its impacts on surface water flood risk. This will help ensure that no significant adverse effects on surface water flood risk will take place as a result of the allocations taken forward through the Neighbourhood Plan, and increased resilience to flood risk is secured."* This supports the view that the Plan adequately addresses flood risk.

In its response to the publication of the Saham Toney Flood Risk Study, Create Consulting, May 2020, the Lead Local Flood Authority stated *"It is really welcome and encouraging to see the attention to surface water flooding and flood risk within the document and through the conversations we have had. If only all Neighbourhood Plans we see were like this."* This supports the view that the Plan adequately addresses flood risk.

Comment (B): In the case of the 6-house development noted (STNP15) it has been demonstrated by the site owner that 59m visibility splays can be provided in both directions from the proposed site access point, which satisfies the requirements of the Local Highway Authority in this respect. This has been further verified by the Saham Toney Neighbourhood Plan Transport Study, AECOM, April 2020. In the case of the 12-house development noted (STNP16) it is actually at Richmond Hall rather than Broom Hall and so the access and visibility issues differ from those noted by the respondent. The site assessment and selection processes showed the access to be acceptable, and the Local Highways Authority concurred with that finding in its consultation response. This has been further verified by the Saham Toney Neighbourhood Plan Transport Study, AECOM, April 2020.

Comment (C): Site assessment and a consultation response by the Local Highways Authority of the sites in question did raise some concern about the total number of houses in the area in question, and initially suggested a combined limit of 25 dwellings for sites STNP4, 5, 6 and 7. In a subsequent clarification of its representation the Authority revised its response and accepted the allocation of sites STNP4, 5, 6 and 7 (see B4.8, Highways section). Hence a reduction in the capacity of those sites due to increased traffic, as proposed by the respondent is not justified.

However, it is noted that for reasons of unacceptable landscape impact, sites STNP5 and 6 will be removed from allocation, thereby easing future traffic levels.

Additionally, the Saham Toney Neighbourhood Plan Transport Study, AECOM, April 2020 demonstrates that both individually and cumulatively, the impact of all allocated sites on traffic flows in the village and on queue lengths at two key junctions, will be negligible compared to existing levels.

Comment (D): While we sympathise and tend to agree with the concerns raised, the redevelopment of Page's Place is an ongoing process approved by a planning application supported by Historic England. While we might wish it would happen at a quicker pace, there is nothing the Neighbourhood Plan can do to achieve that.

Comment (E): The comment refers to a planning application approved at appeal, rather than any aspect of the Neighbourhood Plan. The Neighbourhood Plan Group opposed that application but is powerless to rescind it. However, the Plan does include measures that will help achieve what the respondent seeks more generally in terms of preserving biodiversity: (i) At planning application stage the site allocation policies require every allocated site to submit a full ecological impact assessment demonstrating any impacts remain at acceptable levels; (ii) There are specific policies in the Plan to preserve habitats and biodiversity (Policy 7D), green infrastructure (Policy 7E) and trees and hedges (Policy 7F). Additionally, Policy 2Q includes the designation of a large area of public amenity land immediately adjacent to the approved single-dwelling development noted by the respondent and that will greatly help achieve the aims the respondent mentions in the area concerned (will delete this paragraph if we delete the amenity land).

Comment (F): Noted

ACTION TAKEN:

Comment (A): Pre-submission Policy 8 split into component parts (new policies 8A-8H and 9) and significantly reinforced

Comment (B): No action required

Comment (C): No direct action is justified as a result of the comment, but the removal from allocation of sites STNP5 and 6 for other reasons will ease any traffic concerns.

Comment (D): None required

Comment (E): None required

Comment (F): None required

RESPONDENT NUMBER: 5

DATE:

5 September 2019

REPRESENTATION:

Comment 1: On reading; the "Allocation Plan" it would appear each offered site has been site assessed as individual proposals, their holistic community impact as such is not logically considered with regard to the historic flood events experienced by the area covered by Pages Lane, Chequers Lane and I Hills Road. Specifically draw your attention to STNP 1/4/5/6/7 and their impact if approved on the current historical and natural surface drainage events. You can forget the 100 years flood as you and any metrologically inclined observer will be aware precipitated flood events are becoming more the norm. I reviewed the pamphlet information and from my calculation it shows 63% of the Allocated Sites despatch their surface water via the Hills Road Chequers Lane drainage system and 75% through its extended system via Ploughboy Lane to the Ovington Road / Bell Corner. As I write 3rd Sept 2019 after a dry hot Summer the static water table level in this valley is one metre below the land surface (where measured) I understand the normal farm land can hold 3 & a half inches of rain water at the end of a Winter – please consider now the area of catchment inflow in this "Saham Toney" Valley system and the impact of any additional run-off when the outlet channel is currently a naturally designed given. Bearing in mind as you mention the further indicated surface water flow from Ashill which enters into the same system and currently where extensive housing development is in progress this will further add flow volume. In your document package pages 48-50 where the site "Major Issues / Comments" are assessed there seems to be no definitive knowledge re the water course (sites 4/5/6/7) in fact, the reading would indicate a "Cut & Paste" creation, I would suggest a definitive survey of Topological Hydrological Gradients and rediscovery, (unearthing) of the original partially observable flow course.

Comment 2: The villagers, as I recall, did not object to minor infill where numbers within the range of 4 to 6 houses were suggested the concentration of the STNP 4/5/6/7 will create initially a mini housing estate.

Comment 3: The proposed concentration of the Pound Hill / Pages Lane /Chequers Lane area will destroy the open vista that villagers are able to currently enjoy.

Comment 4: This concentration of development and ancillary support requirements will come at a cost to the residents currently living in the vicinity of the surface waters natural flow dynamics thus adding to the recurring sewage overflows when capacities are overwhelmed.

RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:

Site allocation policies 2G, 2I, 2J, 2K and 2L

Policy 8

Site Selection Report, section 7.6, table 18

REACTION TO REPRESENTATION(S):

Comment1: Independent site assessments were performed by both the Lead Local Flood Authority and the Statutory Water Provider (Anglian Water). Both took account of both individual and cumulative effects of the various sites proposed, and their recommendations as to which sites / parts of sites should not be considered for development have been adhered to in the site selections made. The respondent appears to make the common mistake of thinking that a 100-year flood event will occur only once in 100 years. That is not the case: it instead indicates a 1% chance of a flood occurring in any year. In fact, a 100-year flood event could in theory occur several times in one year; but the chances of that are less than 1%. With respect the percentages of new houses that the respondent has calculated will add to particular surface water flow routes is irrelevant because:

- A) The specialist independent assessors have not raised concern about that; and
- B) Measures are put forward in the general and specific site allocation policies and Policy 8 (Surface Water Management & Sewerage Provision) that must be adhered to if any future planning application is to be approved, and which specifically prevent any increase in existing risk of surface water flooding.

With respect, it is entirely wrong for the respondent to suggest that Table 18 of the Site Selection Report indicates “no definitive knowledge re the water course” and that the column titled “Major Issues / Comments” is an uninformed “cut and paste creation”. Table 18 in its entirety was provided by the Lead Local Flood Authority, who by definition must be seen as having the greatest qualifications to assess sites with respect to flood risk. The Neighbourhood Plan and the site allocations made defer entirely to that Authority’s judgement in this respect.

It is noted that some of the flood problems in the area are caused by the poor maintenance of ordinary watercourses. This is the responsibility of riparian owners. Policy 8 has been split into component parts that significantly reinforce the single pre-submission policy. New policy 8F explicitly deals with requirements for future management and maintenance of such watercourses on new development sites, but other householders who hold riparian rights on watercourses are encouraged to ensure they are regularly maintained. Guidance on riparian owner’s rights and responsibilities can be found in a Breckland Council guide on the subject which can be downloaded from <https://www.stnp2036.org/the-neighbourhood-plan--flood-risk.html>

The Saham Toney Strategic Environmental Assessment, AECOM, June 2020, includes among its conclusions “*In light of the area’s surface water flood risk and recent flooding events, the Neighbourhood Plan provides a close focus on policies which aim to reduce that risk as far as possible. This includes through an emphasis on the inclusion of climate change allowances within flood risk assessments, drainage scheme proposals and through seeking to ensure that new development effectively considers its impacts on surface water flood risk. This will help ensure that no significant adverse effects on surface water flood risk will take place as a result of the allocations taken forward through the Neighbourhood Plan, and increased resilience to flood risk is secured.*” This supports the view that the Plan adequately addresses flood risk.

In its response to the publication of the Saham Toney Flood Risk Study, Create Consulting, May 2020, the Lead Local Flood Authority stated “*It is really welcome and encouraging to see the attention to surface*

water flooding and flood risk within the document and through the conversations we have had. If only all Neighbourhood Plans we see were like this.” This supports the view that the Plan adequately addresses flood risk.

Comment 2: The Neighbourhood Plan must conform to the requirements of the Breckland Local Plan. At the time of the questionnaire noted by the respondent (July 2016 and October 2016) the emerging Local Plan set a criterion for rural villages such as Saham Toney, limiting development size to 5 dwellings. That policy criterion was not accepted as sound by the Government Inspector who examined the Local Plan and was deleted from the Local Plan (Policy HOU 04).

Therefore, the Neighbourhood Plan cannot include a criterion that would contravene the Local Plan, regardless of villager’s earlier expressed preferences.

Additionally, over the period August 2018 to July 2019, a comprehensive and robust process of site assessment and site selection has been undertaken to identify sites suitable for allocation in the Plan. That process is documented in great detail in the Site Assessment and Site Selection Reports, and demonstrates that some of the sites allocated are suitable for the provision of more than 5 dwellings and can be sustainably developed to a higher level: the largest allocation on a single site being 13 dwellings. The NPPF has a fundamental requirement for sustainable development to be supported and the Neighbourhood Plan does that. It is also pointed out that 6 of the 11 sites allocated are for 6 or fewer dwellings, as earlier supported by villagers.

Comment 3: Since the Regulation 14 submission of the Neighbourhood Plan, independent site masterplanning studies have been undertaken by the Government appointed consultants, AECOM. Those studies included three options for the settlement cluster formed by sites STNP1, STNP4, STNP5, STNP6 and STNP7. As a result of the studies and a professional review of the landscape impact of the sites, sites STNP5 and 6 have been shown to have unacceptable landscape impact and will be removed from allocation. This is fully explained in the Saham Toney Neighbourhood Plan Masterplanning Report and the second edition of the Saham Toney Neighbourhood Plan Site Selection Report. As a result, the existing open aspect and views across the land to the east of Pound Hill will be retained. The landscape impact review of masterplanning studies for STNP4 showed that site’s impact to be acceptable and hence it is retained as an allocated site. Given that professional conclusion there is no justification for the respondent’s suggestion to retain the open aspect and views across that site to the west of Pound Hill. Masterplanning for site STNP4 has been done in a way that retains some part of the long vista north-west from Pound Hill across the site.

It is noted that should the decision not to allocate sites STNP5 and 6 be overturned in future, masterplanning for those sites specifically includes a footway to the south and east of the sites that would have a completely open aspect.

Comment 4: The independent site assessments carried out by Anglian Water included a review of sewerage capacity, both for each site individually and cumulatively. Those assessments did not raise any concern in this respect that warrants exclusions of one or more sites from allocation. In addition, at the time of any future planning applications, prior to their approval pre-submission Policy 8 requires the submission of evidence to show that adequate capacity is available within the local sewerage network to accept additional flows, including at the local treatment works. By definition applicants will need to liaise with Anglian Water to establish that such evidence exists. Existing problems with sewerage overflows are outside the scope of the Neighbourhood Plan to deal with, but it should be noted that they are historical rather than the result of recent or future development

ACTION TAKEN:

Comment 1: Pre-submission Policy 8 split into component parts (new policies 8A-8H and 9) and significantly reinforced

Comments 2 and 4: None required

Comment3: Sites STNP5 and 6 have been removed from allocation in the Neighbourhood Plan

Respondents 6-8 supported the Plan without making comments.

REPRESENTATION:

Comment 1: The plan seems to totally disregard the wishes expressed by the people of the village which overwhelmingly said that developments should be restricted to between 4 and 6 houses.

Comment 2: The plan does not really take into account the historic surface flooding issues we have at the junction of Chequers Lane, Hills Road and Pages Lane. Many villagers (some of which have been flooded) in this area have reminded you of this but you have still approved 5 sites in a very tight area and 1 of these sites previously received over 60 letters of objection.

Comment 3: The plan does not seem to look at the traffic issue we have in this area specifically the speed of the traffic which constantly exceeds the 30mph which is in place!

Comment 4: The impact of the number of houses that will be built on the 5 sites in this area will have a great potential effect both on the flood risk and the quantity and speed of traffic. The neighbourhood plan should look to help our villagers and not potentially increase the risk we all live under regarding flood and certainly not put us all at a greater risk of serious accidents and possibly deaths from speeding vehicles.

Comment 5: We have no footpaths so we should protect any local walks we have as villagers appreciate the ability to see the beautiful views, we have which will be spoilt if we end up just walking through housing developments.

Comment 6: I have already submitted reasons (*...for opposing the plan...*) but would add that today, 6th October, the flood issues rear their heads again! We have had Anglian Water out to us as we are Unable to Flush any toilet as the waist will not go away. We are advised NOT to Run any Water at the moment as the entire run to the Bell Lane Pumping Station is overloaded and FULL! If you allow new builds in this area as your plan suggests it will only make the issue worse! We have an environmental issue with regard to the removal of sewerage as the current system does not cope with the current needs so do not make it worse. A complete stop on new build should be put in place until the system is updated and can cope!!

RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:

Comment 1: Policy 2A, Policy 2C, site allocation policies

Comment 2: Site allocation policies, Policy 8

Comment 3: Site allocation policies 2G, 2I, 2J, 2K and 2L

Comment 4: Site allocation policies 2G, 2I, 2J, 2K and 2L, Policy 8

Comment 5: Site allocation policies

Comment 6: Site allocation policies

REACTION TO REPRESENTATION(S):

Comment 1: The Neighbourhood Plan must conform to the requirements of the Breckland Local Plan. At the time of the questionnaire noted by the respondent (July 2016 and October 2016) the emerging Local Plan set a criterion for rural villages such as Saham Toney, limiting development size to 5 dwellings. That policy criterion was not accepted as sound by the Government Inspector who examined the Local Plan and was deleted from the Local Plan (Policy HOU 04).

Therefore, the Neighbourhood Plan cannot include a criterion that would contravene the Local Plan, regardless of villager's earlier expressed preferences.

Additionally, over the period August 2018 to July 2019, a comprehensive and robust process of site assessment and site selection has been undertaken to identify sites suitable for allocation in the Plan. That process is documented in great detail in the Site Assessment and Site Selection Reports, and demonstrates that some of the sites allocated are suitable for the provision of more than 5 dwellings and can be sustainably developed to a higher level: the largest allocation on a single site being 13 dwellings. The NPPF has a fundamental requirement for sustainable development to be supported and the Neighbourhood Plan does that. It is also pointed out that 6 of the 11 sites allocated are for 6 or fewer dwellings, as earlier supported by villagers. The suggestion that the Plan disregarded the wishes of the village is strongly refuted.

Comment 2: The Plan has taken full account of flood risk at the locations noted in the response and throughout the whole of the Neighbourhood Area. A rigorous and independent site assessment process included assessment of each potential site by both the Lead Local Flood Authority and the Statutory Water Operator (Anglian Water). The recommendations of both those assessments were adopted without modification when sites were selected for allocation.

Policy 8 makes detailed and comprehensive provisions to avoid development of allocated sites (or any others that may come forward) increasing existing flood risk, and where relevant for allocated sites, specific measures are included in the site allocation policies to reinforce the requirements of Policy 8. Nevertheless, measures will be taken to further reinforce those provisions.

The respondent is mistaken apparently suggesting the Neighbourhood Plan can resolve existing surface water flood issues. I cannot do that; in line with the NPPF and emerging Local Plan, it can only apply measures to prevent an increase in existing flood risk, and it does that in a stringent and robust manner. The site noted that was the subject of a previous planning application (allocated site STNP1) includes measures to avoid increased flood risk that were not included in that application.

It is noted that some of the flood problems in the area are caused by the poor maintenance of ordinary watercourses. This is the responsibility of riparian owners. Policy 8 has been split into component parts that significantly reinforce the single pre-submission policy. New policy 8F explicitly deals with requirements for future management and maintenance of such watercourses on new development sites, but other householders who hold riparian rights on watercourses are encouraged to ensure they are regularly maintained. Guidance on riparian owner's rights and responsibilities can be found in a Breckland Council guide on the subject which can be downloaded from <https://www.stnp2036.org/the-neighbourhood-plan--flood-risk.html>

The Saham Toney Strategic Environmental Assessment, AECOM, June 2020, includes among its conclusions *"In light of the area's surface water flood risk and recent flooding events, the Neighbourhood Plan provides a close focus on policies which aim to reduce that risk as far as possible. This includes through an emphasis on the inclusion of climate change allowances within flood risk assessments, drainage scheme proposals and through seeking to ensure that new development effectively considers its impacts on surface water flood risk. This will help ensure that no significant adverse effects on surface water flood risk will take place as a result of the allocations taken forward through the Neighbourhood Plan, and increased resilience to flood risk is secured."* This supports the view that the Plan adequately addresses flood risk.

In its response to the publication of the Saham Toney Flood Risk Study, Create Consulting, May 2020, the Lead Local Flood Authority stated *"It is really welcome and encouraging to see the attention to surface water flooding and flood risk within the document and through the conversations we have had. If only all Neighbourhood Plans we see were like this."* This supports the view that the Plan adequately addresses flood risk.

Comment 3: The Neighbourhood Plan cannot address issues regarding vehicles exceeding the speed limit. Furthermore, it is more likely to be through traffic that may be speeding in this location, rather than vehicles entering or leaving new housing developments allocated in the Plan.

Site assessment and a consultation response by the Local Highways Authority of the sites in question did raise some concern about the total number of houses in the area in question, and initially suggested a combined limit of 25 dwellings for sites STNP4, 5, 6 and 7. In a subsequent clarification of its representation the Authority revised its response and accepted the allocation of sites STNP1, 4, 5, 6 and 7 (see B4.8, Highways section). This indicates that any traffic impact must be deemed acceptable.

The respondent is advised to take this issue up with the Local Highways Authority.

Additionally, the Saham Toney Neighbourhood Plan Transport Study, AECOM, April 2020 demonstrates that both individually and cumulatively, the impact of all allocated sites on traffic flows in the village and on queue lengths at two key junctions, will be negligible compared to existing levels.

Comment 4: This representation is a rephrasing of those made by the respondent in comments 2 and 3, and the responses to those comments apply.

Comment 5: The respondent is perhaps referring to a lack of designated footpaths (rights of way) throughout the Neighbourhood Area as opposed to pedestrian pavements, which exist along Pound Hill,

Page's Lane and Richmond Road and part of Bell Lane. It is further assumed the local walks (none of which are documented) and views referred to are the same as those noted by Respondent 1's comment 3 and hence the same reaction applies.

For reasons other than this representation, sites STNP5 and 6 have been deleted from allocation and therefore no longer obstruct a view to the east of Pound Hill, including the Key View towards Saham Mere. The masterplanning studies for site STNP4 have taken into account the long-distance vista north-west across the site.

Comment 6: Anglian Water made assessments of each site put forward for allocation in the Plan, and that included an assessment of the available capacity at the receiving Water Recycling Centre, or WRC (sewage treatment works). Its assessment concluded there is currently limited capacity at the WRC for additional growth in the Saham Toney catchment. However, the assessment went on to state that "Anglian Water has a statutory obligation to provide sufficient capacity for sites with the benefit of planning permission. We are also currently in discussion with the Environment Agency about how this can best be achieved as part of a revised permit for the site. As such this shouldn't be viewed as an absolute constraint to additional residential development at Saham Toney." Full details of Anglian Water's site assessments can be found in the Saham Toney Site Selection Report. It is further highlighted that at the time Anglian Water undertook its site assessments, sites in the area that is the subject of the respondent's comments had a potential capacity of 131 dwellings, whereas the number allocated in the Plan at its Reg. 14 issue in the same area as a result of the site selection process was 48: clearly a significantly lower number than that assessed by Anglian Water. **Note: This has been reduced to a total of 35 as a result of sites STNP5 and 6 being removed from allocation to their harmful landscape impact.**

The problems the respondent refers to are historic in Saham Toney and result not from lack of sewerage capacity, but the inflow of surface water to the foul sewerage system due to (the incorrect) connection of surface water drain pipes to the foul system. That is a problem neither the Neighbourhood Plan nor Anglian Water can solve: responsibility lies with those householders who allow surface water to drain into the foul system.

It is noted that in its response to the consultation, Anglian Water raised no concerns in this respect.

ACTION TAKEN:

Comment 1, 3 and 4: None required (but with respect to comments 3 and 4 sites STNP5 and 6 have been removed from allocation for other reasons, thereby alleviating concern)

Comment 2: Pre-submission Policy 8 split into component parts (new policies 8A-8H and 9) and significantly reinforced

Comment 5: Sites STNP5 and 6 have been removed from allocation in the Neighbourhood Plan.

Comment 6: None required.

RESPONDENT NUMBER: 10	DATE: 06 October 2019
REPRESENTATION: Please see the form entered by my husband, (Respondent 9), as my reasons are the same but I also include the fact that Anglian Water are unable to cope with the current needs for sewerage removal as today, 6th October, the drains from Chequers Lane to the Bell Lane Pumping Station are FULL and unable to move the sewerage waste away and we are UNABLE to flush a toilet or run any water!! If you allow more new builds in this area it will only add to the problem. It is not only Surface Water, it is also Sewerage!! You must put on Hold ALL new Builds until the Drainage system is updated and able to cope with the current needs let alone the needs that all the extra housing will put on the system.	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Site allocation policies	
REACTION TO REPRESENTATION(S): This is an identical comment to Respondent 9, comment 6, hence see that comment for the response	
ACTION TAKEN:	

None required.

RESPONDENT NUMBER: 11	DATE: 06 October 2019
REPRESENTATION: As discussed at the last Parish Council meeting, we are extremely worried about the possibility of exacerbating the problems we already have with regard to the drainage, both surface water and sewage. Today 6/10/19 being a prime example where after heavy rainfall the drain (on the road) between us and our next-door neighbours was overflowing. I have photos which prove this. Our front garden is also flooded. Our neighbours on the other side of us in 'Glendower' cannot flush their toilets and were told by Anglian Water not to run any water. They had checked the pumping station and could see that it was overloaded. This only goes to show the current problems which would be made far worse should these houses be built.	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Site allocation policies	
REACTION TO REPRESENTATION(S): With respect to comments concerning surface water, the problems of 6 th October referred to by the respondent were a result of detritus (as reported by the leader of the Parish Council who helped clear the blockage, this included plastic bags, a tupperware lid, large lumps of wood and sundry other bits of rubbish) in the stream near the property in question blocking a grate gully near the junction of Chequers Lane and Hills Road. When the gully was cleared the problem was solved. This is not a problem the Neighbourhood Plan can solve, and furthermore since the stream in question flows from Ashill to Saham Toney, rather than through any of the allocated sites, so the latter will not contribute further to the problem of rubbish accumulation. It is noted that some of the flood problems in the area are caused by the poor maintenance of ordinary watercourses. This is the responsibility of riparian owners. Policy 8 has been split into component parts that significantly reinforce the single pre-submission policy. New policy 8F explicitly deals with requirements for future management and maintenance of such watercourses on new development sites, but other householders who hold riparian rights on watercourses are encouraged to ensure they are regularly maintained. Guidance on riparian owner's rights and responsibilities can be found in a Breckland Council guide on the subject which can be downloaded from https://www.stnp2036.org/the-neighbourhood-plan--flood-risk.html The Saham Toney Strategic Environmental Assessment, AECOM, June 2020, includes among its conclusions <i>"In light of the area's surface water flood risk and recent flooding events, the Neighbourhood Plan provides a close focus on policies which aim to reduce that risk as far as possible. This includes through an emphasis on the inclusion of climate change allowances within flood risk assessments, drainage scheme proposals and through seeking to ensure that new development effectively considers its impacts on surface water flood risk. This will help ensure that no significant adverse effects on surface water flood risk will take place as a result of the allocations taken forward through the Neighbourhood Plan, and increased resilience to flood risk is secured."</i> This supports the view that the Plan adequately addresses flood risk. In its response to the publication of the Saham Toney Flood Risk Study, Create Consulting, May 2020, the Lead Local Flood Authority stated <i>"It is really welcome and encouraging to see the attention to surface water flooding and flood risk within the document and through the conversations we have had. If only all Neighbourhood Plans we see were like this."</i> This supports the view that the Plan adequately addresses flood risk. The comment concerning the sewerage system is as noted by respondent 9 (comment 6) and respondent 10 – the occupants of the property in question. Refer to the reaction to respondent 9's comment 6.	
ACTION TAKEN: None required.	

RESPONDENT NUMBER: 12	DATE: 07 October 2019
REPRESENTATION: I am not in favour of the proposed 12 house development STNP5 on the East side of Pound Hill. It would impose on the 'Key View' across towards the Mere which contributes to the character of the open landscape of this Norfolk village.	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Site allocation policy 2J	
REACTION TO REPRESENTATION(S): Since the Regulation 14 submission of the Neighbourhood Plan, independent site masterplanning studies have been undertaken by the Government appointed consultants, AECOM. Those studies included three options for the settlement cluster formed by sites STNP1, STNP4, STNP5, STNP6 and STNP7. As a result of the studies and a professional review of the landscape impact of the sites, sites STNP5 and 6 have been shown to have unacceptable landscape impact and will be removed from allocation. This is fully explained in the Saham Toney Neighbourhood Plan Masterplanning Report and the second edition of the Saham Toney Neighbourhood Plan Site Selection Report. As a result, the existing open aspect and views across the land to the east of Pound Hill will be retained, including the Key View across to the Mere. It is noted that should the decision not to allocate sites STNP5 and 6 be overturned in future, masterplanning for those sites specifically includes a footway to the south and east of the sites that would have a completely open aspect and a policy criterion preventing above ground development at the south end of site STNP5, would ensure retention of the Key View to the Mere.	
ACTION TAKEN: Site STNP5 has been removed from allocation due to its unacceptable landscape impact	

RESPONDENT NUMBER: 13	DATE: 07 October 2019
REPRESENTATION: I think there are too many houses allocated around Pound Hill - The areas defined as STNP4, STNP6 & STNP7 in my view would be acceptable. The remaining sites for that area - STNP5 & STNP1 I feel would have an impact on the openness and views of the village. There are very few open areas left, as far as I can see this being one of the last such areas	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Site allocation policies 2G, 2I, 2J, 2K and 2L	
REACTION TO REPRESENTATION(S): Since the Regulation 14 submission of the Neighbourhood Plan, independent site masterplanning studies have been undertaken by the Government appointed consultants, AECOM. Those studies included three options for the settlement cluster formed by sites STNP1, STNP4, STNP5, STNP6 and STNP7. As a result of the studies and a professional review of the landscape impact of the sites, sites STNP5 and 6 have been shown to have unacceptable landscape impact and will be removed from allocation. This is fully explained in the Saham Toney Neighbourhood Plan Masterplanning Report and the second edition of the Saham Toney Neighbourhood Plan Site Selection Report. As a result, the existing open aspect and views across the land to the east of Pound Hill will be retained. The landscape impact review of masterplanning studies for STNP1 showed that site's impact to be acceptable and hence it is retained as an allocated site. Given that professional conclusion there is no justification to remove STNP1 from allocation. In addition, it is noted that site STNP1 is a brownfield site, currently occupied by unattractive farm buildings and hard-standings. It cannot be agreed that replacement of those would harmfully impact the local landscape, or its openness and views. In fact, masterplanning studies for STNP1 indicate landscaping specifically intended to reveal and enhance long views from Hills Road and Chequers Lane across the site towards St. George's Church	

It is noted that should the decision not to allocate sites STNP5 and 6 be overturned in future, masterplanning for those sites specifically includes a footway to the south and east of the sites that would have a completely open aspect.
ACTION TAKEN: Sites STNP5 and 6 have been removed from allocation in the Plan

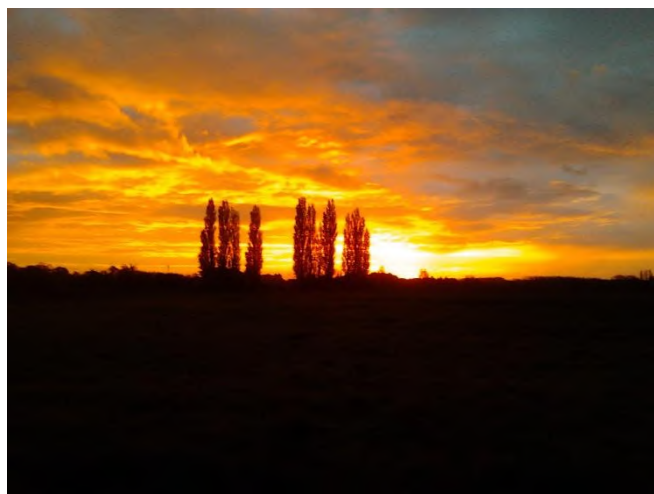
RESPONDENT NUMBER: 14	DATE: 08 October 2019
REPRESENTATION: I do not agree with the proposal to build outside the settlement boundary. this will open the gates to uncontrolled building.	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Policy 2C, site allocation policies 2G-2O and 2Q	
REACTION TO REPRESENTATION(S): Strategic Policy HOU 04 of the emerging Breckland Local Plan specifies that new residential developments may be located “immediately adjacent to the settlement boundary”. That clause was not challenged at examination. The Neighbourhood Plan must comply with the strategic policies of the Local Plan and hence also allows residential development adjacent to the settlement boundary. This is set out in general terms in Policy 2C. Some exceptions to the criterion are allowed (e.g. exception sites) in accordance with the NPPF. One allocated site is within the settlement boundary. All others are immediately adjacent to it. The Neighbourhood Plan therefore complies fully with national and local planning rules in this respect, and a criterion / policy preventing development outside the settlement boundary would not be allowed. By allocating a number of houses in excess of the target set by the Local Plan, the Neighbourhood Plan manages where development will (and hence by inference, will not) take place, and so will not “open the gates to uncontrolled building”. That situation is what is happening at present while the Neighbourhood Plan is not in force and speculative developers are taking advantage of Breckland Council’s lack of a 5-year supply of housing land. The allocation of sites offers additional protection as for the first two years of the Plan Breckland Council will only need to show a 3-year housing land supply (rather than 5-years) in order to refuse non-compliant development proposals in Saham Toney.	
ACTION TAKEN: None required	

RESPONDENT NUMBER: 15	DATE: 12 October 2019
REPRESENTATION: Congratulations on a well written and detailed plan. I would like to add my thoughts on plots STNP4 and STNP5. These lie on the edge of a low knoll of land that slopes down to the circular village lake. Saham Toney was an important centre for the Iceni tribe and, although I am no archaeologist, one would expect that the low knoll might be of archaeological importance. We do not know where Boudica was born although this minor detail might not be of concern to the press. If development were to go ahead, it would be in no one’s interest to see headlines such as “Builder Bulldozes Boadicea’s Birthplace” or “ <u>Bozo</u> Builder Bulldozes Boadicea’s Birthplace”. The landscape around the two sites and its wildlife are enjoyed by a large number of villagers, particularly many who, like me, are dogwalkers. In the mornings, it is not uncommon to see spectacular sunrises or see mists drifting from the lake over STNP5. I attach some of my pictures by way of illustration.	

Overall, I would therefore oppose any development of STNP4 and STNP5.

Best Regards

Dr. Colin Cork



RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:

Site allocation policies 2I & 2J

REACTION TO REPRESENTATION(S):

A consultation response from Norfolk County Council's Historic Environment department made reference to site STNP1 with regard to potential archaeological interest and made note of its response to a 2015 planning application for that site (which was withdrawn before a decision on it was made). That earlier response requested the Local Planning Authority to apply three conditions were planning permission to have been granted, relating to an archaeological written scheme of investigation being provided prior to development. Similar conditions could be requested again at the time of a future application for the site. The same approach would be equally applicable to sites STNP4 and 5. It would not be reasonable to require site owners to undertake such an investigation prior to the submission of a planning application.

As a result of post-consultation masterplanning studies of the sites referred to by this comment, and a professional review of the landscape impact of the master-planned layouts of them as a group, sites STNP5 and 6 have been removed from allocation in the Plan.

ACTION TAKEN:

Add reference to the suggested conditions in the policy supporting text (implementation section) to guide development management officers

For other reasons (landscape impact) site STNP5 has been removed from allocation in the Neighbourhood Plan.

APPENDIX B6. Pre-Submission Consultation August-October 2019: Parishioner “Tick-Box” Questionnaire Results

The results of the consultation questionnaire were as follows:

- 31 parishioners indicated support for the Plan, without comment;
- 6 parishioners indicated support for the Plan, subject to their comments (given in Appendix B5);
- 5 parishioners indicated they did not support the Plan and gave their reasons for that (given in Appendix B5)

APPENDIX B7. Parishioner Responses to Various Other Informal Questionnaires

B7.1 Village Presentation 14 August 2018

20 villagers liked the presentation; none were indifferent or disliked it

NEIGHBOURHOOD PLAN QUESTIONNAIRE

How to answer For yellow items tick all that apply	ANSWER 1	ANSWER 2	ANSWER 3	ANSWER 4	ANSWER 5	ANSWER 6
I find out about the Neighbourhood Plan from its website	YES 2	NO: 5				
On average I visit the Neighbourhood Plan website	NEVER 5	ONCE A MONTH 2	ONCE A WEEK	DAILY		
I find out about the Neighbourhood Plan by reading Saga articles about it	YES 7	NO 1				
I find out about the Neighbourhood Plan from village presentations and other meetings	YES 5	NO 3				
Regular village presentations about the Plan are useful and I try to attend	YES 6	NO 2				
If houses are built in the village, they should have	1 BEDROOM 3	2 7 BEDROOMS	3 6 BEDROOMS	4 OR MORE 1 BEDROOMS		
The village most needs houses that cost	LESS THAN 4 £100,000	£101,000 - 150,000 5	£151,000 - £200,000 3	£201,000 - £250,000 1	£251,000 to £300,000	MORE THAN £300,000
To be called "affordable" a home should cost no more than	£100,000 1	£125,000 2	£150,000 2	£175,000	£200,000 2	£250,000
Every month I read articles in Saga about	HERITAGE 6	NATURE NOTES 7	NEIGHBOURHOOD PLAN 7	PC MINUTES 7	WCCC UPDATES 6	ORCHARD UPDATES 4
	MY CLUB OR GROUP	MY ORGANISATION	MY SCHOOL	MY NEIGHBOURS	OTHER	

I would be interested in the Neighbourhood Plan Group visiting. DETAILS AND CONTACT INFORMATION:				1		
I trust the Neighbourhood Plan Group to do what's best for the village	YES 8	NO				
I would like to be added to the Neighbourhood Plan mailing list to receive occasional email newsletter and news about updates to the website	MY EMAIL ADDRESS IS:					
The word or short phrase I would use to best describe the Neighbourhood Plan is	<ul style="list-style-type: none"> • Professional • Inclusive • They are doing their best • Pleasant • THE Plan • Too detailed and complex • A lot of hard work by a dedicated team. We are lucky to have them 					

B7.3 Site Allocation Event WCCC 14 July 2019

QUESTION	YOUR ANSWER (✓ or x)
Is our method fair and reasonable?	
Have we chosen the right criteria?	
Are the criteria weightings logical?	Possibly should weight open space / footpath provision more highly. Great opportunity to improve current very poor provision
Are the rating descriptions objective and reasonable?	
Have we applied all the above correctly?	
Are the policies okay?	
How many sites would you allocate?	
Which and why?	
Any other comments on the selection process?	<ul style="list-style-type: none"> a) Re STNP9: Does the high voltage electricity wire going diagonally across the site make any input? b) Flooding on Pages Lane / Chequers Lane <u>will</u> still be a problem c) P. 2J Ref j {STNP3}: high voltage electric wire – what to do? d) Concerns about the large number of houses on the Sinclair's land. {STNP4-7} e) STNP5 (after the revised plan) still obstructs the view from Pound Hill across to the Mere. f) The STNP 5 development site juts into the land to the east of Pound Hill and will in the future influence a large infill of development across to the Mere. g) Concern that most of the proposals will result in the building of large houses that will not be affordable for local purchase. h) Lack of trust in Mr Tweed's {owner of STNP16} promises. i) Who will maintain open spaces and land offered for public use in the future {STNP16}? j)

B7.3 Letter from Parishioner Unable to Attend the Site Allocation Event WCCC 14 July 2019

Dear Chris,

STNP 1 / 4 / 5 / 6 / 7

As I was away for the recent meeting at the Village Hall, I have taken the opportunity of downloading the relevant reports which I found extensive and useful.

I see that despite very clear contrary views from the village you appear to still be promoting as many new homes as you can for the village plan. The questionnaire completed by so many villagers who asked for limited development and small sites, seems to have been long forgotten as does the initial request for 33 new homes by Breckland.

I appreciate you have given your reasons why the number needs to be increased to 48 but the numbers now being suggested are far greater. Certainly it would be reasonable to select the best suitable sites throughout the village up to your 48 target but I believe anything over and above should be given a reserve status only.

As you will be very aware due to the storm in 2016 and to a slightly lesser degree in 2017, my neighbours and I were flooded. I had to move out and was unable to return for almost 6 months. This was of course due to the historic flooding problems at the Hills Road / Pages Lane / Chequers Lane junction, so I find it unbelievable that the Flood Risk Assessments seem to almost disregard this problem.

Has the cumulative problems that will occur if 5 new sites with 48 homes are built in the immediate area of this historic flooding been considered fully? (Provisional Number of Homes Allocated Form) I am no longer able to obtain flood risk building insurance because of the likelihood of future flooding.

The problem is caused by surface water running down Pages Lane, Hills Road, Pound Hill and of course water from all the surrounding farmland. This is often made worse because the sewers that run down the centre of the road in Pages Lane & Chequers Lane overflow into the road. There is a historic lack of capacity as any local resident will tell you.

A recent application for 10 bungalows from the Piggery site (now STNP1) received over 60 letters of objection from villagers, mainly concerned about the flooding issues. So I find it somewhat amazing that you have provisionally allocated 48 houses on 5 sites **all** within a stones throw of the Pages Lane junction. (literally) Apart from the flooding issue I would suggest that to build on all of the 5 sites creates an unacceptable concentration of new development on the outskirts of one small part on the edge of the village.

I was under the impression that the feelings of the village were that if we were required to have more homes then they should be distributed in small numbers throughout the village and not grouped together to form the equivalent of this **mini housing estate**. It will engulf a few local homes including the Grade II house known as Pages Place.

Although broken into 5 sites, the applications, some of which I understand are from the members of one family, can reasonably be regarded as **just one development**. Splitting areas down into smaller parcels does not make the applications more palatable when they adjoin each other as these do. If anyone had submitted a plan for 48 houses in any other part of the village it would have been rejected and considered too large.

Even the original site at Richmond Hall was rejected as being too large even though, in my opinion, it went a long way to meeting many of the villages needs, was tucked away and affected few.

Each of the 5 sites will only add to, and increase, the flow of water towards the lowest point in the area, the junction. Certainly builders will show various schemes for surface water retention but at the end of the day water is gravity led and will find its way back into the streams and ditches which end up under Hills Road and flooding will reoccur.

I hope you are able to take on board the comments I have given.

Yours sincerely,

Name withheld for privacy reasons

APPENDIX C

Responses to the Third Regulation 14 Pre-Submission Consultation

24 June – 14 August 2020



APPENDIX C1. Pre-Submission Consultation June-August 2019: Statutory and Non-Statutory Consultees

C1.1 The following organisations were invited to submit comments on the Neighbourhood Plan during its second pre-submission consultation:

Organisation
Abel Homes
Age UK Norfolk 1
Airport operator's association
Ancient Monuments Society
Andy Johnson
Anglian Water 2
Architech Design & Planning
Ashill Parish Council
Attleborough Building Services Ltd
Bennett Homes
Bovis Homes Group plc
Bradenham Parish Council
Breckland District Council
BT Openreach
Bullen Architectural Ltd
Burgess Homes
Cadent (gas network)
CCG South Norfolk
Church of England
Clayland Estates Ltd
Colin Smith (Development consultant)
Community Action Norfolk 1
Councillor Edward Connolly
Councillor Helen Crane
Councillor Timothy Birt
CPRE Norfolk
Crime Prevention and Architectural Liaison Officer
Diocese of Norwich
Disabled Persons Transport Advisory Committee
Ed Buscall (Local landowner)
Environment Agency
Environment Agency 2
Equal Lives (Norfolk Coalition of Disabled People)
Erica Whettingsteel on behalf of the Bowes Estate
Erica Whettingsteel on behalf of Jenny & Mike Sinclair
Federation of Small Businesses - East of England 2
Fields in Trust
Friends of the Earth 1
Friends of the Earth 2
Friends, Families and Travellers (FFT) 1
FW Properties
George Freeman MP (via constituency office manager)
Gladman Developments Ltd

Goodfellow Homes
Graham Tweed (Local landowner)
Great Cressingham Parish Council
Greater Norwich Development Partnership
Halsbury Homes Ltd
Hastoe Group
Highways England
Historic England
Historic England
Holme Hale Parish Council
Home Builders Federation
Homes England
Hopkins Homes Ltd
Ingram Homes
Jamie Bird (Local developer)
Keystone Development Trust
Little Cressingham and Threxton Parish Council
Local rail operator
McCarthy & Stone Retirement Lifestyles
Methodist Chapel (Warden)
Mobile Operators Association
National Farmers Union East Anglia
National Federation of gypsy liaison groups
National Grid 1
National Trust 1
National Trust 2
Natural England 1
Natural England 2
Network Rail Infrastructure Ltd
New Anglia Local Enterprise Partnership
NHS England Midlands and East
NHS Norfolk
NHS Property Services Ltd 1
NHS2
Norfolk Archaeological Trust
Norfolk Biodiversity Information Service
Norfolk Biodiversity Partnership
Norfolk Chamber of Commerce
Norfolk Colonial Homes / Wispy Meadows
Norfolk Community Foundation
Norfolk Constabulary Community Engagement Officer
Norfolk County Council 1
Norfolk County Council 2
Norfolk Deaf Association
Norfolk Homes
Norfolk Local Access Forum
Norfolk Rivers Trust
Norfolk Rural Community Council
Norfolk Wildlife Trust 1
Norfolk Wildlife Trust 2

Orbit Homes
Orchard Homes East
Ovington Parish Council
Parker Planning Services
Parkers Church of England Primary School
Patterson Design Ltd
Persimmon plc
Ramblers Association 1
Richmond Park Golf Club
Roger Baldwin (Local landowner)
RSPB
S&A Jones Developments Ltd
Seamans Building
Shipdham Parish Council
Small Fish
SMG Architects
Sport England
SSA Planning
St George's Church
Studio Thirty Five
Taylor Wimpey plc
The Norfolk and Norwich Association for the Blind
The Traveller Movement
The Wayland Partnership
Tim Goddard (Local landowner)
UK Power Networks 1
UK Power Networks 2
Visit Norfolk
Water Management Alliance
Watton & Wayland Tourist Info Centre
Watton Town Council
Wayland Chamber of Commerce
Wells Cole Community Centre
Wild Anglia
Willow Builders
Woodland Trust 1

In addition, all those living, working or running a business in the Parish of Saham Toney were invited to take part in the consultation, of which they were informed, by a formal announcement and posters displayed around the Parish, by articles in the Parish magazine and local community newsletter and by announcement on the Plan website (www.stnp2036.org).

C1.2 In addition emails were sent to all villagers on the Neighbourhood Plan's mailing list and to all villagers who had submitted comments in response to the first and / or second Regulation 14 consultations. The list of villager names and emails is not published in this document for privacy reasons, but is available on request to Breckland Council and the Plan's examiner, providing guarantees of confidentiality are provided. The list comprised a total of 128 villagers.

APPENDIX C2. Pre-Submission Consultation August-October 2019: Consultation Questionnaire

This questionnaire was also available online for electronic return.

SAHAM TONEY NEIGHBOURHOOD PLAN REGULATION 14 CONSULTATION 24th JUNE - 14th AUGUST 2020

Your Details (Please print legibly)

* Required information

Your Name*:

Which of the following are you answering as*? (Please tick only one box)

☐

Someone who lives in the parish of Saham Toney

☐

Someone who works, but does not live in the parish of Saham Toney

☐

Someone who owns a business based in the parish of Saham Toney

☐

Other (please state):

Your business name if applicable:

If you work but don't live in the Parish, where do you work?

Email address*:

First line of your address*:

Your postcode*:

Your telephone number (optional):

Your age *:

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Under 16

17-24

25-35

36-55

56-65

Over 65

Prefer not
to say

Your Response (Please tick only one box)

☐

I support the Plan without comment

☐

I support the Plan, subject to the comments overleaf

☐

I do not support the Plan, for the reasons given overleaf

Please give any comments overleaf

Your Comments (please use a continuation sheet if necessary)

APPENDIX C3. Pre-Submission Consultation June-August: Breckland Council Comments with STNP Responses

Saham Toney Neighbourhood Plan

Breckland Council comments for the Third Regulation 14 Consultation

[STNP Responses](#)

We welcome the additional work that has been involved with the production of the third version of the Reg.14 STNP. We have aimed to make a thorough review of the Plan that has resulted in a number further comments being made, as well as indicating where objections are likely to result where there are still some outstanding fundamental concerns with the Plan. Also we strongly recommend that after further amendments are made to the Plan (as a result of this consultation), it would really benefit from having a detailed proofreading review by another member of the Parish Council to assist this process to resolve such issues before it is submitted to Breckland Council.

No	Page and Policy/ Paragraph No	Comment	Justification	Suggested Amendments
1	Whole Plan - Phrasing	While there has been an overall improvement in the phrasing of most of the policies, there are a few which are becoming too wordy and therefore not so easy to understand. Also there remains concern that a few policies are still too restrictive and will have negative implications for viability.	Succinct, para 15 NPPF. Viability, para 67 NPPF.	All policies to be reviewed to see where they could be streamlined; without such a review, this risks an independent examiner making changes to policy wording.
This is not a specific comment, so no specific response can be made, other than that policies will be subject to a final review as to their succinctness prior to submission. In general terms we do not agree policies as written are too restrictive or will have negative implications for viability (the Council has provided no evidence of the latter implications) and we consider the Council has not taken into account the very detailed justifications given in supporting text, nor has it fully read or paid attention to the 19 documents that were provided as part of the consultation as evidence in support of the Plan				

It is also noted that an independent examiner 'health-checked' the Plan in July 2020				
2*	General - Terminology	<p>It is important to use the correct planning words to ensure that the correct issue is being referred to. e.g. p3, Contents page and the subsequent map titles.</p> <p>Also in planning a 'proposal' is a very general term, where an 'allocation' is for a specific site therefore replace 'proposal' with 'allocation' e.g. p16, 3.7.1, p28, T1.17 I, p60-89, Policies 2H-2Q etc.</p>	Terminology.	<p><i>EVIDENCE MAP 5.2: FORMAL PLANNING PROPOSALS</i></p> <p>APPLICATIONS (2013-2019) 117</p> <p><i>EVIDENCE MAP 5.3: OUTLINE DEVELOPMENT PLAN</i></p> <p>PROPOSAL FOR RICHMOND PARK GOLF CLUB 118</p> <p>Replace 'proposal(s)' with 'allocation(s)'.</p>
<p>The term 'proposal' was included in policy text for each of the two previous Regulation 14 pre-submissions, and attracted no comment from the Council. 216 occurrences in the Plan of the term 'proposal' have been reviewed and found to be used correctly. Specifically, in the case of the examples given:</p> <p>3.7.1: It is incorrect to amend 'proposal' to 'allocations'. This paragraph is referring to the Local Plan Policy HOU 04, which does not make site allocations, but deals with all proposals that may come forward. No change made.</p> <p>T1.17 deals with any proposal that may come forward, not site allocations exclusively. No change made.</p> <p>Policies 2H-2Q: Allocated sites must still submit proposals prior to being granted permission. No changes made.</p> <p>Evidence Maps 5.2 and 5.3: Amended as recommended</p> <p>The contents page is automatically generated from text in the body of the plan, so is updated in accordance with changes made in body text.</p>				

3		To be consistent with the rest of the Plan, remove the word ' <i>development</i> ' where there is a reference to ' <i>Local Development Plan</i> ' e.g. para 8.2, 8.3, and in the glossary where it appears in relation to the definitions for ' <i>Making of the Plan</i> ' & ' <i>Settlement boundary</i> '.	Consistent terminology.	As advised.
The comment has been implemented in paragraphs 8.2 and 8.3 and in the glossary definition of ' <i>Settlement Boundary</i> '. Elsewhere, the comment fails to recognise the difference between the Local Development Plan and the Local Plan. The latter is merely part of the former. Hence the term ' <i>Local Development Plan</i> ' is used correctly (as the Council refers to it in comment 19) in its remaining 6 occurrences, which have not been changed				
4*		To be consistent with the rest of the Plan, ' <i>NPPF</i> ' should be written as ' <i>National Planning Policy Framework</i> ' e.g. at - p97, T3A.24 b) - e); p149, T7C.3; & p173, T8A.9.	Consistent terminology.	As advised.
All occurrences of ' <i>NPPF</i> ' amended to ' <i>National Planning Policy Framework</i> '				
5*	General - Terminology	Any reference to the NPPF ' <i>dictating</i> ' is incorrect as the ' <i>Basic Conditions</i> ' only require a Plan to have ' <i>regard to</i> ' the Framework.		Replace ' <i>dictates</i> ' with ' <i>states</i> ' e.g. Para T7E.6 and T8.24 & 25.
The specific paragraphs noted have been amended as suggested. The mention of ' <i>e.g.</i> ' against those in the comment is not accurate, since there are no other occurrences of this issue				
6*	General - reference to ' <i>material considerations</i> '	Any reference to Breckland Council accepting a document as a ' <i>material consideration</i> ' does not provide any additional status nor should imply that it agrees with its content; it is simply another document to take account of.	Clarity.	Amend all references to this to confirm that this ' <i>acceptance</i> ' does not mean ' <i>support</i> ' or remove this ' <i>acceptance</i> ' statement e.g. para T3A.2, T3A.3, T3C.1, T3D.1, T7A.2, & T7B.3.
Although ' <i>accepted</i> ' and ' <i>supported</i> ' have different meanings, ' <i>accepted</i> ' has been amended to ' <i>acknowledged</i> ' where used in this context				

7*	General - references	When referring to another document, it would be useful to or clarify where the document can be found and have a website link.	Clarity.	It would be useful to indicate where the assessment on p10, ii, is found e.g. In the Basic Conditions Statement on the website, likewise on p33, T2A.4, where ' <i>STNP Justification of a Minimum Housing Target for the Neighbourhood Plan</i> ' can be found.
<p>Reference in 2.6 ii has been amended accordingly.</p> <p>With regard to the second part of the comment, it is surprising that the Council has been has not identified where '<i>STNP Justification of a Minimum Housing Target for the Neighbourhood Plan</i>' may be found, since it was submitted for consultation as one of the 19 documents that support the Plan, and was/is available for download on the same webpage as the plan itself. Additionally, the Council was provided with a full list of all such supporting documents, and a link to the relevant website page was provided in a letter that formally informed the Council of the pre-submission. Additionally comment 37 itself refers to the document, so at least one officer of the Council must have found it. Nevertheless, the reference has been prefaced by 'evidence base document' to make its whereabouts crystal clear</p>				
8*	General - maps	Format - Although generally well presented, the maps would benefit from being consistent with the information they contain e.g. some have a title, legend, north rose and scale, some have some of these elements and others have none. Also the font size used varies throughout and sometimes the information is still too small to read and therefore difficult to use e.g. p29, 30, 50-54, 118 & 133.	Presentation consistency and clarity.	<p>Review the map format to standardise for the Reg.16 version, to ensure all the basic information is provided advised.</p> <p>Where text is too small to read either make the map bigger, edit the map or remove and add text as a footnote.</p>
<p>With regard to maps Evidence Maps 1a and 1b, when an identical comment was made to the second Reg. 14 pre-submission, it was explained that the text in question is part of the background OS map and hence cannot be made larger or removed. In response to that earlier comment the following note was added to each map "map text note is part of the background, regarding copyright". Given that, it is unnecessary to read that OS text in full. No further change made</p> <p>Policy Maps 2F.1 -9 Maps enlarged and given a standard format as far as possible (the native map already has a north rose). Unnecessary map text deleted by cutting the images</p> <p>Evidence Map 5.3: Note added to explain the small-scale map key</p> <p>Evidence Map 7A: North rose added. Footnote note added to explain text too small to read on the map</p>				

9*	General - maps and graphics	Format - Most of the Maps look, to varying amounts, either like part of the right hand side is missing or, as well the graphics, need repositioning.	Presentation consistency.	Place all such maps and graphics in the centre of the page.
<p>Comment not agreed. No part of any map is missing. Not all maps fill the full width of the frame in which they are presented, as each image is sized to best fit the relevant page. Hence in some cases by default there is blank space to the right of an image. Were the image to be enlarged to fit the width of the page, the full map would stretch over two pages, which is clearly unacceptable. It is surprising the reviewer has failed to check and understand that all necessary information is presented on the maps before making this spurious comment. No changes made</p>				
10	General - Format	Format - As previously advised, to be consistent, where there are criteria in the policy, replace the full stops with a right hand side bracket as this varies throughout the Plan.	Presentation.	As advised e.g. 2B,2C, 2E, 4 (top half), 7B, 7D(top half).
<p>The format of all lists standardised throughout – but note that Microsoft Word does not allow bracketed bullet points when the format i, ii, iii... is used</p>				
11	General - proofing	The Plan would benefit from having a detailed proof reading by another member of the working group to resolve any outstanding errors in the wording and presentation issues, as we may not have picked up all of them e.g. p10, iv. - There is more than one proposal in the Plan.	Presentation.	<i>"...in connection with the proposals in the Plan..."</i>
<p>The Council should not be making comments based on assumption. The reviewer incorrectly assumes only one person reads the Plan before it is submitted. Also, while it is agreed there are some errors, many of those noted in other comments as errors are in fact just reviewer preferences, or reviewer errors – for example, the “error” noted on page 10, does not exist: the wording there is actually <i>"... in connection with the proposal for the Plan..."</i></p> <p>Notwithstanding the above, in response to Health Check recommendation 3.51, the entire Plan has been proof-read and sense-checked after the incorporation of all relevant consultation and health check comments</p>				
		TABLE OF CONTENTS		

12	p1	The format of these pages have been improved and work better than the previous (2 nd) Reg.14 version.		
Noted. No action required				
13*		The charts have been missed off this list.	Consistency.	Add: Chart 2E1: Age Demographics; Chart 2E2: Dwelling Size Demographics; Chart 2E3: Dwelling Type Demographics; Chart 2E4: Housing Tenure Demographics; Chart 2E5: No of Persons per Household; & Chart 2F: Site Selection Process.
This was a deliberate omission, but charts (and tables) have been added to the list of figures				
		1. FORWARD		
14*	p8, Note 3	The February and June 2019 versions of the NPPF are identical, except for the 'Correction slip' at the back of the document.	Accuracy.	<i>"Note 3: All references in this Plan to the National Planning Policy Framework relate to the version published in February 2019 and take account of the June 2019 update to that version".</i>
Amended as suggested				
15	p8 Footnote 1	The number is a minimum requirement of the Local Plan, where para 65 of the NPPF simply requires a figure. Policy HOU 04 allows for development that does not result in a significant over delivery above the 5% figure. Therefore the 5% is a minimum and not a maximum target and this needs re wording.	Accuracy.	<i>"Breckland Council planning policy officers have confirmed through emails that a figure of 33 is the minimum housing requirement figure (as per paragraph 65 in the National Planning Policy Framework) for the Saham Toney Neighbourhood Plan during the plan period Policy HOU 04 of the adopted Breckland Local Plan 2019".</i>
Amended as suggested				

		3. THE NEIGHBOURHOOD AREA: SAHAM TONEY PARISH		
16*	p11	2 nd sentence - This section also notes issues that that come about as a result of the public consultation.	Clarity.	<i>"It also notes issues that arise from the location and character of the parish, as well as the public consultation carried out".</i>
Agreed, but qualified to explain that initial, informal consultations were undertaken with parishioners, businesses and organisations				
17*	p 13, Figure 8	No of Households- it is not clear why two figures have been provided?	Clarity.	Make it clear the reason for the two sets of figures.
Explanatory note added				
18*	p14, para 3.5	This para concerning the priorities identified through early public consultation would fit much better at the end of the next chapter on Consultation, along with section 3.7.	Presentation.	Move to chapter 4.
Not agreed. This is simply reviewer preference. 3.5 contributes to describing the neighbourhood area, the topic of section 3. 3.7 deals with 'items identified through the Neighbourhood Plan work' as its title makes clear, rather than consultation feedback. Section 4 is intended as a very high-level overview of consultation activities, and it refers readers to the Consultation Statement, which should be read for full details				
19	p14, para 3.6.1	The list is out of date and the order is not clear - see May 2020-version of the LDS.	Accuracy.	See link to document above*. .
Updated to match the documents listed in the May 2020 LDS (with status noted therein to be that at March 2020)				
20*	p15, para 3.6.5	<i>"lacks key services and facilities"</i> is negatively phrased.	Para 16 b) <i>"...be prepared positively..."</i> NPPF.	Making reference to 'limited' key services and facilities would be more constructive.
Not agreed. It is not considered that NPPF paragraph 16b should reasonably be applied in the suggested way to descriptive statements of fact that do not form part of policy. Services and facilities that do not exist cannot factually be described as 'limited'				
21	p16-19	This section does work better with the graphics breaking up the previous 3 pages of plan text.		

Noted. No action required				
22*	p16, para 3.7.1	1 st sentence - No justification has been provided for this statement, which has used a recognised methodology and has also been through and found sound at an examination. If this this statement was accurate the Local Plan would not have been found sound.	Accuracy.	Object to the current wording. Replace with: <i>““The simplistic approach taken in the Local Plan does not robustly or reliably establish a sustainable level of growth for the Neighbourhood Area stop the parish seeking additional dwellings above that in the Local Plan”.</i>
Text amended, but in a different way to that suggested as it was felt complete rewording was necessary				
23*	p17, Table 3.7.2	Format - The use of the word ‘dwellings’ does not appear consistent with the presentation of just numbers in the rest of the table.	Consistency.	Remove the word ‘dwellings’.
Amended as suggested				
24	p18 - 19	Format - A space is missing from a couple of the para reference numbers.	Typo.	‘Issue 3.7.8.1’ and ‘Issue 3.7.9.1’.
Corrected				
25	p19, para 3.7.10	Typo - the underlining is missing.	Consistency.	<u>Issue 3.7.10.1:</u>
Corrected				
		5. VISION STATEMENT AND OBJECTIVES		
26*	p23, para 5.3	b. - This is a subjective statement.	Phrasing.	<i>“Set an appropriate additional level of development via site allocations (Policy 2A);”.</i>
Amended, but more accurately rephrased: <i>“Satisfy the Local Plan minimum growth target and set an additional level of development via site allocations”</i>				

27*		c. It would be more logical to move c. to after e. so it is consistency with the order of the policies in the Plan, otherwise this would suggest the order of the policies in the Plan is incorrect.	Consistency.	As advised.
Amended as suggested but noted this is another example of reviewer preference, since there is no prescribed order for policies in a plan				
28*		g. The use of the word ' <i>limited</i> ' has negative connotations and is unnecessary.	Need to be phrased positively Para 16 b) NPPF.	Remove ' <i>limited</i> '.
Reluctantly removed, as it is a factual statement- the Local Plan barely addresses this topic, and as noted in comment 20, NPPF paragraph is not considered to apply to such statements outside policy text				
29*	p23, Footnote 2	This is not consistent (an aspiration) with the approach taken in the rest of the Plan as 'phasing' is included in Policy 2A & all the site allocation policies. In view of comments on Policy 2A on this, remove 2 nd sentence.	Ability to enforce.	Remove as advised.
<p>Not agreed, since comments on phasing with relation to Policy 2A are unjustified and likewise not accepted, and additional justification for phasing has been provided in the Plan, together with additional flexibility for its implementation, in response to health check recommendations</p> <p>The ability to enforce is provided by Policy 1, should there be insufficient social and utilities infrastructure to support development at a faster (or uncontrolled) rate than the indicative phasing given in the site allocation policies</p>				
		POLICY 1: SERVICES, FACILITIES & INFRASTRUCTURE		
30*	p25, Policy 1, P1.1	This should be just for major developments (developments over 10), as otherwise it risks making smaller schemes unviable.	Viability.	<i>"P1.1 For all major development proposals to be supported, it must be demonstrated that...."</i>
Not agreed. The paragraph has already been amended in accordance with recommendation 3.10 of the Health Check, July 2020, which did not require the limitation to major developments, but instead specifies 'where applicable'. It is considered the health check review more correctly addresses the issue and reflects an examiner's likely view, so that has been given precedence				

Also, it is noted that the definition of major development stated in the comment in the context of housing, complies with neither the NPPF nor the Local Plan, which both give (a) 10 or more dwellings; (b) site in excess of 0.5 ha

31*		<p>Whilst it is agreed that there should be sufficient social infrastructure capacity to meet the needs of new development, it is possible that a proposal may make additional infrastructure available to meet the needs of that development if it is not already available.</p> <p>Certain infrastructure (education, community facilities, healthcare, shops, businesses and leisure opportunities may not be available in close proximity to new development but where possible these should be accessible through sustainable forms of transport.</p>	Clarity.	<p><i>“For development proposals to be supported, it must be demonstrated that there is sufficient social infrastructure capacity (including education, community facilities, healthcare, public transport, shops, businesses, employment, leisure and open space) available to support and meet all the necessary requirements arising from the proposal, or that any deficiencies required to meet the needs of a proposed development can be provided , local open space, as well as available sustainable transport (including public transport and or walking / cycling routes) to education, community facilities, healthcare, shops, businesses, employment and leisure opportunities).</i></p>
<p>Not agreed.</p> <p>(a) The paragraph has already been amended in accordance with recommendation 3.10 of the Health Check, July 2020, and it is considered the health check review more correctly addresses the issue and reflects an examiner’s likely view, so that has been given precedence</p> <p>(b) Supporting text para. T1.3 already addresses the point made in the comment</p>				
32*	p25, Policy 1, P1.4	<p>This is unnecessary strategic policy which could apply anywhere and the Local Plan already addresses this issue in more detail. The Plan does not appear to set out the social infrastructure deficiencies that need to be addressed to meet the needs of the individual allocations. Without this it is unclear as to how the phasing of these relatively small scale</p>	INF 02 Local Plan (2019).	Remove.

		developments can be phased in this way. Also see comments re Policy 2A and 'phasing'.		
<p>Not agreed. The criterion is specific to the limited infrastructure in Saham Toney and so is not strategic policy. The paragraph has already been amended in to address recommendation 3.10 of the Health Check, July 2020, and it is considered the health check review more correctly addresses the issue and reflects an examiner's likely view, so that has been given precedence. As a result of the health check recommendation supporting text has already been added to set out deficiencies to be addressed and that will assist decision makers and others when they consider phasing of development. Additional justification for phasing and flexibility in its implementation have been provided elsewhere in the Plan in response to Health Check recommendations</p> <p>Local Plan Policy INF02 includes a range of caveats that will hinder the provision of additional infrastructure in small rural villages such as Saham Toney, so it is appropriate for the Neighbourhood Plan to address this at the local level</p> <p>Furthermore, phasing was the subject of Council comments to the second pre-submission consultation, and in a meeting on 15 October 2019 to discuss those, the Council's Neighbourhood Planning Coordinator confirmed that paragraph 73 of the NPPF allows a neighbourhood plan (as opposed to a Local Plan) to phase development (see Appendix B3 of the Consultation Statement)</p>				
33	p25, T1.3	See comments re Policy 2A and 'phasing'.	Ability to enforce.	Remove.
<p>Not agreed, since comments on phasing with relation to Policy 2A are unjustified and likewise not accepted, and additional justification for phasing has been provided in the Plan, together with additional flexibility for its implementation</p> <p>Furthermore, phasing was the subject of Council comments to the second pre-submission consultation, and in a meeting on 15 October 2019 to discuss those, the Council's Neighbourhood Planning Coordinator confirmed that paragraph 73 of the NPPF allows a neighbourhood plan (as opposed to a Local Plan) to phase development (see Appendix B3 of the Consultation Statement)</p> <p>The ability to enforce is provided by Policy 1, should there be insufficient social and utilities infrastructure to support development at a faster (or uncontrolled) rate than the indicative phasing given in the site allocation policies</p>				
34	p28, T1.17	See comments re Policy 2A and 'phasing'.	Ability to enforce.	Remove.
<p>Not agreed, since comments on phasing with relation to Policy 2A are unjustified and likewise not accepted, and additional justification for phasing has been provided in the Plan, together with additional flexibility for its implementation</p> <p>Furthermore, phasing was the subject of Council comments to the second pre-submission consultation, and in a meeting on 15 October 2019 to discuss those, the Council's Neighbourhood Planning Coordinator confirmed that paragraph 73 of the NPPF allows a neighbourhood plan (as opposed to a Local Plan) to phase development (see Appendix B3 of the Consultation Statement)</p> <p>The ability to enforce is provided by Policy 1, should there be insufficient social and utilities infrastructure to support development at a faster (or uncontrolled) rate than the indicative phasing given in the site allocation policies</p>				
35*	p29, Evidence Map 1a	Format - It would be better if the colour for the bus stops was a more contrasting colour to be easier to view.	Presentation.	Show in a contrasting colour e.g. purple.

<p>Not agreed. This is simply reviewer preference. Additionally, it is entirely logical that both bus stops and the area within 800m of them should be an identical colour as they are one and the same issue. It is nonsense to suggest that small rectangles representing the bus stops themselves might be confused with the large arcs that define the 800m radius for bus stops</p>				
36	p31, Evidence Map 1c	Format - Include the same OS copyright info on Map 1a & b on Map 1c to be consistent.	Presentation.	As previously advised.
<p>Updated as suggested. Note the fact that the reviewer recognises the presence of the copyright note further negates comment 8 in respect of the map text</p>				
		POLICY 2A: RESIDENTIAL HOUSING ALLOCATION		
37	p32, Policy 2A	In the document mentioned in the last sentence of para T2A.4 (see Justification), both the title and in para 3.3a, address the issue of having a 'minimum target', but this is not reflected in the text or in the policy,	<i>'STNP Justification of a Minimum Housing Target for the Neighbourhood Plan'.</i>	<i>"P2A.1 This Plan provides for at least 70 new homes..."</i>
<p>Not agreed. The document referred to in the comment is the evidence base 'STNP Justification of a Minimum Housing Target for the Neighbourhood Area'. That document examines the Local Plan minimum target of 33, and concludes that it should be increased to 48.</p> <p>Site allocations alone deliver 70 new dwellings, and other unquantified growth is supported by Policy 2B and the exceptions given in Policy 2C.</p> <p>The site allocations have been established by an extremely robust process of assessment and selection, as evidenced by the Site Assessment and Site Selection reports, and furthermore it was agreed in a meeting with Breckland Council's Neighbourhood Planning Coordinator on 15 October 2019 that the extensive site assessment and selection work, and the fact STNP allocates more than twice the amount housing than required by the Local Plan, justify limiting the total allocation, and that greater flexibility of allocation numbers is more appropriate to a Local rather than Neighbourhood Plan</p> <p>Local Plan evidence concludes 33 is the appropriate number and Neighbourhood Plan evidence increases that to 48. It would be completely illogical and unjustified to further raise the minimum housing target to 70.</p>				

38	p32, Policy 2A, P2A.1	<p>Concerns remain over the use of ‘indicative delivery’</p> <p>(phasing), and we object to its inclusion.</p> <p>While para 73 states that “all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites”, in practice phasing normally occurs in relation to strategic sites and as it is not normally possible to refuse development that is acceptable in planning terms on phasing grounds alone. This would be exacerbated if the five year housing supply in Breckland were to worsen over the next few years. It is not considered ‘appropriate’ for the Para 73, NPPF to apply to the Plan.</p>	<p>“...arguments that an application is premature are unlikely to justify a refusal of planning permission other than in the limited circumstances....” (e.g. a substantial proposal or when not formally part of the development plan). Para 49, NPPF.</p>	<p>Amend to just set out the housing allocations in the Plan i.e. remove phasing from the policy. This could however be listed as a Parish preference in the support text for individual sites.</p> <p>Also in all other policy, remove references to the ‘phasing’ element including; P2H.2; P2I.2; P2J.2; P2K.2; P2L.2; P2M.3; P2N.2; P2O.4; P2P.2. As well as text including: T2A.3; T2H.17; T2I.10; T2J.17; T2K.19; T2L.10; T2M.7; T2N.7; T2O.11; T2P.14).</p>
<p>Not agreed. (a) It is not accepted that whatever is done ‘in practice’ overrules the NPPF; (b) Phasing has already been further addressed in response to the Health Check, July 2020, and it is considered the health check review more correctly addresses the issue and reflects an examiner’s likely view, so that has been given precedence. As a result, additional justification for phasing has been provided and flexibility in applying this aspect of Policy 2A has been introduced; (c) The indicative phasing set out in Policy 2A, if applied, will deliver 57.5% of the Local Plan’s minimum housing target in the first 5 years of the Plan period. (d) Phasing was the subject of Council comments to the second pre-submission consultation, and in a meeting on 15 October 2019 to discuss those, the Council’s Neighbourhood Planning Coordinator confirmed that paragraph 73 of the NPPF allows a neighbourhood plan (as opposed to a Local Plan) to phase development (see Appendix B3 of the Consultation Statement); (e) Local Plan allocation policies themselves mention phasing of development</p> <p>The ability to enforce is provided by Policy 1, should there be insufficient social and utilities infrastructure to support development at a faster (or uncontrolled) rate than the indicative phasing given in the site allocation policies</p>				
39*	p32, T2A.1	<p>1st sentence - this does not reflect the current situation as the Plan allocates more housing than has been identified in the Local Plan.</p>	<p>Clarity.</p>	<p>“Policy 2A of the Neighbourhood Plan provides a parish specific context to broader growth requirements allocate additional housing</p>

				<i>than that</i> indicated in the Local Plan (se para T2D.1) “.
Not agreed: The Local Plan does not identify housing for Saham Toney, rather it establishes a minimum housing requirement. No change made				
40	p32, T2A.1	3 rd sentence - this requires either deleting the text in brackets (as it duplicates the text in T2A.2) or to reword to be accurate; HOU 04 quotes a %, where Appendix 5 provides a figure.	Accuracy.	Either remove as advised or amend “To be consistent with ... the Local Plan (which requires the overall numbers of dwellings in Saham Toney not to significantly exceed increase by more than 5%; Appendix 5 clarifies that this would be a 33) ...”.
Unnecessary to implement. The sentence in question has already been deleted and replaced with alternate text in response to Health Check recommendation 3.11				
41	p32, T2A.1	4 th sentence - If the Plan allows for more homes under Policy 2B & 2C, this suggests that there could be more housing than the 70 units already allocated. It will not be possible to ‘ <i>manage within the number allocated in this Plan</i> ’, as more than this number have already been allowed for”. See comments on Policy 2A ‘minimum target’ above.	‘STNP Justification of a Minimum Housing Target for the Neighbourhood Plan’.	“(see Policy 2C)., but otherwise the level of new residential development permitted will be managed within the number allocated in this Plan. ”
<p>Not agreed. The comment misinterprets the text in question. The Plan delivers the following new housing:</p> <ul style="list-style-type: none"> • 70 houses via allocated sites; • An unquantified number that may come forward in accordance with Policy 2B; • An unquantified number that may come forward via the exceptions in Policy 2C (P2C.1 (a) and (b)) <p>So yes, clearly as the comment reflects, there may indeed be more than 70 new dwellings in total, but the text in question requires housing on the allocated sites to be managed within the total of 70. That is made clear by the word ‘otherwise’, which means other than new development coming forward via Policy 2B or Policy 2C exceptions. Notwithstanding that this is considered to be abundantly clear, a clarification note has been added to the existing text, which itself remains unchanged</p>				

42	p32/3, T2A.2	Parts of the 6 th and 8 th sentence concerning ' <i>paragraph 3.10 clarifies the 7% growth</i> ' duplicate one another and is unnecessary.	Duplication.	Remove from either sentence.
6 th sentence deleted accordingly				
43	p33, T2A.4	This section does not address the issue whether all of these sites are deliverable or developable. (See comments on Policies 2H, 2J & 2K).	Deliverability.	Amend to add text As well as being sustainable and suitable, it is important for the Plan to include statements for all the allocations that demonstrate landowner / developer support and confirming that each is viable and deliverable or developable when assessed against the infrastructure / masterplanning requirements for each one.
Letters confirming the availability, deliverability and viability of has all 9 allocated sites have been received from the site owners. Appropriate statements are included in supporting text to each allocated site policy/ It is not a requirement that the letters themselves be included in the Plan				
44	p33, T2A.4 b)	It is not possible to ' <i>futureproof</i> ' against any increase in housing units as it's the Local Plan that establishes the strategic housing allocation. Future housing requirements Breckland are yet to be determined as are any implications this number may have on the development strategy for the District. The additional houses proposed in the Neighbourhood Plan (37) are additional to the current Local Plan figures. Although the numbers are likely to increase due to the Local Plan Review, due to the new national housing methodology requirements, the Neighbourhood Plan needs to conform to the current adopted Plan and not the emerging one.	Accuracy.	Remove b).
Not agreed. This recognises that any number of factors, including Local Plan review, changes to the planning system etc., may result in a higher housing target. The text does not claim to know what such increase might be, nor to guarantee it will be less than the 37 dwellings delivered by the site allocations				

in addition then present Local Plan target. But regardless, it cannot be disputed that 37 additional houses provides a very good margin for possible future growth in the target (i.e. 112%) and so the Plan to some extent is 'future-proofed'. To reflect lack of certainty in this respect in the text 'serves' has been amended to 'may serve'				
		POLICY 2B: RESIDENTIAL DEVELOPMENT WITHIN THE SETTLEMENT BOUNDARY		
45*	p36, Policy 2B, P2B.1 a)	This is not using the same wording used in Policy 7A.	Terminology.	Replace ' <i>medium</i> ' with ' <i>moderate</i> '.
Amended as suggested				
46*		Also why does this apply only to ' <i>landscape sensitivity</i> ' when Policy 7A also addresses ' <i>visual sensitivity</i> '?	Clarity.	As advised.
Amended as suggested				
47*		Format - It would be clearer if this referred to a Map (e.g. an amended 7A.3 or new map), rather than a Policy to understand where is applies.	Clarity.	As advised.
Not agreed. This is reviewer preference. The policy and its references are clear and not subject to interpretation. It refers to Policy 7A which includes a table (by fringe area) of landscape, visual and combined sensitivities, and shows the fringe area on Policy Map 7A.3. It would complicate that map to duplicate the sensitivity information on it. Additionally, as the Parish Landscape Character Assessment explains, the settlement fringe areas blend into the open countryside and do not have distinct, specific boundaries where they do so				
		POLICY 2C: RESIDENTIAL DEVELOPMENT OUTSIDE THE SETTLEMENT BOUNDARY		
48*	p39, T2C.8	See comments on Policy 2A re ' <i>minimum target</i> ', as this policy does not address substituted sites as an option.	Ability to enforce.	Remove last sentence.
Not agreed. See responses to comments 37 and 41. Additionally, Policy 2C very clearly addresses substituted sites – see P2C.2. It is unnecessary for that option to be duplicated in Policy 2A				

		POLICY 2D: AFFORDABLE HOUSING		
49	p39, Policy 2D, P2D.1	Reference to site STNP1 appears to be missing as it meets the criteria and is mentioned in P2H.3.	Clarity.	Add reference to 'STNP1'.
<p>Not agreed. This comment overlooks the Council's earlier comments in response to the second pre-submission consultation, 2019 and subsequent advice it provided with regard to affordable housing, which made clear that local connection criteria may only be applied to developments that are additional to those required to meet the Local Plan housing target (33). T2D.1 makes clear that sites STNP1, 2, 9, 13, 14 and 15 are jointly expected to deliver the minimum requirement. They cannot therefore be subject to the local connection criteria, which as P2D.1 specifies, is applicable only to sites STNP4, 7 and 16</p>				
50	p39, P2D.1	<p>The Local lettings policy hierarchy needs to accurately follow the latest Breckland Housing Allocations Policy</p> <p>b) should be former resident of Parish for 3 out of last FIVE years,</p> <p>c) should be close family connections who currently lives in Parish and has done so for past 3 years (Close family connection is defined as a person who is a parent, spouse, civil partner, child or sibling of the applicant or someone who has a relationship with the applicant that can be construed as a close family connection even though not related by blood),</p> <p>d) should be needs to live in Parish due to permanent employment (not time limited to 3 years).</p>	<p>To be consistent with Housing Act 1988 (as amended) and priority for those in reasonable preference groups Also as outlined in Breckland Council's amended housing allocations policy, para 3.4</p> <p><i>Connection to the local area criteria</i> (April 2020).</p>	Amend hierarchy as advised.
<p>Principle agreed, although this comment is inaccurate. With regard to local lettings, the latest Housing Allocations Policy, as adopted in March 2020, states that preference will be given to those meeting the criteria stated in a planning agreement.</p> <p>The hierarchy suggested appears to have been adapted from the local connection criteria given in paragraph 3.4 of the Allocations Policy, but omits the highest tier of that.</p>				

Hence the hierarchy in Policy 2D has been amended as suggested, but adapted to better match the local connection criteria hierarchy noted in the Allocations Policy. Implementation text has been added to give the Housing Allocations Policy definition of close family connection				
51	p39 P2D.1	The local lettings criteria should be time limited to avoid lengthy voids that has occurred since the local letting element of this policy has been introduced, as normally bids need to be made within a week of being advertise. If no local lettings applicant is found within 2 weeks then the Breckland Allocations Policy applies.	To ensure that houses are let as soon as possible.	<i>"Where no-one with a local connection the pool of eligible applicants has been exhausted, within two weeks, prioritisation of other candidates will be in accordance with Breckland Council's housing allocations policy".</i>
Amended as suggested (noted that the comment actually applies to P2D.2, rather than P2D.1)				
52	p40, P2D.3	We support this approach regarding not allowing artificially sub-dividing a plot to negate the requirement to provide affordable housing.		
Noted. No action required				
53	p40, T2D.3	1 st sentence - This approach is not consistent with national guidance. Also as this is not consistent with the Breckland Council Housing Allocations Policy nor Local Plan Policy, we object to this approach.	See Local Plan Policy HOU 07, which is a Strategic Planning Policy.	Amend to apply to all affordable housing or remove as it does not conform to the relevant strategic Local Plan policy.
Agreed and deleted. We are pleased to extend the applicability of the local lettings criterion				
54	p40, T2D.7	It is not clear why STNP1 is listed as a smaller site allocation when it is the 3 rd largest allocation and largest site.	Clarity.	<i>"The smaller-s Site allocations (Sites STNP1, STNP2, STNP9, STNP13, STNP14 and STNP15), are sufficient to realise the Local Plan target."</i>
Amended as suggested				
55	p41, T2D.8-11	Format - Line spaces between all these paragraphs are missing.	Presentation.	As advised.

Corrected accordingly				
		POLICY 2E: HOUSING MIX		
56*	p42, Policy 2E, P2E.1-3	There is no need to mention “ <i>Saham Toney Housing Needs Assessment, 3rd Edition, April 2020</i> ”, in each paragraph. This could be resolved by removing it from para’s P2E.1-3 and adding to para P2E.5.	Phrasing Duplication.	Removing reference to research as advised, but add it to the start of para P2E.5: <i>“Local housing needs should meet that identified in the Saham Toney Housing Needs Assessment, 3rd Edition, April 2020”.</i>
Agreed in principle, but it is not appropriate to add the reference to P2E.5 which covers housing standards by reference to Local Plan Policy HOU 10, a topic not dealt with by the Housing Needs Assessment. Instead the reference text in P2E.1-3 has been replaced by a footnote that provides reference to that Assessment				
57*	p42, Policy 2E, P2E.3	See comments re p54, P2G.1 re clarifying major development.	Clarity.	“P2E.3 For sites that will deliver 10 or more dwellings (major sites)....”,
Not agreed. This criterion deliberately avoids use of the term ‘major development’ since that also includes sites over 0.5 hectares in area, and it is not the intention that it should apply to a development of less than 10 dwellings, even if the site size exceeds 0.5 hectares. Hence the context is different to that for Policy 2G				
58	p42, P2E.4 b)	The terminology needs amending. Low-cost home has a specific meaning within the NPPF, but it is a type of affordable housing that is strongly discouraged in Breckland as it does not meet local need.	Clarity.	Replace ‘low cost ownership’ with ‘affordable home ownership’ which is a broader term.
Change not accepted as suggested, but implemented in an alternate manner. Policy 2E concerns housing mix for all new residential development, not just affordable housing. The term ‘low-cost home’ is not in fact defined in the NPPF. STNP makes a clear distinction between affordable housing in its formal meaning, and ‘housing that is genuinely affordable’, and for the latter uses the term low cost ownership. However, to avoid potential confusion, ‘low cost ownership homes’ has been replaced by ‘homes at a cost...’				
59*	p42, P2E.4 c)	Reference to “ <i>social and affordable housing</i> ” is incorrect in planning terms, as the term ‘social’ is no longer a type of housing.	Terminology – see NPPF Glossary on Affordable Housing.	Remove reference to ‘social and’.
Amended as suggested				

60*		Also to consider the inclusion of delivering community led housing as part of the housing mix, which is a type of self- build scheme.	See https://easterncommunityhomes.com/	As advised.
Considered but not agreed. The policy deals principally with house sizes, not development models, and affordable housing is covered in Policy 2D. No action taken				
61	p42, Policy 2E,P2E.4 c)	Affordable housing includes affordable and social rented housing and intermediate housing (shared ownership and shared equity). However, the description mentions just ' <i>social and affordable housing</i> ' which is misleading as there is only ' <i>social and affordable rent</i> '.	Clarity – see NPPF Glossary on Affordable Housing.	Affordable housing includes affordable rented housing and intermediate housing (shared ownership and shared equity).
See response to comment 59. By removing 'social and' the criterion now simply refers to affordable housing. STNP glossary refers to the NPPF for a definition of affordable housing. No additional change to that noted to comment 59				
62*	p44, Chart 2E4: Housing Tenure Demographics	Government has two types of rent category- Social Rent and Affordable Rent. In Breckland this is only likely to apply to the latter so needs to be amended.	Clarity.	As advised.
Amended as suggested				
		POLICY 2F: COMMON CRITERIA FOR ALLOCATED SITES		
63*	p47, Policy 2F, P2E.1	Replace ' <i>proposal</i> ' with ' <i>allocation</i> ', the latter is much more specific as demonstrated by its use in the title of this policy - see comments re General - Terminology.	Terminology.	"All residential development proposals shall allocations should... ".
Not agreed. As part of the clarifications recommended by the Health Check, the Policy title has been amended to cover all new residential development since the Plan permits non-allocated housing. Hence the comment is no longer relevant or applicable (noted that the comment applies to P2F.1 not P2E.1)				
64	p46, T2E.8	Format - 2 nd line – the return halfway along the page needs removing.	Presentation	As advised.
Corrected as advised				

65*	p47, Policy 2F, P2E.2	As policy concerning 'Landscape and Visual Appraisal' has been amended to take a proportionate approach, it would be appropriate to take the same approach to all sites on this issue.	Viability.	"P2F.2 A full proportionate ecological appraisal shall be provided...".
Principle agreed, but a change has already been implemented in response to a Health Check recommendation (change 'full' to satisfactory). Additionally, the noted criterion has no connection with Landscape and Visual Appraisals, which do not apply to all sites (see Policy 7A), but concerns ecological appraisals. Finally, it is noted that this comment applies to P2F.2 rather than P2E.2. No action required				
66	p50-54, Policy Maps 2F.1-9	Format - It would aid clarity if the access information on these maps were included on the site map for each site.	Presentation.	As advised.
Not agreed. This is simply a reviewer preference. The presentation of Policy Maps 2F.1-9 has been improved in accordance with comment 8. The site maps included in each of the site allocation policies 2H-2P are intended to show only the extent and boundary of each site. Furthermore, they are not at an appropriate scale to include such details, and it is not appropriate to increase their scale simply to duplicate information given elsewhere (also duplication often leads to discrepancies of data)				
		POLICY 2G: MASTERPLANNING		
67	p54, Policy 2G, P2G.1	The wording does not flow well and is not clear why sites STNP1, STNP4, STNP7 and STNP16 appear to be excluded from being (further) masterplanned, although the approach appears to be different in the individual site allocation policies (2H, 2J, 2K & 2P). For these sites, this policy appears to require that they should be similar to the research and layouts included in the Plan, however this too restrictive and does not offer the flexibility required by the planning system.	11. a) plans should be sufficiently flexible to adapt to rapid change..." NPPF and to be consistent with Plan policy 2H, 2J, 2K & 2P.	Remove from " ; with the exception of proposals for allocated sites STNP1, STNP4, STNP7 and STNP16 ..." until the end of the sentence.
Not agreed. This has nothing to do with 'future change'. Sites STNP1, 4, 7 and 16 have been professionally masterplanned to establish indicative layouts that acceptably meet all relevant STNP policy criteria. Policy 2G clearly states that those sites will not need to be masterplanned again <u>if</u> the site layouts proposed for them do not differ significantly from their indicative masterplans. To delete that caveat would impose unnecessary costs on a developer and hence be subject to challenge. At the same time the policy requires that if a layout for any of those 4 sites is put forward that differs significantly from their respective				

masterplans, a new masterplan must be submitted to support them. Hence a developer may present any layout he/she wishes, but it must be shown by a new masterplan that it complies with all relevant STNP policies				
Instead of amending the policy text as suggested, new implementation text has been added to further explain the above				
68	p54, P2G.1	It would be clearer if was a policy that identified what was considered to be 'major'.	Clarity.	See amendment to p41, P2E.3a this is the first time in the Plan that 10 units is mentioned, otherwise clarify in this policy.
This has already been addressed in response to a Health Check recommendation. Supporting text has been added to explain that 'major development' shall be as defined in the latest version of the NPPF. No further action required				
69	p54, P2G.1	See comments re General - Terminology.	Terminology.	"...with the exception of proposals for the allocated sites... ".
Not agreed. The term is not used with regard to the allocated sites, but applies to any non-allocated sites that may come forward should those constitute major development. Hence the term 'proposals' is completely appropriate				
70	p54, P2G.1 & 2	It would be clearer if the was policy identified what was meant by 'acceptable'.	Clarity	P2G.2 "...that shall be to a those produced to similar level of detail to that shown on Policy Maps 2G.1 and 2G., will be considered as acceptable".2
Amended as suggested				
71*	p54, P2G.3	It is not clear why the terminology used here is different to that in Policy 7A.	Clarity.	Replace 'medium' with 'moderate' and remove 'combined' before 'high'.
Partly implemented as suggested. 'medium' replaced with 'moderate'. But there is no use of the word 'combined' before 'high' so the comment is incorrect in that respect. The correct terminology, compatible with Policy 7A is used – i.e. moderate-high, or high combined sensitivity				
72	p54, P2G.3	It would be useful if there was a cross reference to a map (e.g. an amended Map 7A.3 or new map) that identifies 'landscape sensitivity'. N.B. The map on p133 only refers to 'moderate high' and 'high sensitivity' & Policy 7A does not clarify this either.	Clarity.	Include a map where this is clearly demonstrated.

<p>Not agreed. See the response to comment 47 for reasons.</p> <p>Regarding Evidence Map 7A on page 133, as noted in T7A.10, it is taken from a Breckland Council document and STNP is unable and unwilling to amend text taken from other sources. STNP has no way in which to equate its own use of 'moderate', 'moderate-high' and 'high', with the Council's use of similar terminology. That map is presented only as further evidence of the large areas of Saham Toney parish that have landscape character that is sensitive to development. Given that the Council's LCA was produced in 2007, clearly the parish specific LCA of 2019 is more relevant and takes precedence</p>				
73	p55-59, Figures 17, Policy Map 2G.1 & 2	While we welcome the inclusion of these plans, it should be made clear that they are for illustrative purposes only – see comments re P2G.1 above.	Clarity.	As advised.
<p>Not agreed. See also response to comment 67, although contrary to this comment, no earlier comment has been made about the Policy maps being only illustrative. That is not accepted. Their purpose is clearly explained in Policy 2G, the clarifications added to it, and the responses to other comments on Policy 2G. the Policy includes no requirement for the masterplans in the policy maps to be exactly replicated, or for site layouts to exactly mimic them.</p> <p>P2G.3 has been clarified to explain the intended use of Figure 17</p>				
74	p56-59, Policy Maps & Legends, 2G.1 & 2	N.B. The printed maps and legends are presented the opposite way around to those on pages 88 and 158-165 and the online version.	Presentation.	
<p>The online pdf version of STNP is the master. The printed version was provided as a courtesy to assist the Council's review. Since the Council officer who requested it insisted it was urgently needed, printing was done in a rush and these mistakes happened at the printers. The printer is aware. No action required</p>				
		SITE ALLOCATION POLICIES – GENERAL COMMENTS		
75	All site allocation policies (2H- 2P)	As previously advised, concern remains over the reference to phasing in all these policies - see comments re Policy 2A re phasing.	Ability to enforce.	Remove as advised.
<p>Not agreed. See responses to comments 29, 32, 33, 34 and 38</p>				

76	All site allocation policies (2H- 2P)	As previously advised, the use of the words 'up to' (previously 'a maximum of ') remains too prescriptive. Both these issues can be dealt with through amendments to the policy, as well as phrasing it more positively. Also see comments on Policy 2A on 'minimum target'.	Phrasing.	".....for up to at least x new dwellings will be permitted subject to meeting the following criteria:".
<p>Not agreed. See responses to comments 37 and 41. It is pointed out again that in making this comment the Council has unilaterally retracted the agreement made between STNP and the Council's Neighbourhood Planning Coordinator on 15 October 2019, when similar comments on the previous Reg. 14 pre-submission were discussed. It is common practice where a party wishes to vary an agreement, that it first gains the approval of the other party to do that, and it is unfortunate the Council has chosen to ignore such protocol</p>				
77	Policies 2H, 2J 2K & 2P	The same approach regarding the positive wording can be taken regarding those sites delivering affordable housing.	Phrasing.	"This site is required to deliver a minimum of not fewer than at least x affordable homes".
Amended as suggested				
78	Policies 2H, 2J & 2K.	In the 2 nd Reg.14 version of the Plan, the supporting text stated that these policies were not " <i>yet be considered deliverable</i> " and no reference to whether they were developable. In this version of the Plan, all the other site allocation policies (I, L, M, N, O & P) state in the text that they are " <i>considered deliverable</i> ". However, the text is silent on whether these three sites are deliverable or developable, therefore this needs to be clarified?	Para 67 requires sites to be either deliverable or developable (NPPF).	<p>Either clarify their status or remove them if they are not deliverable or developable.</p> <p>See comments for p33, T2A.4 above</p>
A letter confirming the availability, deliverability and viability of site STNP1 (Policy 2H) has been received from the site owners				
		POLICY 2H: SITE ALLOCATION STNP1: GRANGE FARM, CHEQUERS LANE		
79	p60, Policy 2H, T2H.2	As previously advised, e) - g) are not separate issues, but still don't seem to have been combined as has occurred in POLICY 2L?	Addresses similar issues- see draft Consultation Statement.	As advised.

This comment actually applies to P2H.1 g). That has been amended to read the same as P2L.1 f) with regard to merging requirements for FRA's and the location of development (i.e. oversight of previous agreement corrected).

P2H.1 i) relates to a separate topic: the requirement for attenuation of flood risk to be outside areas at medium or high risk, rather than development (covered by point (g)), hence no change is made in this respect

		POLICY 2I SITE ALLOCATION STNP2: DISUSED PIGGERY, OFF HILLS ROAD		
80	p64, Policy 2I, P2I.2	Previously there was a requirement for affordable housing on this site due to the size of the site. It's not clear why this has been reduced from 0.5 ha, by almost half to 0.30a, when the size of site map has not changed? Although the draft Consultation Statement explains that this figure takes account of the land for housing (2,709 sqm) and access (315 sqm), does this figure include other site uses e.g. Is the figure the total site size or just for these two elements?	Clarity & para P2D.3, Policy 2D Affordable Housing.	Further clarity is required.

A Council comment in response to the second Reg. 14 pre-submission of 2019 required that an exact measurement of site STNP2 should be made (to confirm if an affordable housing requirement should apply). The site owner carried out a full measurement, with verification by a STNP work group member and that confirmed the reduced area. In hindsight it appears the site owner simply over-estimated the area when putting the site forward in response to the call for sites. The measurements given in the Consultation Statement are for the whole site, as shown on Policy Map 2I.

No action required

		POLICY 2K: SITE ALLOCATION STNP7: PAGE'S FARM		
81*	p70, Policy 2K	As previously advised, f) - h) are not separate issues, but still don't seemed to have been combined as has occurred in POLICY 2L?	Addresses similar issues - see draft Consultation Statement.	As advised.

P2K.1 f) already addressed the merging comment from the previous Reg 14 consultation and matches the wording of P2.1 f), so no further change is required in this respect

P2K.1 h) relates to a separate topic: the requirement for attenuation of flood risk to be outside areas at medium or high risk, rather than development (covered by point (f)), hence no change is made in this respect				
		POLICY 2M: SITE ALLOCATION STNP13: HILL FARM		
82	p77, Policy 7C, P2M.3	Format - Add space after '3'.	Typo.	"P2M.3 2 This site....".
Corrected as advised				
		POLICY 2O: SITE ALLOCATION STNP15: 8 RICHMOND ROAD		
83*	p81, Policy 20, P2O.2	Why is a policy required to demolish the existing property?	Clarity.	Clarify as advised.
This is a new comment to a requirement that has not changed since the second Reg. 14 pre-submission, August 2019, to which the Council made no comment. That notwithstanding the Health Check highlighted a lack of clarity regarding the plan for the existing dwelling. As a result of that P2O.1 has been amended to state that the six dwellings to be delivered are to replace the existing dwelling. That being the case, P2O.2 has been deleted				
84	p83 Map	This map duplicates some of the information from the map on page 53. It would aid clarity if all of the information for a site was included on a single map.	Duplication & clarity.	Include all the information from the maps on pages 53 & 83 on the map on page 84.
Not agreed. Policy Map 2F.8 shows that safe access to site STNP15 is achievable by demonstrating that the necessary visibility splays can be provided, but without specifically dimensioning the location of the access point. It would be inappropriate to precisely define the access point location on a policy map, as that may restrict a developer. The map referred to in the supporting text to Policy 2O is evidence to address an earlier concern raised by the Local Highways Authority as to the distance of an access point from the bend in Richmond Road to the east. That annotated map confirms the maximum distance available between the bend and a potential access point. Furthermore, the scale of Policy Map 2F.8 and the map given in T2O.11 is significantly larger than that of Policy Map 2O, and the latter serves an entirely different purpose (as similarly noted in response to comment 66)				
		POLICY 2P: SITE ALLOCATION STNP16: RICHMOND HALL		

85	p84/5, Policy 2P, P2P.1 e)	It is inappropriate to link to a site which already has planning permission in this way. However, a different wording would be possible.	Phrasing.	<i>"The site will be developed in conjunction with should have regard to the immediately adjacent site which has outline permission (Ref. 3PL/2018/0563/));".</i>
<p>Not agreed. The allocated site cannot reasonably 'have regard' to the site with outline planning permission, since the proposed site layout for the latter will not provide access to the former. The owner is using the adjacent site as insurance against the allocated site being removed, but has made clear he has no intention to either develop the 5-house site or sell the land for others to do so. Once the Plan is made he intends to submit a new combined application for the combined site in line with Policy Map 2G.2.</p> <p>This is explained in updated policy and supporting text</p>				
86*	p85, P2P.3	Format - amend 'four' to the relevant number to be consistent with the other site allocation policies. Also in light of the above box comments, remove the end of this policy, unless the site is in the same ownership. Also see comments on Policies 2H, 2J 2K & 2P re positive wording.	Consistency & Phrasing.	<i>Either "...to deliver not fewer than four at least 3 affordable homes in combination with the adjacent permitted site" or at least.</i> <i>Or "...to deliver not fewer than at least 4 affordable homes" in combination with the adjacent permitted site has it has the same ownership".</i>
Amended as suggested				
87	p87, T2P.13	Amend text in light of comments made in relation to Policy 2P.	Phrasing.	<i>Amend in view of the amendments to P2P.3: "Since it will be set and developed in conjunction with should have regard to the adjacent permitted site (which has outline approval for 5 dwellings) the two sites should be considered jointly with regard to affordable housing, leading to the requirement for no less</i>

				than 4 at least [3 [4] affordable homes , as it is in the same ownership].”
<p>Not agreed. The allocated site cannot reasonably ‘have regard’ to the site with outline planning permission, since the proposed site layout for the latter will not provide access to the former. The owner is using the adjacent site as insurance against the allocated site being removed, but has made clear he has no intention to either develop the 5-house site or sell the land for others to do so. Once the Plan is made he intends to submit a new combined application for the combined site in line with Policy Map 2G.2.</p> <p>This is explained in updated policy and supporting text</p>				
		POLICY 3A: DESIGN		
88	p89, P3A.3	It would be useful to cross refer to para T3A.11, which has a summary of the ‘village character vernacular’.	Clarity.	<i>“Local vernacular: Design proposals shall incorporate Saham Toney’s character vernacular (see p94), whilst...”.</i>
<p>Not agreed. This is reviewer preference, not essential to policy implementation. The supporting text to which cross reference is suggested is itself just a summary of local vernacular, and refers to the Parish Design Guide for full details. Policy 3A already refers to the Design Guide. Also, it is unusual for policy to directly cross-refer supporting text.</p>				
89	p90/1, 3A.9 a)	This section has a number of sustainable design solutions including BREAM. Which/whose established principles are being referring to?	Clarity.	Reference the principles being referred to.
<p>The criterion has already been rewritten in response to a Health Check comment on a similar theme, thus: “Where practical, use renewable and recyclable resources and reduce waste in both construction and operation”. No further action required</p>				
90	p91, 3A:9 k) & l)	These criteria include a number of low energy requirements, but guidance is needed on how a developer demonstrates this or a planner assessed this? There is reference in part in the supporting text in para T3A.5(T section).	Clarity.	<i>Amend P3A.1 “Planning applications will be expected to be accompanied by a statement (see T3A.5) which explains how the design principles...”</i>
<p>Requirements concerning climate change issues have been moved to new Policy 3F in response to a Health Check comment to simplify and make more concise Policy 3A. The revised version already addresses the points made in the comment</p>				

91	p91, 3A:9 I) ii)	This is a high requirement for this type of development in this location. We would question whether this is realistically achievable?	Clarity.	Some evidence into the viability of this policy for non-residential development in Saham Toney is required.
<p>As part of moving requirements concerning climate change issues to new Policy 3F in response to a Health Check comment to simplify and make more concise Policy 3A, the requirement in question has already been deleted. Hence no further action required.</p> <p>It is however noted that as a principle the 'in this location' aspect of the comment is objected to. There is nothing in national or local policy or guidance that in any way downgrades the need to act on climate change issues in a small rural village</p>				
92	p91, P3A.9 I ii)	Remove ' <i>and additionally</i> ' this is not required as this section applies to different types of development.	Terminology.	Remove as advised.
<p>As part of moving requirements concerning climate change issues to new Policy 3F in response to a Health Check comment to simplify and make more concise Policy 3A, the requirement / text in question has already been deleted. Hence no further action required.</p>				
93*	pP91, P3A.10 f)	The terminology ' <i>social housing</i> ' is no longer used in planning terms.	Terminology	Replace ' <i>social</i> ' with ' <i>affordable</i> '.
Amended as suggested				
94*	p92, T3A.3	Design Guide - This does not clarify how consultation with the public, specifically the local community, has occurred for the Design Guide? Who were consulted? When? What was their response? And how was their response addressed?	Clarity.	As advised.
<p>Not agreed that this information is required in STNP. Information about consultations is appropriately included in the STNP Consultation Statement. This is a reviewer request for background information rather than something that is required to implement policy. The Design Guide has been formally consulted on as part of two Reg. 14 pre-submissions of STNP – one that ran from August to October 2019 and the other from June till August 2020. In terms of the local community, all those who live, work or carry out a business in the Parish were informed of the consultation and the document was available on the STNP website. Outside of formal consultations, the Design Guide has been made available on the STNP website when first published in March 2019, and then updated in May 2020, and villagers have been informed of that both by information in the village newsletter and at parish council meetings.</p>				
95	p92-98, T3A Supporting Text	These statements are to support and provide additional information for the Policy. However, there is no logical order to them and it appears to be a catch all section. There needs to be a rationale for this section.	Clarity.	To edit this section as advised.

Not fully agreed. The rationale is precisely as stated in the comment: to support and provide additional information for the policy. Additionally, to provide guidance on to assist with policy implementation. It is not a 'catch all' section.

To assist understanding some paragraphs of supporting text have been reordered, and sub-headings matching the relevant ones in policy text have been introduced to the supporting text

96	p92-98, T3A.5 g)	In the design guide the wording refers to reinforcing the vernacular, however this wording leans towards mimicking the vernacular style, which could lead to pastiche development.	Clarity.	Edit text to be consistent with design guide.
Amended accordingly				
97	p93, T3A.6	1 st sentence - As design is subjective, it is not appropriate to include such a negative statement or opinion about late 20 th design without any evidence for it, for which there is none. Therefore this needs amending.	Phrasing.	<i>"It is not the intention of Policy 3A that design simply mimics that of the area immediately surrounding a site, since in many cases that may result in copying poor the propagation of late 20th century design that overwrote and detracted from the village vernacular. Instead Policy 3A seeks to guide greater use and reinforcement of the better quality village vernacular".</i>
Amended as suggested. However, it is pointed out that the evidence for the original text is given in the Saham Toney Parish Landscape Character Assessment, January 2020, which was prepared by a professional landscape architect, and includes the text that is objected to in this comment.				
98	p93/4, T3A.11	The 'tick box' list duplicates some of the contents of Appendix A and is therefore unnecessary.	Duplication.	Remove this information, but refer to the relevant section in Appendix A: <i>"The village character vernacular is summarised below, but reference must should be made to the in Guiding Principle 2: Identity-Attractive and Distinctive Design in Appendix A ..."</i>

Reference to Appendix A has already been deleted in response to a Health Check comment (since the information in policy supporting text is the same as the vernacular information in guiding principle 2 or Appendix A). Hence change implemented as follows: “The parish character vernacular is summarised below. Full details are given in the Saham Toney Parish Design Guide”				
99		This ‘tick box’ refers to the desired requirements in materials and built form; not a summary of the ‘ <i>village character vernacular</i> ’.	Clarity.	Outlines the village character as descriptions rather than prescriptive instructions.
Added text ‘Description of features to reinforce...’				
100*	p94, T3A.12	4 th sentence – Could be more diplomatic by reordering some of the text and removing parts.	Phrasing.	<i>“sSite designers should visit the area to examine its character and feel before “putting pen to paper”, rather than using off-the shelf designs used regularly in other places outside the Neighbourhood Area should not be used and,”.</i>
Amended as suggested				
101*	p96, Map	Format - There is no explanatory information included on this map e.g. title, legend, north rose or scale.	Presentation.	Provide as advised.
An amended map with scale and north rose has been substituted for the original. Since this is simply an information map, format as policy or evidence maps is not required. Sufficient explanatory information is already given in the supporting text that immediately precedes the map				
102	p98, T3A.26- 29	Format - The text on this page has been justified on the right hand side, where the majority of the Plan has not.	Presentation consistency.	As advised.
Amended to be justified on the left-hand side				
		POLICY 3B: DENSITY OF RESIDENTIAL DEVELOPMENTS		

103	p99, Policy 3B	<p>There remains concern that the current approach is not the most effective use of land and not in accordance with NPPF (Ch11), as it is possible to design at higher densities and still fit with character of area.</p> <p>Also the 2nd sentence is repeating the 1st, but in more detail - the previous version was generally better.</p>	NPPF, para 122 refers to making an 'efficient' use of land & there are three other criteria not mentioned in the Plan's supporting text that need to be considered e.g. different housing types & land availability; market conditions & viability; and design.	<p><i>"P3B.1 The density of new residential developments shall should maintain the prevailing character and setting of Saham Toney and. To be supported, residential development proposals must shall be guided by the data on existing densities as provided for the 19 areas listed in Table 3B.1 below."</i></p>
<p>Not agreed, as previously advised. The Council has unilaterally retracted the agreement made with its Neighbourhood Planning Coordinator at a meeting on 15 October 2019 that density requirements are justified by NPPF para. 73, by the rigorous process of site allocations and site selection used, and by the landscape character, flood risk and infrastructure limitations of the neighbourhood area. The reviewer appears to consider Saham Toney as an urban area, which it is not.</p> <p>This topic has already been addressed in response to Health Check comments and additional supporting evidence has been provided for both the individual densities of allocated sites, and the general requirements in Policy 3B</p> <p>See also action taken in response to comment 4.</p> <p>Different housing types are covered in Policy 2E: Housing Mix</p> <p>Design is covered in Policy 3A: Design</p> <p>Land availability is addressed by STNP's site allocations</p> <p>The market will decide market conditions, STNP cannot do so</p> <p>Viability is a developer issue, but the landowners of all allocated sites consider those sites to be viable. There is no evidence to suggest that the guidelines given in Policy 3B will hinder viability.</p>				
104	p100, T3B.4	1 st sentence - this is written as if it were a policy, rather than text, (which should justify or explain policy). This is not necessary as it is stating the purpose of the policy.	NPPG makes reference for plans to be flexible (para 11 & 81 b).	Remove.

Not fully agreed. First sentence is agreed to be policy text and has been removed. The remaining text provides implementation guidance for the policy and is appropriate to remain				
		POLICY 3C: SITE ACCESS AND ON-SITE STREETS		
105	p103, Policy 3C, P3C.1, c) & e)	These could conflict with one another as some traffic calming measures involve the creation of spaces without separate roads and pavements e.g. Home Zones. This is an intention of this policy?	Clarity	Clarify as advised.
STNP had not previously considered Home Zones, but has now done so. Having done so, there is no desire to actively promote their use in new on-site streets, but neither is there a wish to prevent their implementation. It is considered that the existing text of P3C.1 c) would allow that, without conflict with P3C.1 e), since the latter includes the wording 'where appropriate'. No action required				
106	p103, T3C.3	Format - the letter's' is missing from the word 'site'.	Grammar.	'Sites'
Amended as suggested				
107*	p103/4, T3C.5	3 rd sentence - This requirement for a condition is not specific enough. It is also for Breckland Council to determine what conditions are required for each individual applications.	Requirements for Conditions.	Remove.
Not fully agreed. Rather than being removed, text has been amended as follows: "Where considered appropriate by the Local Planning Authority, a condition may be imposed..."				
108*	p104, T3C.6	2 nd & 3 rd sentences re conditions. It is Breckland Council's responsibility to determine planning applications, and therefore what conditions are required for each individual application.	Requirements for Conditions.	Remove.
Not fully agreed. Rather than being removed, text has been amended as follows: "...sub-standard, and where considered appropriate by the Local Planning Authority, a condition requiring its improvement prior to the commencement of the development may be imposed"				
109	p104, TC3.10	Format - letter and number need to be swapped to have the same referencing format as the rest of the Plan.	Consistency.	Swap 'C' & '3' e.g. T 3 C.10.
Corrected				

		POLICY 3D: PARKING		
110*	p105, Policy 3D, P3D.1	g) It would be useful to refer to the relevant part of the Local Plan, as in j).	Clarity.	<i>"...and the parking standards defined in the Local Plan in Appendix 2;"</i>
This has already been amended in response to a similar comment in the Health Check. No further action required				
111	p106, T3D.1	It is incorrect to state that as the Parish Council adopted the Design Guide it "...is therefore a material consideration". Any piece of research is a 'material consideration', whether adopted by the Parish Council or not.	Accuracy	<i>"...was formally adopted by the Parish Council on 01 June 2020, and is therefore a material consideration in planning decisions."</i>
Not fully agreed, since adoption by the Parish Council = acceptance by the village = greater weight. Word. 'therefore' only removed				
112*	p106, T3D.3	2 nd sentence – this ignores the fact that the Local Plan already sets standards, as identified in P3D.1 g) and therefore this sentence does not apply.	See Local Plan policy HOU 06 & TR 02	Remove.
Second sentence deleted and reference to Local Plan policies HOU 06 and TR 02 added				
		POLICY 3E: DARK SKIES PRESERVATION		
113*	p107, Policy 3E, T3E.2 b) & c)	As previously advised, it is not appropriate to include lighting times which is an operational matter that the county has responsibility for.	Enforceability.	Remove criteria.
Not agreed (as advised in response to the previous consultation). See Consultation Statement, Appendix B3. Text in T3E.2.b) & c) does not refer to lighting-up times but relates to specific times of day/night throughout the year, regardless of dusk/dawn times. For the avoidance of doubt, a clarifying note to that effect has been added				
114	p108, T3E.6	Format - further amendments are required as a result of editing.	Typo.	<i>"T3E.6 Policy criteria (ed) and (fe) are derived from Planning Practice Guidance on light pollution".</i>
Corrected as advised				

115*	p108, Map	There is no explanatory information included on this map e.g. title, legend, north rose or scale.	Clarity.	Provide as advised.
The Council has not commented on this at two previous consultations, and it has not changed, so for it to do so now is surprising, as well as pedantic, since the map is self-explanatory, and reference is also given to its website source for those wishing to know more. Nevertheless, the map has been updated to show a scale bar (part of the original website image) and a north rose. It is not possible to create a legend, and although it is obvious that bright areas are those lit at night, a note to that effect has been added to the accompanying supporting text				
		POLICY 4: NON-RESIDENTIAL DEVELOPMENT		
116*	p109, Policy 4, P4.1 c)	Not all such developments will have any of these negative impacts.	Accuracy.	<i>"...or any noise, effluent or fumes it would may emit;"</i>
Amended as suggested				
117*	p109, Policy 4, P4.2	Reference should be made to the Local Plan Policy on Developer Contributions (planning obligations) rather than the regulations to provide a better understanding of what is being sought. N.B Reference to the CIL regulations could cause confusion as there is no CIL in place in Breckland.	Clarity.	<i>"...facilities, in accordance with the requirements of regulation 122 of the Community Infrastructure Levy Regulations 2010 Policy INF 02 Developer Contributions".</i>
Amended as suggested. Note: this paragraph had already been moved to supporting text in response to a Health Check recommendation				
118	p109, P4.4 c)	Such developments are already permitted under ' <i>permitted development</i> ' and would be considered as ' <i>ancillary</i> ' to the use of residential development, so is not needed.	Accuracy.	Remove.
Deleted as suggested				

119	p109, Policy 4, P4.4 d)	The text in brackets also appears in para T4.8 and is more appropriately located there.	Duplication.	<i>"Enabling micro-businesses (i.e. those that employ fewer than 10 people have a turnover no more than £632,000 [ONS, HMRC & Companies Houses definition])"</i>
Deleted as suggested				
		POLICY 5: SAHAM TONEY RURAL GAP		
120*	p112, Policy 5, T5.7	It was be useful to cross refer this paragraph to the map on p133, to demonstrate the point being made.	Clarity.	As advised.
Note this is another new Council comment on material that has not changed since the previous consultation, but implemented as suggested				
121*	p115, Photographs	Format - It would be more consistent if these photos were presented in a uniform size and filled the whole box.	Presentation.	As advised.
Note this is another new Council comment on material that has not changed since the previous consultation, and is personal preference of the reviewer. However, adjustment has been made as far as is practical				
122*	p120, Policy Map 5.1	The Map insert is too small to be easily read and is not necessary.	Presentation clarity.	Remove.
Not agreed. Note this is another new Council comment on material that has not changed since the previous consultation, and reviewer preference. The insert does not need to be read; it simply shows where the Rural Gap is in the context of the whole neighbourhood area. It therefore serves a useful purpose and will not be deleted. Likewise, the insert does not detract from the clarity of the main map				
123	p111- 116 Omission	The text should explain what is required by 'A Landscape Visual Impact Appraisal' or should this read 'Landscape and Visual Appraisal'? If the former, it also needs defining in the Glossary.	Clarity.	As advised.
Amended to 'Landscape and Visual Appraisal' which is already defined in the glossary				
124	p116, T5.17	The map references need amending.	Typo	<i>"...as shown on Evidence Maps 5.12 and 5.23".</i>
Amended as advised				
		POLICY 6: HERITAGE ASSETS		

125	p121, Policy 6, P 6.5	It is Breckland Council's responsibility to determine planning applications, and therefore to determine what conditions are required for each individual application.	Requirements for conditions, para 54-56 NPPF.	"P6.5 Where a need for field evaluation is identified by Breckland Council, a planning condition shall may be agreed to prevent any disturbance...
Amended as suggested				
126	p128, Policy Map 6D	N.B. The printed map appears the opposite way around to those on pages 88 and 158-165 and the online version.	Presentation.	
The online pdf version of STNP is the master. The printed version was provided as a courtesy to assist the Council's review. Since the Council officer who requested it insisted it was urgently needed, printing was done in a rush and these mistakes happened at the printers. The printer is aware. No action required				
		POLICY 7A: LANDSCAPE CHARACTER PRESERVATION AND ENHANCEMENT		
127*	p129, P7A.3	Does 'visual sensitivity' only apply to 'Settlement Fringe Areas', if so the Glossary needs amending. If not, add refer to it ('and visual') after 2 nd landscape.	Clarity.	As advised.
The term 'landscape sensitivity' is used by professionals to indicate both landscape (character) and visual sensitivity. However, since the Council clearly does not understand this the requested clarifying text has been added to P7A.3 and other applicable paragraphs. Again, noted that this is a new comment on text that has not changed since the previous formal consultation				
128*	p129, P7A.5 c)	See comments about title for Table P7A.1: Settlement Fringe Landscape Sensitivities by area.	Clarity.	As advised.
The paragraph in question has already been deleted as a result of a Health Check comment. No further action required				
129*	p130, Table P7A.1	It is not clear why the title only makes reference to 'landscape sensitivity', when the table also refers to 'visual sensitivity'.	Consistency.	"Table P7A.1: Settlement fringe landscape and visual sensitivities by area:".
Title amended to include both visual and combined sensitivities				
130	p132, T7A.10	Format – Remove the 'E'.	Typo.	"... Evidence Map E7A.".
Amended as advised				

131*	p134-6, Policy Maps, 7A.1-3	Format - It would be consistent if the colour on the map was also used in the legend.	Consistency.	As advised.
Not agreed. This is entirely reviewer preference and the maps are not in any way inconsistent. It is also not possible to achieve. The map is reproduced from the Landscape Character Assessment and uses colours generated in software used by STNP's landscape consultant that cannot readily be reproduced in Microsoft Word. Even were it possible, adding colours to the legend would add nothing to understanding of the maps				
132*	p136, Policy Map 7A.3	Format - The map would benefit from having a explanation about the shaded grey areas (VCA1-8), as found on Map 7A.3.	Presentation	As advised.
Not agreed. The noted areas are already described in the map notes: "Character area boundary extended to include settled areas excluded from the Local Plan settlement boundary". Although areas denoted 'VCA' are defined elsewhere, a note to explain those are village character areas has been added for the benefit of those who fail to understand				
133*	p136, Policy Map 7A.3	Format - This map should either be amended to either list sensitivity types on the map or a produce new one to show clearly where the 3 local landscape sensitivity types (Moderate; Moderate-High; & High) are.	Clarity.	As advised.
Not agreed. This comment duplicates comment 47 – see the response to that				
		POLICY 7B: KEY VIEWS		
134*	p138-147, Photographs and Maps	Format - It would be more consistent if the titles for the Photographs and Maps were underneath these images, rather than over to be consistent with the rest of the Plan.	Consistency.	As advised.
Not agreed. This is reviewer preference only. What the reviewer perceives as photo titles are actually supporting text paragraph titles, and so, <u>for consistency</u> , rightly belong above the photos. That being the case, map titles in this case have been placed above the maps, to avoid any potential confusion with the paragraph titles. None of this detracts from understanding of the Plan				
135*	p139-147, Maps	It would also look better if all these maps were more uniform size, particularly the smaller ones on pages p1346, Maps 7A.1-3 being made larger.	Presentation.	As advised.
Maps presented to a more standard size, but noted this leads to an increase in white space in the text. Any future comments with regard to plan length in respect to this will not be accepted				

136*	p148, Policy Map 7B	Format - Aside from using a consistent font size in the legend, the colour used for these two difference types of key is too similar to easily read. Also it would help if the landmark features (red stars) were named on the map.	Clarity.	As advised.
Partly agreed. Legend font size standardised. The map is taken from the Parish Landscape Character Assessment and was produced with software not available to STNP and therefore the symbol colours are not possible to revise. Also, in the view of STNP the white and beige circles representing the two types of view are very readily clear and distinguishable and don't requirement amendment				
		POLICY 7C: LOCAL GREEN SPACES		
137	p148, Policy 7C, P7C.1	Format - Add space after '&'.	Typo.	"...and & C 2..."
This was a typo. '&' should have been '7', and has been corrected accordingly				
138	T7C.3 & 4	As these duplicate one another, merge and remove duplicated text.	Duplication.	As advised.
T7C.4 deleted accordingly				
139*	p150, T7C.5	The majority of the characteristics identified by the Open Spaces Society are already identified in the Plan PF as examples of being ' <i>Demonstrably special to the community</i> ', therefore the criteria 'Beauty to 'Richness of wildlife' should sit under this section. It would also make more sense of why there is a mixture of 'Yes' and '✓ & ✕'. The exception to this is ' <i>Supported by the Parish Council</i> '. This is an unnecessarily as not only is it not a NPPF requirement, if it the sites aren't supported by the Pariah Council they shouldn't be included in the Plan.	Clarity.	As advised.
Generally, not agreed as commented. The first three criteria in Table T7C are taken from the NPPF. The remainder are taken from the Open Spaces Society in its Information Sheet No. 20 - Local Green Space Designation (both types are described in the supporting text above the table). The latter recommends				

including 'support by the parish council' as justification for a local green space, so that guidance has been followed. While agreeing that a lack of parish council support might negate designation, confirmation of such support in all cases does not detract from clarity, but in fact makes the position clearer. 'Yes' has been replaced by '✓' for the first 3 criteria and headers have been added to the table to make clear the sources of the two types of criteria				
140*	p151, Policy Map 7C.1	Format - The Map insert is too small to be easily read and is not necessary.	Clarity.	Remove.
Not agreed. Note this is another new Council comment on material that has not changed since the previous consultation, and reviewer preference. The insert does not need to be read; it simply shows where the policy map area is in the context of the whole neighbourhood area. It therefore serves a useful purpose and will not be deleted. Likewise, the insert does not detract from the clarity of the main map				
141*	p152, Policy Map 7C.2	Format - It would be more consistent if these photos were presented in a uniform size and were in boxes, as on p115, but filled in the whole box	Presentation.	As advised.
This is simply reviewer preference, but the request to place the photos in boxes has been accommodated. The images were sized to suit the size of the green space concerned and as can be seen some are landscape, some are portrait and some are square as a result. The amount of work required to reproduce them all to a standard size from scratch is not warranted, since as presented they do not detract from understanding of the Plan in any way. Also, were they to be a standard size the Policy Map would only fit on a single page by making each image smaller than the present ones, thereby reducing clarity				
		POLICY 7D: BIODIVERSITY AND HABITATS		
142	p154, T7D.1-7	The order of these paragraphs could be better arranged by setting the context before addressing the detail.	Clarity.	At the start of the 'Implementation' section, put T7D.5- 7, followed by T7D.1-4.
Amended as suggested				
143	p154, T7D.3	Level 2 - Notable Trees have no recognised status in town planning, so should be removed.	Terminology.	"....Level 2: Priority habitats:; notable trees ;
Deleted accordingly. Also applies to the notes to Policy Maps 7D.1a and 1b (note: there are only 2 notable trees in the neighbourhood area)				

144	P154, T7D.8	1 st sentence re P7D.3 - this won't <i>'apply equally to all other locations'</i> , as this will vary according the hierarchy in T7D.3.	Clarity.	As advised.
First sentence of T7D.8 deleted				
145	p154/5, T7D.8	6 th sentence re conditions. It is Breckland Council's responsibility to determine planning applications, and therefore to determine what conditions are required for each individual application.	Requirements for Conditions.	Remove.
Rather than deleting the requirement, it has been amended (in a similar manner to that suggested in comment 125) to: "may be ensured by planning conditions, if deemed necessary by the Local Planning Authority."				
146	p155, T7D.10	Which species are being referred to? Also see T7D.8.	Clarity.	Either refer to 'T7D.17' or to 'Policy Map 7D.4a and b'.
Rewritten thus: "Additionally species shown on Policy Maps 7D.4a and b are designated as of local priority by this Plan and shall be considered in accordance with P7D.3"				
147	p159, Maps 7D.1a-7D.4b	Maps 7D.2a-7D.3b have the same relevant Legend whether it appears on the map or not, but Maps 7D.1a-b and 7D.4a-b have different legends, mainly showing what applies (except 7D.1b having 'Ancient Woodland' when none is on that map). It would be better to have a consistent approach to the Legends.	Presentation consistency	As advised.
Legends amended accordingly where applicable				
		POLICY 7F: TREES AND HEDGES		
148*	p168, P7F.1	While sympathetic to this approach, this can only apply where they are <i>'irreplaceable'</i> such as <i>'ancient woodland'</i> and <i>'ancient or veteran trees'</i> .	Para 175 c), NPPF.	As advised.

Not agreed. Paragraph 175 c) of the NPPF states “such as ancient woodland and ancient or veteran trees”. I.e. those are examples, not the only types offered protection. Additionally, protection as required by the policy is supported by NPPF paragraphs 175 a) and d)

Note: This is a new comment on a policy criterion that has not changed since the previous formal consultation. The recent examiner’s Health Check raised no concern about this paragraph

149*	p169, P7F.4	3rd sentence re conditions. This requirement for a condition is not specific enough. It is Breckland Council’s responsibility to determine planning applications, and therefore to determine what conditions are required for each individual application.	Requirements for Conditions.	Where necessary, planning conditions should be sought to secure planting of new trees and hedges”.
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Amended rather than deleted, in a similar manner to the responses to comments 125 and 145

150	p169, Policy 7F P7F.5	As previously, advised, the words ‘the roots’ should be removed to ensure that all parts of the tree are protected. Also ‘Appendix A’ should read ‘Annex A’.	Changes proposed as per the wording in the 5837 document.	“...measures shall be taken to protect the roots of all trees and hedges,... defined in sections 5-7 and Appendix Annex A of British Standard BS5837:2012...”
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Amended as suggested

151	p169, T7F.3	Policy DC 12 has been superseded by Local Plan Policy ENV09.	Accuracy.	“...and is in accordance with Policy DC12 of the adopted Development Control Policies Local Plan Policy ENV09. ”
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Amended as suggested

		WATER MANAGEMENT POLICIES		
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152	p170-189, Policy 8A-9	<p>There is concern that a number of these policies are not a land use planning matters, but are implementation (Building Control) ones.</p> <p>Also there is a risk that such technical information can quickly change and risks them becoming out of date. If reference to current guidance is retained then should be clarified to include the following (or prevalent guidance at the time of application):</p> <p>The policies need to be significantly reduced to cover the main planning issues e.g. Surface water, Sustainable drainage including SuDS and Sewerage. Also to separate out the '<i>what</i>' from the '<i>how</i>'; keeping the former in the policy and the latter into another guide or appendix.</p>	<p><i>"...<u>what</u> infrastructure should be provided..."</i></p> <p>para 1 PPG on Neighbourhood Planning.</p>	As advised.
<p>Paragraph 1 of PPG on Neighbourhood Planning has no relevance to the policies in question nor with regard to the comment to set out the 'what' but not the 'how'. These are policies describing the requirements for satisfactorily managing surface water, not the introduction of infrastructure</p> <p>It is noted that the Norfolk County Council Lead Local Flood Authority has formally confirmed it has no comments on the suite of drainage policies and has praised them in writing, and that a professional review of the policies found them to be robust. Anglian Water accepts the policies subject to a few minor revisions to cross-references it recommended and which have been incorporated</p> <p>The policies have been edited as a result of health check recommendations. No changes other than those already implemented as a result of health check comment 3.48 are considered necessary in response to this comment. As edited the policies do not duplicate the requirements of building control. A comparison has made between the policies and Building Regulations Part H, most specifically section H3: Surface Water Drainage to confirm this</p> <p>As part of the response to the health check recommendations, a new supporting document, the Saham Toney SuDS Design Manual, has been prepared, and includes material edited out of the various policies. A new appendix setting out the guiding principles of that manual has been added to the Plan</p>				
		POLICY 8A: SURFACE WATER MANAGEMENT GENERAL PROVISIONS		

153*	p170, P8A.1	It is Breckland Council's responsibility to determine planning applications, and therefore to determine what conditions are required for each individual application.	Requirements for Conditions.	<i>"All development proposals shall include a site-specific Surface Water Drainage Strategy, when required. That Strategy, including any necessary flood risk mitigation measures, should be agreed as a condition of the development, before any work commences on the site, and implemented before the new development is connected to the existing drainage system. Development will not be allowed to proceed until this condition has been discharged"</i>
<p>Not agreed</p> <p>Text making clear when a Surface Water Drainage Strategy will be required has already been added in response to a health check recommendation and has more clarity than the comment's suggested "when required" which is open to interpretation and lacks sufficient precision. No further action required</p> <p>The requirement regarding conditions has already been deleted in response to a health check recommendation, hence no further aspect is required on that aspect of the comment.</p>				
154	p175, T8A.19	Format – This paragraph page has been justified on the right hand side, where most of the Plan has not been.	Presentation consistency.	As advised.
Amended to left-hand justification				
155*	p176, Photographs	Format - It would be more consistent if these photos were presented in a uniform size, except on the last row, but filled all the box.	Presentation.	As advised.
<p>Not agreed. This is entirely reviewer preference and in no way detracts from understanding of the Plan. To stretch some photos to make them fit their box would result in the images not fitting the width of a page. To trim others to do likewise would result in smaller, and hence less clear images.</p>				
		POLICY 8F: MANAGEMENT & MAINTENANCE OF SUSTAINABLE DRAINAGE SYSTEMS		

156	p184, T8F.2	It is Breckland Council's responsibility to determine planning applications, and therefore to determine what conditions or planning obligations are required for each individual application.	Requirements for Conditions and for Planning Obligations, para 54 & 57.	T8F.2 it shall be ensured through the use of planning conditions or planning obligations that there are clear arrangements in place for ongoing maintenance over the lifetime of a development
Not fully agreed. This is too important an issue to simply delete the paragraph in question. Instead it has been reworded as follows: <i>"It may be appropriate for the Local Planning Authority to apply planning conditions or planning obligations to ensure that there are clear arrangements in place for ongoing maintenance over the lifetime of a development."</i>				
		MONITORING		
157*	p194, Table	In relation to Policy 2A target, remove monitoring indicator <i>'Delivery broadly in line with the planned trajectory'</i>	Ability to enforce.	As advised.
Not agreed. (a) Clearly this follows the Council's comments on phasing, but each of those has been rejected with justifying reasons; (b) a monitoring indicator does not require enforcement; (c) these are the indicators the Parish Council wishes to monitor its Plan with and it is not appropriate for Breckland Council to dictate what the indicators should be				
158*	p194, Table	In relation to Policy 2D target, remove reference to <i>'social and'</i> .	Terminology.	As advised.
Deleted as suggested				
159*	p194, Table	In relation to Policy 3A target <i>'Pattern and Design of New Housing'</i> , it is not clear what criteria and how this is measured.	Clarity.	Provide details on how the monitoring will be undertaken.
Not agreed. (a) sufficient information is given in the 'target' column; (b) It is not appropriate for Breckland Council to dictate or interfere with how the Parish Council chooses to monitor its own indicators; (c) clearly these will be somewhat subjective indicators				
160	p194, Table	In relation to Policy 3A target <i>'Use of Local Vernacular'</i> , it is the indicator how local vernacular is used or how a development responds to the local vernacular? The target is <i>'How well the design relates to the Parish</i>	Clarity.	Provide details on what is being measured and how.

		<i>Design Guide</i> ', but it is unclear how this is measured.		
Not agreed. (a) sufficient information is given in the 'target' column; (b) It is not appropriate for Breckland Council to dictate or interfere with how the Parish Council chooses to monitor its own indicators; (c) clearly these will be somewhat subjective indicators				
161	p194, Table	In relation to Policy 3A target ' <i>Building for Life Quality Indicators</i> ', while ' <i>Building for Life 12</i> ' does provide a method to measure good design, it does requires somebody who is trained in its use to use it. Who would assess buildings against the Building for Life 12?	Clarity.	Provide specifics on how the monitoring will be undertaken. N.B. Building for Life 12 has been updated to include active health.
This indicator should have been deleted as reference to 'Building for Life' was previously removed from Policy 3A. This indicator now deleted				
		GLOSSARY		
162	p198/99, Tables	While we welcome the introduction of the Glossary, it would be more useful to the reader if all the terms were found in the Plan.	Clarity.	As advised.
As a result of a word search, 5 unused terms have been deleted from the Plan specific glossary. It is not considered appropriate to edit the references to NPPF and Local Plan glossaries				
163*	p199	Basic conditions - It would be useful to clarify what they are.	Clarity.	Either refer to p10 of the Plan for the details or summarise as " <i>.... that a neighbourhood plan must meet. These include: having regard to national policy, contributing to attaining sustainable development, conforms to the strategic policies in development plan, compatible with EU (environmental) obligations, meets Conservation Regulations and meeting other legislation & regulations</i> ".
Reference to paragraph 2.6 added				
164	p200, Omission	A definition for 'Ecological assessment', as the term is used in the plan.	Clarity.	As advised.

The term 'ecological assessment' occurred 18 times in the Plan, while 'ecological appraisal' was used only twice. For consistency those two occurrences and the glossary term have been changed to 'ecological assessment'				
165	p200	Health Check - Reference should be made to an ' <i>independent examine (or ex inspector)</i> ' rather than a ' <i>qualified inspector</i> '.	Terminology.	As advised.
Amended as suggested				
166	p201	Housing Register - Remove reference to ' <i>social and</i> '.	Terminology	As advised.
Amended as suggested				
167	p201	Local Green Space - "...discretionary designation giving it protection from development in a similar manner to green belt land." is not accurate. The status of the two is different; it is the way that it is managed that should be the same.	"101. Policies for managing development within a Local Green Space should be consistent with those for Green Belts". NPPG & as referred to in para T7C.1 of the Plan.	"...discretionary designation, which should be managed giving it protection from development in a similar manner to green belt land."
Amended as suggested				
168	p201	Local lettings - This should apply to affordable housing properties as the issue of rent is not a factor.	Terminology.	"A policy applying to affordable properties rent tenure ..."
Amended as suggested				
169	p202	Notable Tree - This definition has no recognised status in planning.	Terminology.	Remove from glossary.
Deleted as advised				
170	p202	Parish Action Points - "... but which fall outside the permitted scope of	Clarity.	"... but which fall outside the permitted scope of neighbourhood planning , are not planning

		<i>neighbourhood planning, and so are to be dealt with separately</i> ” is not accurate.		policies and so are to be dealt with separately”.
Amended as suggested				
171	p203	Scheduled Monument – The glossary should explain what this is rather than refer to legislation.		Replace with “ <i>Scheduled Monuments are archaeological sites or historic buildings that are nationally important. Not all ancient sites are always scheduled.</i> ”
Amended as suggested				
172	p203	Site allocation - the description could be made more succinct.	Clarity.	“ <i>The designation of a residential housing site as an allocated site in the Neighbourhood Plan following a process of site assessment and selection</i> ”.
Amended as suggested				
173	p203	Social housing - this term is no longer recognised as a type of housing in planning.	Terminology.	Remove from glossary.
Removed				
		Appendix A		
174	p205-07, Appendix A General	<p>The Appendix aims to be a summary of the key design principles drawn from the Design Guide to support the Design Policies in Plan. However, there are some guiding principles which are too general, vague or a repetition of statements made elsewhere in the Plan and others which are too specific.</p> <p>The idea of providing a summary of key points from the Design Guide and the Landscape Assessment in an Appendix to support the Design policy is a good one. However, as previously commented, the Design Guide requires further editing to</p>	Clarity.	<p>Review Design Guide to draw on the key design principles and key character points which support the Design policy.</p> <p>Separate items from the Guide which are supporting text for the policies and additional information which should be in the Appendix.</p>

		enable the key poignant points to be drawn out.		
<p>The appendix has been appropriately edited to address this comment and to distinguish the guiding principles from policy supporting text. Supporting text has also been edited to reflect comments 94 - 102</p> <p>It is respectively pointed out that the Parish Design Guide is a Parish Council document, to which Breckland Council cannot “require” changes, as it seeks to do in this comment. It may only recommended amendments. Breckland Council comments on the Design Guide made on two previous occasions during informal reviews have been implemented to the extent the Parish Council wishes to do so and considers appropriate. It is unclear how a design guide point can be poignant!</p>				
175	p205, Guiding Principle 2	<p><i>“Identity, Attractive and Distinctive Design (all)”</i></p> <p>It is not clear whether this section is meant to be a Design Guiding Principle or a description of the village vernacular. As design guiding principles, they tend to be prescriptive and denote rules e.g. in the use of “favoured option, alternate option” rather than guiding principles.</p> <p>It contradicts with the overarching proposed purpose of the design guide as indicated on page 5 of the Design guide: <i>“1.3 This guide does not comprise a set of rigid formulae to be followed slavishly. In the specific context of a particular development, various guidelines may conflict and some will be more appropriate than others.” Also see p6 2.2 c) & e).</i></p>	Clarity .	All development design should respond sensitively and positively to the Village Character Vernacular as described in the Design Guide. However, there are various conflicting views within the Plan which lean to mimicking the historic vernacular rather than responding to it sensitively. Consistency of policies, design principles and supporting text is required throughout.
Guiding Principle 2 completely rewritten				

176	p206, Guiding Principle 4	<p><i>"Built Form - Buildings that front onto street"</i> This needs to be developed to add more clarity. This statement could lend itself to favour ribbon development along the roads, but this would contradict the guiding principle of preventing coalescence of existing village clusters.</p> <p>This needs to be developed to add more clarity.</p>	Clarity	Depending on the reasoning and rationale for the principle, reword to make clearer what the guidance is and what should be achieved.
Guiding principle deleted as it is covered by the Design Guide				
177	p206, Guiding Principle 4	<i>"Built Form - integrated interfaces with the countryside"</i> It is not clear what is meant by this guiding principle. Is it for development to integrate seamlessly and sensitively with its rural setting?	Clarity.	As advised.
Reworded accordingly				
178	p206, Guiding Principle 4	<i>"Built Form - maintain dark skies"</i> Saham Toney is not a designated dark sky area	Clarity.	Rephrase to provide a design principle to reduce intrusive light at night.
Reworded accordingly				
179	p207, Guiding Principle 8	<i>"Design all tenure types to the same quality and appearance"</i> The statement is ambiguous in what is meant by the same appearance for all tenure types? This is to support Policy 3A 10F 'which is presented more clearly without this additional text.	Clarity	Rephrase or remove.
Deleted				
180	p207, Guiding Principle 9	<i>"Homes and Buildings: Functional, Healthy and Sustainable - Follow National Design Guide Advice"</i>	Clarity.	Provide more detailed information.

		This is too vague and is not clear about which advice it is referring to?		
Rewritten				
181	p207, Guiding Principle 9	<i>"Incorporating convenience features will likely increase a property's saleability"</i> . This is a justification, not guidance.		Replace with <i>"Sustainable convenience features should be included at the design stage"</i> .
Rewritten as suggested				
182	p207, Guiding Principle 11	<i>"Lifespan- made to last Follow National Design Guide Advice"</i> This is too vague and is not clear about which advice it is referring to?	Too vague- which advice are you referring to in the NPPF?	Provide more information
Guiding principle 11 deleted				
183*		N.B The examiner would benefit from a sheet showing all the policy references changes between the four plans e.g. Reg.14 version 1 - 3 & Reg.16, to assist understand the differences between the different versions of the Plans		
Not agreed. The examiner will examine only the Reg. 16 submission version of the Plan, not all previous versions. The Plan is not the correct document for an explanation of the development of the Plan, derivation of policies etc. That is more properly given in the Consultation Statement, and STNP considers that already provides sufficient detail in this respect				

APPENDIX C4. Pre-Submission Consultation June-August 2020: Statutory and Non-Statutory Consultee Comments and STNP Responses

C4.1: Representation by Sport England

CONSULTEE: Sport England	DATE: 24 June 2020
REPRESENTATION(S): Thank you for consulting Sport England on the above neighbourhood plan. 1) Government planning policy, within the National Planning Policy Framework (NPPF) , identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important. 2) It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document. http://www.sportengland.org/playingfieldspolicy 3) Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded. http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/ 4) Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities . A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery. 5) Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work. http://www.sportengland.org/planningtoolsandguidance	

6) If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

7) Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

8) In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, 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 planning policies and developing or assessing individual proposals.

9) Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

Link a) NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

Link b) PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Link c) 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.)

If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Yours sincerely,

Planning Administration Team
Planning.central@sportengland.org



RELEVANT SECTION(S) OF PLAN:

Policies 3A, 4 and 7C

REACTION TO REPRESENTATION(S)

This is an exact duplicate of the response made by Sport England to the second Regulation 14 consultation on the Neighbourhood Plan (August-October 2019). See Appendix B4.1

ACTION TAKEN:

None required
See Appendix B4.1 for further details

C4.2: Representation by Norfolk Police

CONSULTEE: Norfolk Police	DATE: 25 June 2020
REPRESENTATION(S): <p>Dear Chris,</p> <p>Thank you for the below invite on the Strategic Environmental Assessment. Although I may not offer comment on this particular section, I am anxious as one of the Designing Out Crime Officers for Norfolk Police to have some input on the Neighbourhood Plan with regards to secure environments.</p> <p>Planning applications often make passing comment regarding their aim to provide a 'safe environment', but on the whole I find this mainly refers to health & safety aspects and not security.</p> <p>As the Designing Out Crime Officer, my role within the planning process is to give advice on behalf of Norfolk Constabulary in relation to the layout, environmental design and the physical security of buildings, based upon the principles of Crime Prevention through Environmental Design* (CPTED) and security measures recommended in Secured by Design (SBD) Homes 2019 guidance. Therefore, I seek input on this matter within the Neighbourhood plan to influence future plan-making process in such matters.</p> <p><i>*CPTED principles underpin the national police initiative, Secured by Design (SBD) which promotes the adoption of crime prevention measures. www.securedbydesign.com</i></p> <p>The early adoption of these principles in the Saham Toney Neighbourhood Plan will be a significant step towards protecting the area for future generations; and in utilizing SBD practice, Saham Toney will benefit by reducing the opportunity for crime and the fear of crime to occur, thereby creating a safer, more secure and sustainable environment.</p> <p>In asking for this reference to be incorporated in the appropriate section of the Neighbour Plan, I would be happy to discuss this further with you – if not now, at the appropriate moment.</p> <p>Kind regards,</p> <p>Penny Turner</p> <hr/> <p>Penny Turner</p> <p>Designing Out Crime Officer Norfolk Police Community Safety Neighbourhood Policing Team</p> <p>Email: email withheld</p>	
RELEVANT SECTION(S) OF PLAN: Policy 3A	
REACTION TO REPRESENTATION(S) <p>The following clarification was sent to the responder on 25 June 2020: Subject: Your comments on the Saham Toney Neighbourhood Plan June 2020</p>	

Dear Penny,

Many thanks for your comments on our Neighbourhood Plan, which I would like to explore further with you.

With regard to CPTED, I am currently unable to find that document in the public domain. Are you able to send me a copy? Or is that unnecessary because it underpins the Secured by Design initiative and hence is covered by the latter?

During our second Reg. 14 consultation (August-October 2019) you kindly sent comments on our Plan as it stood at that time. Your second comment recommended: "The Neighbourhood Plan should include a policy that 'All new developments should conform to the 'Secured by Design' principles and the Neighbourhood Plan will support development proposals aimed at improving community safety'. This would be supported by the objective to 'create and maintain a safer community and reduce crime and disorder' (which your first comment recommended we should add)."

We discussed your previous comments with our planning policy consultant and gave our reaction and proposed actions in our draft Consultation Statement, which is available as part of the present consultation. To save you looking that up, we wrote:

"**Comment 1:** Noted. We agree with the proposed objective, but do not consider it appropriate to include it as a principal objective in the Neighbourhood Plan, which is primarily addressing land-use matters at Parish level. The current objective C1: "To maintain and enhance the village's community facilities and improve access to them", is relevant and would cover matters relating to community safety.

Comment 2: Policy 3A as published at Regulation 14 (August 2019) states: "Proposals shall be in accordance with the principles set out in the Police initiative "Secured by Design", which covers the first suggestion in the comment. The addition of a further criterion under P3A.7 to reflect the suggested "All new developments should conform to the 'Secured by Design' principles and the Neighbourhood Plan will support development proposals aimed at improving community safety", will be considered in conjunction with comment 1, but may be unnecessary since that is an inherent requirement of "Secured by Design" which the policy already references. There is no need to create a new policy to deal with this"

As a result, we took no action regarding your first comment at that time.

With regard to your second comment on that consultation we wrote "Policy 3A criterion P3A.7g (previously sub-item b) amended from "Be in accordance with the principles set out in the Police initiative "Secured by Design." to "Be in accordance with the principles set out in the Police initiative "Secured by Design", and include appropriate measures aimed at improving community safety".

This actually became criterion P3A.7 (b) in the current version of the Plan with a little refinement following informal review by our LPA and now reads "Proposals shall be in accordance with the principles set out in the Police initiative "Secured by Design", and development proposals aimed at improving community safety will be supported."

Having made this clear reference to 'Secured by Design', I do not consider it necessary to repeat its guidelines / requirements explicitly in Policy 3A: indeed, our LPA would reject that as failing to adhere to the NPPF requirement for policies to be concise. The criterion is a firm requirement as it includes the conditional verb 'shall' (whereas our LPA would prefer it to say 'should' - advice we have declined, because we see this as important).

Hence, I would respectfully suggest the Plan as published has already adopted the principles you note with a suitable and appropriate reference. Additionally, our Parish Design Guide (already accepted by the LPA as a material consideration in planning matters) expands a little on the policy criterion by stating:

"10.4 Reference shall be made to the guidance given in the most up-to-date published version of "Secured by Design" (an official police security initiative), which covers a wide range of aspects relating to crime prevention and security, including:

- a) The layout of roads and footpaths;
- b) Footpath design;
- c) Communal areas;
- d) Property boundaries and rear access;
- e) Layout and identification of dwellings;
- a) Parking;
- b) Planting;
- f) Door-set standards; and
- g) Windows and roof-lights.

10.5 Open spaces must be designed with due regard for natural surveillance, and care should be taken to ensure that the security of a lone dwelling will not be adversely affected by the location of amenity space.

10.6 Communal areas, such as playgrounds and seating areas have the potential to generate crime, the fear of crime and anti-social behaviour. They should be designed to allow supervision from nearby dwellings with safe routes for users to come and go.

10.7 Boundaries between public and private space should be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces should not immediately abut residential buildings."

The design guide also mentions security in connection with street lighting and parking.

The Guide forms part of the present consultation, and if you have time to review it with regard to the issues you work with, I'd be glad of any recommendations you might have to improve it.

I look forward to hearing your views on the approach we are taking, and will be happy to discuss any remaining concerns further.

Thanks again for your interest in our Plan.

Kind Regards,
Chris

Chris Blow
Work Group Leader
Saham Toney Neighbourhood Plan Committee

The reply received was as follows:

Architectural Liaison (NC)

to me 25 June 2020

Dear Chris,

Thank you for your speedy and comprehensive reply - I have taken on board all the points you have raised/explained and am happy with the reassurances that reference to Secured by Design principles are within Policy 3A and again in the Parish Design Guide – as you say no further repetition necessary.

I will not be commenting on the present consultations but am glad of this confirmation from previous policy deliberation. All the best as you move forward with the Neighbourhood Plan.

Kind regards,

Penny

Penny Turner

Designing Out Crime Officer

Norfolk Police

Community Safety Neighbourhood Policing Team

Email: [email withheld](#)

ACTION TAKEN:

None required

C4.3: Representation by George Freeman MP

CONSULTEE: George Freeman MP	DATE: 25 June 2020
REPRESENTATION(S): As part of my ongoing work to help communities in Mid Norfolk create their own Neighbourhood Plans, I am delighted to promote the efforts of Saham Toney Parish Council. The Neighbourhood Plan is a hugely important piece of work for the community – helping to determine how they would like the village to grow over the next two decades. I would encourage everyone associated with the village to take the time to look over the documents and share their views as part of the consultation.	
RELEVANT SECTION(S) OF PLAN: General	
REACTION TO REPRESENTATION(S) Gratefully acknowledge our MP's support	
ACTION TAKEN: None required	

C4.4: Representation by the Environment Agency

CONSULTEE: The Environment Agency	DATE: 30 June 2020
REPRESENTATION(S): Benn, Neville to me 30 June 2020 Dear Chris We have no comment to make. We consider any aspect within our remit can be picked up at the planning application stage. Please see attached matters within our remit. You should be aware that there are some foul drainage capacity issues in your area. I would suggest a conversation with Anglian Water. Kind regards Neville Benn Senior Planning Advisor Sustainable Places	

<p>East Anglia Area (West)</p> <p>✉ Environment Agency, Bromholme Lane, Brampton, Huntingdon, Cambs. PE28 4NE</p> <p>☎ Internal: 51906</p> <p>☎ External: 0203 0251906</p> <p>Attached file: "East Anglia Pre-Application Planning Advice Guide", The Environment Agency, May 2018</p>
<p>RELEVANT SECTION(S) OF PLAN:</p> <p>Not applicable</p>
<p>REACTION TO REPRESENTATION(S)</p> <p>Noted. File attached to representation is for information only and not of specific relevance to the Neighbourhood Plan</p>
<p>ACTION TAKEN:</p> <p>None required</p>

C4.5: Representation by Norfolk Constabulary

<p>CONSULTEE:</p> <p>NPS Property Consultants on behalf of Norfolk Constabulary</p>	<p>DATE:</p> <p>10 July 2020</p>
<p>REPRESENTATION(S):</p> <p>Dear Sir</p> <p><u>Saham Toney – Neighbourhood Plan – Response to Regulation 14 Consultation</u></p> <p>I refer to the above plan and your request for comment. NPS is commissioned by Norfolk Constabulary to prepare representations on such planning policy matters. Therefore on behalf of Norfolk Constabulary, I would make the following comments</p> <p>Norfolk Constabulary have the responsibility for policing making Norfolk a safe place where people want to live, work, travel and invest in.</p> <p>Central Government place great emphasis on the role of the Police. Furthermore National Planning Policy Framework (NPPF) gives significant weight to promoting safe communities (in section 8 of the NPPF). This is highlighted by the provision of paragraph 91 which states</p> <p><i>Planning policies and decisions should aim to achieve healthy, inclusive and safe places which.....</i></p> <p><i>b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas;</i></p> <p>Nationally the Police have sought to provide advice and guidelines to support and create safer communities, most notably reflected in their Secured By Design initiative which seek to improve the security of buildings and their immediate surroundings to provide safe places to live. The references to this initiative is welcomed in Policy 3A (Design) and Guiding Principle 7 of the Plan.</p> <p>In terms of creating and maintaining safer communities, there are a number of measures that should be embedded in the Neighbourhood Plan to ensure that it satisfactorily addresses NPPF provisions and the needs of the Neighbourhood Plan area.</p> <ol style="list-style-type: none"> 1. The Neighbourhood Plan should include within its provisions a specific objective to ‘<i>create and maintain a safer community and reduce crime and disorder</i>’. 	

2. The Neighbourhood Plan should be more specific in support for the principles of crime prevention through good design as the design and layout of the built environment plays an important role in designing out crime and reducing the opportunities for anti-social behaviour. The Neighbourhood Plan should include policy provision which states that *'All new developments should conform to the 'Secured by Design' principles and the Neighbourhood Plan will support development proposals aimed at improving community safety'*. This would be supported by the objective to *'create and maintain a safer community and reduce crime and disorder'*.
3. The Neighbourhood Plan should include clear reference to the use of developer contributions to deliver local initiatives that create safer communities (and reduce crime). This should include measures identified by Norfolk Constabulary, along with County and Breckland District Councils in infrastructure studies and infrastructure delivery plans, to contribute to the finance of police infrastructure (including premises, vehicles, operational equipment and communication equipment). Should Breckland introduce a Community Infra-structure Levy (CIL), an element of which would be available for use by Parish Councils, use of CIL monies by the Parish Council would be appropriate to support measures that create and maintain a safer community and reduce crime and disorder.

I trust that these elements will be incorporated into Neighbourhood Plan objectives and policies to reduce the opportunities for crime and disorder (and also help reduce the fear of crime in the Neighbourhood Plan area) to ensure that the Plan is consistent with the emphasis that Government places on creating safer communities.

Yours faithfully
Andy Scales

Copy to Duncan Potter (Norfolk Constabulary – Head of Estates)

Andy Scales Head of Planning Consultancy

NPS Property Consultants

T +44 (0) 1603 706150
E [email withheld](#) W nps.co.uk

Nautilus House 10 Central Avenue Norwich NR7 0HR

RELEVANT SECTION(S) OF PLAN:

Comment 1 applies to section 5.2
Comment 2 applies to Policy 3A: Design
Comment 3 applies to Policies 1 and 3A.

REACTION TO REPRESENTATION(S)

The comments are an exact duplicate of those provided by Norfolk Police on 21 August 2019 in response to the Regulation 14 consultation of August-October 2019. See Appendix B4.3.
Comment 2 also addresses the same issue as that raised in Norfolk Police's response of 25 June 2020, to this third Regulation 14 consultation, by Penny Turner, Norfolk Police Designing Out Crime Officer. Appendix C4.3 gives details of correspondence with Ms Turner which highlighted to her satisfaction that the Neighbourhood Plan already adequately references 'Secured by Design'
Because of the comment duplication, the same reaction applies to comments 1 and 3 as for the previous consultation, follows:

Comment 1: Noted. We agree with the proposed objective, but do not consider it appropriate to include it as a principal objective in the Neighbourhood Plan, which is primarily addressing land-use matters at Parish level. The current objective C1: "To maintain and enhance the village's community facilities and improve access to them", is relevant and would cover matters relating to community safety.

Comment 3: Noted. It is considered that this aspect is covered by Breckland Local Plan Policy INF 02 'Developer Contributions' and paragraph 8.11 of that Plan, and hence does not require duplication in the Neighbourhood Plan. It is further noted that under the Town and Country Planning Act and Planning Practice Guidance, planning obligations may only constitute a reason for granting planning permission if they meet the tests that they are necessary to make the development acceptable in planning terms.

They must be:

- d) necessary to make the development acceptable in planning terms;
- e) directly related to the development; and
- f) fairly and reasonably related in scale and kind to the development.

General contributions to deliver local initiatives, including those identified by Norfolk Police (who in this representation have not actually identified any Parish-specific measures) would not meet these tests and so cannot be included in the Neighbourhood Plan.

ACTION TAKEN:

None required

C4.6: Representation by Natural England

CONSULTEE: Natural England	DATE: 23 July 2020
REPRESENTATION(S): Date: 23 July 2020 Our ref: 320473, 320482 Your ref: n/a Chris Blow Saham Toney Neighbourhood Plan Steering Committee Work Group stnp2036@gmail.com BY EMAIL ONLY Hornbeam House Crewe Business Park Electra Way Crewe Cheshire CW1 6GJ T 0300 060 3900 Dear Mr Blow Saham Toney Neighbourhood Development Plan - Third Regulation 14 Pre-submission Saham Toney Neighbourhood Development Plan - Consultation on the SEA Thank you for your consultation on the above dated 24 June 2020. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.	

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely

Richard Hack
Norfolk & Suffolk Team

RELEVANT SECTION(S) OF PLAN:

Whole plan

REACTION TO REPRESENTATION(S)

Noted

ACTION TAKEN:

None required

C4.7: Representation by National Grid

CONSULTEE:

Avison Young on behalf of National Grid

DATE:

29 July 2020

REPRESENTATION(S):



Central Square
South Orchard Street
Newcastle upon Tyne
NE1 3AZ
T: +44 (0)191 261 2361
F: +44 (0)191 269 0076

avisonyoung.co.uk

Our Ref: MV/15B901605

29 July 2020

Saham Toney Neighbourhood Plan Committee
stnp2036@gmail.com
via email only

Dear Sir / Madam

Saham Toney Neighbourhood Plan Regulation 14 Consultation
June – August 2020

Representations on behalf of National Grid

National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

Response

We have reviewed the above document and can confirm that National Grid has no comments to make in response to this consultation.

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning their networks.

Please see attached information outlining further guidance on development close to National Grid assets.

If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets.

We would be grateful if you could add our details shown below to your consultation database, if they are not already included:

Matt Verlander, Director Spencer Jefferies, Town Planner

nationalgrid.uk@avisonyoung.com box.landandacquisitions@nationalgrid.com

Avison Young
Central Square South
Orchard Street
Newcastle upon Tyne
NE1 3AZ National Grid
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



Matt Verlander MRTPI Director
0191 269 0094

nationalgrid.uk@avisonyoung.com For and on behalf of Avison Young

RELEVANT SECTION(S) OF PLAN:

All

REACTION TO REPRESENTATION(S)

Noted

ACTION TAKEN:

None required

C4.8: Representation by Norfolk County Council

CONSULTEE:

DATE:

REPRESENTATION(S):

NCC comments on the Saham Toney NP Reg 14 no.3

Reg 14 (3) Consultation Responses

Dear Chris

Thank you for consulting Norfolk County Council on the Saham Toney NP Reg 14 (round 3).

Norfolk County Council only has Highway Authority comments on the NP Reg 14 (round 3), see attached.

Best wishes,

Naomi

Naomi Chamberlain, Planner

Community & Environmental Services

Tel: 01603 638422

County Hall, Norwich, NR1 2DH

Attachment:

**Norfolk County Council Comments on the: Saham Toney Neighbourhood Plan (Reg 14) no.3
August 2020**

1. Preface

1.1. The officer-level comments below are made without prejudice, the County Council reserves the right to make to any further comments the County Council may have on future iterations of 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. Transport

2.1. Please see below the specific Highway Authority comments on the proposed site allocations.

Site reference	Comments
SNTP1	OK subject to the allocation policy requiring the highway conditions set out in planning application 3PL/2015/1430/F. Visibility requirements should not be left to general policy on highway visibility. The exact requirement must be included in the site-specific policy.

SNTP2	The Highway Authority objects to this allocation. There is no pedestrian provision on Hills Road and new allocations should have adequate pedestrian provision to connect to services in the village. The site is not required to meet Local Plan numbers and other sites not chosen for allocation could provide for pedestrians.
SNTP4	OK
SNTP7	OK
SNTP9	Object on the basis of the letter contained in the site assessment appendix. Lack of footways – this is identified as the main concern and the proposal does not address this.
SNTP13	The Highway Authority objects to this allocation. - There is no pedestrian provision on Hills Road and new allocations should have adequate pedestrian provision to connect to services in the village. The site is not required to meet Local Plan numbers and other sites not chosen for allocation could provide for pedestrians.
SNTP14	The Highway Authority objects to this allocation. There is no pedestrian provision on Hills Road and new allocations should have adequate pedestrian provision to connect to services in the village. The site is not required to meet Local Plan numbers and other sites not chosen for allocation could provide for pedestrians.
SNTP15	The Highway Authority objects on the basis that it is not demonstrated that adequate visibility can be achieved. This cannot be left to a general policy. It is fundamental to the allocation, without evidence it cannot be shown that the site is safe and meets basic conditions.
SNTP16	OK subject to access through adjacent development and that access being capable of serving both sites.

2.2 The Highway Authority cannot agree to allocation that does not provide suitable pedestrian provision and a number of these sites do not. The NP could still meet basic conditions if these sites are removed as it can still provide the numbers the Local Plan requires on safe suitable sites.

2.3. Should you have any queries with the above comments please contact Richard Doleman (Principal Infrastructure Development Planner) at [email withheld or call](#) 01603 223263.

RELEVANT SECTION(S) OF PLAN:

Policies 2H-2P

REACTION TO REPRESENTATION(S)

Comments 1.1 & 1.2: Noted

Comment 2.1: See Table C4.8 below

Comment 2.2: As was pointed out in response to similar comment in response to the second Regulation 14 consultation (see B4.8), a lack of footway provision is not a matter for the basic conditions. The Neighbourhood Plan, including the allocation of the sites objected to, meets the basic conditions.

Comment 2.3: Noted

ACTION TAKEN:

Comments 1.1, 1.2 & 2.3: None required

Comment 2.1:

STNP1:

- a) A requirement for visibility splays to be free of obstruction to a height of 0.6m has been added to Policy 2F;
- b) Appropriate highway improvement measures have been added to Policy 2H;
- c) A requirement to prevent surface water discharge onto the highway has been added to general policy 2F.

Sites STNP2, 4, 7, 9, 13, 14, 15 and 16: None required.

Comment 2.2: None required

Highway Authority Comment	Reaction
STNP1: OK subject to the allocation policy requiring the highway conditions set out in planning application 3PL/2015/1430/F. Visibility requirements should not be left to general policy on highway visibility. The exact requirement must be included in the site-specific policy.	<p>Planning application 3PL/2015/1430/F was withdrawn prior to being decided and hence no conditions apply to it, since conditions can only be set by the Local Planning Authority. In its representation to the application the Highways Authority requested 6 conditions should the application be permitted. Those are given in Figure B2 in Appendix B of the Site Selection Report, and each is addressed below:</p> <p>SHC 20 required 59m x 2.4m visibility splays ‘to be maintained free from any obstruction exceeding 0.6m above the level of the adjacent highway carriageway’. The splay requirement is given in Policy 2F, and it is noted that the Local Planning Authority required that, as opposed to repeating identical requirements in each site allocation policy.</p> <p>SHC 24 required on-site car parking and turning to be laid out in accordance with the approved (application) plan. This is not appropriate to include in policy, (a) because it would be deemed restrictive detail; (b) the site boundary and masterplanned layout differs from that proposed at the time of the application.</p> <p>SHC 29A and SHC 29B required a construction traffic management plan, and compliance with that during construction. The specification of such a document and adherence to it is not appropriate to include in policy, even more so as the Highways Authority proposes that for only one of the nine allocated sites.</p> <p>SHC 39A and SHC 39B required highway improvement works be completed before commencement of onsite work. Given the changes to the site boundary since that proposed in the application, it is not appropriate to simply refer to the drawing of highway improvements</p>

	<p>submitted in support of the application, but additional measures will be added to the site allocation policy to reflect the intention of those improvements.</p> <p>SHC 50 required measures to prevent discharge of surface water from the site to the highway. This is equally applicable to other sites and so will be added to Policy 2F.</p>
<p>STNP2: The Highway Authority objects to this allocation. There is no pedestrian provision on Hills Road and new allocations should have adequate pedestrian provision to connect to services in the village. The site is not required to meet Local Plan numbers and other sites not chosen for allocation could provide for pedestrians.</p>	<p>The objection is noted but not accepted. Full reasons are given in response to a similar comment on the second Regulation 14 consultation (see B4.8 of this statement). Of particular relevance in the previous response was the conclusions of a Transport Study in this respect</p> <p>Contrary to the reviewer's understanding the Local Plan does not set a precise limit on the level of development in the Neighbourhood Area</p> <p>Other sites not selected for allocation were not allocated for a variety of reasons set out in the Site Assessment and Selection Reports, regardless of their pedestrian access characteristics</p>
STNP4: OK	Noted
STNP7: OK	Noted
<p>STNP9: Object on the basis of the letter contained in the site assessment appendix. Lack of footways – this is identified as the main concern and the proposal does not address this.</p>	<p>The objection is noted but not accepted. Full reasons are given in response to a similar comment on the second Regulation 14 consultation (see B4.8 of this statement). Of particular relevance in the previous response was the conclusions of a Transport Study in this respect</p> <p>The letter noted is given in Figure B6 of the Site Selection report. It states that subject to the site being limited to 2-3 houses the required footway provision is along the site frontage, and that only if additional houses are developed would more extensive footway provision be required. Policy 2L makes clear the site is allocated for 'up to 3 dwellings' and includes a requirement for a site frontage footway, and is hence in accordance with the Highways Authority letter noted in the comment.</p>
<p>STNP13: The Highway Authority objects to this allocation. - There is no pedestrian provision on Hills Road and new allocations should have adequate pedestrian provision to connect to services in the village. The site is not required to meet Local Plan numbers and other sites not chosen for allocation could provide for pedestrians.</p>	<p>The objection is noted but not accepted. Full reasons are given in response to a similar comment on the second Regulation 14 consultation (see B4.8 of this statement). Of particular relevance in the previous response was the conclusions of a Transport Study in this respect</p> <p>Contrary to the reviewer's understanding the Local Plan does not set a precise limit on the level of development in the Neighbourhood Area</p>

	Other sites not selected for allocation were not allocated for a variety of reasons set out in the Site Assessment and Selection Reports, regardless of their pedestrian access characteristics
STNP14: The Highway Authority objects to this allocation. There is no pedestrian provision on Hills Road and new allocations should have adequate pedestrian provision to connect to services in the village. The site is not required to meet Local Plan numbers and other sites not chosen for allocation could provide for pedestrians.	The objection is noted but not accepted. Full reasons are given in response to a similar comment on the second Regulation 14 consultation (see B4.8 of this statement). Of particular relevance in the previous response was the conclusions of a Transport Study in this respect Contrary to the reviewer's understanding the Local Plan does not set a precise limit on the level of development in the Neighbourhood Area Other sites not selected for allocation were not allocated for a variety of reasons set out in the Site Assessment and Selection Reports, regardless of their pedestrian access characteristics
STNP15: The Highway Authority objects on the basis that it is not demonstrated that adequate visibility can be achieved. This cannot be left to a general policy. It is fundamental to the allocation, without evidence it cannot be shown that the site is safe and meets basic conditions.	The objection is noted but not accepted. It has been demonstrated in both the supporting text to Policy 2O, in Policy Map 2F.8 and the Saham Toney Neighbourhood Plan Transport Study that adequate visibility may be provided. This has been done by means of scale drawings, precisely as required by the Highways Authority in its response to the second Regulation 14 consultation, 2019 (see B4.8 of this statement)
STNP16: OK subject to access through adjacent development and that access being capable of serving both sites.	Noted. Adequate access has been demonstrated in the Saham Toney Neighbourhood Plan Transport Study and is shown on Policy Map 2F.9 and suitable access through the adjacent development is a requirement of Policy 2P, and is indicatively indicated on Policy Map 2G.2
	General reaction: It is respectfully pointed out that each allocated site remains subject to the submission of a satisfactory planning application, at which stage the Highways Authority is at liberty to raise concerns and request any site-specific conditions, but the objections given do not justify removal of sites from allocation

Table C4.8: Responses to Highway Authority Comments

C4.9: Representation by Anglian Water

CONSULTEE: Anglian Water	DATE: 14 August 2020
REPRESENTATION(S): Thank you for the opportunity to comment on the third Pre-submission Neighbourhood Plan. The following response is submitted on behalf of Anglian Water.	

Policy 5: Saham Toney Rural Gap

In our comments we had previously raised concerns that Policy 5 as drafted required Anglian Water as an infrastructure provider to demonstrate a need for development to be located within the designated Rural Gap.

We note that Policy 5 has been amended to address our previous comments and is therefore supported.

Policy 8A: Surface water management general provisions

We note that Policy 8A (formerly Policy 8) has been amended significantly and includes additional text to that which appeared in the earlier version.

P8A.5 – reference is made to the water undertaker (Anglian Water) commenting on proposals where it is proposed to make a surface water connection to the public sewerage network irrespective of scale. The justification for this requirement appears to be the LLFA's guidance on its roles as a statutory consultee for planning applications.

Anglian Water generally comments on proposals of 10 or more dwellings or 0.5 ha or more for non-housing uses. On request from the relevant planning authority we provide comments on development proposals below this threshold and in doing so we ask that they provide reasons of any issues they wish us to consider in our response. It is also important to note that in this context we are a sewerage undertaker as opposed to water undertaker as referred to in Policy 8A.

P8A.6 – reference is made to Local Highway Authority confirming that there is capacity within the public sewerage network to receive additional surface water flows. Anglian Water as sewerage undertaker would comment on the available capacity to receive surface water flows and our expectation is that any proposed surface water connection to a foul or combined sewer would be considered as a last resort only subject to evidence of the surface water hierarchy having been followed.

P8A.7 – reference is made to Sewers for Adoption Edition 8.

A further version of Sewers for Adoption Version 8 was subsumed within the sector's work to implement Ofwat's Code for Adoption Agreements. This code requires the water sector to prepare guidance on both water and sewerage asset adoption. That guidance must include "Design and Construction Guidance" and it is that document (also known as the DCG) which now contains details of the water sector's approach to the adoption of SuDS which meet the legal definition of a sewer.

We would look adopt to SuDs features which meet the legal definition of a sewer and meet the requirements as outlined in the DCG guidance and other related drainage guidance including that produced by Anglian Water.

There are also options available for the options for the adoption and maintenance of SuDS particularly for those that don't meet the legal definition of a sewer including Norfolk County Council as Highways Authority, Breckland District Council (where agreed as part of a S106 agreement) or a maintenance company.

It is therefore suggested that Policy 8A is amended as follows:

'P8A.5 All proposals in areas of high, medium or low risk of surface water flooding, regardless of development size, shall be reviewed by the Lead Local Flood Authority (for the means of surface water disposal) and the Statutory ~~Water~~ **Sewerage** Undertaker (where surface water is proposed to be discharged into the public sewerage network) prior to being decided **upon request from Breckland Council**.

P8A.6 Permission for proposals for which no other practicable alternative exists to dispose of surface water other than a public sewer, shall only be granted if it is confirmed by Anglian Water, ~~the Local Highways Authority, or their agents that there is adequate spare capacity in the existing system taking future development requirements into account~~ **that evidence has been provided by the applicant to demonstrate it does not increase flood risk both within the development and elsewhere and that the surface water hierarchy has been followed.**

‘P8A.7 As a condition of their adoption **by Anglian Water**, SuDS drainage schemes **which meet the legal definition of a sewer** shall comply with the guidelines given in Water UK’s ~~"Sewers for Adoption", Edition 8, 2019~~ **Design and Construction Guidance March-2020**, or any more up to date version made available, and with the most up to date version of CIRIA 753, The SuDS Manual’

Policy 8B: Surface water run-off and discharge rate and volume

Reference is made to detailed requirements for surface water discharge rate and volumes.

In respect of any surface water connections to the public sewerage network we would expect the discharge rate to be agreed with Anglian Water consistent with the guidance outlined in our [Surface Water Drainage Policy](#).

Policy 8C: Policy on Infiltration testing

Anglian Water welcomes the requirement for developers to undertake infiltration testing to establish whether surface water infiltration is feasible.

Policy 8D: Surface Water Flood Risk and Climate Change

Anglian Water welcomes the requirement for developers to make an allowance for climate change when considered surface water discharge.

In respect of any surface water connections to the public sewerage network we would expect the discharge rate to take account of climate change consistent with the guidance outlined in our [Surface Water Drainage Policy](#).

Policy 8F: Management and maintenance of Sustainable Drainage Systems

Anglian Water welcomes the requirement for developers to provide a SuDs Management and Maintenance Plan setting out who will responsible for any ongoing maintenance of SuDs.

Policy 8H: Design of Sustainable Drainage Systems

We note that an additional policy relating to the design of Sustainable Drainage Systems has been added to the Neighbourhood Plan following the previous consultation.

Anglian Water is supportive of the statement that SuDs are the preferred method of surface water drainage and that any SuDs being put forward for adoption by Anglian Water should meet the required design standards.

Policy 9: Sewerage provision

We note that a separate policy for sewerage provision has been added to the Neighbourhood Plan we are generally supportive of this policy as drafted subject to some detailed comments.

P9.6 - As set out above a further version of Sewers for Adoption Version 8 was subsumed within the sector’s work to implement Ofwat’s Code for Adoption Agreements

It is therefore suggested that Policy 9 is amended as follows:

'P9.6 Foul sewers shall comply with the guidelines given in "~~Sewers for Adoption~~", ~~Edition 8, 2019~~ **Design and Construction Guidance March 2020**, or any more up to date version made available.'

Habitats Regulation Assessment

Reference is made to a potential increase in water abstraction due to the additional development at Saham Toney having an adverse impact on Norfolk Valley Fens SAC (page 14 of report).

However Anglian Water is not proposing to increase the level of water abstraction as a result of the scale of development anticipated in the Neighbourhood Plan or growth anticipated within the company area as outlined in our approved Water Resource Management Plan.

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

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

Regards,
Stewart Patience, MRTPI
Spatial Planning Manager
Telephone: 07764 989051

Anglian Water Services Limited

Anglian Water, Thorpe Wood House, Thorpe Wood, Peterborough, Cambridgeshire. PE3 6WT

RELEVANT SECTION(S) OF PLAN:

Policies 5, 8A, 8B, 8C, 8D, 8F, 8H and 9

REACTION TO REPRESENTATION(S)

Policy 5: Noted
Policy 8A: Comments agreed
Policy 8B: Comment agreed.
Policy 8C: Noted
Policy 8D: Noted.
Policy 8F: Noted
Policy 8H: Noted
Policy 9: Agreed

ACTION TAKEN:

Policy 5: None required
Policy 8A: Comments incorporated
Policy 8B: Requirement regarding compliance with Anglian Water's Surface Water Drainage Policy added
Policy 8C: None required
Policy 8D: Discharge rate comment covered by the update to the Policy 8B noted above
Policy 8F: None required
Policy 8H: None required
Policy 9: Suggested amendment made

C4.10: Representation by Historic England

CONSULTEE: Historic England	DATE: 14 August 2020
REPRESENTATION(S):	

Ref: Saham Toney Neighbourhood Plan Regulation 14 Consultation

Thank you for inviting Historic England to comment on the Regulation 14 Pre-Submission Draft of the Saham Toney Neighbourhood Plan. We have reviewed the comments we made in October 2019, as well as the more recent 'Justification for Minimum Housing Target' document and Strategic Environmental Assessment produced for the neighbourhood plan group to support the plan. We will focus our comments on the site allocations proposed in the Saham Toney neighbourhood plan, and their potential effect on designated heritage assets. We note that the plan proposes to allocate land for c.70 residential units, and we also note that the minimum number considered necessary is 48 units, as set out in the justificatory document referenced above.

In general, we welcome the production of the neighbourhood plan, and in particular we commend the thought and effort that has obviously gone into its preparation. This is particularly related to the inclusion of considerable information relating to the parish's heritage assets, as well as its landscape character (Policies 6 and 7). We also appreciate the work that has gone into the development of policies supporting comprehensive masterplanning for major development sites.

We do not wish to make any comments on site allocations STNP1, STNP2, STNP4, STNP7, STNP9, STNP13, STNP14, or STNP16, and in general agree with the conclusion of the SEA that some enhancements to the setting of Page's Place may be possible through good landscape design. We make a general point regarding the design of highways infrastructure that also applies to Site STNP15, which we comment on below in more detail.

As you are aware, paragraph 185 of the NPPF requires that plans set out a positive strategy for the conservation and enjoyment of the historic environment, which *inter alia*, should take into account 'the desirability of new development making a positive contribution to local character and distinctiveness' and 'opportunities to draw on the contribution made by the historic environment to the character of the place'. Paragraph 190 highlights that any proposals should avoid or minimise any conflict between the heritage asset's conservation and *any aspect of the proposal* (my italics). Paragraph 193 makes clear that great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Paragraph 194 goes on to state that any harm or loss should be clearly and convincingly justified. Paragraph 124 makes clear that good design is a key aspect of sustainable development, whilst Paragraph 127 requires that developments are visually attractive as a result of good architecture, layout and appropriate landscaping, as well as being sympathetic to local character and history.

As the SEA and draft neighbourhood plan identifies, site STNP15 lies in close proximity to the Old Rectory (Grade II), and the parish Church of St George (Grade I). The latter is an asset of the highest significance, as identified in the National Planning Policy Framework, and is therefore afforded the highest weight.

The development of this site has the potential to negatively affect the setting of both of these heritage assets, owing to the densification of this relatively small plot, and the addition of an unnecessarily over engineered entrance junction immediately opposite the principal entrance to the Old Rectory, and in the near vicinity of the church's boundary. At present, Richmond Road enjoys a pleasant rural quality, unencumbered by intrusive highway and junction infrastructure, as befits its history and character. A 4.5m carriageway width, as specified, and 2.4m set back visibility splay is appropriate for a busy main road in an urban setting, but not for a narrow access street for six residential units in a rural village location, and this would not constitute good design. We would refer you to the section 7.2 of the government's best practice guidance, 'Manual for Streets', as well as page 26 of 'Manual for Streets 2'.

The latter, in paragraph 2.7.1.1 makes clear that DMRB standards for highways are not appropriate in rural settings.

Having regard to the requirements of national policy, we do not consider that the potential harm this development would cause to the setting of the two adjacent listed buildings, albeit of a relatively low level, is justified. The adjusted minimum housing requirement of 48 in the document referenced above would safely be met were site STNP15 removed from the plan, and this would therefore avoid any harm to these two designated heritage assets. We are not convinced by the point that these units would themselves 'future proof' the neighbourhood plan in a meaningful way. We therefore recommend that this site allocation is not included.

The general point regarding highway dimensions and infrastructure is also relevant to all of the other proposed entrances to proposed sites, where over engineered overly junction of urban character may not be necessary or appropriate for Saham Toney's pleasant rural character.

We would refer you to our detailed guidance on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here:

[<https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>](https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/).

For further advice regarding the historic environment and how to integrate it into your neighbourhood plan, we recommend that you consult your local planning authority conservation officer, and if appropriate the Historic Environment Record at Norfolk County Council.

To avoid any doubt, this letter 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 plan, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'E James', is written over a faint, repeating watermark of the words 'electronic electronic electronic'.

Edward James

Historic Places Advisor, East of England

RELEVANT SECTION(S) OF PLAN:

Policies 2F and 2O

REACTION TO REPRESENTATION(S)

Policy 2F: Details of site access are a matter for the Local Highways Authority.

Policy 2O: With regard to potential impact of site STNP15 on the setting of St George's Church and the Old Rectory, the comment notes that may be 'of a relatively low level'. It is therefore considered that removal of the site from allocation simply on the basis of only the possibility of low-level impact is not justified.

Under Policy 2E: Housing Mix, dwellings on the site will be of three or fewer bedrooms and therefore on a small scale. There is no evidence to suggest it will not be possible to deliver an attractive site, fully respecting the setting of nearby heritage assets and local character. Indeed, it might be considered that such a well-designed development would add to the setting. The nearby Church Barns complex to the south-east is a good example of what may be achieved in this respect.

With regard to the Old Rectory, that building is barely experienced from the part of Richmond Road in which STNP15 is located. It is set well back from the road and well screened by a high brick wall and well-established trees and hedges along its boundary.

The STNP15 site slopes quite sharply away from Richmond Road, meaning any development impact may more readily be addressed by using the elevation of the land to effectively blend it in without harmful impact of the street scene.

Neither the Church or the Old Rectory publicly visible looking through the development site.

The site is no nearer the Church than Parker's Close on Pound Hill, which comprises 5 large dwellings, which was permitted within the last 12 years. It is of modern style and discordant with the character of the immediate area. If its impact was deemed acceptable when approved, then it is clear a more sympathetic scheme is achievable at STNP15.

ACTION TAKEN:

Policy 2F: None required

Policy 2O: Reference to the Old Rectory and nearby non-designated heritage assets has been added to the policy with regard to a requirement for a Heritage Impact Statement.

A policy criterion has been added to emphasise the need for sensitive design of the site.

APPENDIX C5. Pre-Submission Consultation June-August 2020: Parishioner Comments and STNP Responses

RESPONDENT NUMBER: 1

DATE:

Various as noted

RESPONSE 1: 24 June 2020

We found a few of the pictures taken in June (2016) at the time of the flooding.

The water came rushing in down Pages Lane and entered under the gate and followed the concreted roads in Page's Farm fields which on your plans appear to be the road accessing the future estate.

We appreciate that a narrow area will be kept between Pages Place and the newly built estate.

Unless a pond or a deep ditch is dug along our boundary with the estate, we shall never be able to keep the excess waters out.

Thank you for your time and attention to those important details.

We are supporting your great work and plans, as long as you take in consideration those worrying facts of life and unruly natural phenomena.

Good luck for the future success of your important work for the village.

Stay safe and healthy.

Names removed for confidentiality





RESPONSE 2: 27 June 2020

A few more pictures sent by my son to remind us of the issues we had four years ago. The fields' underground 10in clay pipes and the five manholes built around the pig sties and old barns couldn't cope with the amount of surface water running along those concrete paths. We hope those can be helpful to help with securing those new future buildings.







RESPONSE 3: 6 July 2020 (reply to STNP email of the same date):

Chris

Thank you for your message to us showing the various drawings and potential mitigations for the flood risk brought by the proposed development on the site of Pages Place Farm.

It is very interesting that when the floods came in 2016, surprisingly, given the drawings you show, they did not come from the North and North West corner of our property. The water came from the bursting banks of the higher land drain at the top of pages lane, down the road, in at the gate of the farm and across the already sodden field, exactly where you want to build.

The water came into the Manor building from the South West entrance and flowed through from there.

The flooding to Moatside was similarly first through their front door off the southern lay-by and NOT from the drain at the North.

This is why {name removed} built his front wall and the "speed bump" at the top end of the layby, to stop recurrence of the "mini tsunami" that came down Pages Lane as discussed above.

That the drain to the North of both our houses was overwhelmed in 2016 was, therefore, a secondary, not primary, cause of flooding.

My land was flooded because it lies lower than Fickling's field and when the top ditch overflowed, it ran down the road and in through the gate to drain into our northern ditch, not because the ditch overflowed in its normal run.

You make a couple of "asides" points in your notes concerning my own property and planning which are incorrect and need to be addressed.

If you care to drop by, I will show you the aerial photos of my house in 1963. It shows the entire footprint of the original house, including, to the North end, the Victorian dairy, scullery, paved enclosed courtyard and attached outbuildings. All the buildings from the dairy to the northernmost outbuilding were demolished under the first planning permission. The "extension" to be rebuilt is almost exactly in the same footprint and will have no more impervious surface than the original building.

In addition, while it is not a "condition" of my 2018 permission, I have built a rain water recuperation system into my plans to achieve "grey water flush" for my lavatories and to defend my home from the potential flooding from the same direction as in 2016.

Accordingly, your criticisms of my permission are entirely unwarranted and the designation of my house as the epicentre of the flood plain slightly skewed.

Yours sincerely

Name removed for confidentiality

RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:

Policies 2F, 2K, 8A – 8G

REACTION TO REPRESENTATION(S):

The following response was sent to the respondent on 6 July 2020 with regard to Responses 1 and 2:

Dear {*name removed for confidentiality*},

Thanks again for your comments and many photos of the 2016 flood.

We have reviewed how the Plan's policies deal with your concerns and would like to draw your attention to the following requirements in the current version of the Plan:

Policy criterion	Remarks
P8A.2 All development proposals coming forward within the areas of high, medium and low risk from surface water flooding as identified by the Environment Agency in its up to date online maps, shall include a site-specific Flood Risk Assessment that gives adequate and appropriate consideration to all sources of flooding and the proposed method of surface water drainage.	In the case of STNP7, reference to "all sources of flooding" means surface water flowing along Page's Lane, entering Page's Farm and then passing onwards to your land, must be included in the assessment
P8A.3 All proposals shall have a neutral or positive impact on surface water drainage.	This means development of a site is not allowed to result in increased flood risk elsewhere
P8B.5 If control to greenfield runoff volume is considered unachievable, then any excess runoff volume shall be temporarily stored and released at a rate no more than 2l/s/ha.	This is a fallback, set by national guidance to ensure surface water dissipates slowly, rather than at the rates seen in 2016. For site STNP7 it would mean surface water could only be released from the site at a rate not exceeding 1.08 litres per second. To put that in context if we have 1mm of rain that results in 1 litre on every square metre of land, and clearly 1mm of rain is not a flood condition
P8B.9 Where runoff from off-site sources is drained together with the site runoff, the contributing catchment shall be modelled as part of the drainage system in order to take full account of the additional inflows to the site.	This means that surface water flowing onto site STNP7 from Page's Lane or from the fields to the west, must be included in calculations to determine the necessary capacity of the site's drainage system
P8B.10 Where runoff from off-site sources is conveyed separately to a site's proposed drainage system the flood risk should be managed in accordance with the most up	Again, this deals with surface water flowing onto a site from an external source. We don't have access to this British Standard as

to date version of BS8533: "Assessing and managing flood risk in development – code of practice".	it is only available at a cost of about £200, but reference to it is recommended by national guidance and drainage consultants will have a copy
P8F.2 Proposals shall sufficiently consider the likely maintenance requirements of new and existing drainage infrastructure over the design life of a development, including those for ordinary watercourses that are bounded by, or within a development site.	This will mean that existing ditches bordering the site will need to be restored to good working condition, thereby slowing the flow of water onto the site
P8H.15 Where applicable, design of SuDS systems shall include measures to improve land drainage via watercourses or ditches that form part of a site or run adjacent to its boundary, and make adequate provision for their future maintenance.	As previous point
P8H.17 Design of temporary drainage for the construction phase shall be included where necessary and shall demonstrate construction activities will not lead to an increase in flood risk.	This ensures that flood risk is also addressed during construction – a phase when ground is likely to be compacted and less able to provide natural drainage

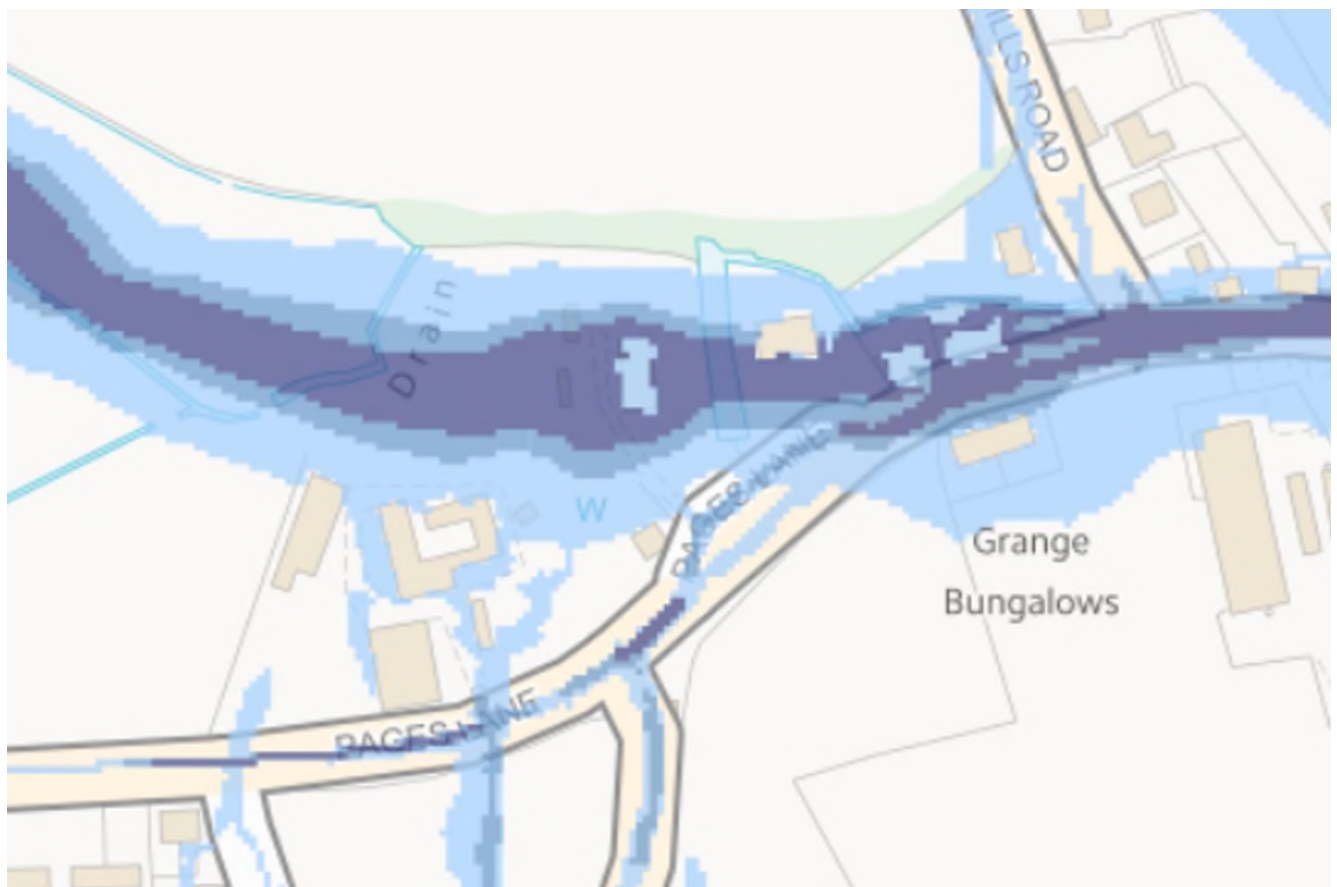
Additionally, the masterplanned site layout for STNP7 included in policy 2G and the site-specific policy 2K specify green areas for surface water attenuation measures, specifically, that "a bio-retention area or infiltration area shall be provided in the area of the site's greatest risk of surface water flooding, with a minimum length / area that calculations demonstrate to be adequate to prevent flood risk to properties and/or off-site".

You can see that in the site layout shown below, which development must adhere closely to:



The mocked-up picture below shows the slightly wider picture in your area. As you can see, we reduced the site size from what was proposed by the owners such that it avoids the area of highest

flood risk. I have only shown that risk area approximately but I also include below the detailed risk map of the area for your reference, the darkest shade being the highest risk. As I hope you will appreciate, the green area above serves a dual purpose in that it is also intended as a means of conserving the setting of Page's Place.



Perhaps in theory it would additionally be possible to limit / prevent surface water flowing onto the site from Page's Lane or the field to the west by specifying some form of barrier (for example an earth bund and/or a hump plus drain at the site entrance). Our view is that to directly specify that would





risk contravening guidance that while anyone can protect their own property from flood risk, they cannot do that by increasing flood risk to other properties; and in this case if surface water was prevented from entering site STNP7 it would instead flow further along Page's Lane and/or to the stream and enter your land by a different route.

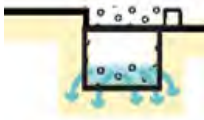















Additionally, it is not sensible for the Plan to specify precise details of measures to prevent flood risk: each site is unique and we would not wish to tie the hands of a designer who will know better than us the most appropriate solution for a particular site.




Another consideration is that STNP7 is a brownfield (i.e. already developed) site with not insignificant areas of roofs and hard-standing that in the case of the former, add to the amount of water falling onto the site and in the case of the latter, reduce the amount of natural infiltration that can take place. It is unlikely either incorporates any specific drainage, so both add to the amount of surface water runoff. Both will be demolished and while only detailed design of the site can give the full picture, there may well be less overall impervious surfaces when the site is developed, and there will certainly be an adequate and well-maintained drainage system, because that's what the Plan's policies require. This allows further confidence that the flood risk situation after development will actually be better than it is at present.

As you will see from the flood risk map, unfortunately your own property and much of your land lies in the area at highest risk of surface water flooding. As I have noted in the past, the Plan can only prevent flood risk from being made any worse by new development. But in fact, as I hope you will appreciate from the information herein, the measures we have taken should lead to a reduction in your risk. However, the Plan cannot stop nature or prevent you suffering from another event like 2016; the stream on your northern boundary will likely overflow at times and surface water will continue to flow across those parts of Page's Farm that are not included in site STNP7.

It is of interest to note that the application for your present renovation of Page's Place stated that the site is not in a designated flood risk zone. While that was true for river flood risk, as you know from experience, it was not true for surface water flood risk. Your consultant and Breckland Council's planners unfortunately did not pay attention to this fact. I say this not as a criticism, but simply to point out that if flood attenuation measures had been a condition of your planning permission, you would have less reason for concern now. As indeed would your neighbours, because as things stand, enlarging your property will inevitably lead to increased surface water runoff that will flow to the stream and onto neighbours' land. Trying to be constructive I'd like to highlight some things you might like to consider regardless of any planning conditions, once your work is complete and you perhaps turn your attention to landscaping:

SuDS component	Description	Setting	Required area
	A planted soil layer constructed on the roof of a building to create a living surface. Water is stored in the soil layer and absorbed by vegetation		Building integrated
	Rainwater is collected from the roof of a building and other paved surfaces, and stored in an underground or over ground tank for treatment and re-use locally. Such water may be used for toilet flushing and irrigation. On a smaller scale, water butts can also be used		Water storage

	<p>Designed to allow water to quickly soak into permeable layers of soil. Constructed like a dry well, an underground pit is filled with gravel or rubble. Water is stored in the soakaway and from there allowed to gradually seep into the ground</p>		<p>Open space</p> <p>Dependent on runoff volumes and soil type</p>
	<p>A grassed or planted area that runoff is allowed to run across to promote infiltration and cleansing</p>		<p>Open space</p> <p>Minimum length required = 5m</p>
	<p>Runoff is temporarily stored below the surface in a shallow trench filled with stone / gravel, providing attenuation, conveyance and treatment (via filtration)</p>		<p>Open space</p> <p>Minimum length required = 5m</p>
	<p>Paving which allows water to soak through. It can be in the form of paving blocks or porous paving where water filters through the paving itself. Water can be stored in the sub-base beneath paving or allowed to infiltrate into the ground below</p>		<p>Street / open space</p> <p>Can typically drain double its area</p>
	<p>A vegetated area with gravel and sand layers below, designed to channel, filter and cleanse water vertically. Water can infiltrate into the ground below or drain to a perforated pipe and conveyed elsewhere. Can be integrated with tree-pits of gardens</p>		<p>Street / open space</p> <p>Typical surface area is 5-10% of drained area with storage below</p>
	<p>A shallow, vegetated depression in the ground designed to convey and filter water. A swale can be 'wet', where water gathers above the surface before draining, or 'dry', where water collects in a gravel layer beneath. Can be lined or unlined to allow infiltration</p>		<p>Street / open space</p> <p>Account for width to allow safe, accessible maintenance: typically, 2-3 metres wide</p>
	<p>Can be used to store and treat water. 'Wet' ponds have a constant body of water and runoff adds to that, while 'dry' ponds are empty during periods of little / no rainfall. Can be designed to allow infiltration into the ground or to store water for a period of time before discharge. May require an outlet that restricts/ controls outflow, to ensure adequate attenuation</p>		<p>Open space</p> <p>Dependent on runoff volumes and soil type</p>
	<p>Shallow vegetated water bodies with a varying water level. Specially selected plant species are used to filter water. Water flows horizontally and is gradually treated before being discharged. Can be</p>		<p>Open space</p> <p>Typically, 5-15% of drainage area to provide good treatment</p>

	incorporated with a natural or hardscape environment		
Trees	Can be planted within a range of SuDS components to improve their performance, as root growth and decomposition increase soil infiltration capacity. Can also be incorporated as standalone features in soil-filled tree pits or tree planters	Open space 	
Underground storage 	Water can be stored in permeable crates beneath the ground to provide attenuation	Open space 	Dependent on runoff volume and soil type

I wouldn't pretend to be an expert and perhaps if any of the above are of interest you would be wise to get specialist advice on what might work best in your case.

I emphasise this is just some friendly advice, rather than trying to pressure you into anything.

I hope this addresses your concerns, but please feel free to contact me if you would like to discuss matters further.

Kind Regards,

Chris

The following was sent to the commenter on 9 July 2020, with regard to Response 3:

Dear {*name removed for confidentiality*},

Thank you for your latest email.

Firstly, I apologise for any offense caused by my previous remarks about your planning permission. I was not aware of your earlier application, but should have checked my facts. I have no need to view your evidence of the earlier property footprint: I am happy to accept what you say about that. Furthermore, I certainly had no intention to portray your property as an epicentre of the flood plain and I am sorry you have interpreted my note in that way. Yours is one of a number of properties that suffers from excess surface water runoff, the causes of which are a rather complex mix of natural processes, topography, underground drainage features that would benefit from improvement, and a failure by some landowners to carry out their obligations to keep watercourses clear. I was simply trying to point out that being in a high-risk area for surface water flooding, regardless of development on an adjacent site, that risk will remain. Of course, I commend you for incorporating rainwater harvesting into your plans, for both its flood risk reduction and water-saving benefits. It is one of a range of measures the Plan and Village Design Guide encourage new developments to implement. Taking account of your information about the route flood waters took along Page's Lane in 2016, we could perhaps add a requirement to the Plan for the developer of site STNP7 to implement appropriate measures to prevent surface water entering that site. But as I noted earlier, that water would then instead continue to flow along Page's Lane and perhaps enter your property (or those of others) by a different route. I would be interested to hear your views on introducing such a measure? As I understand things, one of the current problems is that the ditch along the north side of Page's Lane is very poorly maintained and so does not perform its intended function of draining both road and field and slowing the flow of water sufficiently to prevent / limit flooding. The Plan cannot enforce such improvements on the landowner upstream of site STNP7. Norfolk County Council could

and should do so. I believe they may undertake some investigations in the area when Covid-19 restrictions ease, but do not have any specific details of what they will review nor what may result from that review. Villagers as individuals or via the Parish Council should lobby the County Council for action to limit downstream flood risk.

If both sites STNP4 and STNP7 are developed, improvement to their boundary ditches will be a requirement under the Plan. In the light of your and other villager comments, we will now additionally consider if it would be appropriate to specify more precise requirements, for example as to the size and width of a renovated ditch. The danger of that is due to a lack of expertise we may underestimate the requirement and give developers a 'loophole'. It is probably better to have wording along the lines of "a renovated ditch (or wet and dry swale) shall satisfactorily contain and attenuate maximum surface water flows to prevent excess runoff over the site itself or onto neighbouring properties". The final version of such wording would have to be agreed with our policy consultant and Breckland Planning, but meanwhile I'd be interested in your opinion about this aspect?

We are also investigating whether the Plan could impose conditions on developers to contribute to the costs of drainage improvements in your area via S106 payments. We do not think those could be applied to improving ditches on private property, but a key aspect of the existing surface water drainage system is the size and condition of a culvert under the lower end of Hills Road and another that picks up water from the ditch on the north side of site STNP4 (we don't yet know the underground route of that one). We are waiting for advice from our consultant about what if anything the Plan may specify in this respect. If it were to be possible, it should actually mean the Plan leading to a reduction in existing flood risk, as well as preventing increased risk due to development, which it already does. (Subsequent advice from the STNP policy consultant, in an email dated 10 July 2020, highlighted that such a condition would not comply with the Town and Country Planning Act or Planning Practice Guidance, and so cannot be included in policy).

If things remain as they are, with no development of site STNP7, I cannot envisage much change in the flood risk your property is subject to, particularly with regard to water flowing off Page's Lane over Page's Farm and on to your land, as happened in 2016, unless the County Council enforces action on riparian owners of watercourses where necessary and instigates a programme of drainage improvements. Conversely, while I'm not at all pretending that STNP7 is proposed for development primarily as a means to reduce existing flood risk, I do think that if such development is implemented in line with strong Plan policies, it offers the best chance there is of solving at least some of the existing problems.

I look forward to hearing any further views you may have.

Kind Regards,
Chris

ACTION TAKEN:

Comment 1:

RESPONDENT NUMBER: 2

DATE:

29 June 2020

Comment:

Just wondered why The Chequers was not on your list of heritage housing. It's not listed because Breckland (Council) did not know it existed until we moved in, we know this because no one had ever paid rates until we asked why, yup, stupid move I agree. They wanted to list it then but we said no thanks.

It was built according to 'Shadows on the Summer Grass', circa 1740, and the road is named after the pub. It is also mention as the pub where the ordinary members of the village spent 10/- after the football match against Watton over the Wissey bridge.

We will be listing it before we eventually move to stop several building interested parties, from destroying the trees and building houses on the acre plot. Adding it to your list will also help stop this.



RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:

Policy 6: Heritage Assets

REACTION TO REPRESENTATION(S):

The following response was sent on 6 July 2020:

Dear {name removed for confidentiality},

My group and I have discussed your suggestion to include 'Chequers' in the neighbourhood plan as a non-designated heritage asset.

Respectfully we feel that is not appropriate for the following reasons:

- We did not simply select buildings for inclusion at random, but reviewed each against selection criteria recommended by Historic England. While it is a subjective matter, we do not feel that "Chequers" meets enough of those criteria to qualify;
- A key part of the plan's policy for non-designated buildings is to preserve their setting for the benefit of villagers. National planning rules define setting as "the surroundings in which a heritage asset is experienced". In the case of 'Chequers' it is not "experienced" by villagers, since neither it nor most of the land surrounding it is visible from the roadside.

We have to be very careful about making additions to the Plan between now and when it is submitted. Too many and the Plan will be subject to challenge due to not allowing consultation on new items. This would be of small concern were it just the addition of 'Chequers', but you will hopefully understand that its inclusion would require further consideration of other buildings around the village that similarly have interest but are not publicly visible.

A key point is that the Plan can and does aim to protect village interests, while conversely planning rules – and I think ethics – do not allow it to protect individual's interests, even in such cases as yours where the aims are noble.

As individuals, the group fully supports what you aim to do with regard to safeguarding 'Chequers', but do not feel the Plan is the appropriate way to do that on a more formal level. But to offset any disappointment this may cause; I want to reassure you that your property is already protected in other ways:

Local Plan Policy ENV 08 says: "Proposals that could affect previously unrecognised heritage assets will be expected, through agreement with the Council, to undergo an appropriate assessment, proportionate to the significance of the asset." Clearly as we speak 'Chequers' is an unrecognised heritage asset (in formal terms) and so qualifies for Local Plan protection.

To back this up, Historic England's Advice Note 7 "Local Heritage Listing" notes: "However, the absence of any particular heritage asset from the local list does not necessarily mean that it has no heritage value, simply that it does not currently meet the selection criteria or that it has yet to be identified". Furthermore, and probably most importantly, there are two other protections:

- The Local Plan does not allow development remote from the settlement boundary, so development of your land would be refused on that basis;
- Other than new single buildings in the countryside for agricultural workers and sites made up entirely affordable housing, the Neighbourhood Plan does not allow any new housing other than that on the 9 allocated sites.

I am sure you know much more about the process for listing a building than I do, but I would also have thought if a building was in the process of being listed, that would have to be taken into account should it be subject to a planning application while that process was in progress.

I hope you will understand the reasons for our decision. We salute your intention to safeguard your house for the future, and wish you well in gaining listed status for 'Chequers'.

Thanks for your interest in the Plan.

ACTION TAKEN:

None required

RESPONDENT NUMBER: 3

DATE:

01 August 2020

Comment:

I feel that the plan under represents the value of and need for improved public access routes, ideally off road. There are references to improved walking and cycling routes but they are quite vague. Could there be an aspiration for an off-road or dedicated connection to Watton (via the golf course if development there materialised?) and to the Peddars Way. The possible provision of new greenspace off Richmond Road is great but again, how valuable it would be to provide links to it from other parts of the village and perhaps down to the Brandon Road. Footpath provision in the Parish is very poor and I feel that improving it should be a key part of the plan.

RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:

General

REACTION TO REPRESENTATION(S):

The Plan addressed just such an aspiration in its first Regulation 14 version, March 2018, based on community responses to initial questionnaires. Since it was an aspiration rather than a land development topic, it was included under "Parish Action Points". During the formal consultation on that version of the Plan, that action point received overwhelming parishioner support (93% in favour). Given the level of support for all the Parish Action Points, in October 2018 they were formally accepted by the Parish Council for implementation, and hence subsequently removed from the Plan.

For information the accepted action was worded as follows:

Following further consultation with parishioners to establish a solution likely to be both practical and achievable, Saham Toney Parish Council and other elected representatives will work with the Highways Authority, Breckland District Council and others as appropriate, to seek to improve pedestrian routes through the village, particularly along eastern routes, and if feasible also across open country, particularly towards Watton. Among possible measures to implement this, the construction of pavements locally via conditions to planning permissions will be sought.

ACTION TAKEN:

None required

RESPONDENT NUMBER: 4

DATE:

09 August 2020

Comment1: Ref: - Proposed development of 6 houses at Terra Firma, Richmond Road. - close proximity to our historic church.

This would constitute an absolute backfill development and all those affected by this will object. My land borders this property on the total length of its western side, it is an elevated site and I am in no doubt that the topography of same will contribute to a considerable run off of water to my meadows which further to the south are the level of Saham Mere, and I would prefer to not have any further water placed here to contribute further to this area.

Richmond Road has become an extremely busy road, and to consider further vehicles accessing the highway from this site creates a dangerous situation, being between the two sharp bends. I would think that if this proposal ever reached Breckland, Highways would throw it out as being totally unsuitable.

Comment 2: Finally, a minor point, I am at a loss as to why you have considered it favourable to include sites –

Pages Lane/Chequers lane – whereby there will be somewhere about 50% of all potential sites proposed within a 100+ metres of each other. I question how effective your plan will be because you have I suppose no alternative but to include these as they are within the village boundary, So where are you in being sensitive to the needs of the village, these will happen without the village plan. In truth all you will accomplish is eliminating the odd development from someones large garden. I would rather see those than these larger developments totally eliminating those green spaces within the village.

Comment 3: I don't wish to be too disparaging because undoubtedly endless hours of work have been put into this, with best intentions and this I acknowledge.

RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:

Comment 1: Policy 2O: Site Allocation STNP15

Comment 2: Policies 2H, 2J, 2K: Site Allocations STNP1, 4 and 7

Comment 3: General

REACTION TO REPRESENTATION(S):

Comment 1: The allocation of site STNP15 has been justified by a process of independent site assessments and an objective and analytical process of site selection. Policy 2O and the Plan in general include a range of requirements to ensure the site's development is acceptable, including with regard to flood risk, highway safety, the amenity of neighbouring properties and heritage impact to the Church. A professional transport study has shown that safe access to and from the site is achievable, and that the site, in combination with the other sites allocated, will have only negligible impact on road traffic and junction use. The study demonstrates that satisfactory visibility splays are available at the site with reference to both bends in Richmond Road mentioned in the comment.

It is respectfully pointed out that the Local Highways Authority does not have the power to 'throw out' planning applications, all decisions lie with the Local Planning Authority.

The Plan's policies on surface water management ensure that runoff rates and volumes will be no more than their pre-development values, so there is reason to expect considerable additional runoff to the south.

The comment does not present any evidence against allocating the site in question, though the commenter is of course at liberty to object to any future planning application.

Comment 2: None of the sites in the area noted (STNP1, 4 and 7) are within the settlement boundary, so the comment is inaccurate. As for comment 1, their allocation has been fully justified by a rigorous process of site assessment and selection and no valid reason is given to amend that

Comment 3: Noted

ACTION TAKEN:

Comments 1-3: None required

RESPONDENT NUMBER: 5

DATE:

12 August 2020

I am interested in reading the Neighbourhood Plan for Saham Toney, and have particular interest in the site that has been allocated (STNP14).

I would be grateful if you could confirm the actual site where the 5 homes have been allocated as there appears to be a discrepancy in the site plans that are available, and in turn, will have a significant impact on our property.

I have noticed on your website, under the main 'site allocations' page (<https://www.stnp2036.org/site-allocations.html>), the 5 homes are allocated to run alongside Hills Road, as shown in the picture below.



However, looking at the documents that listed under the third regulation 14 Consultation on the pre-submission plan ([stnp_site_selection_report_2nd_edition_may_2020.pdf](#)), the site allocation of the suggested 5 properties has moved to run alongside our property, as shown in the picture below.



I am very much hoping that this has been a mistake, but would be grateful if you could confirm as soon as possible as this will result in comments being made on the pre-submission plan by the required time (14 August).

RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:

Policies 2A and 2N

Site Selection Report, 2nd Edition, Fig. 1

REACTION TO REPRESENTATION(S):

The configuration given in Policy Map 2A of the plan (the first illustration in the comment) is the correct one. That is further confirmed by Policy Map 2N, which concerns the site allocation itself. The alternative given in Figure 1 of the site selection report (the second illustration in the comment) was valid at the time sites were put forward to be considered for allocation, and remained valid when sites were

provisionally allocated (see Figure 11 of the Site Selection Report), However, it was subsequently amended in the Plan at the suggestion of a Breckland Council planning officer prior to the publication of the plan for consultation between August and October 2019. That change is noted in paragraph 15.4 of the Site Selection Report, and is shown in Figure 19 of that report. That is the version that has been carried forward into the Plan's policies.

Hence there is no need to amend either the Plan or the Site Selection Report.

ACTION TAKEN:

None required

RESPONDENT NUMBER: 6

DATE:

12 August 2020

Comment:

I am concerned that the 6 new dwellings planned for 8 Richmond Road is excessive for the size and location of the site and should be reduced in number due to the dangers of the Richmond Road. Most house-holds have a minimum of 1 car and very often 2 or 3. This would mean the daily comings and goings of perhaps 12 cars from the site onto an already very busy road, which surely raises safety concerns for all. It has been reported by the local Speedwatch Team in the village that Richmond Road regularly carries an average of 340 vehicles an hour – back in 2018. With other new developments on the Richmond Road i.e. Richmond Hall Richmond Road Saham Toney 5 houses, and also other new developments in Saham not to mention the large new development to be built behind Wayland Avenue off Richmond Road in Watton to consider. New residence will be wanting to use the Richmond Road at some point either to come into/through or out/through the village.

The entrance to the development at 8 Richmond Road, will be right opposite my kitchen window, where I spend 90% of my time. This means, especially in Winter months' the comings and goings will be quite invasive with car engine noise pulling away/slowing down. After dark headlights will shine into our private space and impact on our family life.

The houses intended for the site are for 1, 2 or 3-bedroom properties, that are affordable to younger villagers, has the potential impact to the school been taken into account?

We have already been subjected to the development expansions of SuBridge pet supplies. They work extensive shift hours. We often hear warehouse noise, ie fork lift trucks beeping their horns, lorries dropping off trailers ready for hitching. The lighting is polluting the night sky, it is very bright. When the lorries pass our home it literally blocks all our light out downstairs from the road. The lorries cannot get round the corner at the church on their side of the road and oncoming traffic is at risk and this includes the pedestrians walking along the pavement, which I have experienced first-hand with wing mirrors missing me by cms. At the moment if two lorries/farm traffic, one of the vehicles usually mount the curb or the pavement, as the road was not designed for the amount and type of traffic that is using it, without any more additional traffic joining it at this stretch of the road. There is also the problem of oncoming traffic in the middle of the road at the old post office corner, due to parked cars

What I am trying to say is, there is excessive traffic already passing along Richmond Road. With the potential new traffic from the new development at 8 Richmond Road joining the carriage way between two ninety-degree bends at each end of the proposed new site entrance, is a highly dangerous recipe. Sadly speeding cars hurtle past this stretch of road, although we are in a 30 mile an hour zone. One of my big concerns is a car being shunted into my house which is close to the road.

Lastly, I feel it's a great shame to knock down a very nice house which has a large garden backing onto open fields, this provides habitat to extensive wild life species, including birds, hedgehogs, owls and deer etc etc. Building over the garden would have a detrimental effect on the local wildlife.

We feel that any additional building to the site can only detrimental to the existing residents.

RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:

Policy 2O

REACTION TO REPRESENTATION(S):

The Saham Toney Transport Study (AECOM, April 2020) assessed the potential traffic impact of site STNP 15 (8 Richmond Road) along with 10 other sites that at the time delivered a total of 83 new dwellings (two sites were subsequently removed from the Plan, reducing the total to 70 dwellings). The study paid particular attention to the road junction between Richmond Road and Pound Hill, about 80m from the proposed access point for the site. As part of the study a village traffic survey was carried out, and included measurements taken at that junction. That survey established the weekday peak hour two-way traffic flows. For the junction in question the maximum hourly flow was 210 vehicles with an 85th percentile speed of 33.8 mph, during the 9-10 am peak. The study recommended 59m long visibility splays in either direction from the site access point, and that requirement has been implemented in Policy 2F. The study identified that safe access to and from the site is achievable, and provided an indicative drawing of such access, which is included as Policy Map 2F.8 of the Plan. Using standard methodology, the study estimated the site will generate an additional 5 vehicular trips at peak periods. The study examined collision data and concluded there was no evidence that the development would exacerbate any existing road safety concerns.

The study also concluded that the development will have no discernible impact on the capacity at the nearby junction, which currently operates well within its capacity.

The overall conclusion of the study was that the allocated sites can be accommodated without detriment to the local highway network.

It is respectfully noted with some irony that the access to the reviewer's property is virtually opposite the existing dwelling at site STNP15, and is not deemed to cause a nuisance in terms of headlight intrusion for example.

The Neighbourhood Plan cannot dictate school places, that is the responsibility of Norfolk County Council. However, Policy 1 does require this to be taken into account as far as is possible, by virtue of stipulating a need for adequate social infrastructure to accompany development.

The consequences of expansion of facilities at Su-Bridge do not result from development of STNP15, nor are they a valid reason not to allocate STNP15. Likewise, disturbance the respondent experiences by traffic passing a property sited directly at the roadside.

All development will be likely to have some impact on local wildlife, but Policies 7D, 7E and 7F provide suitable protections in this respect.

In summary the points raised do not justify the removal of site STNP15 from allocation in the Plan.

ACTION TAKEN:

None required

RESPONDENT NUMBER: 7

DATE:

12 August 2020

Comment 1: The first comment is that the website for the Plan makes it much easier to submit an approval on the Plan. It takes more searching to make comments which might oppose various parts of the Plan.

Comment 2: We object in particular to the proposed inclusion of the site at 8 Richmond Road as a redevelopment site. The initial proposal has moved from building two new houses on the site to six, comprising what can only be a small estate in a heritage sensitive site. This is the centre and the heart of the historic Saham Toney.

Comment 3: The plot is sandwiched between the historically important Alms-houses and the Church Cottages. We take issue that the Church Cottages were not included as being of historic interest. They were built by the Church in the 1850s to house members serving the Church and Parish and predate

many other dwellings in the village. We suggest that the Plan be updated to reflect their historic and heritage importance. The two-way access road will run beside the Alms-houses. This planned estate road leading into Richmond Road will be incongruous and break the natural line of buildings. It will also impinge on one of the valued and identified (in your plan) views to be preserved facing East along Richmond Road to the Church Green and St George's.

Comment 4: The site is within view of a Grade I listed building, St George's Church. It is also directly opposite the Old Rectory, a Grade II listed building and one of the most important historic houses in the village.

Comment 5: I trust that should planning permission be sought it will be heavily opposed on the heritage aspect when it goes before the Breckland Planning Committee. We believe it would be better for Saham Toney for this plot to be excluded from those identified as suitable in the Plan. It will be yet another dreadful planning blight on the village.

Comment 6: We plan to include Breckland Council in our comments.

RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:

Policy 20

Policy 6

Policy 7B

REACTION TO REPRESENTATION(S):

Comment 1: Comment not accepted and strongly refuted. During consultation, the home page of the STNP website had a simple form for those who wished to support the Plan without making comments. It also had a direct and prominent link to the consultation page where there is an online form for those wishing to make comments, either in support of, or opposition to the Plan, together with a downloadable version of that form in both Word and pdf formats. See screen shot below:

The screenshot shows a web browser window with the address bar displaying 'Regulation 14 (3) Consultation Ju' and a sub-page 'ation-14-3-consultation-june-2020.html'. The website has a navigation menu with 'HOME', 'DOCUMENTS', 'CONSULTATIONS', 'SITE ALLOCATIONS', and 'MORE...'. A red 'HERE' link is present. Below the navigation, a message states: 'Although consultation is now closed, you can still show your support for the Plan by filling in your details below and clicking "I support the Plan"'. A form is provided with fields for 'Name *' (split into 'First' and 'Last') and 'Email *'. A button labeled 'I support the Plan' is below the form. Further down, text explains that the form was available during consultation and is no longer accepting entries. It mentions that comments were also invited by email or phone, and a paper copy was available on request. It also states that the same form was provided in MS Word format and could be emailed to 'stnp2036@gmail.com'. At the bottom, there are two download links: 'reg_14_comments_form_instructions_final.pdf' and 'reg_14_3__consultation_comments_form.docx'. A large box at the bottom contains the text 'Regulation 14 Consultation Comments Form' and 'This form will available during the Regulation 14 public consultation'.

Regulation 14 Consultation Comments Form

This form will available during the Regulation 14 public consultation

It is clear that the facility to simply support the Plan had no more prominence than the comments form, and it took no more searching to find the latter than the former.

A link to that page was provided to all villagers in two issues of the village magazine (which is hand delivered to every household) and two issues of the local community newspaper, in a 4-page leaflet that was delivered to every household at the start of the consultation, in emails to all on the Plan's mailing list, and publicised on local community social media. In addition, a widely publicised 'hotline' number was open for 11 hours each weekday throughout the consultation period, for villagers to call for information on the Plan, advice on how to make comments, and if wished, to give comments.

Information on how to make comments was also given on posters and notices displayed around the parish. This comment is simply an ill-advised attempt to falsely discredit the consultation process and is unequivocally rejected.

Comment 2: The comment about proposed site size is inaccurate. Two options for the site were originally put forward by the owner: one for two dwellings, which the owner subsequently withdrew (meaning it could not be allocated); and the other for 4-8 dwellings. The 6 dwellings allocated cannot reasonably be considered 'an estate'. The site has undergone a process of independent site assessment and rigorous site selection, which both concluded the site is suitable for development, subject to meeting certain requirements, which are set out in Policies 2F and 2O, as well as in other relevant policies of the Plan. Policy 3A: Design and the Parish Design Guide sets out measures to ensure any development properly respects local character and the village vernacular.

Comment 3: The buildings included in Policy 6 as non-designated heritage assets were identified by an analytical process using criteria recommended by Historic England, as set out in the supporting document 'Reasoned Justification for Policy 6: Heritage Assets'. The age of a building was just one of eleven criteria considered, and is not in itself sufficient to warrant designation. It is also pointed out that the non-designated assets in the current version of Policy 6 are precisely the same as were in the first (March 2018) and second (August 2019) Regulation 14 versions of the Plan, and at neither of the consultations on those versions were additions or deletions from the list put forward for consideration. Circumstances have not changed since then, hence there is no justification to amend the list of non-designated assets. With regard to Key View 2, as given in Policy 7B, the supporting text to the policy notes "The aspect of value which make this a key view is related to the glimpses of the church tower experienced on the approach to the village and its role as a locally important landmark, aiding in orientation and signalling the village ahead". The allocated site, being on the opposite side of Richmond Road, does not play a significant part in that view, but nevertheless development of the site will be managed by the requirements of Policy 7B to preserve and incorporate a Key View, and future proposals may be judged in that light. No plans of an 'estate road' have been put forward, hence comment in this respect is considered speculative. There is no 'natural line' of buildings along this section of Richmond Road, since all dwellings are set back at different distances from the roadside. The site access road, for which again there are as yet no details to make valid comment on (those coming only when a planning application is submitted), will not in any case run beside the Alms houses: (a) because they do not directly adjoin the allocated site, and (b) because their setting is offered protection under Policies 3A and 6.

Comment 4: Policies 3A: Design and 6: Heritage Assets, ensure that any development must conserve the significance and setting of the two listed buildings noted, and that is further emphasised in the site allocation policy (2O). The same applies to the setting of the Alms Houses (Wisteria Cottage), which is a non-designated heritage asset under Policy 6.

Comment 5: A site allocation in the Plan is not the same thing as a planning application. The former sets requirements that the latter will be required to meet. Comment on the specific form the development may take can only be speculative at this stage, and it is stressed that the Plan's policies, together with the Local Plan and national policies, will not permit 'planning blight'.

Comment 6: Noted, and pointed out that regardless, Breckland Council automatically sees all comments in this Consultation Statement.

Overall: It is considered that the Plan's policies already include sufficient measures to address the concerns raised.

ACTION TAKEN:

None required

RESPONDENT NUMBER: 8**DATE:**

14 August 2020

Comment 1: I would like to voice my strong objection to the proposed development of 8 Richmond Road (Site 15), which lies at the historic centre of the village of Saham Toney. The site currently has one house and the proposal seeks to replace this with up to 8 properties. This is incredibly inappropriate, as not only would this housing be of a high density, but it would irreversibly destroy the character of the village.

Comment 2: Given that the village plan states that it aims to protect the character and feel of the village, it makes no sense that this site would even be considered given that 8 Richmond Road is surrounded by historic buildings, many of which feature on your own heritage list (both listed and non-listed). First and foremost, this development will be situated directly opposite our historic church and the adjacent Old Rectory, and will do great harm to the setting of these handsome buildings. 8 Richmond Road is also directly adjacent to the old Alms Houses, which will be dwarfed by this development. My family's property, 10 Richmond Road is part of 2 cottages, the Church Cottages, built by the church almost 300 years ago. These cottages are as historic as any other building on the village's heritage list and they are older than some of these, too, but they are conspicuously absent. The well in the garden of 10 Richmond Road provided water for the church and the school for many years, and the church used the cottages to house visitors, including the schoolteacher. The two properties are thus part of the village's history. The development of 8 Richmond Road will see a high-density development of new houses right in the centre of these historic buildings. Although 8 Richmond Road itself is a relatively modern building, it is sufficiently set back from the road and of a sympathetic design that it does not damage the overall feel of the historic centre of the village.

Comment 3: From my personal perspective, I am highly concerned about the encroachment of properties up to the boundary of 10 Richmond Road. Due to the proposed high concentration of properties, it is inevitable that these would come right up to our boundary, resulting in properties overlooking ours. Indeed, loss to the flora at 8 Richmond Road would be damaging to our property's privacy, as well as the biodiversity we enjoy in our garden. Given that this proposed development is immediately next door, I am also angry that no specific notice was given to us as we would be directly affected. We should not have to go through the whole village plan to find reference to the site. Moreover, the development of the site was not clear, given that there were two proposed sites on the same land – a proposal for 2 dwellings and a proposal for up to 8. As a long-term resident of Saham Toney, growing up here, I feel that the proposal for Site 15 shows a complete lack of respect for residents and ignores the desire for village life, which I have enjoyed for so many years. This intensification of Saham Toney simply destroys the character and nature of a key part of the village. It is worth noting here that the website itself actively discourages objections by only providing an easy way to approve the plan and putting the option to add comments or objections below this. This was particularly difficult to identify on a mobile device.

Comment 4: I am also greatly concerned by the destruction of nature that would occur if this development were to go ahead. 8 Richmond Road has a good-sized garden that has many trees and a nature pond, providing habitats for a wide variety of wildlife. The property's rear boundary also backs onto farmland. Building up to 8 properties here would destroy these habitats and reduce the biodiversity of the village. Given local, national and global concerns relating to the destruction of natural habitats, these natural features must be preserved. A development of 8 properties, or any properties on this land for that matter, cannot avoid the destruction of nature and this cannot be accepted. Furthermore, the proximity to the fields is unsafe for development as the sheep in the field carry ticks which may be passed on to pets and humans.

Comment 5: Next, I am hugely concerned about the safety implications of this development. 8 Richmond Road sits on a relatively narrow stretch of road with two sharp bends at either end. 10 Richmond Road has been consistently denied a driveway because it is too unsafe, and your own independent assessors

have determined that access for 8 properties would be dangerous. The only way to mitigate this is to place a driveway at the boundary with the Alms Houses, which again would destroy the character of this property and the wider area. Furthermore, given that towards SuBridge there is another sharp bend and a very narrow road used extensively by HGVs, I am not convinced that access here would be any safer, particularly as 8 properties could have upwards of 16 cars, vans and other vehicles. Certain aspects of 10 Richmond Road also pose significant health and safety risks to the development that have not been considered, namely that our property has a septic tank that drains directly onto 8 Richmond Road, which lies at a lower elevation, and that we have an oil tank right by the property boundary, which would prevent any construction within a certain radius.

Comment 6: Lastly, I am concerned about the long-term implications of this development for the village. In addition to destroying the character and visual appeal of the village in an area with such a high concentration of old and historically-significant buildings, this development means a sudden densification of inhabitants, vehicles, pets, and not to mention construction work so close to the church and to the fields. The development would lead to an irrevocable loss of the quiet and tranquillity of the village and an increase in noise. 16 cars will be coming and going at all hours and upwards of 36 people will be housed on this site. This will be especially damaging for the church when services are being held, as well as for the elderly residents of nearby properties, such as in the Alms Houses, who have lived in the village for much of their lives and find themselves no longer welcome.

Comment 7: In sum, Site 15 is unsuitable for development and should be removed from consideration. At present, it has been admitted in your plan that it fails to meet multiple criteria, particularly with regards to access safety, and it remains on the list because it is hoped that you will be able to work around these criteria. However, it is self-evident that Site 15 will not ever meet these criteria and nor does it fit within your own policies for development. Taking all my objections together, I will summarise these points with direct reference to your own policies, providing additional comments and elaboration where necessary.

Comment 8: P1.1 While not mentioned up until now, there is not a sufficient number of school places for children from up to 8 additional households. Neither does Saham Toney have any current social infrastructure beyond the pub and community centre.

Comment 9: P1.2 Pedestrian walkways are highly limited here and largely unsafe for children. Due to the rural nature of the area, improvements cannot be made and the addition of pavements would actually destroy the rural character. Given the commitment to ensuring that there is no streetlighting, it is presently quite dangerous crossing the road and it would be even more so if there were additional houses, increasing the amount of foot traffic, especially children. Cycling is very dangerous around here due to narrow roads and sharp bends. Public transport is limited in the village with only 1 bus to Norwich per day, and it is a walk to the bus stop.

Comment 10: P2F.2 8 Richmond Road is home to a wide array of wildlife due to its large gardens with trees, hedgerows and pond, as well as its proximity to farmland. Any development of this site would be damaging, particularly to small species such as newts, whose population in the UK has been reduced to dangerously low levels.

Comment 11: P2F.3 It is not possible to mitigate the above damage, especially as there are no plans for public areas or parks. Small individual gardens with lawns would not replace the diversity of the existing gardens.

Comment 12: P2F.4 Given the biodiversity of the existing site and the property's existing solar panels, it will be very difficult for the development to improve the green infrastructure.

Comment 13: P2F.5 Highway visibility cannot be improved due to the sharp bends at either end of the road. Removing hedgerows may help this, but this is very damaging to the ecosystem. I am very concerned that the hedges to the front of the property will be removed by this development.

Comment 14: P2F.6 10 Richmond Road has a septic tank which drains directly onto 8 Richmond Road, which is at a lower elevation. This is unsanitary. I believe that the independent assessment included issues with Anglian Water infrastructure, too.

Comment 15: P20.1.2 Safe access to the site cannot be guaranteed as has already been stated in the independent assessment. The shared driveway could only be possible at the boundary with the Alms

Houses, which would damage the character and value of that property, and may necessitate the removal of hedgerows, which the plan promises to protect.

Comment 16: P20.1.3 It is not possible to mitigate the impact on the heritage setting of the church as the development is directly opposite the church tower and main entrance. Unless the development is hidden behind hedgerows and sufficiently set back from the road to reduce visual and noise disturbances, the church will suffer.

Comment 17: P20.1.4 I am concerned that the west hedgerows will be removed to enable the provision of a driveway. Given the importance of biodiversity, hedgerows around the whole property should be preserved. I would also like clarification and assurances that the east hedgerows will be retained along the full side of the site, ensuring that 10 Richmond Road retains its privacy. This should also include trees close to the boundary.

Comment 18: P20.1.5 This is not possible. Neighbouring properties including 10 Richmond Road will be adversely affected by the development, with upwards of 36 new neighbours and 12 vehicles accessing the site at all times of the day. At 10 Richmond Road, we also have access issues, such as being denied a driveway, and crossing the road from our property is incredibly dangerous. Adding to this traffic will only add to this danger. The Old Rectory, whose driveway is directly opposite 8 Richmond Road will also find it more difficult leaving their drive with the increase in traffic. Neighbouring properties will also find that their privacy is removed, with properties overlooking them. They will also lose natural views. From the garden of 10 Richmond Road, it is currently possible to see over the garden of 8 Richmond Road to the farmland beyond – this will be lost. Furthermore, all adjacent properties will fall in value due to the development of what is essentially an estate.

Comment 19: P3A.1 & P3A.2 The new properties will be totally out of keeping with the local area. The current dwelling at 8 Richmond Road is a brick house that is sympathetic to its surroundings, aided by large gardens separating it from its neighbours. As the historic centre of the village, the area is not characterised by a high concentration of houses each with good sized gardens and bordering agricultural land. The only exception to this is the small development on the other side of the church, which this plan acknowledges was a failure in design and construction. Furthermore, given the variety of building styles in this area (lump clay brick, the brickwork of the Alms Houses, the converted barns and of course the flint church), what is an appropriate style for houses here? Any properties built here will be concrete blocks with a single skin of brick cladding. They will certainly not have a natural lime plaster such as 10 Richmond Road. I would like to draw your attention to this point about local context: “Retain rural spaces between existing village settlement clusters to avoid their coalescence.” The surrounding properties are characterised by large gardens with the properties set back from the road (with the exception of the barn conversion). This is impossible to recreate in the proposed development of 6-8 properties.

Comment 20: P3A.3 As above – what is the local vernacular? I note that in the plan, while distinctive chimneys, quoins and so on are mentioned, there is no mention of traditional lime plastering or other materials characteristic of this area. The new builds will be incongruous with the area.

Comment 21: P3A.4 The proposed development will drastically encroach on existing countryside and integration is not possible. There are no opportunities to improve pedestrian or cycling provision. Extending the footway would mean the removal of verges and hedgerows, which would be an ecological disaster.

Comment 22: P3A.5 The development is completely insensitive to surrounding built forms and layouts, which are characterised by various traditional construction techniques and local materials as well as large spacing between properties. It is problematic that only developments above 2 stories are accompanied by an appraisal when a large development will have similar visual harm.

Comment 23: P3A.6 Due to the large number of trees and other natural features on the property at 8 Richmond Road, any development of the site will reduce the area of habitats. Due to the space required for houses, the remaining “green” space will be significantly less than what exists already. Furthermore, 8 Richmond Road already has clear and attractive boundary treatments that do not need altering. Key views will not be enhanced here. Approaching the area from SuBridge, the view across the fields will be ruined by the development.

Comment 24: P3A.7 Given the specific character of the area and the historic buildings, a development of multiple properties cannot have a positive impact on the local environment or the local community. Furthermore, safety is a major issue in this area and this site is not suitable for the development of multiple family homes.

Comment 25: P3A.8 This proposal ignores the significance of the historic environment, encroaching on multiple historic properties and adversely affecting the current setting of the property, which has large gardens overlooking fields. Furthermore, neighbouring buildings, all of which are hundreds of years old, will lose material value as they will lose the advantage of being in a rural area, no overlooking windows and full privacy. 10 Richmond Road will particularly suffer as it will not only find itself with up to 8 additional neighbours, which will surely reduce its value, but its value is already lower than it should be due to the unsafe nature of the road which prevents the building of a driveway.

Comment 26: P3A.10 The area is currently unsafe, with limited access to footways, infrequent public transport, and no amenities. Due to the rural character of the roads, footways cannot be added nor can existing footways be widened, which means that these properties will not be suitable for those with mobility issues. The high concentration of properties additionally raises concerns about safety during this current pandemic, as social distancing will be difficult on narrow paths and on a development where there is only one entry/exit.

Comment 27: P3B.1 The density of the proposed development at 8 Richmond Road does not maintain the prevailing character of the area. Saham Toney is quite diverse, with densities varying across the village. In this particular area, a large number of properties on less than half a hectare is completely inappropriate.

Comment 28: P3C.1 Due to the sharp bends at either end of the stretch of road, site access will impact highway safety, particularly as many HGVs and other vehicles use the village as a route to Swaffham, regularly ignoring the speed limit. The development will add a significant number of additional cars to the road, rising from 2 at the current property to upwards of 12. Traffic calming measures are not possible as this is at the edge of the village with speeds rising to 60mph. Only one pedestrian/vehicle access in and out of the site is possible, and even then it is possibly dangerous. Pavements are not possible, as stated above.

Comment 29: P3D.1 Parking is of great concern in terms of its contribution to the visual character of the area as there would be a large number of parked cars visible from the church. Due to the size of the plot, parking spaces would reduce the land available for gardens, which goes against the commitment to improving green spaces and biodiversity.

Comment 30: P3E.1 I am highly concerned that a development of multiple properties would necessitate streetlighting, which is out of character with the area, particularly in the historic centre and this close to farmland. Light will unavoidably spill into neighbouring properties, which currently enjoy good views of dark skies. Streetlighting would also be damaging for wildlife, particularly the sheep on the farmland and the animals in the hedgerows and trees.

Comment 31: P6 8 Richmond Road is surrounded by heritage assets and the development of 6-8 properties will have a detrimental effect on these.

Comment 32: P7A.1 The development will see the removal of the biodiversity of the existing gardens.

Comment 33: P7A.2 Spacing between properties will be reduced.

Comment 34: P7A.3 This development will badly affect the rural and village characters of Saham Toney and are not sensitive to the existing landscape.

Comment 35: P7A.4 A distinguishing feature of this part of the village is the low density of housing marked by large gardens either side of properties. This will be lost.

Comment 36: P7A.5 8 Richmond Road backs directly onto farmland, which should be avoided. The property also boasts a number of features that should be protected, but cannot be if development goes ahead.

Comment 37: P7A.6 The setting and views of this area have been overlooked in the plan and will be damaged by the dense development of the site.

Comment 38: P7A.7 As the site falls outside the centre of the “modern” village (as opposed to the historic centre around the church), it is essential that the area retains its rural character and aesthetic. This is not possible with such a large development.

Comment 39: P7B.1 The site falls on Key View 2, which is defined by countryside views, hedgerows and a small number of old houses of historic value and a limited number of “new” properties (the new barn and 8 Richmond Road in its current form). The development of 8 Richmond Road will have a significant impact on this view and will badly damage the village’s character.

Comment 40: P7C.1 The sites designated as local green spaces are highly limiting and, in my opinion, misleading. While these may benefit biodiversity, many of these spaces are not accessible to the public. While this policy refers to preventing their development, other parts of the plan refer to the provision of green spaces for the enjoyment of residents. Saham Mere is private, and the churchyard is not an open space to be enjoyed. Neither site could be developed due to the limitations of the sites, and their inclusion detracts from other green spaces that should be preserved. 8 Richmond Road has a large amount of biodiversity in its current gardens that would be lost, and the development would be detrimental to surrounding farmland.

Comment 41: P7D.1 Due to the density of the proposed development at 8 Richmond Road, it would not be possible to recreate the same level of biodiversity and it would definitely be possible to enhance it. Furthermore, any development would need to ensure that only native plants are used in order to best promote native wildlife, especially insects. Such flora is already well-established and its removal would disturb extant habitats.

Comment 42: P7D.2 For the above reason, this will be a net loss of biodiversity, which is not permitted. The loss of areas with water in particular will have a devastating impact on species like frogs and newts, which would not be recreated in any development.

Comment 43: P7D.5 The hedgerows were planted to provide a habitat and network for hedgehogs. Even if hedgerows were retained, any fencing would be highly damaging to hedgehogs, which are in great abundance in the area. The natural style of the gardens of 8 Richmond Road cannot be retained if 6-8 houses are to be put in their place. Thus, this is against your policy of “improv[ing] the naturalness of green spaces and access to them”. Indeed, the use of fences and other partitioning structures except for natural hedgerows would reduce existing connective between spaces and damage wildlife.

Comment 44: P7D.6 Due to the high abundance of biodiversity through the large gardens, it will be impossible to restore biodiversity once houses are constructed. This loss cannot be avoided either. Furthermore, where will this offsetting take place?

Comment 45: P7D.7 8 Richmond Road has large gardens which are undeveloped but have a large amount of flora, including trees and hedges, which benefit the local ecosystem. According to your policy, such spaces should be preserved, but this would not be possible for a development of 6-8 houses.

Comment 46: P7E.1 This property already has solar panels and its gardens are used to grow a variety of native fruits and vegetables for the owners. There would be no net gain in its development.

Comment 47: P7E.4 Due to the high density of housing, soft landscaping cannot be incorporated.

Comment 48: P7E.5 Similarly, due to the high density, the site will lose a well-established nature pond and it will not be possible to replace this with “small water bodies”. Even if one or two were possible, this would not make up for the loss of habitat and biodiversity.

Comment 49: P7F.2 While the site only has tree preservation orders on its 2 of its trees, its trees and hedgerows are long established and provide homes to numerous birds, animals and insects. Its loss would be catastrophic. Your own plan says that developments which include additional planting of flora would be supported – this development will result in a net loss.

Comment 50: P7F.3 A full inspection of the flora at 8 Richmond Road should be carried out to confirm the above points. If any of these are lost, it will not be possible to “enhance the landscape”, but only destroy it.

Comment 51: P7F.4 What is an appropriate level of new tree and hedge planting? You have already stated that you intend to remove hedgerows, and the building of 6-8 houses will necessitate the removal of trees.

Comment 52: P7F.5 Due to the density of the proposal, the protection of trees and hedgerows, particularly given that they are long established and have long roots, will be very difficult.

Comment 53: P8C.1 & P8E While not an issue of surface water discharge, 10 Richmond Road's septic tank drains onto the land of 8 Richmond Road, which significantly reduces the acceptable area for building.

RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:

Policies 2F, 2O and 6 specifically and various individual policies as noted in the comments

REACTION TO REPRESENTATION(S):

General: It is respectfully noted that the respondent has not understood that a site allocation in a neighbourhood plan is not a planning application, and is not required to present the level of detail that must accompany the latter. It is hence invalid to make guesses or to speculate as to what form a planning proposal might take, and then use that as a means to support an objection to a site allocation. What can be said with certainty is that any future planning application will be required to comply with the Plan's policies.

The Plan's Site Assessment and Site Selection Reports have shown the site to be 'suitable for development' and demonstrated that factors that initially were constraints on the site's development may be adequately mitigated. In order to ensure that, specific requirements for the development of the site have been given in Policy 2O, together with common requirements in Policy 2F, together with many other applicable criteria throughout the Plan's policies.

It is noted that many of the comments contain inaccuracies and misconceptions, which are addressed in the specific responses.

Comment 1: The proposal is for 6 dwellings not 8. The site density has not only not been challenged by planning officers; in fact, they have challenged the density as potentially being too low, as has an independent examiner who completed a 'health check' of the Plan in July 2020.

Comment 2: The site allocation policy, 2O, together with policies 3A and 6 require that the significance and setting of heritage assets be conserved and respected, and any future planning application will need to address the requirements of those policies in this respect. Although Historic England has made an objection to this site, its response notes that any potential impact to the setting of nearby listed buildings will 'be relatively low'. Given that, like the applicant, it is not commenting on a detailed planning application, it lacks information to justify that comment, which has therefore not been accepted. The historic environment officers at Norfolk County Council and Breckland Council have raised no objections to the site. See reaction to respondent 7, comment 3 with regard to the Church cottages and their lack of designation as heritage assets. Also, the Strategic Environmental Assessment raised no concerns about the site with respect to heritage impact.

Comment 3: The Plan does not include a site plan, so there is no basis for the supposition that new development will 'inevitably come up to the boundary of the neighbouring property. The Plan's criterion for residential amenity (Policy 3A) and building control regulations would both preclude that. Local Planning Authorities are required to inform neighbours of planning applications; neighbourhood plan groups do not have an equivalent obligation. That notwithstanding, the location of sites allocated in the Plan has been widely publicised over an 18-month period, in both paper and online form. This included an information leaflet delivered to every household in August 2019 which included a clear map of the allocated site locations, which the respondent as a long-term resident would have been seen. That map can be found on the Plan's website and is specifically linked to in the Plan's contents list, meaning it is unnecessary to read the whole Plan to find it.

The 2 and 8-dwelling options mentioned in the comment were two alternate proposals put forward by the landowner in response to a call for sites. Neither option is included in its original form in the Plan itself, though both are, of necessity, mentioned in the site assessment and selection reports. Those documents concluded that a 6-dwelling allocation was suitable and appropriate and that is the only option that has appeared in the Plan, in both the second and third Regulation 14 versions.

It is strongly refuted that the Plan's website, or the work group, in any way "actively discourages objections"! To base such a claim on the fact that an option to simply support the Plan without comment is above a form to provide comments (be they in support or objections) is spurious. It was also possible

to comment by phone or to request delivery and collection of a paper comments form, or to simply send an email without using the comments form. All such options were made clear in an information leaflet delivered to every household at the start of the consultation and on posters and notices displayed around the village. Additionally, on many occasions neighbourhood plan articles in the monthly Parish magazine have stressed that STNP welcomes constructive criticism and negative comments on the Plan.

Comment 4: All development to a certain extent impacts on a nature. Site STNP15 is not more or less sensitive than any other allocated site in this respect, and the Plan's policies offer appropriate protections and any impacts must be fully considered at the planning application stage. The site has been shown in both the Strategic Environmental Assessment and Habitats Regulations Assessments to be acceptable in terms of environmental impacts. It is again noted the site is for 6 dwellings not 8.

Comment 5: Refer to the reaction to the comments of respondent 6 and to the Saham Toney Transport Study, in respect to highway safety.

Comment 6: The comments made are almost entirely based on speculation about the details of a future planning application and are therefore not valid with regard to the Neighbourhood Plan, but it is recommended the respondent revisits them as and when a future planning application is submitted. The Neighbourhood Plan's policies provide a rigorous framework to prevent the negative affects the respondent, without evidence, presumes will occur.

Comment 7: STNP 15 has been shown by a robust, objective and analytical site assessment and selection to be suitable for development. By contrast the respondent's conclusion is based on pure speculation about the details of a future planning application, and an emotional response to development 'in their backyard'. Site STNP15 has been included in two formal Regulation 14 publications of the Plan and has attracted no comments from Breckland Council planning officers, heritage specialists or Natural England. Furthermore, it has been shown in both the Strategic Environmental Assessment and Habitats Regulations Assessments that it is acceptable in terms of environmental impacts

Comments 8 – 53, general: The policies of the Neighbourhood Plan set out requirements with which any future planning application for the site must demonstrate compliance in order to be permitted. Those requirements are in part required to overcome constraints on the site identified by the 4 independent site assessments, and in that regard are explained and justified in the Site Selection Report. It is completely inappropriate to interpret those policies with respect to uninformed, unfounded and highly speculative suggestions as to the detailed proposals that may be made at the planning application stage, and to then conclude on that basis the site fails to meet many of the Plan's policies. Each policy comment is individually addressed below.

Comment 8: It is again noted the site is for 6 dwellings not 8. School places are the responsibility of Norfolk County Council and are not a matter for a neighbourhood plan. The County Council has made no objections with regard to this, or any allocated site, and school places. A future planning application will be required to consider the availability of infrastructure with reference to Policy 1, but it is pointed out that limited (as opposed to inadequate) existing infrastructure is not on its own a reason to deem a site unsuitable for development.

Comment 9: While the comment is valid for many parts of the village, in the case of STNP15, it benefits from footway access to neighbouring Watton, to the pub, hotel and community centre, and to the primary school. Development of a single site cannot directly address cycling or public transport provision.

Comments 10 and 11: Any future planning application must include a satisfactory ecological appraisal. Furthermore, it has been shown in both the Strategic Environmental Assessment and Habitats Regulations Assessments that it is acceptable in terms of potential environmental impacts.

Comment 12: See reaction to comments 10 and 11. Also solar panels on the existing property are irrelevant, since that dwelling is to be demolished as part of the development of the site.

Comment 13: The Transport Study concluded that adequate visibility splays can be achieved in both directions, as shown on Policy Map 2F.8. That map shows there is no requirement to remove hedges from neighbouring properties in order to create the required visibility.

Comment 14: This would appear to be a matter for the owner of 10 Richmond Road to address rather than a developer of site STNP15. It is presumed that only clean water drains from the septic tank rather

than sewage; if not the respondent is putting other people's health at risk and should take steps to rectify that. Anglian Water's independent site assessment did not identify any infrastructure issues specific to site STNP15.

Comment 15: This assertion is incorrect and invalid. While the independent site assessment raised a concern about the ability to provide safe access, it did not conclude that made the site unsuitable for development, and the issue has subsequently been addressed in the site selection report and the Transport Study.

Comment 16: Policy 20 requires the submission of a Heritage Statement with any future planning application, and that will address this concern. Until then, it is premature and unfounded to conclude there will be heritage impact, and not a valid reason to remove the site from allocation. Although Historic England has objected to the site, it actually has no justification to do so, since like the respondent it can only speculate about the details of a future planning application, and admits that any potential impact will be 'at a relatively low level'. The historic environment officers of the County and District Councils have raised no concerns in this regard. The Strategic Environmental Assessment of the Plan concludes development of site STNP15 may be implemented in a way that will not lead to harmful impact on the setting of heritage assets, providing it adheres to STNP policy criteria, which it must do in order to gain permission.

Comment 17: While a short length of hedge will be removed to form a site access, there will be an equivalent opportunity to infill the present site access with natural planting to offset the loss. In general trees and hedges are offered appropriate protection in Policy 7F. Policy Map 2F.8 confirms there is no requirement to remove the hedges to neighbouring properties in order to create the required visibility.

Comment 18: The likely numbers of new residents quoted is supposition, but six 1-, 2- and 3- bedroom properties are highly unlikely to result in 36 new residents. The plan shows to a necessary level of detail that the provision of safe access is achievable. More detailed drawings will address the fine detail of that when a future planning application is submitted. No-one is entitled to a private view, and in any case the only view neighbours will lose is that of the private garden at site STNP15. 6 houses cannot be considered 'an estate' and comment on property values is pure speculation. The Transport Study concludes that the site will generate a maximum of 5 additional vehicular trips at peak times, rather than the 12 supposed by the respondent.

Comments 19 and 20: Since the Plan presents no designs for the dwellings on any allocated site, this comment is entirely speculative and invalid. It will be the responsibility of a future developer to establish acceptable designs that respect local character and present them in a future planning application, and for planning officers to decide the application. Policy 3A and the Parish Design Guide set a suitably robust but flexible framework in which to do that. 21st century development at the nearby Church Barns shows that that design that is sympathetic and in keeping with local character can be readily achieved. In response to a comment from Historic England a new criterion has been added to Policy 20 with respect to design as follows: "Design shall pay particular attention to the historic character of the immediately surrounding area and fully respect its sensitive nature."

Comment 21: The development will be entirely within the boundary of an existing private residence and hence will not encroach on the countryside at all. It is not obligatory for every site to improve pedestrian or cycling provision, only where opportunities occur. Site STNP15 is already served by a pedestrian footway. Hedges are suitably protected by Policy 7F.

Comment 22: Since it is not the purpose of a site allocation policy to put forward specific design proposals, the comment is speculative and invalid.

Comment 23: See reaction to comments 7, 10 and 11.

Comment 24: As with other similar comments, this is largely a matter for a future planning application. The provision of new housing is recognised as offering social benefits to a community. If by safety the comment refers to highway safety see reaction to earlier comments on that topic. If it refers to general public safety that is not recognised as an issue in Saham Toney.

Comment 25: There is no planning requirement to protect the setting of an existing property (that has no heritage characteristics) when developing a site and that will in any case be demolished as part of the development. Regarding the historic environment, see reaction to comments 2 and 16. Comments on

the value of neighbouring properties are speculative and not an issue for the Plan as they do not relate to the use of land. The inability to create a driveway at a neighbouring property is not a result of the site allocation, and has no bearing on its suitability for development.

Comment 26: The site is well served by footways and none need to be added to serve it. Reference to social distancing being compromised by the addition of 6 dwellings is spurious, emotional and invalid.

Comment 27: Parker's Close, within a short distance of the site, has a higher density. See also reaction to comment 1.

Comment 28: See reaction to comments 5, 13, 15 and 18. The 85th percentile speed professionally measured by a survey as part of the Transport Study was 33.7 mph. It did not record speeds even approaching 60mph and there is no evidence that such speeds occur, but in any case, that is unlikely given the two right-angle bends in the near vicinity of this relatively short straight section of Richmond Road.

Comment 29: Visibility of parked cars from the church is not a planning issue and not a valid comment. Furthermore, it is just as likely that garage parking will be provided as on-drive. Provisions to improve green spaces and biodiversity in the Plan are qualified by 'where opportunities exist' rather than being obligatory for every site.

Comment 30: Policy 3E goes as far as is possible in a plan to prevent the introduction of streetlighting on any site, although it has been deemed unacceptable by planning reviews to outrightly ban it. All the same the policy inhibits intrusive light in cases where lighting is necessary. Again, this comment speculates on a future planning application which is not a valid reason for deeming the site unsuitable for allocation.

Comment 31: See reactions to comments 2 and 16.

Comment 32: See reaction to comments 10, 11 and 17.

Comment 33: This site is an infill development within the settlement boundary and the landscape preservation policy quoted does not deal with the spaces between individual dwellings, but rather the preservation of gaps between individual settlements

Comment 34: The Landscape Character Assessment makes no conclusions to support this comment. Actual impact, if any is a matter for a future planning application, rather than a speculative comment on the site allocation.

Comment 35: See reaction to comment 1 and 27.

Comment 36: No policy in either the Neighbourhood or Local Plans or in national planning policy, precludes development backing onto farmland. The Plan requires site design to take opportunities to blend in with the landscape and that will be a matter for a future planning application.

Comment 37: See reaction to previous comments on heritage and to comments 18 and 39 with regard to views.

Comment 38: As noted elsewhere the proposed development is not large. The comment speculates on a future planning application and so is invalid in that respect.

Comment 39: The site is on the very periphery of Key View 2, but the focus of that view is noted in Policy 7B of the Plan as being glimpses of the Church Tower from Cressingham Lane and that part of Richmond Road that lies to the west of the Church. The site does not impinge on that.

Comment 40: Local Green Spaces have been assessed and designated in strict accordance with national planning policy. STNP15 has no detrimental effect on farmland as it consists entirely of land that forms a residential garden. See reaction to earlier comments on biodiversity.

Comments 41-46: See reaction to earlier comments on density and biodiversity. The site allocation does not specify any loss of areas with water and it is unclear what the respondent is referring to in this respect. Again, the comment speculates on a future planning application. Biodiversity offsetting is a 'last resort' to offset losses if that cannot be achieved on a site itself. Its provision and location would be a matter for the local planning authority and a developer to agree when a future planning application is considered.

Comment 47: Any future development will not consist of entirely hard surfaces, so soft landscaping is feasible, but its details are a matter for a future planning application.

Comment 48: This comment is speculative and is invalid until a future planning application is considered.

<p>Comments 49-52: Again, this is a speculative comment in respect of the impact of future development. Policy 7F protects trees and hedges to the extent possible under planning rules. The Plan does not in any way dictate the removal of hedges, quite the opposite.</p> <p>Comment 53: This appears to be an issue for the owner of the neighbouring property to address the potentially insanitary issue that property gives rise to, rather than a reason not to allocate site STNP15.</p>	
<p>ACTION TAKEN:</p> <p>None justified by the comments as explained in the reactions to them. No action taken</p>	

RESPONDENT NUMBER: 9	DATE: 14 August 2020
<p>Comment 1: I was born in Norfolk and have lived in Saham Toney for the last 18 years and raised my family here and have considered it my home, where I had planned to live for the rest of my life. Whilst I appreciate and support the importance of a Neighbourhood Village Plan and the need to provide appropriate and affordable housing options allowing the village to grow and develop, I believe that these plans should be proportionate, sympathetic and should enhance the character and nature of both the village, its history and its wildlife. Therefore, I was very upset and disappointed to read the development plans for 8 Richmond Road (STP 11 & 15) as I feel strongly that these do not meet any of those criteria and therefore strongly object to the proposed development. As a result of these plans I feel that myself and my family are being driven from our home by the greed of those whose incentive is to sell their property for profit without consideration to the impact on their neighbours. In all truth they have not even had the courtesy to discuss their decision with their immediate neighbours.</p> <p>Comment 2: From my personal perspective, I am highly concerned about the encroachment of properties up to the boundary of my property. Given that this proposed development is immediately next door, I am also angry that no specific notice was given to us as we would be directly affected. We should not have to go through the whole village plan to find reference to the site. Moreover, the development of the site was not clear, given that there were two proposed sites on the same land – a proposal for 2 dwellings and a proposal for up to 8. This has also proven extremely difficult for elderly neighbours who do not have access to the internet and would not have known anything about this development or had the opportunity to object to it at this stage in the consultation if they had not been alerted by younger neighbours. This feels at the very least, an oversight, but to the more cynical appears almost dishonest as it allows the plan to proceed without a high level of objection. The website design itself is difficult to access on anything other than a computer and is difficult and frequently impossible to access properly on android devices, phones, ipads etc, it is poorly designed making it difficult to locate information or key documents. The way it presents the information is biased in that it only provides a clear opportunity to approve of the plan and to lodge any complaints or objection requires the download of a word document or the completion of a Google form – both of which are so well concealed on the website that they are nigh on impossible to find.</p> <p>Comment 3: I bought my property adjacent to existing houses with gardens and farm land that was outside the settlement belt for the security of knowing that this was land that could not be developed or built on. I bought my property for peace and quiet and therefore am devastated to discover the plans for 6-8 houses to be built on this site bordering my property. This will change the nature of my home completely. Even up until earlier this year I was assured by the owners of 8 Richmond Road that any future development plans were only for one property and even offering me the opportunity to have a right of way across the land to access a driveway for my property if they decided to develop this one property and gained planning permission, to then discovering that the plans are actually for 6-8 properties is causing me undue stress and anxiety. I work in a highly stressful environment dealing with safeguarding of children and special educational needs and my home has always been my haven from the stresses associated with this job. I now feel that this is being ripped away from for someone to make an exorbitant profit at the expense of their neighbours.</p>	

Comment 4: I was aware that when 8 Richmond Road was originally built that the plot next to it, adjacent to my house, had outline planning permission for one property. The previous owner of 8 Richmond Road (Mr [REDACTED]) had specifically bought this plot when he purchased his home to avoid this site being developed. In order to fit 6-8 houses on this relatively small plot, including the necessary access road, parking etc, it will mean that the properties will have to be built close to and all along the boundary of my property. As a consequence, my current views of fields, trees and sky will be obliterated by brick walls which will have a significantly negative impact on my quality of life and wellbeing. The peace and quiet of my garden with its birdsong, sheep noises, bees buzzing etc will be obliterated by the noise of cars accessing the site and 6-8 households.

Comment 5: When [REDACTED] inhabited the house, [REDACTED] was a keen amateur gardener and attended many courses to learn how to develop her garden to be rich in and sustain wildlife. The garden was planted with trees, shrubs and plants to support wildlife and together with the neighbouring gardens we have worked to create a corner of Saham Toney that is rich in birds, pond life and other wildlife. A prime example of this is that together with Mr [REDACTED] and our other neighbour we planted native hawthorn hedging on our properties. This has encouraged a range of wildlife and houses nests for many species of birds, but also provides habitats for other wildlife such as shrews, voles, mice etc as well as hedgehogs allowing them to travel across the boundaries of our properties. Consequently, there has always been a thriving population of hedgehogs in our gardens. Hedgehogs travel up to 3km a night, and whilst not territorial, follow a regular routine, visit the same gardens and same areas and appear to follow a routine according to research. Hedgehogs have now been identified as vulnerable to extinction for the precise reason of developments such as the proposed development of 8 Richmond Road. If this were to be built there is no doubt that it would have a significant impact on the local hedgehog population. <https://www.openaccessgovernment.org/british-hedgehogs-vulnerable-to-extinction/91551/>

Along with hedgehogs the gardens are also home to thriving populations of other endangered native British wildlife including bats, voles, harvest mice, reptiles and amphibians as well as native British fungi, fauna and flora; all of which would be significantly negatively impacted by this development. See following reports <https://www.theguardian.com/environment/2019/oct/03/populations-of-uks-most-important-wildlife-have-plummeted-since-1970> and <https://www.theguardian.com/environment/2020/jul/30/quarter-of-native-uk-mammals-at-imminent-risk-of-extinction> Many of these are already considered endangered. Both in our garden and at 8 Richmond Road there are wildlife ponds that support a diversity of native pond life which travel between the two ponds including newts, water boat men, frogs, toads, water snails and dragon flies – to name a few of the many species that are regularly found in our gardens.

Through careful planting of insect and bee friendly plants, native flora, fauna and trees, these gardens have increased biodiversity and there are healthy insect and bee populations. This in its turn supports the bird population and within both the gardens of numbers 8 and 10 Richmond Road a number of species regularly build nests in the trees, hedgerows and bird boxes. Regular visitors in the gardens include a wide range of tits, finches, blackbirds, thrushes, starlings, swifts etc including endangered species such as gold crests and both lesser and greater spotted woodpeckers. The development of 8 Richmond Road would have a significantly negative impact on these birds.

Comment 6: The village plan states that it aims to protect the character and feel of the village, and therefore it makes no sense that this site would even be considered given that 8 Richmond Road is surrounded by historic buildings, many of which feature on your own heritage list (both listed and non-listed). First and foremost, this development will be situated directly opposite a Grade 1 Listed church, St George's, and the adjacent Grade II Listed Old Rectory, and will do great harm to the setting of these handsome buildings. 8 Richmond Road is also directly adjacent to the old Alms Houses, a recognised Heritage asset, which will be dwarfed by this development. My property, 10 Richmond Road, formerly known as 2 Church Cottages is one of two cottages, the Church Cottages, built by the church circa 1850-60. These cottages are as historic as any other building, more so than many, on the village's heritage list and they are older than some of these, too, but they are conspicuously absent. These cottages should

also be considered a heritage asset due to their architectural features and traditional Norfolk lump clay construction with a lime plaster render.

The cottages were built to house members of the church staff and clergy, including at various times: the verger, the church warden, the curate and the Rectory housekeeper and maid. Prior to the building of the school house, the school teacher lodged in my cottage living in the largest bedroom in the house as befitting her status. The well in the garden of 10 Richmond Road (2 Church Cottages) provided water for the church and the school for many years and army divers discovered that it leads to the same underground lake that feeds Saham Mere. Therefore, in my opinion these buildings constitute an important part of the village's history and their nature and environment should be preserved. The development of 8 Richmond Road will see a high-density development of new houses not only alongside, but at the centre of these historic buildings. Although 8 Richmond Road itself is a relatively modern building, it is sufficiently set back from the road and of a sympathetic design that it does not damage the overall feel of the historic centre of the village and additionally has a well in the garden which promotes the aesthetic.

Comment 7: I am extremely concerned about the safety implications of this development. 8 Richmond Road sits on a relatively narrow stretch of road with two sharp bends at either end. Over the last 18 years we have been consistently denied a driveway because it is too unsafe, in fact the exact words of the assessor from highways were that it would only happen over his dead body. The independent assessors have also determined that access for 8 properties would be dangerous. They have identified that the only way to mitigate this is to place a driveway at the boundary with the Alms Houses, which again would destroy the character of this property and the wider area. The fact that there is a oak tree with a preservation order on it in the way of where an access road should additionally be considered as even placing it close to the tree would have a highly detrimental effect. Furthermore, given that towards SuBridge there is another sharp bend and a very narrow road used extensively by HGVs, I am not convinced that access here would be any safer, particularly as 8 properties could have upwards of 16 cars, vans and other vehicles as well as those required for services such as rubbish collection. Views from this access road will also be obstructed by any service or delivery vehicles at our property especially oil tankers delivering our heating oil, sewage collection from our septic tank etc. Due to the refusal to allow us a driveway we have spent 18 years navigating the dangers of crossing Richmond Road and can testify personally to its risk and danger. During our time in the property there have been multiple accidents on this stretch of road and we have narrowly avoided being hit ourselves on multiple occasions. Traffic does not travel at the speed limit and has increased hugely in its quantity over the last few years.

Comment 8: I believe there are additional elements that make this site unsuitable for development including a covenant that the previous owner included, but more importantly that there is drainage from my property which would impact on the development. As the land at 8 Richmond Road is on a slope along the boundary and at the rear end of the boundary of my garden there is a significant difference in height, with my garden being around 1 metre higher. Therefore, all excess water from my garden drains onto the neighbouring property. In the far corner of my garden, against the boundary to 8 Richmond Road, my septic tank is installed and the soak away field drains into the neighbouring property. Building regulations state that nothing can be built with 15 metres of a soakaway field. Additional to this we also have fuel tanks for heating oil against the boundary of the property. Building regulations state that these must be:

1.8m away from non-fire rated eaves of a **building**.

1.8m away from a non-fire rated **building** or structure (e.g. garden sheds)

1.8m away from openings (such as doors or windows) in a fire rated **building** or structure (e.g. brick **built house**/garage)

Comment 9: Finally, I am concerned about the long-term implications of this development for the village. In addition to destroying the character and visual appeal of the village in an area with such a high concentration of old and historically-significant buildings, this development means a sudden

densification of inhabitants, vehicles, pets, and not to mention construction work so close to the church and to the fields. The development would lead to an irrevocable loss of the quiet and tranquillity of the village and an increase in noise. At least 16 cars will be accessing the site. Their headlights will be impacting directly on the residents of Rectory Barns as they will be in line with their windows and upwards of 36 people will be housed on this site. This will be especially damaging for the church when services are being held, as well as for the residents of nearby properties, such as myself, my neighbour Mr [REDACTED], Mrs [REDACTED] in the Alms Houses and other residents, who have lived in the village for much of their lives and feel that they are finding themselves no longer welcome and effectively driven out of our homes.

Comment 10: In conclusion, 8 Richmond Road (STP 15) is unsuitable for development and should be removed from consideration. At present, it has been admitted in your plan that it fails to meet multiple criteria, particularly with regards to access safety, and it remains on the list because it is hoped that you will be able to work around these criteria. However, it is self-evident that it will never meet these criteria and nor does it fit within your own policies for development. To summarise please see below points which I have been raised in collaboration with other concerned residents, with direct reference to your own policies, providing additional comments and elaboration where necessary. We strongly feel that we are a community and that we will be addressing this as a community through a unified approach.

Comments on Policy criteria:

P1.1 While not mentioned up until now, there are insufficient number of school places for children from up to 8 additional households and the school does not have the ability to grow due to the constrictions of the school site. Neither does Saham Toney have any current social infrastructure beyond the pub and community centre. Both the doctors and dentist surgeries in Watton are to capacity, and even Shipdham are not taking new patients.

P1.2 Pedestrian walkways are highly limited here and largely unsafe for children. Due to the rural nature of the area, improvements cannot be made and the addition of pavements would actually destroy the rural character. Cycling is very dangerous around here due to narrow roads and sharp bends. Public transport is limited in the village with only 1 bus to Norwich per day, and it is a walk to the bus stop.

P2F.2 8 Richmond Road is home to a wide array of wildlife due to its large gardens with trees, hedgerows and pond, as well as its proximity to farmland. Any development of this site would be damaging, particularly to species such as newts, hedgehogs, voles etc whose population in the UK has been reduced to dangerously low levels.

P2F.3 It is not possible to mitigate the above damage, especially as there are no plans for public areas or parks. Small individual gardens with lawns would not replace the diversity of the existing gardens. As each property is likely to be demarcated with fencing this would have a significant impact on the travels of hedgehogs etc. There would be increased light pollution from these properties that would have a devastating impact on the bats and other nocturnal animals which inhabit this area.

P2F.4 Given the biodiversity of the existing site and the property's existing solar panels, it will be very difficult for the development to improve the green infrastructure.

P2F.5 Highway visibility cannot be improved due to the sharp bends at either end of the road. Removing hedgerows may help this, but this is very damaging to the ecosystem. I am very concerned that the hedges to the front of the property will be removed by this development. At no point will either 10 or 12 Richmond Road consider removing their hedgerows to improve the visibility.

P2F.6 10 Richmond Road has a septic tank which drains directly onto 8 Richmond Road, which is at a lower elevation. This is unsanitary; the independent assessment included issues with Anglian Water infrastructure, too as additionally supported by the testimony of Mr Derek Moles regarding back up of his sewage

P20.1.2 Safe access to the site cannot be guaranteed as has already been stated in the independent assessment. The shared driveway could only be possible at the boundary with the Alms Houses, which

would damage the character and value of that property, and may necessitate the removal of hedgerows, which the plan promises to protect.

P20.1.3 It is not possible to mitigate the impact on the heritage setting of the church as the development is directly opposite the church tower and main entrance. Unless the development is hidden behind hedgerows and sufficiently set back from the road to reduce visual and noise disturbances, the church will suffer. Whilst the report refers to 'wooded areas', unless the properties were all single storey they would be visible and completely change the skyline and appearance of the area.

P20.1.4 I am concerned that the west hedgerows will be removed to enable the provision of a driveway. Given the importance of biodiversity, hedgerows around the whole property should be preserved. I would also like clarification and assurances that the east hedgerows will be retained along the full side of the site, ensuring that 10 Richmond Road retains its privacy. This should also include trees close to the boundary. The current hedgerow on the boundary was put in and paid for in a joint action by myself and 8 Richmond Road in 2002/3. This hedgerow actually marks the border of the property, the later post and wire fence was put in by myself inside my side of the boundary to prevent my dogs going through the hedgerow at a later date.

P20.1.5 This is not possible. Neighbouring properties including 10 Richmond Road will be adversely affected by the development, with upwards of 36 new neighbours and 12-16+ vehicles accessing the site at all times of the day. At 10 Richmond Road, we also have access issues, such as being denied a driveway, and crossing the road from our property is incredibly dangerous. Adding to this traffic will only add to this danger, which would therefore be a violation of our human rights. The Old Rectory, whose driveway is directly opposite 8 Richmond Road will also find it more difficult leaving their drive with the increase in traffic. Neighbouring properties will also find that their privacy is removed, with properties overlooking them. They will also lose natural views. From the garden and windows of 10 Richmond Road, it is currently possible to see over the garden of 8 Richmond Road to the farmland beyond – this will be lost. Furthermore, all adjacent properties will fall in value due to the development of what is essentially an estate.

P3A.1 & P3A.2 The new properties will be totally out of keeping with the local area. The current dwelling at 8 Richmond Road is a brick house that is sympathetic to its surroundings, aided by large gardens separating it from its neighbours. As the historic centre of the village, the area is not characterised by a high concentration of houses each with good sized gardens and bordering agricultural land. The only exception to this is the small development on the other side of the church, which this plan acknowledges was a failure in design and construction. Furthermore, given the variety of building styles in this area (lump clay brick, the flint and brickwork of the Alms Houses, the converted barns and of course the flint church), what is an appropriate style for houses here? Any properties built here will be concrete blocks with a single skin of brick cladding. They will certainly not be lump clay or have a natural lime plaster such as 10 Richmond Road. I would like to draw your attention to this point about local context: "Retain rural spaces between existing village settlement clusters to avoid their coalescence." The surrounding properties are characterised by large gardens with the properties set back from the road (with the exception of the barn conversion). This is impossible to recreate in the proposed development of 6-8 properties.

P3A.3 As above – what is the local vernacular? We note that in the plan, while distinctive chimneys, quoins and so on are mentioned, there is no mention of traditional lime plastering or other materials characteristic of this area. The new builds will be incongruous with the area.

P3A.4 The proposed development will drastically encroach on existing countryside and integration is not possible. There are no opportunities to improve pedestrian or cycling provision. Extending the footway would mean the removal of verges and hedgerows, which would be an ecological disaster.

P3A.5 The development is completely insensitive to surrounding built forms and layouts, which are characterised by various traditional construction techniques and local materials as well as large spacing

between properties. It is problematic that only developments above 2 stories are accompanied by an appraisal when a large development will have similar visual harm.

P3A.6 Due to the large number of trees and other natural features on the property at 8 Richmond Road, any development of the site will reduce the area of habitats. Due to the space required for houses, the remaining “green” space will be significantly less than what exists already. Furthermore, 8 Richmond Road already has clear and attractive boundary treatments that do not need altering. Key views will not be enhanced here. Approaching the area from SuBridge, the view across the fields will be ruined by the development.

P3A.7 Given the specific character of the area and the historic buildings, a development of multiple properties cannot have a positive impact on the local environment or the local community. Furthermore, safety is a major issue in this area and this site is not suitable for the development of multiple family homes.

P3A.8 This proposal ignores the significance of the historic environment, encroaching on multiple historic properties and adversely affecting the current setting of the property, which has large gardens overlooking fields. Furthermore, neighbouring buildings, all of which are hundreds of years old, will lose material value as they will lose the advantage of being in a rural area, no overlooking windows and full privacy. 10 Richmond Road will particularly suffer as it will not only find itself with up to 8 additional neighbours, which will surely reduce its value, but its value is already lower than it should be due to the unsafe nature of the road which prevents the building of a driveway and which despite being asked the Parish Council or the Highways department of Breckland has done nothing to mitigate, despite being asked numerous times over the last 18 years.

P3A.10 The area is currently unsafe, with limited access to footways, infrequent public transport, and no amenities. Due to the rural character of the roads, footways cannot be added nor can existing footways be widened, which means that these properties will not be suitable for those with mobility issues. The high concentration of properties additionally raises concerns about safety during this current pandemic, as social distancing will be difficult on narrow paths and on a development where there is only one entry/exit.

P3B.1 The density of the proposed development at 8 Richmond Road does not maintain the prevailing character of the area. Saham Toney is quite diverse, with densities varying across the village. In this particular area, a large number of properties on less than half a hectare is completely inappropriate.

P3C.1 Due to the sharp bends at either end of the stretch of road, site access will impact highway safety, particularly as many HGVs and other vehicles use the village as a route to Swaffham, regularly ignoring the speed limit. The development will add a significant number of additional cars to the road, rising from 2 at the current property to upwards of 12. Traffic calming measures are not possible as this is at the edge of the village with speeds rising to 60mph. Only one pedestrian/vehicle access in and out of the site is possible, and even then it is possibly dangerous. Pavements are not possible, as stated above.

P3D.1 Parking is of great concern in terms of its contribution to the visual character of the area as there would be a large number of parked cars visible from the church. Due to the size of the plot, parking spaces would reduce the land available for gardens, which goes against the commitment to improving green spaces and biodiversity.

P3E.1 I am highly concerned that a development of multiple properties would necessitate streetlighting, which is out of character with the area, particularly in the historic centre and this close to farmland. Light will unavoidably spill into neighbouring properties, which currently enjoy good views of dark skies, with the exception of Watton’s light pollution. Streetlighting would also be damaging for wildlife, particularly the sheep on the farmland and the animals in the hedgerows.

P6 8 Richmond Road is surrounded by heritage assets and the development of 6-8 properties will have a detrimental effect on these.

P7A.1 The development will see the removal of the biodiversity of the existing gardens.

P7A.2 Spacing between properties will be reduced.

P7A.3 This development will badly affect the rural and village characters of Saham Toney and are not sensitive to the existing landscape.

P7A.4 A distinguishing feature of this part of the village is the low density of housing marked by large gardens either side of properties. This will be lost.

P7A.5 8 Richmond Road backs directly onto farmland, which should be avoided. The property also boasts a number of features that should be protected, but cannot be if development goes ahead.

P7A.6 The setting and views of this area have been overlooked in the plan and will be damaged by the dense development of the site.

P7A.7 As the site falls outside the centre of the “modern” village (as opposed to the historic centre around the church), it is essential that the area retains its rural character and aesthetic. This is not possible with such a large development.

P7B.1 The site falls on Key View 2, which is defined by countryside views, hedgerows and a small number of old houses of historic value and a limited number of “new” properties (the new barn and 8 Richmond Road in its current form). The development of 8 Richmond Road will have a significant impact on this view and will badly damage the village’s character.

P7C.1 The sites designated as local green spaces are highly limiting and, in my opinion, misleading. While these may benefit biodiversity, many of these spaces are not accessible to the public. While this policy refers to preventing their development, other parts of the plan refer to the provision of green spaces for the enjoyment of residents. Saham Mere is private, and the churchyard is not an open space to be enjoyed. Neither site could be developed due to the limitations of the sites, and their inclusion detracts from other green spaces that should be preserved. 8 Richmond Road has a large amount of biodiversity in its current gardens that would be lost, and the development would be detrimental to surrounding farmland.

P7D.1 Due to the density of the proposed development at 8 Richmond Road, it would not be possible to recreate the same level of biodiversity and it would definitely be possible to enhance it. Furthermore, any development would need to ensure that only native plants are used in order to best promote native wildlife, especially insects. Such flora is already well-established and its removal would disturb extant habitats.

P7D.2 For the above reason, this will be a net loss of biodiversity, which is not permitted. The loss of areas with water in particular will have a devastating impact on species like frogs and newts, which would not be recreated in any development.

P7D.5 The hedgerows were planted to provide a habitat and network for hedgehogs. Even if hedgerows were retained, any fencing would be highly damaging to hedgehogs, which are in great abundance in the area. The natural style of the gardens of 8 Richmond Road cannot be retained if 6-8 houses are to be put in their place. Thus, this is against your policy of “improv[ing] the naturalness of green spaces and access to them”. Indeed, the use of fences and other partitioning structures except for natural hedgerows would reduce existing connective between spaces and damage wildlife.

P7D.6 Due to the high abundance of biodiversity through the large gardens, it will be impossible to restore biodiversity once houses are constructed. This loss cannot be avoided either. Furthermore, where will this offsetting take place?

P7D.7 8 Richmond Road has large gardens which are undeveloped but have a large amount of flora, including trees and hedges, which benefit the local ecosystem. According to your policy, such spaces should be preserved, but this would not be possible for a development of 6-8 houses.

P7E.1 This property already has solar panels and its gardens are used to grow a variety of native fruits and vegetables for the owners. There would be no net gain in its development.

P7E.4 Due to the high density of housing, soft landscaping cannot be incorporated.

P7E.5 Similarly, due to the high density, the site will lose a well-established nature pond and it will not be possible to replace this with “small water bodies”. Even if one or two were possible, this would not make up for the loss of habitat and biodiversity.

P7F.2 While the site only has tree preservation orders on its 2 of its trees, its trees and hedgerows are long established and provide homes to numerous birds, animals and insects. Its loss would be catastrophic. Your own plan says that developments which include additional planting of flora would be supported – this development will result in a net loss.

P7F.3 A full inspection of the flora at 8 Richmond Road should be carried out to confirm the above points. If any of these are lost, it will not be possible to “enhance the landscape”, but only destroy it.

P7F.4 What is an appropriate level of new tree and hedge planting? You have already stated that you intend to remove hedgerows, and the building of 6-8 houses will necessitate the removal of trees.

P7F.5 Due to the density of the proposal, the protection of trees and hedgerows, particularly given that they are long established and have long roots, will be very difficult.

P8C.1 & P8E While not an issue of surface water discharge, 10 Richmond Road’s septic tank drains onto the land of 8 Richmond Road, which significantly reduces the acceptable area for building and due to the difference in land height the garden also drains onto this land.

There are no circumstances that we will accept this development as it will have such a negative impact on us, our neighbours and the village as a whole and feel that it is our civic duty to object as strongly as we can.

RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:

Policies 2F, 2O and 6 specifically and various individual policies as noted in the comments

REACTION TO REPRESENTATION(S):

Comment 1: It is pointed out that contrary to the comment, the Plan does not include development plans for STNP15. Such plans will only be made available when a future planning application is submitted. The respondent appears not to have understood that a site allocation in a neighbourhood plan is not a planning application, and is not required to present the level of detail that must accompany the latter. It is hence invalid to make guesses or to speculate as to what form a planning proposal might take, and then use that as a means to support an objection to a site allocation. What can be said with certainty is that any future planning application will be required to comply with the Plan’s policies. It would appear the respondent has mistaken the Site Assessment and / or Site Selection Report for the Neighbourhood Plan. The former refers to the original proposals put forward by the landowner during a call for sites that preceded site allocations. At that time two options were submitted, one for 2 dwellings on part of the overall plot (STNP11), and the other for 4-8 dwellings on the full plot (STNP15). The former was subsequently withdrawn by the landowner. The site assessment and selection processes showed the latter to be suitable for development provided it was limited to 6 dwellings and subject to a range of policy criteria implemented to overcome various constraints.

It is not proposed to respond to the emotional aspects of the comment, other than to point out that the allocated site anticipated development period, as stated in Policy 2O, is 2033 – 2036, so the proposal cannot fairly be said to be driving anyone from their home.

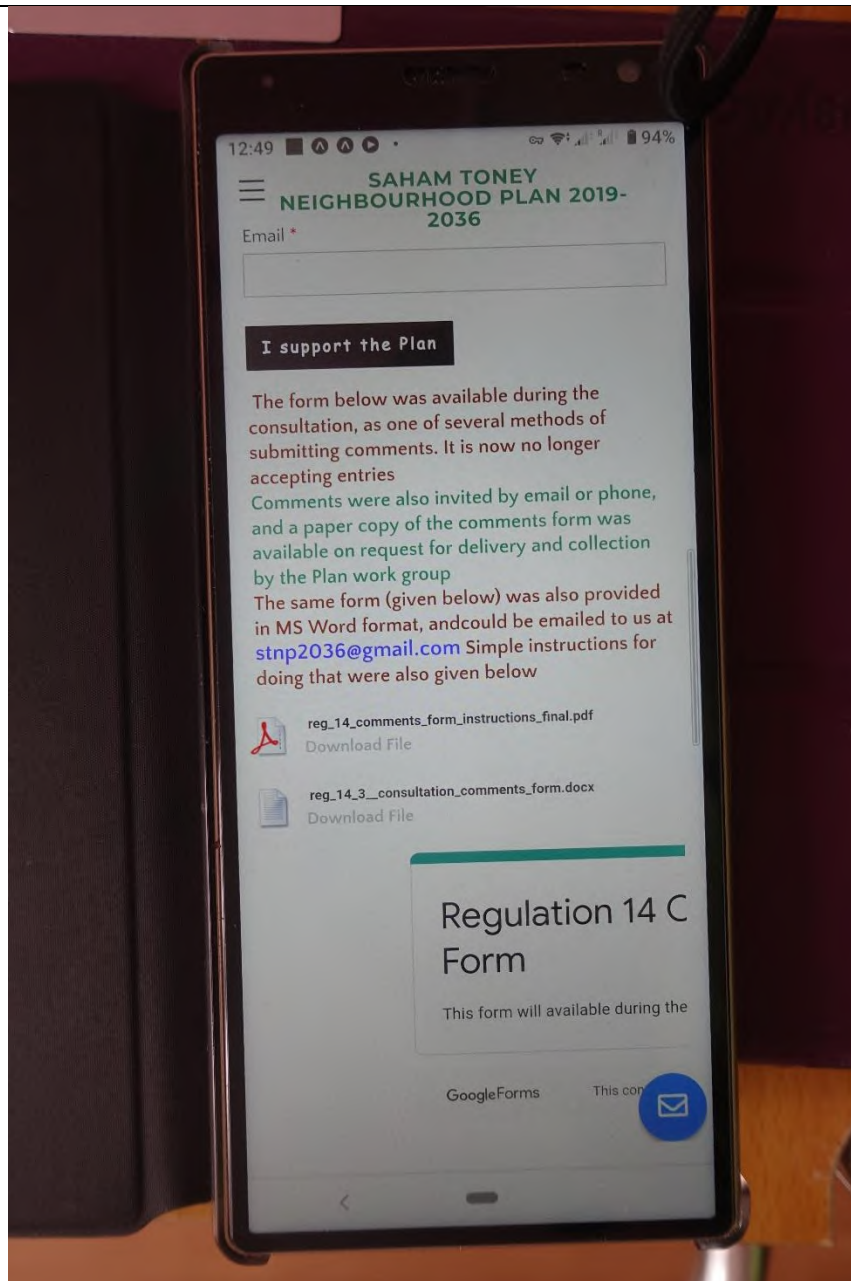
Comment 2: Unlike a planning application a Neighbourhood Plan is not required to individually notify those who may be affected by its proposals. Nevertheless, the fact that STNP15 is allocated has been widely publicised around the village, via the website, at several village presentations, via a series of online slideshows and in the monthly parish magazine. Its allocation has not changed since the second Regulation 14 consultation on the Plan (August-October 2019), during which a 16-page pamphlet about the Plan was delivered to every household, and included a map showing the location of all site

allocations. An updated pamphlet including the same map was available on request (a fact well publicised) throughout this consultation. A telephone hotline operated throughout the consultation period to deal with questions about the Plan from villagers. Hence it is untrue a villager would need to read the whole plan in order to find out about site STNP15.

The suggestion that it was difficult for those without internet access to find out about the Plan is incorrect and an ill-advised attempt to discredit the consultation in order to achieve the respondents aim to remove STNP15 from the Plan. The comment that things were done dishonestly is false and offensive. In previous village presentations and articles in the Parish magazine it has repeatedly been stressed that all comments are welcomed, including objections. During the consultation a range of measures were adopted to ensure those without internet access were not excluded from the process:

- Ways of finding out about the Plan and how to make comments on it were included in the 4-page leaflet that was hand delivered to every household at the start of the consultation. Hence even someone who did not leave their home throughout would have been aware.
- A consultation hotline was publicised in the aforementioned leaflet, in two issues of the parish magazine (which each household receives), in two issues of the local community newspaper and on posters and notices around the village. It operated for 11 hours a day on weekdays throughout the consultation, with an answering machine available at other times.
- All publicity on the Plan made very clear that paper copies of the Plan, 16-page leaflets about it and hard copy versions of the comment form were available on request, and would be safely delivered and collected by members of the Plan work group.

The website is readily accessible on all devices, though it is naturally at a smaller scale on a mobile phone than a desktop computer. The screenshot below is of the consultation page when viewed on a mobile phone, and shows clearly that the form for comments is given the same prominence as that for simply expressing support without comments, and that the comments form was also available for download as a Word or pdf file as an alternate to the online form.:



The comment on website design is mean-spirited, insensitive and unnecessarily disparaging, and fails to recognise that the site was prepared by a villager with no prior knowledge of website design, giving up large amounts of his own time at no cost to provide villagers and others with regularly updated and comprehensive information about the Plan. Depending on the device the site is viewed on the main sections appear either as tabs at the top of the page, or on smaller screens by clicking on a menu icon. One of the main tabs is for documents and at a single click of that, all documents relating to the consultation may be found. Some navigation of the site is required, simply because it contains such a wealth of information, far more than has been found on any other neighbourhood plan website. If difficulties were experienced by the respondent, a call to the hotline or an email to STNP would have quickly resolved the issue, without the need to make offensive remarks at the close of the consultation period.

There is absolutely no bias in the way the website presents information. There is equal opportunity to support the plan without comment, support it with comment and to object to it. To simply support the Plan requires completion of a form, just as does the making of comments or objections, but naturally the former is a simpler form as it does not require a means of entering text, since no comments are being made.

The support and comments form were provided on the same page of the site and given equal prominence as shown by the screenshot below

Regulation 14 (3) Consultation Ju X +

ation-14-3-consultation-june-2020.html

HOME DOCUMENTS CONSULTATIONS SITE ALLOCATIONS MORE...

HERE
Details of online 'drop-in' meetings held during consultation may be found **HERE**

Although consultation is now closed, you can still show your support for the Plan by filling in your details below and clicking "I support the Plan"

* Indicates required field

Name * Email *


First Last


I support the Plan

The form below was available during the consultation, as one of several methods of submitting comments. It is now no longer accepting entries

Comments were also invited by email or phone, and a paper copy of the comments form was available on request for delivery and collection by the Plan work group

The same form (given below) was also provided in MS Word format, and could be emailed to us at stnp2036@gmail.com Simple instructions for doing that were also given below

 [reg_14_comments_form_instructions_final.pdf](#) Download File

 [reg_14_3_consultation_comments_form.docx](#) Download File

Regulation 14 Consultation Comments Form

This form will available during the Regulation 14 public consultation

It is very clear the comments form was not concealed, though again naturally if the respondent was using a mobile phone there would of course have been a greater need for scrolling.

Comment 3: Part of the site is within the settlement boundary. The Local Plan allows development immediately adjacent to the settlement boundary and the Neighbourhood Plan conforms with that. Given that a 6-house allocation for the site was included in the second Regulation 14 version of the Plan, published in August 2019 (to which no comments were made by villagers regarding STNP15), and the landowner has not suggested making any changes to the allocation since then, it seems unlikely that the landowners informed the respondent during 2020 that development would be for only one property, and even were that the case, the Plan has made no such statement. Given the site's location partly within the settlement boundary a planning application for it could be submitted out with the Neighbourhood Plan, and therefore not subject to any of that Plan's requirements, in reasonable expectation of approval. Its allocation means any future planning application will be subject to more stringent requirements than those in the Local Plan or NPPF alone, and that fact should assuage rather than add to the respondent's concerns.

The emotional aspects of this comment do not require response by STNP.

Comment 4: This comment simply speculates about a future planning application. The Plan does not stipulate any of the design and layout aspects the respondent alludes to.

Comment 5: The Plan includes a wide range of policy measures to preserve and where possible enhance biodiversity and green infrastructure. At the time of a future planning application it will be a requirement that a satisfactory ecological assessment is submitted. The Strategic Environmental and Habitats Regulations Assessments both conclude that if the site is developed in accordance with the Plan's policies there will be no harmful environmental impact.

Comment 6: Much of this comment simply speculates about a future planning application. Submission of a Heritage Statement is a policy requirement for STNP15, and that will need to demonstrate that any

impact on the setting of designated and undesignated heritage assets is acceptable. Nothing in the Plan suggests that the development will 'dwarf the old Alms House' (6 Richmond Road), so this part of the comment is unfounded.

The nearby early 21st century development of Church Barns on Richmond Road, demonstrates how sympathetic development in keeping with local heritage character can be successfully integrated with existing buildings.

Regardless of their lack of designation in the Plan, buildings such as Church cottages are dealt with under Policy ENV 07 of the Local Plan.

Comment 7: Important aspects of this comment are incorrect and therefore refuted. The independent assessor referred to (i.e. the site assessment report by AECOM) did not determine that access would be dangerous. That assessment highlighted provision of safe access as a constraint to development. The ability to achieve safe access has subsequently been demonstrated by the Transport Study. Neither did the site assessment report suggest a drive would be needed at the boundary with 6 Richmond Road, in fact it made no suggestions in this respect. The Transport Study concluded there was 59m visibility to the bend in Richmond Road to the east. If access is implemented at that distance, it would be approximately 27m from the boundary between 6 and 8 Richmond Road.

Any potential impact on tree roots is an issue for a future planning application, most specifically in an arboricultural assessment. Comments about that at this stage are speculative.

Rather than the 16 vehicles speculated (for a site incorrectly noted as for 8 dwellings rather than 6), the Transport Study concluded that the site will lead to 5 additional vehicular trips during peak periods. The problems the respondent experiences due to having a property on the bend in the highway are irrelevant to the Plan and its allocation of site STNP15.

The Transport Study includes a review of collisions along this stretch of road and does not identify multiple accidents, but says there is no pattern of accident hotspots around the village.

Comment 8: We are unable to comment on a covenant that may or may not exist but has not been presented to us. If such exists, it will be a matter for a future planning application.

Implementation of building regulations is not a matter for a neighbourhood plan, but nothing in the Plan is stipulated in a way that would lead to them being contravened. It is however pointed out the Part H of the Building Regulations requires soakaways to be 5m from buildings, roads and boundaries, not 15m as stated in the comment, and if the soakaway in question is on land forming part of STNP15, any future developer will be at liberty to remove and replace it at a more convenient location in the unlikely event it proved to be a constraint on development. Comments regarding the possible layout of development with respect to a soakaway field and oil tank are entirely speculative and without foundation based on the site allocation policy. These are matters for a future planning application.

Comment 9: Again, most of the comment is incorrect or speculative. The Transport study concludes that at peak there will be 5 additional vehicular trips, not 16. There is no reason to suppose a small development will lead to noticeably more noise. Many driveways in Saham Toney access the highway opposite other dwellings: that is simply the nature of the settled form, not something unusual relating to STNP15, and does not contravene Highway Authority guidelines. Even so comment on the layout and location of access to the site is speculative and can only be addressed when a future planning application is decided.

Comment 10: It is an incorrect and frankly scurrilous statement to suggest that the Plan 'admits STNP15 fails to meet multiple criteria'. It most definitely does not. All allocated sites were objectively reviewed against a range of criteria as part of the site assessment and selection processes, to the extent that was reasonable and possible to do when preparing allocation policies (i.e. to a lesser level of detail than will be considered when a future planning application is submitted).

Sites were assessed independently of both the parish council and the Plan work group, neither of which had any influence over their conclusions. The site selection process adopted has been subject to scrutiny by villagers (and others, including planning officers) at a village presentation prior to allocations being confirmed and during two previous formal Regulation 14 consultations on the Plan and its supporting documents (including the site selection report). At no stage have any objections been raised to either the methodology adopted or the way in which that has been applied.

Comments on policy criteria: These to a very great extent duplicate comments made by respondent 8, with some minor editing in a few cases. Hence reference should be made to the reaction to respondent 8's comments numbers 8-53. It is noted that the duplication of comments by members of the same household does not add to their weight or validity.

ACTION TAKEN:

None required. Most of the comments are either factually incorrect or speculative. Those with some basis have been addressed above.

RESPONDENT NUMBER: 10

DATE:

14 August 2020

Comments:

I have requested that [REDACTED] submits my objections to the plan as I do not have access to an email or the internet and do not wish to.

Comment 1: I feel that people of my generation without access to the internet have been discriminated against in the nature of how these consultations have been conducted. If other people had not alerted me to the proposed development adjacent to my property, I would have been completely unaware and unable to make my objections known. Therefore, I feel that my rights have been violated in this matter. I am opposed to the development of the site at 8 Richmond Road (STNP 11 & 15) for a number of reasons and the knowledge that this could happen has had a significantly negative impact on my wellbeing and mental health, in what already has been a difficult period due to the Coronavirus lockdown.

Comment 2: I bought my property adjacent to an existing house with gardens and farm land that was outside the settlement belt for the security of knowing that this was land that could not be developed or built on. I bought my property for peace and quiet and therefore am devastated to discover the plans for 6 houses to be built on this site bordering my property. This will change the nature of my home completely. Even up until earlier this year I was assured by the owners of 8 Richmond Road that any development plans were only for one property and discovering that the plans are actually for 6-8 properties is causing me undue stress and anxiety which at my age is highly detrimental for my health.

Comment 3: I am particularly concerned by the reports that state that the current driveway would be unsuitable for the purpose of this development and recommends that the access road be located along the boundary of my property, which coincidentally is next to my bedroom as my property extends up to the boundary. The likelihood is that this access road would be in use constantly by a minimum of 12 resident vehicles and far more when guests, deliveries and service vehicles are included in the equation. This would have a significantly negative impact on my quality of life and my mental health. Additionally, I am concerned about the proposed siting of this access road as there is an oak with a preservation order on it along this boundary, even if the road goes around it the amount of traffic is likely to have a negative impact on its roots and on the hedgerow along the boundary and the abundance of nature that lives within it.

Comment 4: Richmond Road has become increasingly busy since I have lived in my property. There are already large numbers of lorries, both for SuBridge and other local industrial areas, as well as a large number of vehicles using the village as a through road to Swaffham. I often find it difficult getting out of my own drive safely (and this located even further from the bend than the proposed access road) and it is made doubly difficult by the fact that there is very limited visibility due to blind bends on both sides of the road. There is limited pedestrian access as the pavement is only on one side of the road and on my side stops shortly after my property. This an accident black spot and increased numbers of vehicles trying to pull on and off the road for this development will only make that risk higher.

Comment 5: My other objection to this planned development is the impact that it would have on the historic nature of the area. My property (The Alms House) is already noted to be a heritage asset, the Old Rectory close by is Grade II listed and St George's Church is Grade I listed, however within this area there are additional buildings of historic and heritage importance and character such as the Rectory Barns opposite my property and Church Cottages which are on the opposite boundary to the proposed

development. These cottages are not currently on the Heritage asset register, but should be due to their age, their construction and their historical links to village and church life. To build a new property development on a site surrounded by historic properties will have a highly negative impact on the historic centre of the village and the views of the village from the Swaffham entrance to the village, from the Church, the Church Green and coming up Richmond Road from the Watton direction.

RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:

Policies 2F and 2O

REACTION TO REPRESENTATION(S):

Comment 1: The claim of discrimination against those without internet access is strongly refuted. It is unreasonable to suggest awareness of the Plan and the consultation depended on the respondent being alerted by others, because, even if confined to home, a 4-page leaflet about both was hand-delivered to every household in the parish at the start of the consultation and gave a range of accessibility options for those without internet access, which comprised:

- Safe and hygienic delivery of a paper copy of the Plan on request to a hotline that was open 11 hours a day on weekdays throughout the consultation and took messages outside those times;
- Safe and hygienic delivery of a 16-page information pamphlet about the Plan, which was itself an update to a similar pamphlet hand-delivered to every household at the time of the second Regulation 14 consultation in August 2019 (and which included a map of allocated site locations);
- Safe and hygienic delivery and collection of a paper copy of the comments form;
- A telephone hotline that was open 11 hours a day on weekdays throughout the consultation, to answer villager queries about both the Plan and the consultation, and to take comments;
- Articles publicising the consultation and giving accessibility information in 2 issues of the parish magazine (1 July and 1 August);
- Articles publicising the consultation and giving accessibility information in 2 issues of the local community newspaper;
- Posters and notices announcing the consultation and giving accessibility information displayed at many prominent outdoor locations around the village.

It is most firmly asserted that nobody's rights have been violated during the consultation.

It is not intended to comment on respondent's wellbeing and mental health, other than to point out that the allocated site anticipated development period, as stated in Policy 2O, is 2033 – 2036, and hence cannot reasonably be said to be impacting on those at the present time.

Comment 2: Mention of 6-8 new homes is incorrect, since the allocation is for 6 new dwellings. It is pointed out that much of the land allocated as site STNP15 is in fact within the settlement boundary. Furthermore Local Plan Policy HOU 04 allows development 'immediately adjacent to the settlement boundary', so regardless of allocation in the Plan, a planning application this site could be submitted for the site at any time, and in that case would not be subject to the many measures to manage development that are set out in the Plan. Given that a 6-house allocation for the site was included in the second Regulation 14 version of the Plan, published in August 2019 (to which no comments were made by villagers regarding STNP15), and the landowner has not suggested making any changes to the allocation since then, it seems unlikely that the landowners informed the respondent during 2020 that development would be for only one property, and even were that the case, the Plan has made no such statement. Given the site's location partly within the settlement boundary a planning application for it could be submitted out with the Neighbourhood Plan, and therefore not subject to any of that Plan's requirements, in reasonable expectation of approval. Its allocation means any future planning application will be subject to more stringent requirements than those in the Local Plan or NPPF alone, and that fact should assuage rather than add to the respondent's concerns.

The emotional aspects of this comment are not a planning matter and so are deliberately not addressed herein.

Comment 3: The report noted about the location and details of access to the site, have not been taken from the Plan or any of its supporting documents. It can only be assumed that the person who made the respondent aware of the site allocation passed on his/her own speculation on this topic (and in doing so without any foundation, helped created the stress the respondent notes in comment 2). The site access

road, for which again there are as yet no details to make valid comment on (those coming only when a planning application is submitted), will not in any case run beside the Alms houses: (a) because they do not directly adjoin the allocated site, and (b) because their setting is offered protection under Policies 3A and 6. Site access is required to offer 59m visibility of the highway in both directions. If access is located 59m from the bend in Richmond Road to the east of the site, that access will be approximately 27m from the boundary with 6 Richmond Road, indicating there is sufficient flexibility to locate the access without being directly adjacent to the boundary of 6 Richmond Road.

Comment 4: The transport study concluded that there is adequate visibility in both directions from the site and that safe access is achievable. The transport study reviewed collision data throughout the parish and found no evidence that this section of Richmond Road is ‘an accident black spot’ as suggested by the respondent. The site is well served by a footway immediately fronting the site and providing a safe route to neighbouring Watton as well as the community centre, pub and village school.

Comment 5: Submission of a Heritage Statement is a policy requirement for STNP15, and that will need to demonstrate that any impact on the setting of designated and undesignated heritage assets is acceptable. The nearby early 21st century development of Church Barns on Richmond Road, demonstrates how sympathetic development in keeping with local heritage character can be successfully integrated with existing buildings. Certain buildings have been defined in the Plan as non-designated heritage assets since the Plan’s first Regulation 14 pre-submission in March 2018. The policy making those designations received over 95% support from villagers, and no suggestions were made to designate other buildings. Similarly no suggestions for additions were made during the second Regulation 14 consultation, August-October 2019. It is not proposed to add further designations to the Plan at this stage, when villagers will not have a further chance to consult on them (the final consultation on the Plan being limited to matters concerning the basic conditions). Regardless of their lack of designation in the Plan, buildings such as Church cottages are dealt with under Policy ENV 07 of the Local Plan.

ACTION TAKEN:

None required. Most of the comments are either factually incorrect or speculative. Those with some basis have been addressed above.

RESPONDENT NUMBER: 11	DATE: 14 August 2020
<p>I have requested that [REDACTED] submits my objections to the plan as I do not have access to an email or the internet and do not wish to.</p> <p>Comment 1: I feel that people of my generation without access to the internet have been discriminated against in the nature of how these consultations have been conducted. If other people had not alerted me to the proposed development close to my property, I would have been completely unaware and unable to make my objections known. Therefore, I feel that my rights have been violated in this matter. I am opposed to the development of the site at 8 Richmond Road (STNP 11 & 15) for a number of reasons which I believe will mean that it will be detrimental to the village and local wildlife.</p> <p>Comment 2: I bought my property adjacent to existing houses with gardens and farm land that was outside the settlement belt for the security of knowing that this was land that could not be developed or built on. I bought my property for peace and quiet and therefore am devastated to discover the plans for 6-8 houses to be built on this site close to my property. This will change the nature of my home completely.</p> <p>Comment 3: Richmond Road has become increasingly busy in the 15 years I have lived in my property. There are already large numbers of lorries, both for SuBridge and other local industrial areas, as well as a large number of vehicles using the village as a route to Swaffham. I often find it difficult getting out of my own drive safely and it is made doubly difficult by the fact that there is very limited visibility due to blind bends on both sides of the road. There is limited pedestrian access as the pavement is only on one side of the road and on my side finishes before the SuBridge Bend. This an accident black spot and there have been a number of accidents on this stretch of the road during my time living here. Increased</p>	

numbers of vehicles trying to pull on and off the road for this development will only make that risk higher and increase the risk to me trying to pull on and out of my driveway.

Comment 4: The bend opposite the church is already treacherous and any parents trying to cross the road with children safely will struggle. My neighbours have to cross this road daily to access their vehicles as they are not allowed a driveway (due to the dangerous nature of these bends) and have had many near misses. I find it hard to understand how an access road for potentially 20+ vehicles can be considered when the road is already considered too unsafe for one property to be allowed a driveway. Vehicles already travel well above the speed limit and this is not regulated by highways or the police.

Comment 5: I am additionally concerned with the impact that this development would have on the sewerage pipes in this end of the village. I regularly have issues with the sewage backing up to my property and have been informed by Anglian Water that this is due to the main sewerage pipes not being adequate to cope with effluent from this end of the village, this has become worse as a direct result of new properties that already have been built. An additional 6-8 properties would make this significantly worse.

Comment 6: Another objection to this planned development is the impact that it would have on the historic nature of the area. The old Alms Houses are already identified as a Heritage Asset and the Old Rectory is Grade II listed and St George's Church is Grade I listed. My property (1 Church Cottages) and the adjoining cottage have not been identified as a heritage asset, but should be due to their age (approx. 1850's), their construction (Norfolk Clay Lump), their architectural features and their historical links to both village and church life. To build a new property development on a site surrounded by historic properties will have a highly negative impact on the visual aspect of the historic centre of the village and the views of the village from the Swaffham entrance to the village, from the Church, the Church Green and coming up Richmond Road from the Watton direction.

Comment 7: As a keen gardener and wildlife enthusiast I am concerned about the impact that the proposed development would have on local wildlife as the gardens and hedgerows at 8 Richmond Road provide habitats for a diverse range of wildlife which uses the gardens of the adjacent properties. This wildlife includes hedgehogs, bats, small mammals including moles, shrews, voles and mice, pond life including newts, tadpoles, frogs, water boatmen, water beetles, dragon flies etc. There is also an abundance of birds including blue tits, great tits, swifts, sparrows, blackbirds, thrushes, gold crests, bullfinches, woodpeckers etc as well as owls which hunt here of a night-time.

RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE:

Policies 2F and 2O

REACTION TO REPRESENTATION(S):

Comment 1: This comment is an almost exact duplicate of respondent 10's comment 1, hence reference is made to the reaction to that.

Comment 2: Mention of 6-8 new homes is incorrect, since the allocation is for 6 new dwellings. It is pointed out that much of the land allocated as site STNP15 is in fact within the settlement boundary. Furthermore, Local Plan Policy HOU 04 allows development 'immediately adjacent to the settlement boundary', so regardless of allocation in the Plan, a planning application this site could be submitted for the site at any time, and in that case would not be subject to the many measures to manage development that are set out in the Plan.

Comment 3: This comment is an almost exact duplicate of respondent 10's comment 4, hence reference is made to the reaction to that. It is respectfully pointed out that the respondent's drive is on the crown of the bend in Richmond Road, directly opposite the junction with Pound Hill, and hence presents significantly different issues regarding safety than will be the case for STNP15.

Comment 4: Development of the site will neither add to nor diminish the danger experienced by those who choose to cross the highway at a blind bend. The Richmond Road footway allows pedestrians to find a safe place to cross to another footway on the opposite side, and away from the bend. Suggesting that a 6-house development of 1, 2 and 3-bedroom properties will result in 20 vehicles is exaggerated speculation. The Transport Study calculates there will be a maximum of 5 additional vehicular trips at peak times.

Comment 5: Policy 9 includes a clear requirement that planning applications must demonstrate confirmation from Anglian Water that there is sufficient capacity in the foul sewer network to service new development. Anglian Water made independent site assessments of all sites put forward for allocation, including site STNP15 (at a time when it comprised 8, rather than 6 dwellings) and did not object to STNP15. In notes to its assessments, Anglian Water also pointed out its statutory obligation to provide sufficient capacity for sites having the benefit of planning permission.

Comment 6: This comment is to a large extent a duplicate of respondent 10's comment 5, hence reference is made to the reaction to that.

Comment 7: These are matters for consideration at the time of a future planning application. Policy 2F requires that such an application will be required to include a satisfactory ecological assessment. Furthermore, policies 7D, 7E and 7F provide appropriate safeguards in respect to the concerns raised.

ACTION TAKEN:

None required. Most of the comments are either factually incorrect or speculative. Those with some basis have been addressed above.

RESPONDENT NUMBER: 12	DATE: 14 August 2020
Comment: Concern that the surface water drainage system cannot cope in certain areas and needs to be improved before any new development in the Pages and Chequers Lane area	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Policies 8A-8H	
REACTION TO REPRESENTATION(S): Policies 8A-8H include robust requirements to ensure that the development of new sites does not add to flood risk either onsite or offsite. Those policies have been accepted by Anglian Water and praised by the Lead Local Flood Authority, who had no comments on them. It is respectfully pointed out that new development cannot solve existing village problems in this respect and that is a matter for the Lead Local Flood Authority, but the Plan does ensure such problems will not be increased by development and in feasible ways on development sites themselves will assist in reducing those risks, for example by localized improvement of watercourses and better future maintenance of them. The respondent may find the reactions to respondent 1 of interest.	
ACTION TAKEN: None required.	

RESPONDENT NUMBER: 13	DATE: 14 August 2020
Comment: Utilities and the drainage network need to be improved before any new development	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Policy 1 Policies 8A-8H and 9	
REACTION TO REPRESENTATION(S): Policy 1 deals with appropriate upgrade of utilities infrastructure and policy 9 requires adequate capacity in the foul sewer system Policies 8A-8H stipulate the use of sustainable underground drainage systems with offsite runoff limited to no more than pre-development rates and volumes – i.e. ensure no additional load on the wider drainage network. See also response to respondent 14.	

ACTION TAKEN: None required

RESPONDENT NUMBER: 14	DATE: 14 August 2020
Comment: Seek S106 funding for a footpath link along Cley Lane to link with Watton. Ensure payment by placing the Covenant onto the Property purchaser.	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: None specific as this is an aspiration not a matter of land use. A Neighbourhood Plan cannot dictate S106 payments to be applied as that is a matter for the Local Planning Authority	
REACTION TO REPRESENTATION(S): See reaction to respondent 3	
ACTION TAKEN: None required	

RESPONDENT NUMBER: 15	DATE:
Comment: No support for the development on STNP1, 4, 7, and 16. Too many houses will impact on village life, law and order, traffic and the local school. This village has already been over developed	
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: Policies 2H, 2J, 2K and 2P	
REACTION TO REPRESENTATION(S): <u>Comment 1:</u> With respect, the rigorous, objective and analytical process of site assessment and site selection applied, shows these three sites to be suitable for development. Each has a robust set of policy requirements which will ensure that in combination with the Plan's general policies, development is managed in a way that will prevent to impact on village life that the respondent is concerned about. The Plan also balances development and growth with increased protection and enhancement of the local environment. The sites have been masterplanned (see Policy 2G) to give greater reassurance they may be developed in an appropriate way. All four sites must deliver affordable housing (a total minimum of 12 homes) and Policy 2D includes a local lettings criterion that means locals will be given first priority for such houses. Site STNP16 is allocated together with a large area of amenity land that will be made publicly accessible, and is thus a benefit to the village. The Transport Study shows the development of all 9 allocated sites will have a negligible impact on the local road network, and will not lead to increased queuing at key junctions or reduce highway safety Schooling is matter for the County Council and is outside the scope of the Plan.	
ACTION TAKEN: None required	

RESPONDENT NUMBER: 16	DATE: 14 August 2020
Comment:	

The village has already been overdeveloped and will become a large housing estate. The school is currently unable to accept more pupils and more development would add to recent flooding issues. This only benefits the land owners who are somewhat greedy and not interested in the future make-up of the village
RELEVANT SECTION(S) OF PLAN / EVIDENCE BASE: General
REACTION TO REPRESENTATION(S): None of the allocated sites, individually or in combination comprise a 'large housing estate'. The Plan specifies phasing of development and links that to adequate infrastructure provision. Over its 16-year period on average between 4 and 5 new homes will be developed each year. This is less than the rate at which development has taken place over the last 9 years when a neighbourhood plan was not in place. Schooling is matter for the County Council and is outside the scope of the Plan. With regard to flooding issues see responses to respondents 1 and 13. The central principle of the Plan is to balance development with improved preservation and enhancement of all that's best in the local environment, so although developers can reasonably expect to make profits, the village will also benefit. It is not the purpose of a Neighbourhood Plan to prevent suitable development
ACTION TAKEN: None required

APPENDIX C6. Pre-Submission Consultation June – August 2020: Parishioner “Tick-Box” Questionnaire Results

The results of the consultation questionnaire were as follows:

- 56 parishioners indicated support for the Plan, without comment;
- 8 parishioners indicated support for the Plan, subject to their comments (given in Appendix C5);
- 1 parishioner submitted comments (see Appendix C5), without indicating either support for or opposition to the Plan;
- 7 parishioners indicated they did not support the Plan and gave their reasons for that (given in Appendix C5)

APPENDIX D

Responses to the Consultation on the Strategic Environmental Assessment (SEA)

24 June – 14 August 2020



APPENDIX D1. Strategic Environmental Assessment Report Consultation June-August 2019: List of Statutory and Non-Statutory Consultees

The same organisations were invited to submit comments on the SEA as were for Neighbourhood Plan during its third pre-submission consultation. A full list of those consultees is given in Appendix C1.

APPENDIX D2. Strategic Environmental Assessment Report Consultation (20 June to 14 August 2020) Responses

D2.1: Representation by the Environment Agency

CONSULTEE: The Environment Agency	DATE: 30 June 2020
REPRESENTATION(S): Benn, Neville to me 30 June 2020 Dear Chris We have no comment to make. We consider any aspect within our remit can be picked up at the planning application stage. Please see attached matters within our remit. You should be aware that there are some foul drainage capacity issues in your area. I would suggest a conversation with Anglian Water. Kind regards Neville Benn Senior Planning Advisor Sustainable Places East Anglia Area (West) . ✉ Environment Agency, Bromholme Lane, Brampton, Huntingdon, Cambs. PE28 4NE ☎ Internal: 51906 ☎ External: 0203 0251906 Attached file: "East Anglia Pre-Application Planning Advice Guide", The Environment Agency, May 2018	
<hr/> Chris Blow stnp2036@gmail.com to Neville 30 June 2020 Dear Neville, Many thanks for your quick response. Just for the avoidance of doubt, could you please confirm if 'no comment' applies to our Strategic Environmental Assessment, as well as to the Neighbourhood Plan? Kind Regards, Chris ----- Chris Blow Work Group Leader Saham Toney Neighbourhood Plan Committee	

Benn, Neville

to me 30 June 2020

Dear Chris

Yes it does.

Kind regards

Neville Benn

Senior Planning Advisor
Sustainable Places
East Anglia Area (West)

✉ Environment Agency, Bromholme Lane, Brampton, Huntingdon, Cambs. PE28 4NE

☎ Internal: 51906

☎ External: 0203 0251906

RELEVANT SECTION(S) OF THE SEA REPORT:

Entire report

REACTION TO REPRESENTATION(S)

Noted

ACTION TAKEN:

None required

D2.2: Representation by Natural England

CONSULTEE:

Natural England

DATE:

23 July 2020

REPRESENTATION(S):

Date: 23 July 2020

Our ref: 320473, 320482

Your ref: n/a

Chris Blow

Saham Toney Neighbourhood Plan Steering Committee Work Group

stnp2036@gmail.com

BY EMAIL ONLY

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Mr Blow

Saham Toney Neighbourhood Development Plan - Third Regulation 14 Pre-submission

Saham Toney Neighbourhood Development Plan - Consultation on the SEA

Thank you for your consultation on the above dated 24 June 2020.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely

Richard Hack
Norfolk & Suffolk Team

RELEVANT SECTION(S) OF THE SEA REPORT:

Whole report

REACTION TO REPRESENTATION(S)

Noted

ACTION TAKEN:

None required

D2.3: Representation by Norfolk County Council

CONSULTEE:

Norfolk County Council

DATE:

07 August 2020

REPRESENTATION(S):

Thank you for consulting Norfolk County Council on the Saham Toney NP Reg 14 (round 3).

Norfolk County Council only has Highway Authority comments on the NP Reg 14 (round 3), see attached.

Best wishes,

Naomi

Naomi Chamberlain, Planner

Community & Environmental Services

Tel: 01603 638422

County Hall, Norwich, NR1 2DH

This was followed by the following clarification query:

Many thanks Naomi,

Am I right to assume that comments on our Strategic Environmental Assessment will follow? There are still 7 days left on that consultation.

That was answered as follows, also on 7 August 2020:

NCC doesn't have any further comments on the SEA.

Best wishes,

Naomi

Naomi Chamberlain, Planner
Community & Environmental Services
Tel: 01603 638422
County Hall, Norwich, NR1 2DH

RELEVANT SECTION(S) OF THE SEA REPORT:

Whole report

REACTION TO REPRESENTATION(S)

Noted

ACTION TAKEN:

None required

D2.4: Representation by Historic England

CONSULTEE:

Historic England

DATE:

14 August 2020

REPRESENTATION(S):

Note: The consultee incorrectly returned this response to Breckland Council instead of STNP

Ref: Saham Toney Neighbourhood Plan Strategic Environmental Assessment Consultation

Thank you for inviting Historic England to comment on the Environmental Statement for the Saham Toney Neighbourhood Plan.

We have reviewed the Strategic Environmental Assessment for Saham Toney, and do not wish to make any substantive comments on its assessment.

To avoid any doubt, this letter 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 plan, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely



Edward James
Historic Places Advisor, East of England

RELEVANT SECTION(S) OF THE SEA REPORT:

General

REACTION TO REPRESENTATION(S)

Noted

ACTION TAKEN:

APPENDIX D3. Late Response to the Strategic Environmental Assessment Report by Breckland Council

CONSULTEE: Breckland Council	DATE: 24 September 2020
<p>REPRESENTATION(S):</p> <p>Overall, we have no major concerns about the production of this assessment. However, there appears to be a weakness in the approach to the assessment of the historic environment. Please note that Historic England have subsequently supported his approach (see attached email). Historic England provided advice in response to the 2nd SEA Screening and to the SEA Scoping Report, on the approach to considering effects upon the Historic Environment. Reference was made to Historic England guidance note 8 on SEA/SA that AECOM has noted that sets out the following five key steps:</p> <ol style="list-style-type: none"> 1. Identify the heritage assets and their settings that are affected by the Plan. 2. Assess the degree to which the setting contributes to each assets' significance. 3. Assess the beneficial or harmful effects of the development. 4. Explore options to maximise enhancement or minimise harm. 5. Document the decision and monitor outcomes. <p>The heritage evidence does not appear to clearly assess the role of setting upon the significance of heritage assets or conclude on the degree of harm that might arise to the significance of any assets if development took place in their setting. Therefore, potential negative impacts may not be fully defined and the capacity of mitigation to address such impacts cannot be understood. It is also unclear whether the value of non-designated heritage assets has been taken into consideration through the assessment. In light of this, can both of these assessments be made clearer?</p> <p>Finally, further text is required addressing the required consultation and response on the final draft of the Assessment with the Environment Agency, Historic England and Natural England. We would support a similar approach taken in Table 3.1 to addresses this.</p> <p>The text of the referenced email from Historic England to Breckland Council, dated 7 September 2020, was as follows:</p> <p><i>Having reviewed the SEA report again at your request, my view is that the SEA does identify the two principal areas of concern and suggest mitigation, but that if I was to find a fault it is perhaps a bit lightweight on the specifics regarding significance, and what the impacts (either positive or negative) are likely to be. Your colleagues are right that they did not follow our suggested 5 step process. I did not have any major issues, though, so I would simply say that the report could be improved with a bit more information and demonstration of process (which could involve fleshing out the assessment a bit), but that I suspect the outcome would be largely similar. I would highlight the concerns I raised in my regulation 14 response to the plan, which may also inform you with regards to the potential impacts I identified for the site allocations in question.</i></p>	
<p>RELEVANT SECTION(S) OF THE SEA REPORT:</p> <p>5.27 to 5.32, and 5.54</p>	
<p>REACTION TO REPRESENTATION(S)</p> <p>It is noted that Breckland Council, with input from Historic England is suggesting a level of assessment of the historic environment that goes beyond the scope of a SEA and would only be appropriate to an in-depth Heritage Statement.</p> <p>There is nothing in the SEA Regulations that requires the inclusion in a SEA report of representations received by a Qualifying Body with regards to a Regulation 14 consultation on a Plan and environmental report. Those are included in the STNP Consultation Statement, which has been made available to</p>	

Breckland Council and that is the correct document for them. For information responses to the SEA Scoping Report are included in Table 3.1 because that formed a specific part of the SEA process and was undertaken by AECOM, the authors of the report. Subsequent consultation was carried out by Saham Toney Parish Council, whose responsibility it is to include representations in its Consultation Statement. It is accepted that the report will benefit from further information on the potential impacts on the significance of listed buildings.

ACTION TAKEN:

Information on the potential impacts of nearby allocated sites have been added for Page's Place; St George's Church and Old rectory, and Brick Kiln Farm, in Tables 5.1, 5.2 and 5.3 respectively. Text addressing consultation and response on the final draft of the Assessment with the Environment Agency, Historic England and Natural England is included in this statement and will not be duplicated in the Environmental Report. In fact, during the consultation period, each of those bodies confirmed it had no comments.

APPENDIX D4. Late Response to the Habitats Regulations Assessment Report by Breckland Council

<p>CONSULTEE: Breckland Council</p>	<p>DATE: 24 September 2020</p>
<p>REPRESENTATION(S):</p> <p>Although we also have no significant issues about the production of this assessment, it would benefit from a few areas of clarification:</p> <p>Para 1.6 - Can you include which subsection of Regulation 105 applies, as 106 does not currently apply?</p> <p>Para 1.7, First sentence states it is the LPA responsibility to carry out the consultation with Nature England, but para 105 (2) states it is the plan makers (Parish Council's) responsibility – please clarify this inconsistency?</p> <p>Last sentence - This states that Natural England was consulted on the HRA in Feb 2020, but this needs to be made clearer that this was on an 'initial version of the report'.</p> <p>Further text needs to be included clarifying that they have been consulted on the final version of the Assessment. In light of this we would support a more consistent approach on how the comments are recorded by using the same format used in the SEA (see Table 3.1).</p> <p>Para 5.11 – Can reference 21 clarify the date of the 'Consultation Response' as there has been more than one.</p> <p>Finally, further text is required addressing the required consultation and response on the final draft of the Assessment with Natural England. We would support a similar approach taken in the SEA Table 3.1 to address this.</p>	
<p>RELEVANT SECTION(S) OF THE SEA REPORT: As noted in the comments</p>	
<p>REACTION TO REPRESENTATION(S)</p> <p>Paragraphs 1.6 and 1.7:</p> <p>Regulation 105 sets out the HRA process for all plans, while Regulation 106 explains how these work for Neighbourhood Plans specifically.</p> <p>Regulation 105 states that '<i>the plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives</i>'. It also states that '<i>A plan-making authority must provide such information as the appropriate authority may reasonably require for the purposes of the discharge by the appropriate authority of its obligations under this Chapter</i>'. This is unhelpfully vague wording but Regulation 3(1) at the start of the Regulations explains that, throughout the Regulations, the appropriate authority is the relevant Secretary of State. The reference to his/her obligations is a reference to Regulation 107(5): that a</p>	

competent authority must consult the appropriate authority if it intends to allow a damaging plan to proceed on the grounds of Imperative Reasons of Overriding Public Interest and No Alternatives. The potential for confusion arises with Regulation 106 which doesn't explicitly use the phrase 'plan making authority' at all. Regulation 106 (1) states that '*A **qualifying body** which submits a proposal for a neighbourhood development plan must provide such information as the **competent authority** may reasonably require for the purposes of the assessment under regulation 105*'. This wording implies that the qualifying body (which Regulation 106(2) explicitly explains is the Neighbourhood Plan Group) and the competent authority are separate bodies. The Regulation is also explicit that it is the competent authority (rather than the qualifying body) which has formal responsibility for ensuring the Regulation 105 process is undertaken for a Neighbourhood Plan. We know that the District Council has an obligation to check, advise and ensure that the work the Neighbourhood Plan group is undertaking is procedurally sound and is therefore the effective competent authority. So, for a Neighbourhood Plan, the local planning authority is both the competent authority (under Regulation 106) and the plan-making authority (under Regulation 105), even though it is the qualifying body (the NPG) which is actually writing the plan.

The confusion that is evident in the representation arises because Breckland Council appears to see itself as the appropriate authority in Regulation 106 (5) which states that '*A plan-making authority must provide such information as the appropriate authority may reasonably require for the purposes of the discharge by the appropriate authority of its obligations under this Chapter*' but Regulation 3(1) has already defined the appropriate authority as the relevant Secretary of State.

Although the Regulations are unhelpfully less than explicit over what a 'plan making authority' and 'competent authority' are in a Neighbourhood Plan process, that is rendered moot by the fact that the Qualifying Body has in any event (a) consulted Natural England; and (b) consulted the Local Planning Authority.

Regarding consultation response from Natural England: There is nothing in the Regulations that requires the inclusion in an HRA report of representations received by a Qualifying Body with regards to a Regulation 14 consultation on a Plan and environmental report. Those are included in this Consultation Statement, and that is the correct document for them.

ACTION TAKEN:

Paragraphs 1.6 and 1.7: Text amended and added to in order to further clarify the regulations for the benefit of Breckland Council, and making clear the correct process has been followed in accordance with the regulations.

Consultation response from Natural England: None required.

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**Prepared by the Neighbourhood
Plan Work Group**



**Saham Toney
Parish Council**