

Saham Toney Neighbourhood Plan
Informal Plan Comments – response comments on Revision 3 of Neighbourhood Plan

Including Saham Toney Responses to Comments (in blue text)

From: Breckland District Council.

Overall, while we welcome the progress that has been made in developing the Neighbourhood Plan, but further amendments will need to be made due to the latest version of the Local Plan, which amends the policy referencing. There is also some unfortunate misunderstandings about planning that needs to be resolved before the plan should progress further, which can be addressed at the next meeting.

Referencing: in **bold** – new comments. Commentary on most of the original comments (in plain text) are made in separate document – to be forwarded later.

Comments 1-63 received 6.22pm, 25 July 2017

Comments 64-165 received 6.37pm, 28 July 2017

General responses:

- a. Saham spelt incorrectly in title of these comments.
- b. It is confusing to include Breckland's responses to comments on the original informal submission (Feb. 2017) together with comments on the revision 3 submission, since the former document has been completely rewritten, and especially since only a selection of those comments are included herein. We suggest rather than duplicate those comments herein, add a status column to the original comments table for revision 1 and note there if each comment has been satisfactorily addressed by our earlier response and/or the revision 3 update, and if not, what further action is required. This will be even more important as we move forward into further informal and formal reviews, and it will greatly assist us in making updates.
- c. It aids mutual understanding and future discussion and monitoring of comment status to give each comment a unique number: we have taken the liberty of adding a new column to this effect. The need for this is reinforced by the numerous repetitions of and reference to other comments.
- d. References to the draft Reg. 19 Local Plan are understood and generally accepted, but we would point out that the wording of such comments is generally harsh, since they imply we have ignored that document, when in fact the Local Plan update is not yet formally published in the public domain and only became available to us in its draft form four days after we submitted our revision 3 Plan.
- e. To avoid any possible future misunderstandings, all overall references to our Plan are to use its revision number (3) as stated on the cover sheet rather than "3rd version" etc.
- f. It should be remembered that a Plan has a variety of audiences who must all understand it in order to reasonably make comments. Some measure of duplication with Local Plan policies is deliberately included for that purpose at this stage, with parishioners particularly in mind, most of whom will not be familiar with the Local Plan nor would wish to cross refer to it. We consider in many cases it will aid understanding to leave such duplications in place until the Reg. 16 submission.
- g. We have taken the liberty of adding further rows to this table beneath our responses to each comment where we propose to record mutually agreed actions and/or the agreed status of each comment.

SPECIFIC RESPONSES					
No	Page and Policy/ Paragraph No	Comment	Justification	Suggested amendments	Response (to original plan)
1	Whole Plan	Format – welcome the use of 12pt font in (most of) the plan and use of maps and photographs. However, there does need to be a check on the overall format e.g. consistent spaces (1 or 2) between sentences; use of page brakes rather than a number of returns; reduce text down into smaller paragraphs e.g. p4, Introduction; p5, 3 rd para; p10, 4.4 Village History; p17, para 5.4, Roads, Traffic and Transport etc.		May want to make use of charts and other types of graphics to develop how the plan is presented. Ensure the whole of the plan is in the same font and same font size and other formatting issues.	Some changes - welcome the overall development of the document, as well as more effective use of paragraph numbers in the text (not policy - see below) and overall use of a range of graphics, but this could still be developed further – see comments below.
a. We consider this earlier comment to be closed and that no further action on it is needed					
Agreed resolution / status: PARTLY UPDATED AT REV 4 12 pt font used for policy and parish action point text; 11 pt elsewhere since changing all to 12 pt increases the Plan length by 10 pages and isn't justified since it's not used in the Local Plan nor other Breckland Neighbourhood Plans					
2	Whole Plan	There are some changes which need reversing.		Policy is normally in bold; the font size should be not less than 12pt font.	N/A
a. While it would be possible to make these changes, since Breckland's own Local Plan for Reg. 19 submission has non-bold policy text and uses ArialMT10 point font throughout we consider this an unjustified and unnecessary change. Similarly Yaxham's made plan does not use bold text for its policies. No further action is proposed.					
Agreed resolution / status: PARTLY UPDATED AT REV 4 12 pt font used for policy text. Bold font not adopted because accessibility guidelines recommend against using it.					
3	Whole Plan	The format of the Policy needs revising. Policy intent, statements of fact and referencing should be included as part of the supporting text, not in the policy.	Policy should provide guidance concerning what needs to be considered when making a decision on a planning application.	As a minimum, remove PX from all of policy, and ideally all of the paragraph referencing. Lettering or numbering of bullet points is welcome.	N/A
a. We do not accept that "Px" numbering and/or all of the paragraph referencing must be removed since it aids clarity, and point out that all paragraphs of the NPPF are uniquely numbered and often referred to by that means. We have not seen any rules that dictate we cannot do this. No further action is proposed.					
Agreed resolution / status: SOME CHANGES AT REV 4 Statements removed, paragraph referencing and PX remains					

Statements of fact have been moved from policies to their supporting text, with the exception of the definition of items included in the policy (per agreement at meeting STNP - SH 03 August 2017)

"Px" numbering is retained as it allows easy referencing and its removal has not been justified.

4		The policy referencing has been over complicated.	It will make it difficult to use.	Simplify, ideally by removing referencing.	N/A
---	--	---	-----------------------------------	--	-----

a. We cannot accept that the very simple addition of a "Px" paragraph number is over complicated nor that it makes our policies difficult to use. We consider exactly the reverse is true. No further action is proposed.

Agreed resolution / status: **NOT AGREED. NO CHANGE AT REV 4**

"Px" numbering is retained as it allows easy referencing and its removal has not been justified.

5	Whole Plan - Maps	The maps would benefit from some fine tuning e.g. titles should be consistent e.g. either on the map or below; make reference to "key" or "legend" and have the same sized text. Text on the map/key to be at least 12pt font and in black rather than blue text.	To aid clarity.	Amend as advised.	N/A
---	-------------------	---	-----------------	-------------------	-----

a. We will improve map consistency where it is reasonable to do so, however:

b. Breckland does not use 12pt font in its own Local Plan, so we find it hard to accept that we must.

c. For our Reg. 14 submission we are planning to provide a duplicate set of all maps in a separate document at A3 size, thus further improving readability.

d. Since blue text has been accepted (by lack of comment) elsewhere in our Plan (for example charts 4.9a-d) we do not accept that black text is necessary on a map, which is already in colour and on which the text of the original map is also black. Blue distinguishes our text from the original.

No further action is proposed other than response (a).

Agreed resolution / status: **COMPLETE: New standardised format introduced**

6	Policies	A number of policies need rewording as many contain statements, text (that is appropriately located as justification text), references and notes rather than policy.	Policy should provide clear guidance concerning what needs to be considered when making a decision on a planning application. Also see 2 nd sentence of para 6.2.1.1 regarding this.	Move <u>all</u> Policy Intents, statements, references and notes to justification text.	N/A
---	----------	--	---	---	-----

a. We propose to move policy intents ahead of each policy as we think it is important to lay readers, especially parishioners, who may not read the Plan cover to cover, to easily find them.

b. We will make the requested changes where they do not amend the intent of our policies, but in order to do so will first require more specific guidance on what constitutes "statements" or "text" rather than policy.

c. This is to be subject to detailed discussion 3 August as it is fundamental to how we approach our next update.

d. It would have been better had this comment been made when we submitted our revised policies for review on 14 June 2017.

Agreed resolution / status: **SOME CHANGES AT REV 4**
Statements of fact, etc. have been moved from policies to their supporting text, with the exception of the definition of items included in the policy (per agreement at meeting STNP and S Heinrich 03Aug 2017.

7	p2,Contents page	Would be useful to have a list of all the policies in the plan listed here.	For referencing purposes.	As advised – see comments re p16.	N/A
----------	-------------------------	--	----------------------------------	--	------------

- a. All policies are listed in section 6.2.2.
- b. The reader is guided to the applicable page number for the section on policies, or if viewing the document electronically can use an automated link from the table of contents to section 6.
- c. We consider a list of policies most usefully belongs with those policies, and do not wish to duplicate this table elsewhere in the document. Duplication often leads to inconsistencies.
- c. Our aim has been to minimise the amount of material ahead of the policies, so as not to deter readers (especially parishioners) from persevering to that point in reviewing what is a long document.
- d. We would be willing to make the list of policies item 6.1 and to introduce a page break before the policies section to ensure readers would see the list immediately on reaching or navigating to section 6.

Agreed resolution / status: **DONE AT REV 4, included in Table of Contents**

8	Original p3, 2. Contents	This section has been deleted and it was useful in explaining the contents.		Consider reinstating.	
----------	---------------------------------	--	--	------------------------------	--

- a. We believe the contents list and section titles therein are self-explanatory as given. No further action is proposed.

Agreed resolution / status: **REINSTATED AT REV 4**

9	p3, para 2.1	Although accurate, this would be more appropriately part of the Basic Conditions Statement.		Move as advised.	N/A
----------	---------------------	--	--	-------------------------	------------

- a. We agree to this change, on condition that no future comments from Breckland DC or others that require reinstatement of this paragraph in the Plan will be countenanced.

Agreed resolution / status: **DONE AT REV 4**

10	p3, para 2.4.1- 7	This would benefit from being displayed as a table or chart.		Amend as advised.	
-----------	--------------------------	---	--	--------------------------	--

- a. We will amend this accordingly, even though as presented it is effectively a table without borders; the choice between table and chart will be made at the time of update, and we will presume either will be acceptable. We will not later change a table to a chart, nor vice versa.
- b. We point out there is also a flowchart in Appendix 2 to aid understanding.

Agreed resolution / status: **AMENDED TO A CHART AT REV 4**

11	p4, para 2.6	"consultation forms part of the final (Regulation 15) plan proposals submission of the Plan" would benefit from rewording.	Clarity	Amend "consultation forms part of the final (Regulation 15) plan proposals submission version of the Plan ".	N/A
<p>a. We agree to this change.</p> <p>Agreed resolution / status: AMENDED AT REV 4</p>					
12	p4, para 2.7	Please note: Sustainability Appraisal does not need to be produced to justify sustainable development.		This issue can be addressed in the Basic Conditions Statement at Reg.16	N/A
<p>a. Comment should refer to Reg. 16 not 26.</p> <p>b. Government planning policy guidance states: "Does a neighbourhood plan require a sustainability appraisal? There is no legal requirement for a neighbourhood plan to have a sustainability appraisal as set out in section 19 of the Planning and Compulsory Purchase Act 2004. However, a qualifying body must demonstrate how its plan or order will contribute to achieving sustainable development. A sustainability appraisal may be a useful approach for doing this and the guidance on sustainability appraisal of Local Plans should be referred to. Paragraph: 026 Reference ID: 11-026-20140306 Revision date: 06 03 2014" We have followed government advice by preparing an appraisal and consider that the Council is obliged to review that document regardless of its opinion on the need for such a document.</p> <p>c. We are willing to amend the title of our draft "Sustainability Appraisal" however you direct, but would wish to retain it either as a separate document or appendix to the basic conditions statements since that will minimise the amount of rework required.</p> <p>d. Although you have not commented on our draft Sustainability Appraisal or Basic Conditions at this stage we respectfully request you do so before our Reg. 14 Plan submission so we will know if the approach we have taken to those documents is broadly appropriate.</p> <p>e. We would appreciate if you could tell us if Breckland intends any changes to its list of sustainability objectives when it publishes its Local Plan Sustainability Appraisal for Reg. 19 consultation.</p>					
<p>Agreed resolution / status: NOT FULLY AGREED</p> <p>We will prepare and publish a sustainability statement at Reg 14 (to the same format as the Sustainability Appraisal that was provided to accompany our revision 3 Plan) to allow it to be consulted on. We may subsequently merge it into our Basic Conditions Statement, providing Breckland Planning first provides comments to the revision 1 version of that statement, sent by STNP 17 July 2017. Breckland Planning also need to provide comments to the revision 1 sustainability appraisal as sent to them 17 July 2017.</p>					
13	p4, para 2.8	This is only when there is conflict between a Neighbourhood and Local Plan is the most recently adopted document.	NPPF para 185 " <i>...the policies it contains take precedence over existing non-strategic policies in the Local Plan for that neighbourhood, where</i>	Need to clarify further as advised.	N/A

			<i>they are in conflict."</i>		
a. We will amend 2.8 to make it clear as advised.					
Agreed resolution / status: AMENDED AT REV 4					
14	p4, para 2.9	Welcome this para which outlines "good practise".			N/A
a. Noted No further action is proposed.					
Agreed resolution / status: CLOSED, NO ACTION REQUIRED					
15	p4, para 2.10	An interesting option and welcome the opportunity to provide feedback.		N/A	N/A
a. We have not made a final decision about offering a summary version of our Plan; the fact that policies alone run to 14 pages means it may not achieve the objective of brevity. b. We have some concerns that should people review only a summary version of the Plan their comments may be deemed less, or not at all valid. c. We note that the Locality document "Quick Guide to Neighbourhood Plans" states "It may be useful to prepare a concise summary of the plan for those that don't wish to read the full document." c. We welcome any feedback you can provide on this topic.					
Agreed resolution / status: THIS OPTION WILL NOT BE PURSUED FURTHER but individual policies and maps etc will be available on our website. We have also split the Plan so that evidence is a separate document thereby making it easier to read					
16	p4, para 2.11-12	These may be better placed as footnote at the start of the plan.		As advised.	N/A
a. We disagree. A footnote is less prominent and so would be easy for a reader to miss. b. We are willing to amend these two items to be paragraphs 2.1 and 2.2 and change other numbering to suit.					
Agreed resolution / status: UPDATED AT REV 4 Moved to a new list of maps that forms part of the Plan's contents list.					
17	p4, Section 3.	Overall a good concise write up. Also useful use of the "Issue" in this section. However, this approach only addresses 3 policies, and would be useful to address all of them.		Consider using this approach for all policies.	N/A
a. Section 3 currently notes policies 1, 9 and 13 which are highlighted in the issues noted. b. Further "issue" text in existing paragraphs and where appropriate additional paragraphs will be added to section 3, but only where that can be readily done in the context of the section's title and purpose - a description of the neighbourhood area. We do not commit to providing "issue" text in this section for every policy.					
Agreed resolution / status: UPDATED AT REV 4 SUCH THAT ISSUES ADDRESS ALL 9 POLICIES					

18	p6, para 3.5, 1st sentence	Clarity needed in this paragraph: Need better referencing regarding “The adopted district core planning strategy ...”		Amend “The adopted district core planning strategy ...”	N/A
a. We agree to the proposed revised wording.					
Agreed resolution / status: AMENDED AT REV 4					
19	4th sentence	Also about the type of “draft local policies” being referred to.		Amend: “draft local <i>plan</i> policies”.	N/A
a. We agree to the proposed revised wording.					
Agreed resolution / status: AMENDED AT REV 4					
20	p8, para 4.9	Welcome the larger font in these tables.		N/A	N/A
a. Noted No further action is proposed.					
Agreed resolution / status: CLOSED. NO ACTION REQUIRED					
21	p12, para 4.12	It is not accurate to state that “policies cannot oblige developers to provide housing association dwellings”.	See emerging Local Plan Policy DC 4 Affordable Policy HOU 07 - Affordable Housing re 25% requirement.	Requires amending.	N/A
a. Policy DC4 is taken from Breckland's core strategy rather than the emerging Local Plan and specifies a 40% affordable housing requirement.					
b. 25% affordable housing is specified in the unpublished Reg. 19 version of the Plan in its policy HOU 07.					
c. Policy HOU 07 applies only to developments of eleven or more houses. Our Plan does not support developments of that size, so it is not applicable.					
d. Even were Policy HOU 07 to apply, it does not address the housing needs of local people, which is the subject of our para. 4.12					
e. We need more specific guidance on how to amend para. 4.12, since we understood from you earlier we could not nor should not specify housing for local people in our policies. Possibly reference to the Reg 19. draft Local Plan Policy HOU 14 would address this comment?					
Agreed resolution / status: TEXT AMENDED AT REV 4 BUT WOULD BENEFIT FROM FURTHER DISCUSSION TO ENSURE UNDERSTANDING					
22	p13, Section 5 Vision & Objectives (was p22, Section 6)	This section needs to be made much clearer about what is the vision and the objectives are. At present it is mainly a narrative of the current situation.		N/A	Welcome development of this section.
a. Noted.					
b. See also general response (b).					

Agreed resolution / status: **NO ACTION REQUIRED**

This was a comment to the revision 1 Plan that has been addressed at revision 3

23	p13, Section 5	Generally welcome this section outlining the Vision & Objectives.		N/A	N/A
-----------	-----------------------	--	--	------------	------------

a. Noted
No further action is proposed.

Agreed resolution / status: **CLOSED. NO ACTION REQUIRED**

24	p13, para 5.1	While the vision is understood, it is not possible for planning to control development in the manner expressed e.g. gradual and small scale.	This matter has been addressed and supported by two independent examiners to date.	Review	
-----------	----------------------	---	---	---------------	--

a. Breckland's own draft Reg. 19 Local Plan seeks phased development through the use of a housing trajectory which clearly controls development (it states that it "includes a stepped approach to housing delivery") in a similar fashion to that objected to in the word "gradual" of our vision.
b. Among other requirements for developments in rural settlements with boundaries (of which Saham Toney is one) Breckland's own Reg. 19 draft plan specifies a limit of 5 dwellings on the scale of developments (Policy HOU 04). We are doing no more than Breckland itself is specifying.
c. Breckland sets housing allocations in its Local Plan which are a control on development.
d. Breckland's adopted core strategy allocates zero housing to Saham Toney up to 2026 which further justifies phasing of development in the parish, since any amount will exceed the core strategy target.
e. Our Plan supports a higher level of development than that specified for rural settlements with boundaries in Breckland's Draft Reg. 19 Plan, so cannot be considered to control development in an unacceptable manner when taken in the context of the Local Plan.
f. Breckland's draft Reg. 19 Local Plan states in Policy HOU 05 "Development in smaller villages and hamlets outside of defined settlement boundaries will be limited...". If the District Council can exercise such control over the entire district, then by that precedent the Saham Toney Parish Council can do the same for its Neighbourhood Area.
g. Please be specific about what else in the vision statement is deemed unacceptable; "e.g." is too open-ended and vague.
h. We would be willing to change our vision statement if and only when Breckland first amends its Local Plan to include a specific housing allocation to Saham Toney and specifies in a policy that once that allocation is satisfied no further development will be permitted over the Plan period. Otherwise we do not agree to change our vision statement.

Agreed resolution / status: **NOT AGREED**. Breckland uses similar wording in the emerging Local Plan

25	p13, para 5.2.1, H1	It is not possible to "adopt" LPA policies, as this is a development plan in its own right.	Also see comments re P1.1.	It is more appropriate to "support" them once the plan has been adopted.	N/A
-----------	----------------------------	--	-----------------------------------	---	------------

a. We agree to amend the word "adopt" to "support".
b. The supported policies will be amended to be those in Breckland's draft Reg. 19 Local Plan.
c. We do not agree to await the adoption of the Local Plan before publishing the amended objective (nor its related policy) in our Plan.

Agreed resolution / status: **DONE AT REV 4**

26	H2 & H3	As advised other Parishes, planning can't control the size of developments or phase over time.	See both Yaxham & Mattishall Examiners Report.	Delete or amend to a percentage of the village size re-emerging Local Plan policy.	N/A
<p>a. The vision in Yaxham's post-examination, as-adopted plan states the plan "supports small-scale development".</p> <p>b. We could find no objection in the examiner's report to the wording of Yaxham's vision .</p> <p>c. We do not have access to Mattishall's examiner's report and could not find it in the public domain, so can neither agree nor disagree with the comment in respect to that.</p> <p>d. The points made in response to comment 24 apply equally to this comment.</p> <p>e. We cannot consider changing our objectives H2 and H3 without more detailed and logical justification from Breckland.</p>					
<p>Agreed resolution / status: NOT AGREED. Our woding corresponds with that in the emerging Local Plan for rural settlements</p>					
27	p13, para 5.2.2, E2	Need clear evidence to justify this issue e.g. number planning applications in this area?	See PPG, Neighbourhood Planning, Preparing a neighbourhood plan or Order, para 040 regarding evidence. See both Yaxham & Mattishall Examiners Report.	Provide evidence or delete.	N/A
<p>a. We understood we need evidence to justify each policy but not for every objective as well. Please provide reference to the regulation that requires this.</p> <p>b. Policy HOU 04 of Breckland's draft Reg. 19 Local Plan dictates that development must avoid the coalescence of settlements. It does not require this to be justified by reference to planning applications.</p> <p>c. Planning applications at a given time are merely a snapshot and lack or profusion thereof has little or no bearing on the longer term avoidance of settlement coalescence.</p> <p>d. We are willing to delete either our objective or policy regarding a strategic gap.</p> <p>e. We are willing to provide more evidence, and indeed expected to be asked to do so. We would only ask that you be very specific about what evidence would satisfy the basic conditions in this respect, and also confirm if it is acceptable to postpone collation of such evidence until our Reg. 16 submission should we choose to do so?</p>					
<p>Agreed resolution / status: PARTLY DONE AT REV 4 Evidence of planning proposal pressures added at Rev 4. Breckland Planning have failed to advise details of any other specific evidence required</p>					
28	p14, Table 6.1.1	Table will need amending re the new Reg.19 Local Plan.	A new Reg.19 Local Plan.	A link to this plan has already been forwarded to the Working Group.	N/A
<p>a. Agreed.</p> <p>b. Respectfully note that the link mentioned was only provided one week after submission of our rev 3 plan, so this could not have been addressed in that version.</p>					
<p>Agreed resolution / status: NO LONGER APPLICABLE. Reference to Local Plan deleted from table at Rev 4 since it will be covered by the Basic Conditions Statement</p>					
29	p16, Section 6, The Policies (was	It is really important that the Local Plan is read – this will help understand what	There is concern that this is producing a mini local plan		A draft of the Reg.19 Local Plan is available

	p24) Planning policies	policies are already in place and need not be duplicated. It will also help understand how to word policies.	rather than focusing on policy issues unique to the village.		on the following website page: http://democracy.breckland.gov.uk/mgChooseDocPack.aspx?ID=4083
<p>a. Agreed.</p> <p>b. Respectfully note that the link mentioned was only provided one week after submission of our rev 3 plan, so this could not have been addressed in that version.</p> <p>c. Despite (b) we have made sufficient review of the revised Local Plan to be in a position to discuss its impact on our Plan at the review meeting on 3 August.</p>					
Agreed resolution / status: DONE AT REV 4 . The updated Local Plan has been read cover to cover and policies updated to align with it					
30	p16, 6.2.1.1	It is normal practise for policies to be set out in bold.		Also see comments re policy being in bold.	N/A
<p>a. This has not been done in the Reg. 19 version of Breckland's own Local Plan, nor Yaxham's made Neighbourhood Plan or Mattishall's Reg. 16 submission. Hence we do not accept this is normal practice.</p> <p>No further action is proposed.</p>					
<p>Agreed resolution / status: NOT AGREED. NO FURTHER ACTION</p> <p>Guidance on document accessibility notes that the use of bold text is not recommended for those with visual impairment.</p>					
31	p16, 6.2.2 Index	A number of these policies are linked to consultation evidence in earlier pages.	Issues on pages 6-8, re para 3.5, 3.7, 3.8 & 3.11, made reference to policies 1, 9, & 13. Also p12, made reference to policies 1-3, 9-13, 15 &16.	It would be useful if all those that are not, were e.g. 4-8, 14 & 17.	N/A
<p>a. See response item (b) to comment 17</p> <p>b. A similar approach will be taken to para. 4.10 items (a) to (i), but again we do not commit to do this in every case.</p>					
<p>Agreed resolution / status: DONE AT REV 4</p> <p>Note: Policy index moved to Table of Contents as requested in another comment</p>					
32	p16, Policy 1	It is not possible to “adopt” these policies in advance of them being “adopted” into the Local Plan as they have not completed their own statutory process. Also the Local Plan will be adopted before this Neighbourhood Plan is “made”.	Current planning practise.	Amend to outline what is supported.	N/A
<p>a. We will make the requested amendment, which becomes more straightforward now Breckland has only one draft Local Plan (i.e. Reg. 19 version) rather than the previous two that sometimes conflicted with one another.</p> <p>b. For accuracy we note that it is only likely rather than certain that the Local Plan will be adopted before our Plan is made; and that the regulations do not require that to be the case.</p>					

Agreed resolution / status: **DONE AT REV 4**

33	Policy 1	For policies not to apply e.g. PD03-05, this would require other policies in the plan that have a different approach.		Make clear what the alternative policies are.	N/A
----	----------	---	--	---	-----

- a. At the time of preparing our revision 3 Plan Breckland policies PD03-PD05 from December 2015 conflicted with Policy PD05A from September 2016, but none of them were adopted policies, and it was not clear which would go forward to examination. We simply stated that we took policy PD05A applied to our Plan rather than PD03-05, so the former was the "alternate" approach.
- b. In our revision 4 update Policy 1 will be based on Breckland's draft Reg. 19 Local Plan and this problem will no longer arise.

Agreed resolution / status: **NO LONGER APPLICABLE; SUPERSEDED BY THE UPDATED LOCAL PLAN. NO ACTION REQUIRED OTHER THAN ALIGNMENT WITH UPDATED LOCAL PLAN WHICH HAS BEEN DONE AT REV 4**

34	Policy 1	None of this policy is written in the form required to guide development.	See "Writing Planning Policies" http://mycommunity.org.uk/resources/writing-planning-policies/ Deconstructed policies http://www.ourneighbourhoodplanning.org.uk/storage/resources/documents/Deconstructed_planning_policies.pdf	Requires to be re-written as policy.	
----	----------	---	---	--------------------------------------	--

- a. We had studied the document "Writing Planning Policies" before preparing our revision 3 Plan, but as laymen found it generally not specific enough to greatly aid our understanding.
- b. We would greatly benefit from and appreciate if you could include in your comments at least one rewritten policy that maintains our intent but satisfies the required form, rather than simply requiring us to "try again".
- c. We note with interest the policy taken from Cuckfield's Neighbourhood Plan in the document "Deconstructed Planning Policies" includes restrictions on development and deems them acceptable as they are not blanket restrictions over the entire area. Our policies seek to do exactly the same, and so it is hard to understand why they are deemed as unacceptably controlling development. We seek clarity on this apparent difference of approach.
- d. We also note with interest that the quoted Cuckfield policy, held up to be a good example, makes reference to other policies in its wording, but you have advised us we must not do that. We seek clarity on this apparent difference of approach.
- d. We find it difficult to accept or agree that "none" of Policy 1 is acceptable.
- e. We recognise the necessity to reword policy 1 but seek more specific guidance before doing so in order to avoid making repeated abortive attempts at getting it right.

Agreed resolution / status: **DONE AT REV 4**

35	p16, P1.1 (Also applies below & to p17, P1.9)	There is only one emerging Local Plan. Also neighbourhood plan policy is "made", not adopted.	Accuracy	Amend as advised.	N/A
----	---	---	----------	-------------------	-----

a. At the time of submitting our revision 3 Plan there was both a "preferred" and "emerging" Local Plan. The way they were written meant in some instances both had to be considered in order to understand Breckland's policy, so our statements about this were correct at the time.

b. In our revision 4 update Policy 1 (and others) will refer to Breckland's draft Reg. 19 Local Plan and this problem will no longer arise.

Agreed resolution / status: **AMENDED AT REV 4**

36	p16/17, P1.2	Policies gain more weight as they are subjected to public consultation.	Accuracy	Amend as advised.	N/A
-----------	---------------------	--	-----------------	--------------------------	------------

a. We propose amending "...and hence its policies may not carry weight in planning decisions." to "...and until it is adopted its policies will not carry full weight in planning decisions, albeit they will gain more weight as each stage prior to adoption is passed."

Agreed resolution / status: **CLOSED**

Text in question deleted at Rev 4

37	p16, P1.3	All these policy references are now out of date.	Accuracy – See Reg.19 version of the emerging Local Plan.	Amend as advised.	
-----------	------------------	---	--	--------------------------	--

a. At the time of submitting our revision 3 Plan there was both a "preferred" and "emerging" Local Plan. The way they were written meant in some instances both had to be considered in order to understand Breckland's policy, so our statements about this were correct at the time.

b. In our revision 4 update Policy 1 (and others) will refer to Breckland's draft Reg. 19 Local Plan and this problem will no longer arise.

Agreed resolution / status: **DONE AT REV 4**

References throughout the Plan amended to align with the updated Local Plan

38	p17, P1.4	Local Plan polices can't be excluded unless there is clear evidence why this is the case.	Clarification.	Need to justify with alternative policies.	N/A
-----------	------------------	--	-----------------------	---	------------

a. At the time of submitting our revision 3 Plan policies in Breckland's preferred and emerging plans were in conflict but both versions of the plan needed to be considered together. hence it was essential to exclude the conflicting policies that we did not support.

b. In our revision 4 update Policy 1 will refer to Breckland's draft Reg. 19 Local Plan and this problem will no longer arise.

Agreed resolution / status: **NO LONGER APPLICABLE**

This situation does not arise at Rev 4, which aligns with the updated, single Local Plan

39	p17, P1.5	This appears to directly conflict with P1.4 – the former stating it is 'excluded', while the latter states it is to be 'adopted'.	Clarification.	Revise so consistent.	N/A
-----------	------------------	--	-----------------------	------------------------------	------------

a. This is an incorrect interpretation of the text. P1.4 excluded three policies from Breckland's December 2015 Local Plan; whereas 1.5 referred to the September 2016 Local Plan. The conflict was in Breckland's documents rather than ours , and we had no choice but to address that.

b. In our revision 4 update Policy 1 (and others) will refer to Breckland's draft Reg. 19 Local Plan and this problem will no longer arise.

Agreed resolution / status: **DONE AT REV 4**

Policy completely rewritten

40	p17, P1.6	Reference is made to "Proportionate share	Clarification – see policy	Policy needs to be revised to	
-----------	------------------	--	-----------------------------------	--------------------------------------	--

		<i>of the total rural allocation”, but there is no clarification regarding how it is to be implemented.</i>	writing guides above.	explain how this is to be implemented.	
<p>a. P1.6 defines "proportionate share..." as between one and ten new dwellings and para. 6.2.4 seeks to justify that.</p> <p>b. Furthermore P1.6 states development of the proportionate share will be allowed over the full plan period. We are unclear what else is required to explain implementation of the proportionate share, but we could add text to the effect "development that cumulatively with all other developments would exceed the defined proportionate share will not be allowed (supported)."</p> <p>c. This is a fundamental issue. It appears to us that Breckland regularly sets new housing allocations but then takes no measures to manage development within the limits of those allocations (recent experience in Watton is a perfect example of this). Our policy is trying to address that weakness in Breckland's approach.</p>					
Agreed resolution / status: DONE AT REV 4 Full calculations and implementation approach added					
41	p17, P1.7	There is no need for the settlement boundary to be included within the Neighbourhood Plan as it already forms part of the development plan for the area.	<i>Avoid duplication – there is little point in addressing issues that are already covered by the policies in your Local Plan”</i> Writing Planning Policies (Locality).	Delete as not required.	N/A
<p>a. The settlement boundary given in Breckland's draft Reg. 19 Local Plan differs from that in the September 2016 Reg. 18 version. Furthermore it is unclear if it corresponds with the adopted core strategy version since it is at a small scale. If you could provide us with the native file of both versions it would be helpful.</p> <p>b. The Reg. 19 version omits a rather large recently completed development, around which the boundary was previously extended in the September 2016 Reg. 18 version. We believe this to be a mistake on Breckland's part.</p> <p>c. We would not wish the noted development to remain outside the settlement boundary as that would set an undesirable precedent for future proposals outside the boundary. We respectfully request Breckland DC to correct this before making its Reg. 19 submission and inform of us of their decision in advance of that.</p>					
Agreed resolution / status: CLOSED. DONE AT REV 4					
42	p17/18, para 6.2.4 a)	The timetable for the preparation of the Local Plan is set out in supporting documentation and changes to plan policy are part of the normal plan preparation process. Also see comments re p16, Policy 1.	Local Development Schemes includes the timetable for the preparation of the Local Plan.	Comments should be reflected in the text.	N/A
<p>a. Breckland DC has already amended its timetable several times and its currently projected adoption date remains an estimate rather than a certainty.</p> <p>b. Whilst it is understood changes to policy are part of normal plan progression we cannot completely rely on what is stated in policy today becoming adopted policy.</p> <p>c. We would not wish to amend the wording of 6.2.4 (a) for the reasons stated.</p>					

d. If Breckland keeps to its published timetable and the Local Plan is adopted by April 2018 Policy 1 will no longer serve any purpose after that time and can then be deleted in its entirety.

Agreed resolution / status: **DONE AT REV 4**
 Text at Rev 4 reflects the latest publicly available estimate from Breckland Council as to when its Local Plan will be adopted, but also reflects the possibility that date may change

43	p18, para 6.2.4 d)	Please note: None of this currently applies as the five year housing supply is not currently being met; therefore it is difficult to refuse any development.		N/A	N/A
----	--------------------	---	--	-----	-----

a. We are frankly shocked at this comment. To our understanding of the NPPF at any time when a Council cannot demonstrate a five year housing supply its planning policies should not be considered up to date, but we do not believe policies are intended to be completely disregarded in such cases. However following comment 43 to its logical conclusion we are wasting our time preparing a Plan. We do not accept such a conclusion.

b. The Government's Planning Policy Guidance states "Where the local planning authority cannot demonstrate a 5-year supply of deliverable housing sites, decision makers may still give weight to relevant policies in the emerging neighbourhood plan, even though these policies should not be considered up-to-date."

c. Saham Toney's Plan runs to 2036 and must be robust for those periods when Breckland can show a five year housing supply, rather than those when it cannot.

d. It is entirely Breckland's responsibility to ensure a five year housing supply in the district. Were we allowed to do so (which we know we are not) we would happily show a five year supply in Saham Toney since that would equate to about two houses.

e. We rely on Breckland to ensure a five year supply throughout the period of its Local Plan, such that development can be refused where it fails to comply with policies.

f. We will update 6.2.4 (d) to reflect the fact that the draft Reg. 19 Local Plans start date for the allocation of new housing is March 2017, rather than April 2015, as it was in the Reg. 18 version, but we do not agree this paragraph does not apply and will not amend it for the reason stated in the comment.

Agreed resolution / status: **NOT AGREED. NOTHING AMENDED IN THIS RESPECT**
 A Neighbourhood Plan is not required to address such a situation

44	p19, Map 4	Map is not required (also see comments re p17, P1.7).	The boundary already appears in a development plan. See comments above re Duplication of policy.	Delete as not required.	N/A
----	------------	--	---	--------------------------------	-----

a. The settlement boundary given in Breckland's draft Reg. 19 Local Plan differs from that in the September 2016 Reg. 18 version. Furthermore it is unclear if it corresponds with the adopted core strategy version.

b. The Reg. 19 version omits a rather large recently completed development, around which the boundary was previously extended in the September 2016 Reg. 18 version. We believe this to be a mistake on Breckland's part.

c. We would not wish the noted development to remain outside the settlement boundary as that would set an undesirable precedent for future proposals outside the boundary. We respectfully request Breckland DC to correct this before making its Reg. 19 submission and inform of us of their decision in advance of that.

Agreed resolution / status: **DELETED AT REV 4**

45	p20, Policy 2	This policy needs to be clearly justified and key evidence is missing e.g. planning applications in this area.	See Yaxham and Mattishall Examiners Reports regarding this issue.	Delete map and just retain an amended policy, unless more specific evidence can be provided.	
<p>a. While they may form a minor part of evidence for the policy, we do not accept that current or recent planning applications should be a consideration when assessing this policy, since the Plan will be in force till 2036, and we seek this measure of protection throughout that period, not just for the immediate future, and not only based on current trends.</p> <p>b. Without a map this policy will be very difficult to understand and impossible to enforce. Also given that the made Yaxham Plan includes a map, clearly the inclusion of such a map must be deemed acceptable by that precedent.</p> <p>c. We have previously indicated our willingness to provide more evidence where required, either at Reg. 14 or Reg. 16 submission, but require more precise guidance on what such evidence should comprise.</p> <p>d. We note the draft Reg. 19 Local Plan now includes policies that support the prevention of settlement coalescence, but also that they make no specific definition of the location and extent of gaps that seek to achieve that. Thus it is left to a Neighbourhood Plan to provide that definition.</p>					
<p>Agreed resolution / status: NOT AGREED Breckland Planning to clarify specifically what evidence it requires. In any case the map will be retained as it is the only rational way to define the area of the strategic gap</p>					
46	p20, P2.3 a)	Local Plan reference needs to be amended.	Accuracy	Amend as advised.	N/A
<p>a. Agreed though we respectfully point out we worked to what was available when submitting our revision 3 version.</p>					
<p>Agreed resolution / status: DONE AT REV 4</p>					
47	p20, P2.3 g)	This is too restrictive; particularly as the five year housing supply is not being met.	Looks like a means to restrict development.	Remove, as already addressed in other policies.	N/A
<p>a. Regarding the comment's reference to five year housing supply please see response items (b) - (e) to comment 43. For the reasons stated in those items we do not agree a policy should be judged on the (temporary) situation with respect to a five year housing supply at any given time.</p> <p>b. We are restricting development in a very limited area, not as a blanket policy, and in the context of Breckland's small housing allocation to Saham Toney. We believe this must be allowed since similar localised restrictions have been accepted in other made Plans.</p> <p>c. Protection of a specific gap area is not already addressed in other policies.</p> <p>d. Breckland's draft Reg. 19 Local Plan promotes the avoidance of coalescence of settlements. The criteria in P2.3 simply define how that district policy will be applied in Saham Toney.</p>					
<p>Agreed resolution / status: NOT AGREED District Councils not Neighbourhood Plans, must address five year housing supply The Policy does not restrict sustainable development in teh overall Neighbourhood Area in accordance with the emerging local Plan</p>					
48	p20, P2.3 f)	Not 'all' other policies in the Neighbourhood Plan maybe relevant.	Clarification	Replace 'all' with 'relevant'.	
<p>a. We do not agree with this change. The word "relevant" is open to interpretation and hence not robust enough.</p>					

b. In its draft Reg. 19 Local Plan, in Policies HOU 04 and 05 (relevant examples since they apply to Saham Toney), Breckland states "subject to being supported by other policies within the Local Plan* (* with the exception of Policy GEN 05 Settlement Boundaries)". There is no use of the word "relevant". We will not consider nor implement suggested changes that Breckland DC does not implement in its own Local Plan.

c. We would agree to change "all other policies" to "all other policies, except where a developer can objectively show a particular policy, or policies, to not be relevant."

Agreed resolution / status: **DONE AT REV 4 WHERE WE DEEM APPROPRIATE AMENDED AT REV 4 TO "ALL RELEVANT "**

49	p20, P2.4	The text above is not phrased in a manner to make all the criteria apply.	Formatting	Need to include "and" after last, but one criteria.	N/A
-----------	------------------	--	-------------------	--	------------

a. We disagree since 2.4 clearly states "each of the seven criteria in P2.3", but are willing to add the word "and" as proposed to reinforce that.

Agreed resolution / status: **DONE AS COMMENT RESPONSE AT REV 4**

50	P2.4	Use of term "incontrovertible" is very subjective. Also what type of harm is being referred to?	Clarification	Requires rewording in light of comments.	
-----------	-------------	--	----------------------	---	--

a. The Oxford English Dictionary defines "incontrovertible " as "Not able to be denied or disputed." That definition is very precise and so we cannot agree it is a subjective term and do not agree to change it.

b. The term "harm" is used in various policies of Breckland's draft Reg. 19 Local Plan without explanation of what type of "harm" it refers to. Most relevantly Policy HOU 05 requires that a "proposal does not harm or significantly undermine a visually important gap", without additional justification for that text. We fail to understand why terminology acceptable in Breckland's own policy is not considered acceptable in our Plan.

c. We do not accept a need to reword this item without further justification from Breckland.

Agreed resolution / status: **DONE AT REV 4**

51	P2.4	Also it would not be possible to implement the section requiring community support prior to approval for an individual planning application.	The responsibility for making decisions on planning applications lies with Breckland Council.	As above.	N/A
-----------	-------------	---	--	------------------	------------

a. We refer to item 3 of Policy HOU 04 of Breckland's draft Reg. 19 Local Plan, which specifically applies to Saham Toney as "a rural settlement with boundary" and the explanation in that policy's reasoned justification concerning how it may be demonstrated that a proposal will provide a significant community benefit (item 3.22). That among other things states that evidence could comprise "robust surveys of local opinion prepared independently."

b. We wrote our requirement for community approval in Policy 2 at a time when Breckland's earlier policy only required proposals outside of settlement boundaries to demonstrate local support without defining how that was to be achieved.

c. We are pleased to see that Breckland's revised policy addresses this issue more forcibly, but still wish to define precisely how we expect this element of policy to be applied in Saham Toney.

d. Since Breckland's policy requires robust surveys of local opinion such surveys must be deemed practical and achievable, so we do not agree our policy would be impossible

nor unreasonable to implement in this respect.

e. Subject to further discussion we may be willing to slightly amend our wording but not in a wholesale manner, nor such that it takes some element of control (in line with the District policy) away from the local community.

f. We agree that Breckland Council is responsible for making decisions on planning applications and have not sought to circumvent that. Breckland's own policy dictates that it will give weight to local opinion in reaching its decision and only allows development that among other things satisfies its policy item 3.

Agreed resolution / status: **NOT AGREED**
 Breckland Council adopts a similar approach in Policy HOU 04 of the emerging Local Plan

52	p20, P2.5	What is the justification for the 2000m requirement?	Evidence required.	Need to justify.	N/A
-----------	------------------	---	---------------------------	-------------------------	------------

a. The requirement is 200m rather than 2000m.

b. We have previously indicated our willingness to provide more evidence where required, either at the Reg. 14 or Reg. 16 submission, but require more precise guidance on what such evidence should comprise.

c. Breckland's draft Reg. 19 Local Plan seeks to avoid the coalescence of settlements but criteria for that is missing / vague. In order to be implemented more specific criteria are required and that's what Policy 2 aims to provide. We are willing to discuss and possibly amend the precise extent of the land specified in P2.5, but not willing to drop the principle of such a strip of land.

Agreed resolution / status: **PENDING STNP** await Breckland Planning guidance on specific evidence required

53	p20, para 6.2.5 a)	This statement about evidence needs to be qualified.	Evidence required.	Need to make clear how many supported this view and at what event.	N/A
-----------	---------------------------	---	---------------------------	---	------------

a. We will add information on how many supported this and at which consultation(s), albeit that is already given in chart 4.9c. We will subsequently further rely on responses to our Reg 14 consultation 14 questionnaire on this policy.

b. While we are willing to add this information we question whether it would be more appropriate to do so in our Consultation Statement at the Reg. 16 stage?

Agreed resolution / status: **DONE AT REV 4**

54	p21, para 6.2.5 c)	Some of the latter evidence needs to be qualified.	Clarification	As above.	
-----------	---------------------------	---	----------------------	------------------	--

a. Please advise more precisely what is required?

Agreed resolution / status: **DONE AT REV 4 as best we can without further BDC guidance**

55	p21, para 6.2.5 d) –m)	Spacing in these sections is narrower than the rest of the page.	Consistency	Amend to be consistent with the rest of the page. Also see comments above.	
-----------	-------------------------------	---	--------------------	---	--

a. We will check and reformat text to a consistent setting where necessary, but in the stated example we can find no difference in settings in our Word original.

Agreed resolution / status: **DONE AT REV 4**

56	p21, para 6.2.5 e)	If the area has already been identified as <i>"highly sensitive to development"</i> , this does not make it clear why special protection is required? Is this not addressed in the new Reg.19 Local Plan.	Clarification	Further justification is required.	
-----------	--------------------	---	---------------	------------------------------------	--

- a. Experience has taught us that Breckland Council does not protect areas that are "highly sensitive to development" against development. Almost all recent development in Saham Toney has been in such areas and outside of the settlement boundary. Hence there is a clear need for additional special protection.
- b. Policy ENV 05 of Breckland's draft Reg. 19 Local Plan states "Release of land in Breckland will have regard to the findings of the Council's Landscape Character Assessment (LCA) and Settlement Fringe Landscape Assessment to ensure land is only released in areas where the impact on the landscape is minimal." Having regard to those documents is not the same as providing specific protection.

Agreed resolution / status: **DONE AT REV 4**

57	p21, para 6.2.5 i)	This does not explain how the Policy "strengthens & reinforces District Polices...."	Evidence	Further justification is required.	
-----------	--------------------	--	----------	------------------------------------	--

- a. We will provide further justification for item (i).

Agreed resolution / status: **DONE AT REV 4**

58	p21, para 6.2.5 l)	This is a statement and does not explain the significance of the strategic gap beginning outside the settlement boundary.	Clarity	Further justification is required or delete.	
-----------	--------------------	---	---------	--	--

- a. We will provide further justification for item (l).

Agreed resolution / status: **DELETED AT REV 4**

59	p22, Policy 3	See comments (24 & 26) re p13, para 5.1 and 5.2.1. H2 & H3			
-----------	---------------	--	--	--	--

- a. Please see our response to comments 24 and 26.

Agreed resolution / status: **NOT AGREED**. At meeting of STNP and Breckland Planning 22Sept2017 Breckland Head of Planning stated "Policies can be restrictive, but in that case need more evidence". We have provided such evidence

60	p22, P3.1	Also see previous comments (24 & 26) re Section 5 re scale and phasing.			
-----------	-----------	---	--	--	--

- a. Please see our response to comments 24 and 26.
- b. This comment is an immediate repeat of the previous one (No. 59). It appears the intention is to falsely maximise the number of negative comments to strengthen Breckland's case against our Plan.

Agreed resolution / status: **NOT AGREED**. At meeting of STNP and Breckland Planning 22Sept2017 Breckland Head of Planning stated "Policies can be restrictive, but in that case need more evidence". We have provided such evidence

61	P22, P3.2	The Parish Council are already consulted as a Statutory Consultee on all relevant planning applications. Who is the discussion with the Parish Council to be with and who will provide the resources to enable this to occur?	See Statement of Community Involvement (2017) re Breckland Council consultation.	Clarification required.	
-----------	------------------	--	---	--------------------------------	--

- a. The intent of this paragraph was to encourage (voluntary) discussion with the Parish Council prior to an application being made to Breckland District Council, on the basis it would be better for all concerned for already supported applications to then go forward.
- b. We think this remains a good idea that does not impinge on the subsequent application consultation process, and does not place any unwarranted obligation on applicants but will reword it to make the intention clear.

Agreed resolution / status: **CLARIFIED AT REV 4**

62	p23, P3.3/4	Not 'all' other policies in the Neighbourhood Plan maybe relevant.	Clarification	Replace 'all' with 'relevant'.	
-----------	--------------------	---	----------------------	---------------------------------------	--

- a. We do not agree with this change. The word "relevant" is open to interpretation and hence not robust enough.
- b. We would agree to change "all other policies" to "all other policies, except where a developer can objectively show a particular policy, or policies, to not be relevant."
- c. See also our response to comment 48.

Agreed resolution / status: **UPDATED WHERE APPROPRIATE AT REV 4**

63	p23, P3.3/ 4	The emerging Local Plan does not identify enough smaller sites (of the size set out in the aspirations of the NP) and therefore it would be difficult to see how the plan would either support the strategic needs set out in the Local plan or plan positively to support local development.	In line with Paragraph 16 of the NPPF, neighbourhood plans should support the strategic needs set out in the Local Plan and plan positively to support local development.	Delete policy or provide further evidence for the size of sites being proposed.	
-----------	---------------------	--	--	--	--

- a. We have no control over what sites the emerging Local Plan does or does not identify and should not be criticised for a failing on Breckland's part in this respect.
- b. The strategic need set out in the emerging Local Plan as it relates to Saham Toney is for the parish, along with seventeen others, to be allocated 150 new dwellings between March 2017 and 2036. Please define which strategic need(s) we have failed to comply with.
- c. In Policy 1 we have defined Saham Toney's proportionate share of the overall allocation to all rural settlements with boundaries and demonstrated how that share is reasonable and justified since it more than exceeds one eighteenth of 150.
- d. Breckland Council repeatedly revises its housing allocation upwards and we are unable to second guess what changes may be introduced later than the time of updating our plan. In Breckland's Reg. 18 Local Plan eighteen new dwellings approved after 01 April 2015 formed part of Saham Toney's allocation. Now in the draft Reg. 19 Local Plan Breckland has "wiped the slate clean" and no longer counts those eighteen dwellings as part of the housing target till 2036. Although we cannot argue against it, this information was not available to us at the time of submitting our revision 3 Plan, but will be taken into account at the revision 4 update.
- e. Regardless of point (d) we will continue to define a proportionate share of the overall rural settlement with boundaries and ensure that value exceeds 1/18 of the total.
- f. Since Breckland Council makes no specific definition of housing allocation to Saham Toney, we must do so in our policies. Without such definition, taken to the extreme all 150 new dwellings could be developed in Saham Toney and none in the other seventeen rural settlements. We cannot agree to a watering down of our policy in a way that would make such a situation possible.
- g. We are fully aware of and in support of the latest strategic needs regarding housing allocations as set out in the Local Plan and will continue to match or exceed those needs. Therefore other than likely revisions noted in the points above we do not agree to amend our policy in this respect.
- h. If the above explanation by reference to the existing policy wording is deemed insufficient we are willing to provide more evidence, but will first require more specific guidance about what such evidence must comprise.

Agreed resolution / status: **NOT AGREED**

Policy is completely in accordance with Policy HOU 04 of the emerging Local Plan in this respect

64	Policies	The new Reg.19 version Local Plan has a new set of policy references which are different from the latest emerging Reg.18 version.		All policy references that refer the latest Reg.18 Local Plan now need to refer to the new references in the Reg.19 version.	
----	----------	---	--	--	--

- a. We are fully aware of the updated version of the Local Plan and will amend references accordingly in the revision 4 update of our plan.
- b. We respectfully point out that the updated Local Plan was not available at the time we submitted our revision 3 version for review, so we find it harsh and rather condescending to receive so many comments for not referring to it. One such comment would have been sufficient as a reminder.

Agreed resolution / status: **ENTIRE PLAN UPDATED IN THIS RESPECT AT REV 4**

65	Policies	There is concern about duplicating other Neighbourhood Plan policies; therefore it would be a valuable exercise to see how the latest Local Plan policies compare to the consultation evidence, to evaluate			N/A
----	----------	---	--	--	-----

		whether additional policies are required.			
<p>a. We are not clear what other Neighbourhood Plan policies you are referring to. Vague comments such as this are unhelpful. Does this refer to other policies in our Plan or another community's plan?</p> <p>b. Please provide specific comments as to which of our policies are unacceptable by virtue of being duplications, and why.</p> <p>c. We have not duplicated any other Plan's policy verbatim. We consider if a policy in another made Plan applies to us, it is not unreasonable to use some elements of it and adapt them appropriately in our Plan.</p> <p>d. It is unreasonable to expect us to undertake the suggested comparison exercise proposed. We are non-professionals working voluntarily to assist our community. The task you suggest is one for any of the many professional organisations making money from neighbourhood planning to carry out and advise neighbourhood groups of the result. Additionally Breckland Planning should be able to advise us on this aspect with regard to other plans prepared in the district.</p>					
<p>Agreed resolution / status: NOT AGREED Comparison of Neighbourhood Plans is an exercise for Breckland Council not STNP All Rev 4 STNP policies align with the updated Local Plan</p>					
66	Whole Plan	It would useful to have a summary list of all the 17 planning policies and the 7 Parish Action Points. A glossary would also be very useful.			N/A
<p>a. A summary list of policies is given in 6.2.2. We do not agree to add another such list.</p> <p>b. A summary list of parish action points is given in 7.4. We do not agree to add another such list.</p> <p>c. We did consider a glossary but felt there were very terms, if any, that required explanation. Please provide a specific list of terms which either you don't understand, or consider others may not understand, and when we see it we will reconsider if there is a need for a glossary. We don't commit to provide one.</p>					
<p>Agreed resolution / status: COMPLETE: POLICIES ARE LISTED IN THE TABLE OF CONTENTS AT REV 4</p>					
67	p23, para 6.2.5 b)	This statement about consultation evidence needs to be qualified.	Evidence required.	Need to make clear how many supported this view and by what means.	N/A
<p>a. There is no mention of "consultation evidence" in 6.2.5 (b) We presume you mean item (c) and respond accordingly.</p> <p>b. As already stated in 6.2.5 (c) in response to 3 questionnaires we received 59 specific requests to keep Saham Toney separate from Watton. We do not understand why that is not clear enough.</p> <p>c. Please be specific about what further qualification of this point is required. We understood that detailed information about consultation results belongs in a Consultation Statement rather than the Plan.</p> <p>d. We cannot address this comment further without more specific information.</p>					
<p>Agreed resolution / status: NO ACTION REQUIRED. SUCH EVIDENCE WAS ALREADY INCLUDED AT REV 3</p>					
68	p23, para 6.2.5 c)	See comments (26) re p13, para 5.1 and 5.2.1. H2 & H3 re gradual and small scale development.			N/A

a. We assume you are actually referring to 6.2.6 (c). If so, see our responses to comments 24 and 26. If not please clarify.					
Agreed resolution / status: NOT AGREED . At meeting of STNP and Breckland Planning 22Sept2017 Breckland Head of Planning stated "Policies can be restrictive, but in that case need more evidence". We have provided such evidence					
69	p23, para 6.2.5 e)	The adopted plan is the Local Development Framework, not the Local Plan. Also	Terminology	Amend as advised.	N/A
a. There is no reference to the Local Plan in 6.2.6 (e) . Please advise what this comment refers to.					
b. The final word "Also" of this comment is spurious.					
Agreed resolution / status: NO ACTION TAKEN: COMMENT DOES NOT MAKE SENSE AND REQUESTED CLARIFICATION WAS NOT PROVIDED BY BRECKLAND					
70	p24, para 6.2.5 f)	See comments (61) re p22, P3.2 re consultation.			N/A
a. We assume you are actually referring to 6.2.6 (f). If so see our response to comment 61.					
Agreed resolution / status: CLARIFIED AT REV 4					
71	p24, P4.2	See comments (61) re p22, P3.2 re consultation.			N/A
a. See our response to comment 61.					
Agreed resolution / status: CLARIFIED AT REV 4					
72	p24, P4.3	See comments (62) re p23, P3.3/4 re all policies.			N/A
a. See our response to comments 48 and 62.					
Agreed resolution / status: UPDATED WHERE APPROPRIATE AT REV 4					
73	P24, P4.3	This also needs to be worded more positively.	<i>'Neighbourhood plans should reflect these policies (Local Plan) and neighbourhoods should plan positively to support them'. Para 184 NPPF.</i>	Amend policy wording to conform to national guidance.	N/A
a. Please explain what "more positively" actually means.					
b. Policy 4 includes the statement "Within the settlement boundary development which complies with all other relevant District...policies will normally be supported." Please explain how this can be considered negatively or how it does not reflect the Local Plan.					
c. In the draft Reg. 19 Local Plan Policy GEN 05 it is stated "Outside the defined settlement boundaries, development is restricted to preserve the countryside. Development outside the settlement boundaries will only be acceptable where it is compliant with one or more of the following policies...". The list that follows includes policies HOU 04 and					

05 which apply to the Saham Toney Neighbourhood Area. We fail to understand how Policy 4 is in any way less positive than this since we have also listed other policies in our plan that must be adhered to.

d. We note with great interest Breckland's use of the word "restricted" in its policy GEN 05 and refer Breckland Planning to that when commenting on our policies being too restrictive.

e. Policy HOU 04 of the draft Reg. 19 Local Plan, which applies to Saham Toney, presents no criteria for development within a settlement boundary. We consider this a glaring error, and do not accept that uncontrolled development must be allowed within a settlement boundary.

f. Respectfully perhaps Breckland DC would benefit by spending more time improving its own policies rather than criticising ours.

Agreed resolution / status: **DONE AT REV 4**

74	Criteria f)	This would not apply to <i>"rural exception sites"</i> .	NPPF - glossary	This should be acknowledged in the policy.	
-----------	-------------	--	-----------------	--	--

a. Agreed. Will be updated at revision 4

Agreed resolution / status: **DONE AT REV 4**

75	p24, P4.4	See comments (51?) re p24, P2.4 re prior approval. There are already Local Plan Policies that address this issue, so why are additional policies required?			N/A
-----------	-----------	--	--	--	-----

a. There is no P2.4 on page 24. We assume you mean page 20. Please confirm. If so please see our response to comment 51

Agreed resolution / status: **NOT AGREED**. At meeting of STNP and Breckland Planning 22Sept2017 Breckland Head of Planning stated "Policies can be restrictive, but in that case need more evidence". We have provided such evidence

76	p24, para 6.2.7 a)	See previous comments (24 and 26) re small scale development.			N/A
-----------	--------------------	---	--	--	-----

a. See our responses to comments 24 and 26

Agreed resolution / status: **NOT AGREED**. At meeting of STNP and Breckland Planning 22Sept2017 Breckland Head of Planning stated "Policies can be restrictive, but in that case need more evidence". We have provided such evidence

77	p24, para 6.2.7 b)	See previous comments (51) re P2.4 re prior approval.			N/A
-----------	--------------------	---	--	--	-----

a. You have misunderstood this point. See our response to comment 51.

Agreed resolution / status: **DONE AT REV 4 Rewritten to clarify intent**

78	p25, Policy 5, P5.2	This density figure could be viewed as being very restrictive and not complying with the Strategic polices of the adopted	<i>"...housing density to reflect local circumstances"</i> Para 47 NPPF.	Take a more flexible approach to this issue e.g. density to reflect the range in the local	N/A
-----------	---------------------	---	---	--	-----

		development plan.		environment.	
<p>a. Breckland's draft Reg. 19 Plan states in Policy HOU 06 "In rural locations...proposals for lower density development will be supported where it can be demonstrated that is justified having regard to local character..."</p> <p>b. The onus to demonstrate that rests with a developer not Saham Toney parish council.</p> <p>c. We have simply specified an acceptable figure to aid developers make such demonstration.</p> <p>d. In the made Yaxham Plan, Policy HOU 02 a density of "approximately 20" is specified without further justification.</p> <p>e. We consider it unreasonable to treat Saham Toney differently to the draft local Plan and a made plan in the district.</p>					
Agreed resolution / status: DONE AT REV 4 A more flexible approach has been adopted which evidence shows to be justified					
79	p25, para 6.2.8	This statement about consultation evidence needs to be qualified.	Evidence required.	Need to make clear how many supported this view and by what means.	N/A
<p>a. We understood such evidence belongs in our Consultation Statement, which Breckland Planning is aware is not yet written. Must we repeat the consultation statement in the Plan? Please clarify.</p>					
Agreed resolution / status: DONE AT REV 4					
80		The justification/evidence for the density figure provided policy is missing.	Evidence required.	Provide evidence for the figure in the policy.	N/A
<p>a. We are willing to provide evidence, but first please advise what would constitute acceptable evidence.</p>					
Agreed resolution / status: DONE AT REV 4 A more flexible approach has been adopted which evidence shows to be justified					
81	p25, Policy 6, P6.2	The definition would be better placed in a glossary in the plan.	Policy wording.	Amend as advised.	N/A
<p>a. We do not yet see a need for a glossary (see response to comment 66).</p> <p>b. Even if we introduce a glossary, we do not agree with moving P6.2 to another section of the Plan. Since only policies have legal force we consider it must remain in the Policy text.</p> <p>C Comment rejected.</p>					
Agreed resolution / status: NO ACTION A glossary is not required for one definition					
82	p25, Policy 6, P6.3	See previous comments (24 and 26) re small scale development.			N/A
<p>a. See our responses to comments 24 and 26</p>					
Agreed resolution / status: NOT AGREED. At meeting of STNP and Breckland Planning 22Sept2017 Breckland Head of Planning stated "Policies can be restrictive, but in that case need more evidence". We have provided such evidence					

83		See comments (62) re p23, P3.3/4 on 'all' policies.			N/A
a. See our response to comments 48 and 62					
Agreed resolution / status: DONE AT REV 4					
84	p25, Policy 6, P6.4	What type of 'public nuisance' is being referred to?	Clarification	Clarify in a glossary.	N/A
a. We will clarify this to explain that it refers to any form of nuisance arising / that previously arose from the pre-existing use of the site.					
Agreed resolution / status: DONE AT REV 4					
85	p25, Policy 6, P6.5	This too restrictive and could not be implemented.	Impact on sustainable development.	The issue of flooding can be addressed by on site mitigation e.g. SuDS	N/A
a. With respect, unless we are mistaken, only an specialist engineer is qualified to decide the effectiveness of a SuDS solution.					
b. SuDS solutions do not work when groundwater is inundated, as regularly occurs in Saham Toney.					
c. We disagree this is restrictive. The logical alternate is to accept greater flood risk which would clearly contravene national planning policy.					
d. Implementation will be straightforward as a developer would be able to show compliance in a flood risk assessment, or even more readily in a very simple calculation of the area of hard surfaces before and after the proposed development.					
Agreed resolution / status: NOT AGREED Our Policy is in line with Local Water Authority guidance					
86	p25, para 6.2.9	This statement about consultation evidence needs to be qualified.	Evidence required.	Need to make clear how many supported this view and by what means.	N/A
a. We understood such evidence belongs in our Consultation Statement, which Breckland Planning is aware is not yet written. Must we repeat the consultation statement in the Plan? Please clarify.					
b. It is clear government policy to promote brownfield site development ahead of greenfield, and indeed Breckland DC is required to keep a register of all brownfield sites in the district as part of that policy. Are we expected to justify government policy?					
Agreed resolution / status: DONE AT REV 4					
87	p25, Policy 7, P7.4	Reference to Building for Life 12 assessment is no longer government policy. For it to apply to all development it may affect its viability.	"Plans should be deliverable". Para 173 NPPF. Reference to this was removed by the examiner for the Mattishall Plan.	Have qualifying criteria in the policy regarding design and viability.	N/A
a. Please advise what you propose takes the place of Building For Life 12 if we are not to refer to it.					

- b. Please advise which specific government policy forbids reference to Building For Life 12.
- c. Please explain why the made Yaxham plan, Policy HOU 06 makes reference to Building For Life 12 if that is not allowed, and why it is considered Saham Toney should be assessed differently from Yaxham.
- d. Please provide us with a copy of the Mattishall's examiner's report since Breckland DC has not uploaded it to its site.

Agreed resolution / status: **NOT AGREED** Building For Life is included in teh Government White Paper "Fixing Our Broken Housing Market" and was accepted at examination of the Yaxham Plan

88	p26, P7.5 a), b), c), d), e), f), & h).	All these criteria could be viewed as too restrictive and in turn affect viability.	Plans should have ' <i>...sufficient flexibility to adapt to rapid change...</i> ', Para 14 NPPF.	Replace 'shall' with 'should'.	N/A
-----------	---	---	---	--------------------------------	-----

- a. Policies have legal force.
- b. The word "should" means a clause cannot be enforced in law since it leaves a matter open to choice.
- c. By changing "shall" to "should" it would completely neuter the policy.
- d. There is plenty of flexibility in what we have specified.
- e. This policy applies to good housing design and has nothing to do with "rapid change". That appears to be a smokescreen to get us to water down our policy.

Agreed resolution / status: **NOT AGREED** Our criteria are completely flexible

89	P7.5 b)	This also needs to be worded more positively.	<i>'Neighbourhood plans should reflect these policies (Local Plan) and neighbourhoods should plan positively to support them'</i> . Para 184 NPPF.	Have a qualifying criteria to outline when this would be considered appropriate.	
-----------	----------------	---	--	--	--

- a. We cannot begin to understand how point (b) limiting new housing to two storeys, can be considered negative. Should we allow tower blocks in the village in order to be positive?
- b. Detailed and specific information would be required as to why point (b) contravenes national or district policy before we would consider any revision.

Agreed resolution / status: **DONE AT REV 4**

90	p26, P7.6	Not clear how this could be implemented when applications are judged on their individual merit, not in comparison to one another.	Planning practise.	Amend to state that it will be supported.	N/A
-----------	-----------	---	--------------------	---	-----

- a. It is unclear why the Local Plan may specify requirements for design but our Plan is only allowed to support criteria. There is a very big difference between "required to meet" and "will be supported".
- b. National policy encourages the use of renewable energy sources and the UK is committed by international treaty to reducing carbon emissions dramatically. Presumably

planning practice should be updated to reflect that rather than our policy watered down.

Agreed resolution / status: **REMOVED AT REV 4**

91	p26, P7.7	The emerging Local Plan sets a minimum standard of two per dwelling. No sufficient evidence has been provided to reduce this.	Reference to this was removed by the examiner for the Yaxham Plan.	Delete or provide additional evidence.	N/A
-----------	------------------	--	---	---	------------

- a. The Reg. 18 Local Plan on which our Plan is based did not give such criteria.
- b. The draft Reg. 19 Local Plan gives the criteria in a table impossible for anyone outside the Council to understand since it defines requirements against codes which are not defined. Please provide the definitions for the codes used in the Council's latest parking criteria.
- c. Once we have seen the Council's evidence we will agree to this amendment and increase the parking requirement.

Agreed resolution / status: **DONE AT REV 4**

92	p26, para 6.2.10	The evidence for why there is a need for the Building for Life 12 assessment is missing.	Evidence required.	Provide evidence for the need for the assessment.	N/A
-----------	-------------------------	---	---------------------------	--	------------

- a. What specific evidence is required?
Yaxham's made Plan includes the same reference without providing additional evidence. Please explain why more onerous requirements are being made of Saham Toney.

Agreed resolution / status: **DONE AT REV 4**

93	p26, para 6.2.10 b)	There seems to be a misunderstanding about the previous comments.		To be discussed at meeting.	N/A
-----------	----------------------------	--	--	------------------------------------	------------

- a. Agreed to be discussed if time allows. However this is not our priority for discussion at the first meeting.

Agreed resolution / status: **Addressed at REV 4 although BDC provided no extra information**

94	p27, Policy 8, P8.2	This is a negative and restrictive approach on the issue and new development needs to meet building standards.	Policy wording	Use policy wording which will reduce the impact.	N/A
-----------	----------------------------	---	-----------------------	---	------------

- a. We cannot accept this comment. Saham Toney has almost no street lighting at present and none at all on the main routes through the parish. To specify that the dark skies must be maintained is perfectly reasonable, especially as we have given an option for lighting new developments without spoiling our dark skies.
- b. While dark skies may be an irrelevance to planners and something that if destroyed and lost forever is not a matter of regret, but the same cannot be said of Saham Toney residents.
- c. We have seen a number of other made plans with dark skies policies, including Yaxham's, so the precedent exists for such a policy.
- d. We do not believe building standards require street lighting. If they do recent developments in Saham Toney are non-compliant.
- e. neighbourhood Plans are said to be a means for a community to say what it wants (and does not want). It would seem in reality planners feel free to trample all over community wishes.

f. We have been unable to find a UK building standard or regulation that imposes a requirement for there to be street lighting of new developments. Please provide the reference for the standard referred to.

Agreed resolution / status: **NOT AGREED**. Extensive evidence added at REV 4

95		Also see comments (49) re p20, P2.4 re prior approval.			
-----------	--	--	--	--	--

a. The cross-referenced comment, which we can only assume to be No. 49, includes text that is not used in any way in Policy 8, so we cannot understand the relevance of this comment. Please clarify its meaning.

Agreed resolution / status: **NOT AGREED. COMMENT IS NOT RELEVANT TO THE TEXT IT REFERS TO**

96	p27, para 6.2.11 a)	This statement about consultation evidence needs to be qualified.	Evidence required.	Need to make clear how many supported this view and by what means.	N/A
-----------	------------------------	---	--------------------	--	-----

a. We understood such evidence belongs in our Consultation Statement, which Breckland Planning is aware is not yet written. Must we repeat the consultation statement in the Plan? Please clarify.

Agreed resolution / status: **DONE AT REV 4**

97	p27, para 6.2.11 b)	This statement about consultation evidence needs to be qualified.	Evidence required.	Need to make clear how many supported this view and by what means.	N/A
-----------	------------------------	---	--------------------	--	-----

a. We understood such evidence belongs in our Consultation Statement, which Breckland Planning is aware is not yet written. Must we repeat the consultation statement in the Plan? Please clarify.

Agreed resolution / status: **DONE AT REV 4**

98	p27/8, Policy 9, P9.2-6	These are statements, not policy.	Wording	Move to text.	N/A
-----------	----------------------------	-----------------------------------	---------	---------------	-----

a. Only a policy has legal force. Without inclusion of at least some of these points in the policy text (the policy map, definition of which assets the policy applies to, as examples) the policy will not make sense and the removed text may be ignored. We do not understand how our policy can effectively be applied in such a circumstance.
b. More specific justification is needed for this change. Simply noting "wording" is not a justification.

Agreed resolution / status: **DONE AT REV 4**

99	p28, P9.8	See comments (51) re p20, P2.4 re prior approval.			N/A
-----------	-----------	---	--	--	-----

a. Comment 51 refers to a need for developers to demonstrate at least 51% parishioner support for certain aspects of a proposal. Neither P9.8 nor any other clause of Policy 9 specifies such a requirement. Hence we cannot understand how comment 51 applies in this case. Please clarify.

Agreed resolution / status: **DONE AT REV 4** Rewritten to match the approach in the emerging Local Plan

100	p28, P9.10	Breckland have no plans to do this as it should only be done in “exceptional circumstances” and it is not clear why this is wanted.	Planning guidance & clarification https://historicengland.org.uk/advice/hpg/historic-environment/article4directions/		N/A
<p>a. This is outright refusal without any discussion.</p> <p>b. We think the comment is unnecessarily aggressive given that we only wrote "subject to agreement" and "this Policy proposes".</p> <p>c. Where demands are made to delete a policy clause a reasonable alternate should be proposed to maintain the intent of the policy, as part of the guidance the Council is obliged by law to give us.</p> <p>d. Breckland's stance on this matter is too restrictive on community rights.</p>					
Agreed resolution / status: DELETED AT REV 4					
101	p28, P9.11	The Local Planning Authority has the authority to make such decisions, not the Parish Council and other groups.	Planning regulations.	Requires rewording in light of comments.	N/A
<p>a. Please advise which regulation justifies this comment.</p> <p>b. Again it appears the message in the comment is "a Neighbourhood Plan cannot decide anything only Breckland planners can do that." We do not believe that is the government's intention in its promotion of Localism. If it were why would anybody write a neighbourhood plan?</p> <p>c. Our Plan supplements the Local Plan as is the intention of the Neighbourhood Planning regulations. It is not the intention to take away decision making from Breckland DC in this and other matters, but by law that decision making must take into consideration a neighbourhood plan's policies. The parish council is a statutory consultee, so if it were to advise Breckland DC that a certain requirement had not been satisfied by an application, why would Breckland DC object to that?</p>					
Agreed resolution / status: DONE AT REV 4					
102	p28, P9.13	A Heritage assets tree or hedgerow does not exist in England.	Planning regulations.	Delete	N/A
<p>a. It does in our Plan!</p> <p>b. We are not prepared to simply delete this clause. Protection of trees and hedgerows is national and district policy. We have simply coined a term to describe specifics of what is to be protected.</p> <p>c. If that term is unacceptable please suggest another rather than reject the intent of this item.</p>					
Agreed resolution / status: DONE AT REV 4					
103		See comments (51 or 61?) re p20, P2.4 re prior approval.			
<p>a. We assume this comment refers to P9.13 and respond accordingly.</p> <p>b. Comment 51, re p20,P2.4 refers to community support for proposals. P9.13 does not refer to that, nor does any other part of Policy 9.</p> <p>b. Given the ambiguity of the comment, we can only assume it refers to the earlier comment 61 on decision making. If so see our response to comment 61. If not please clarify.</p>					

Agreed resolution / status: **DONE AT REV 4**

104	p28, P9.14	See comments (102) above re existence of designation (p28, P9.13).	All relevant issues are material considerations when making a decision on a planning application.	Delete	N/A
------------	-------------------	---	--	---------------	------------

- a. Only policy items are material considerations, so we do not understand the logic or justification for deleting this.
- b. Our past experience with unwanted and unjustified development has taught us that the Council cannot be relied on to consider all issues. Therefore we need further protection
- c. See also our responses (b) and (c) to comment 102

Agreed resolution / status: **DONE AT REV 4**

105	p29, Map 6	While the map is very useful, it needs to be enlarged to be able to be clearly read.	Accessibility	Enlarge map.	N/A
------------	-------------------	---	----------------------	---------------------	------------

- a. We find map 6 perfectly readable when printed at A4 and even more so when viewed electronically.
- b. As noted in our response to comment 5, we are planning to include a separate duplicate set of maps at A3 size with the next update of the Plan.
- c. In light of (a) and (b) we do not consider any change to the Plan itself is justified.

Agreed resolution / status: **NOT AGREED MAP IS ENTIRELY READABLE AT A4 AND CAN BE ENLARGED ON SCREEN OR PRINTED AT A3 BY THE READER**

106	p30, Map 7	While the map is very useful, it needs to be enlarged to be able to be clearly read.	Accessibility	Enlarge map.	N/A
------------	-------------------	---	----------------------	---------------------	------------

- a. Map 7 is not on page 30. We assume you are referring to map 12. If so:
- b. We have subsequently already improved the readability of map 12 when printed at A4 and even more so when viewed electronically.
- b. As noted in our response to comment 5, we are planning to include a separate duplicate set of maps at A3 size with the next update of the Plan.
- c. In light of (a) and (b) we do not consider any change to the Plan itself is justified.

Agreed resolution / status: **NOT AGREED MAP IS ENTIRELY READABLE AT A4 AND CAN BE ENLARGED ON SCREEN OR PRINTED AT A3 BY THE READER**

107	p30, para 6.2.12 a) - h)	Spacing in these sections is narrower than the rest of the page.	Consistency	Amend to be consistent with the rest of the document.	N/A
------------	---------------------------------	---	--------------------	--	------------

- a. We can no find no such difference in our original Word file. No further action proposed.

Agreed resolution / status: **DONE AT REV 4**

108	p30, para 6.2.12 a)	This statement about consultation evidence needs to be qualified.	Evidence required.	Need to make clear how many supported this view and by what means.	N/A
------------	----------------------------	--	---------------------------	---	------------

- a. Do you seriously require a public consultation on each non-listed building in the parish as to whether it should be included as a heritage asset?

b. We consider that parishioners will express approval or otherwise for the buildings selected when responding to our Reg. 14 consultation with regards to Policy 9.
 c. Many of the non-listed buildings specified appear in the Norfolk Heritage Explorer records, a source that Breckland DC itself notes in its draft Reg 19. Local Plan.

Agreed resolution / status: **NOT AGREED** REV 4 includes full justification for selection of buildings. Parishioner support is not specifically required for each building!

109	p30, para 6.2.12 b) & c)	This is written as a statement, not a justification e.g. the why is missing.	Clarification	Need to indicate that the policy aims to support this guidance, rather than repeating it.	N/A
------------	-----------------------------	--	---------------	---	-----

a. It is hard to understand why we must justify clauses in the National Planning policy Framework. We consider that by highlighting our compliance with such clauses we are giving more than ample justification.

Agreed resolution / status: **DONE AT REV 4**

110	p31, para 6.2.12 e)	This is a statement, not justification about a policy.	Policy wording.	Revise to include justification in the form of evidence.	N/A
------------	------------------------	--	-----------------	--	-----

a. Previous comments instructed us to move "statements" from our policies to their justification. This particular "statement" is already in the justification of policy 9 and yet again we are asked not to do that. Can explanatory statements not be made anywhere in a plan?

Agreed resolution / status: **DONE AT REV 4**

111	p31, para 6.2.12 g) & h)	This is a good example of reference to guidance and what the policy seeks to implement this.			N/A
------------	-----------------------------	--	--	--	-----

a. Noted. No further action is required.

Agreed resolution / status: **CLOSED. NO ACTION REQUIRED**

112	p31, para 6.2.12 g)	However, see comments (102) re p28, P9.13			N/A
------------	------------------------	---	--	--	-----

a. See our response (b) to comment 102.

Agreed resolution / status: **DONE AT REV 4**

113	p32, Policy 10, P10.2 & P10.4	This is the overall guidance on the issue; policy is required showing how to implement it.	Policy wording.	Reword as policy.	N/A
------------	----------------------------------	--	-----------------	-------------------	-----

a. P10.2 states very clearly how development of our local green spaces will be controlled - in accordance with NPPF rules - and thereby how policy will be implemented. We understood we do not need to repeat the text of NPPF rules in our policy text.

b. P10.4 specifies very clear criteria under what circumstances development may be allowed in a local green space and thereby how policy will be implemented.

c. Without specific guidance as to what changes would make these points satisfactory we are at loss to know what is required of us.

Agreed resolution / status: **DONE AT REV 4**

114	p32, Policy 10, P10.7/8	This is restrictive unless it meets the criteria of a countryside hedge row; such features are material considerations and need to be assessed against others.	Policy wording. https://www.gov.uk/guidance/countryside-hedgerows-regulation-and-management	Take a more flexible approach on this issue, unless referring to protected hedgerows.	N/A
<p>a. The referenced guidance quoted states: " Protected countryside hedgerows are defined by their length and location. Hedgerow length A countryside hedgerow is protected if it's:</p> <ul style="list-style-type: none"> • a boundary line of trees and shrubs that at one time was a continuous line • more than 20m long with gaps of 20m or less in its length • less than 20m long, but meets another hedge at each end • less than 5m at its base. <p>b. We think all, or very nearly all roadside hedges in Saham Toney satisfy one or more of the above criteria, but we will check our facts and amend the text of P10.7 if necessary.</p> <p>c. In its Settlement Fringe Landscape Assessment Breckland DC defines the following management principles for Saham Toney's landscape: "Conserve the grazed pasture fields and <u>hedgerows</u> that surround the settlement – and create the distinct tributary valley character"</p> <p>d. In Policy ENV 05 of the emerging Local Plan it states: "Development should have particular regard to maintaining the aesthetic and biodiversity qualities of natural and man-made features within the landscape, including a consideration of individual or groups of natural features such as trees, <u>hedges</u> and woodland or rivers, streams or other topographical features". Policy 9 simply seeks to define more specifically what hedges are to be considered in the planning process and we believe defining such items on a local basis is one of the fundamental intention of neighbourhood planning". Please explain why this is not deemed to be the case.</p> <p>d. With regard to both P10.7 and P10.8 we also refer to Policy HOU 06 of the Yaxham made Plan which makes very similar stipulations and has passed examination, and therefore must be in accordance with the basic conditions in this matter.</p>					
Agreed resolution / status: DONE AT REV 4					
115	p33, para 6.2.13, a) & c)	This does not apply - see comments (102) re p28, P9.13.			N/A
<p>a. Re 6.2.13 (a) please explain clearly how can a paragraph of the NPPF not apply to our Plan.</p> <p>b. re 6.2.13 (c) see our response item (b) to comment 102.</p>					
Agreed resolution / status: DONE AT REV 4					
116	p33, para 6.2.13, b) 2 nd sentence	Need the evidence to justify the statement <i>"These are precious to the community...."</i>	Evidence required.	Need to make clear how many supported this view and by what means.	N/A
<p>a. It would seem we must justify every word we write although we have not seen anything like that level of evidence in any of the many made plans we have reviewed. We can only assume Breckland DC wishes to place impossible hurdles in our way to ensure our Plan has little chance of progressing to adoption without being written as they wish it, without any teeth.</p> <p>b. . We understood such evidence belongs in our Consultation Statement, which Breckland Planning is aware is not yet written. Must we repeat the consultation statement in</p>					

the Plan? Please clarify.

c. We consider it unreasonable for us to be expected to have asked for support of every policy before writing those policies, and further consider that such statements will be justified by a positive response to our policies in our Reg. 14 consultation.

Agreed resolution / status: **DONE AT REV 4**

117	p33, para 6.2.13, d)	Under the basic conditions assessment, this is likely to be viewed as not having regard to national policy as insufficient evidence has been provided to justify this approach. Also there is nothing in the policy about this, so wouldn't apply.	Evidence required.	Delete or include justification in the form of evidence.	N/A
------------	-----------------------------	---	---------------------------	---	------------

a. We are willing to move this to the policy text.

b. We are also willing to delete this concession, but no doubt that would be considered "too restrictive".

c. It appears that even when we make our policies more flexible (as required in other comments) they are still unacceptable. This leaves us at a loss to know which approach to take.

Agreed resolution / status: **DONE AT REV 4**

118	p33, para 6.2.13, e)	It needs to be explained what this shows?	Evidence required.	Clarify what the relevance of the photographs are?	N/A
------------	-----------------------------	--	---------------------------	---	------------

a. The photos show views of the green spaces, it is unfortunate that is not obvious.

b. Surely it would be considered important to give visual evidence of the areas selected?

c. The photos are themselves evidence. We were told it is sometimes better to include evidence in a separate appendix and that is what we have done in this case.

Agreed resolution / status: **DONE AT REV 4**

119	p35, Policy 11, P11.2	The Parish Council, along with the other bodies mentioned, are already consulted as a Statutory Consultee on all relevant planning applications. However, it is ultimately up to the Local Planning Authority has the authority to make such decisions.	Planning regulations. Also see Statement of Community Involvement (2017) re Breckland Council consultation.	Delete	N/A
------------	------------------------------	--	--	---------------	------------

a. Our wording in no way takes decision making away from the Local Planning Authority.

b. We already understand that the Parish Council is a statutory consultee.

c. The parish council has a right to require evidence and information from developers in order to enable it to make an objective and detailed consultation response. Or is it the case that only neighbourhood plans have to show evidence and not developers?

d. We would have expected that Breckland DC would value receiving more informed responses to planning application consultations so that its own decisions are also better

informed. e. We do not agree to delete this item based on the present comment.					
Agreed resolution / status: DONE AT REV 4					
120		Text for from Reference 16 to end of text is not planning policy	Policy wording.	Move to text justification section.	
a. Only policies have legal weight so nothing else will be adhered to by developers. please explain how we are to impel them to use the referenced maps if they are not included in the policy wording.					
Agreed resolution / status: DONE AT REV 4					
121		Note; need county to comment on this as Lead Local Flood Authority.			N/A
a. We understand that but do not propose early informal reviews by every consultation body in advance of our Reg. 14 Plan. b. Both Norfolk County Council and the Environment Agency will be included in the Reg. 14 consultation and will have a chance to comment on this policy. No further action proposed in against this particular comment.					
Agreed resolution / status: NO ACTION AT REV 4 SINCE THIS IS A NON-COMMENT					
122	p35, para 6.2.14, a)	This is a statement, not justification about a policy.	Policy wording.	Revise to include justification in the form of evidence.	N/A
a. As in the case of many comments, this one is too vague and risks us having to repeatedly revise our text until Breckland Planning finally agrees to it. We do not wish to expend such abortive effort. Please provide more concrete guidance on what is required to make this item acceptable.					
Agreed resolution / status: DONE AT REV 4					
123	p35 & 40, para 6.2.14, b) – c)	Spacing in these sections is narrower than the rest of the page.	Consistency	Amend to be consistent with the rest of the document.	N/A
a. We can see no such difference in our original Word file. No further action proposed.					
Agreed resolution / status: DONE AT REV 4					
124	p36-39, Flooding sources Maps	As mentioned in 6.2.14 a), ground water flooding is an issue, therefore a map showing this could be useful e.g. protection zones for this.	See http://maps.environment-agency.gov.uk/wiyby/wiybyController?x=573500.0&y=292500.0&topic=groundwater&ep=map&scale=9&location=Breckland Fm, Norfolk&lang=_e&layerGroups=default&distance=&textonly=off#x=593128&y=298274&lg=1,10,&scale=5	Considered adding to plan.	N/A
a. We will review the referenced groundwater flood protection zone map for possible inclusion in the next update of our plan.					
Agreed resolution / status: CLOSED CONSIDERED BUT NOT DONE AT REV 4 AS THE MAP SUGGESTED HAS NO RELEVANCE TO THE POLICY TEXT					

125		The source of these maps needs to be quoted.	Referencing	Add reference to Environment Agency as the source.	N/A
<p>a. Such reference is given in the text to Policy 11, albeit you have asked us to delete that.</p> <p>b. Please don't make contradictory comments.</p> <p>c. We agree to add reference the Environment Agency as the source of the maps.</p>					
Agreed resolution / status: DONE AT REV 4					
126	p35 & 40, para 6.2.14, d)	Indent at start of sentence & line space missing afterwards.	Formatting	Remove indent.	N/A
<p>a. Agreed. Will be amended at the next update.</p>					
Agreed resolution / status: DONE AT REV 4					
127	d) & e)	Maybe better to merge as address same issue. Also these statements about consultation evidence needs to be qualified.	Evidence required.	Need to make clear how many supported this view and by what means.	N/A
<p>a. We noted in the text of Policy 11 that we will be gathering further evidence of local flooding problems for possible inclusion at a future update. We have yet to complete such consultation.</p> <p>b. As with other similar comments we require advice on when such evidence must be presented: at Reg 14. in the Plan itself, or at Reg. 16 in the Consultation Statement.</p> <p>c. Having seen many made plans with little or no evidence for their policies, we find it odd that we were expected to provide a full body of evidence for an informal pre-Reg. 14 review that was intended most of all to assist rather than deter us.</p> <p>d. At present we would have no objection to merging items (d) and (e) but suspect separate points may be more appropriate once we have gathered additional evidence of the different events referred to.</p>					
Agreed resolution / status: DONE AT REV 4					
128	p40, Policy 12, P12.2	See comments (119) re p35, Policy 11, P11.2 re decision making.			N/A
<p>a. See our response to comment 119.</p>					
Agreed resolution / status: DONE AT REV 4					
129	p40/41, Policy 13, P13.2-4	These are statements, not policy.	Wording	Move to text.	N/A
<p>a. As noted elsewhere only policies have legal weight. Please explain how the definitions given in P13.2-4 will still carry weight if they moved to another part of the Plan.</p> <p>b. Maps are defined as part of a policy by virtue of being noted in policy text. Hence move reference to them will have the effect of leaving them as having no effect.</p>					
Agreed resolution / status: DONE AT REV 4					

130	p41, Policy 13, P13.5	See comments (62) re p23, P3.3/4 on 'all' policies.			N/A
a. See our response to comment 48 and 62.					
Agreed resolution / status: DONE AT REV 4					
131	P13.5	See comments (119) re p35, Policy 11, P11.2 re decision making.			N/A
a. See our response to comment 119.					
Agreed resolution / status: DONE AT REV 4					
132	p41, Policy 13, P13.6	See comments (73) re p24, P4.3 re positive wording.			N/A
a. Please explain what "more positively" actually means.					
b. P13.6 states "Development that spoils, obstructs, intrudes upon or otherwise detracts from a communal view designated by this policy shall not be permitted." Please explain how to state this in a way that would be considered positive without losing its intent.					
c. We note with great interest Breckland's use of the word "restricted" in its policy GEN 05 and refer Breckland Planning to that when commenting on our policies being insufficiently positive.					
f. Respectfully perhaps Breckland DC would benefit by spending more time improving its own policies rather than criticising ours.					
Agreed resolution / status: DONE AT REV 4					
133	p41, para 6.2.16, a)	Why is it the Parish support this approach rather than the local community?	Clarification	Revise to include justification in the form of evidence.	N/A
a. In comments to our revision 1 plan we were told that the community cannot make such decisions, but the Parish Council (acting on the community's behalf) can.					
b. In fact both the parish and the community support this approach and evidence for that is already given in section 4 and that's precisely what item (a) says ("the council seeks to respect parishioners' strong wish...").					
c. We were attempting to write this in a positive manner, but it seems that too is unacceptable in this case.					
Agreed resolution / status: DONE AT REV 4					
134	6.2.16 (a)	What evidence do you have to justify that the "in keeping" approach is "unhelpful and insufficient"? Without this, this is just opinion.	Evidence required.	Revise to include justification in the form of evidence.	N/A
a. We have stated that such approach is too vague. It means nothing since it could be interpreted in a thousand ways, and each would be just opinion. We have stated our approach would be "less subjective" which is why we consider it an improvement.					
b. We do not believe Breckland DC is better qualified to define the character of Saham Toney than its residents and parish council, yet that is what it appears to be seeking to					

do.
 c. Breckland clearly does not appreciate that a settlement does not usually have just one character. Certainly Saham Tone has several and wants to maintain each.
 d. One only has to look at numerous modern developments to see they are not in keeping with their surroundings yet they have been approved by Breckland DC using its "in keeping" approach, which patently has no teeth, and opinions on which would vary even among different planning officers, who rarely if ever see the sites they are agreeing for development.

Agreed resolution / status: **DELETED AT REV 4**

135	6.2.16 (a)	See comments (119) re p35, Policy 11, P11.2 re decision making.			N/A
------------	-------------------	--	--	--	------------

a. See our response to comment 119.

Agreed resolution / status: **DONE AT REV 4**

136	p41, para 6.2.16, a)	How is 'protection of such views', 'in accordance with NPPF?	Clarification	Revise to include justification in the form of evidence.	N/A
------------	-----------------------------	---	----------------------	---	------------

a. We believe you are actually referring to 6.2.16 (b).
 b. If so, we note that Policy COM 01 of the emerging Local Plan requires development to preserve key and important views. We assume the Local Plan is compliant with NPPF although it does not make sufficient reference to the latter to be certain of that.
 c. We refer to NPPF paragraph 126, second bullet point, paragraph 131.
 d. We have seen a number of made Plans that include policies to protect views. Just one example is the Outwoods Neighbourhood Plan, Policy LR5. We assume since that is a made plan it passed examination and thereby was deemed to meet the basic conditions which in turn infers compliance with NPPF.

Agreed resolution / status: **DONE AT REV 4**

137	p41, para 6.2.16, b)	Why are the 'protection communal views', 'not appropriate'?	Clarification	Revise to include justification in the form of evidence.	N/A
------------	-----------------------------	--	----------------------	---	------------

a. We have not said "protected communal views" are "not appropriate" Our text actually says the areas of such views are not appropriate for Local Green Space designation, therefore an alternate form of protection is proposed.
 b. See our many earlier comments regarding evidence.

Agreed resolution / status: **NOT AGREED for reasons stated in response**

138	P13.5	See comments (62) re p23, P3.3/4 on 'all' policies.			N/A
------------	--------------	--	--	--	------------

a. See our response to comment 48 and 62.
 b. We note this comment is an exact repeat of comment 130. It is unnecessarily time consuming and confusing to deal with the same comment several times.

Agreed resolution / status: **DONE AT REV 4**

139	p41, para	What does this show?	Evidence required.	Clarify what the relevance of	N/A
------------	------------------	-----------------------------	---------------------------	--------------------------------------	------------

	6.2.16, c)			the photographs is?	
<p>a. The photos show views of the protected communal views, it is unfortunate that is not obvious.</p> <p>b. Surely it would be considered important to give visual evidence of the views selected?</p> <p>c. The photos are themselves evidence. We were told it is sometimes better to include evidence in a separate appendix and that is what we have done in this case.</p> <p>d. Please explain specifically what further evidence is required.</p>					
Agreed resolution / status: DONE AT REV 4					
140	p42, Map 9	While the map is very useful, it needs to be enlarged to be able to be clearly read.	Accessibility	Enlarge map.	N/A
<p>a. We find map 9 perfectly readable when printed at A4 and even more so when viewed electronically.</p> <p>b. As noted in our response to comment 5, we are planning to include a separate duplicate set of maps at A3 size with the next update of the Plan.</p> <p>c. In light of (a) and (b) we do not consider any change to the Plan itself is justified.</p>					
Agreed resolution / status: NOT AGREED Map can be read easily at A4 and can be enlarged by the reader either on screen or by printing at A3					
141	p43, Map 10	While the map is very useful, it needs to be enlarged to be able to be clearly read.	Accessibility	Enlarge map.	N/A
<p>a. We find map 10 perfectly readable when printed at A4 and even more so when viewed electronically.</p> <p>b. As noted in our response to comment 5, we are planning to include a separate duplicate set of maps at A3 size with the next update of the Plan.</p> <p>c. In light of (a) and (b) we do not consider any change to the Plan itself is justified.</p>					
Agreed resolution / status: NOT AGREED Map can be read easily at A4 and can be enlarged by the reader either on screen or by printing at A3					
142	p43, Policy 14, P14.2	This is a statement, not policy.	Wording	Move to text.	N/A
<p>a. Only policies have legal weight. If P14.2 is moved to text it will carry no weight and developers will be able to ignore which facilities the policy applies to. In such a case the Policy becomes meaningless.</p>					
Agreed resolution / status: DONE AT REV 4					
143	p44, Policy 14, P14.3	See comments (101) re p28, P9.11 re decision making.			N/A
<p>a. See our response to comment 101.</p>					
Agreed resolution / status: DONE AT REV 4					
144	p44, Policy 14, P14.4	See comments re p35 (119), p20, P2.4 (51) re decision making.			N/A
<p>a. See our response to comments 51 regarding a developer's need to show parishioner support.</p> <p>b. Comment 119 refers to a developer's need to present certain justification to Saham Toney Parish Council prior to approval (by Breckland DC) of an application. Neither P14.4</p>					

specifically, nor any part of Policy 14 specifies a similar requirement. We therefore consider cross-reference to comment 119 to be spurious and shall ignore it.

Agreed resolution / status: **DONE AT REV 4**

145	p44, para 6.2.17, a)	The statement about consultation evidence needs to be qualified.	Evidence required.	Need to make clear how many supported this view and by what means.	N/A
------------	-----------------------------	---	---------------------------	---	------------

- a. Parishioners raised concerns about community facilities in consultations undertaken before the Plan was prepared. Such consultations were necessarily of a preliminary nature.
- b. The issue raised in the preliminary consultations, have been, in our opinion, adequately explained in section 4 of the Plan.
- c. We consider that should we receive positive support for our policies in the Reg. 14 consultation that would constitute sufficient evidence. If this is not the case much more specific guidance is required on what evidence is needed.
- d. As noted in other responses we seek guidance as to whether full evidence is required at Reg. 14 or whether it can be submitted only at the Reg. 16 stage.

Agreed resolution / status: **DONE AT REV 4**

146	p44, para 6.2.17, b)	See comments (101) re p28, P9.11 re decision making.			N/A
------------	-----------------------------	---	--	--	------------

- a. See our response to comment 101

Agreed resolution / status: **DONE AT REV 4**

147	6.2.17 (b)	See comments re p35 (119) , p20, P2.4 (51) re decision making.			N/A
------------	-------------------	---	--	--	------------

- a. See our responses to comments 51 regarding a developer's need to show parishioner support.
- b. Comment 119 refers to a developer's need to present certain justification to Saham Toney Parish Council prior to approval (by Breckland DC) of an application. Neither 6.2.17 (b) specifically, nor any part of the justification of Policy 14 specifies a similar requirement. We therefore consider cross-reference to comment 119 to be spurious and shall ignore it.
- c. We respectfully point out how time-consuming it is to address repeated and different comments on the same subject instead of grouping all items to which a common comment applies in a single comment.

Agreed resolution / status: **DONE AT REV 4**

148	p44, Policy 15, P15.2 b)	See comments (62) re p23, P3.3/4 on 'all' policies.			N/A
------------	---------------------------------	--	--	--	------------

- a. See our response to comments 48 and 62.
- b. We respectfully point out how time-consuming it is to address repeated comments on the same subject instead of grouping all items to which a common comment applies in a single comment.

Agreed resolution / status: **DONE AT REV 4**

149	p44, Policy 15, P15.2 c) & P15.3	This approach is too restrictive and not implementable.	<i>“Planning should operate to encourage and not act as an impediment to sustainable growth”.</i> NPPF para 19	Revise wording so not to restrict business development.	N/A
<p>a. This comments makes it appear we must accept all and every type and size of business development and that is unacceptable.</p> <p>b. We cannot be in contravention of district planning policy since employment in Saham Toney is not covered in the adopted core strategy or the emerging local plan.</p> <p>c. By encouragement does the NPPF mean "Please build a massive plant in Saham Toney without any restriction?"</p> <p>d. By the very fact of having a policy for business development Breckland DC states criteria for such development and thereby restricts development in some way. Why can Saham Toney not do the same?</p> <p>e. P15.2c merely expresses a preference. We do not understand how a preference can be deemed restrictive.</p> <p>f. P15.3 merely expresses a preference. We do not understand how a preference can be deemed restrictive.</p> <p>g. We point out that "preference" is defined as "a greater liking for one alternative over another or others". It in no way precludes other options. There is no justification to say it is restrictive.</p> <p>h. Comment to be withdrawn.</p>					
Agreed resolution / status: DONE AT REV 4					
150	p44, para 6.2.18	The approach regarding employing parishioners and contributing to village life has not been justified.	Evidence required.	See above.	N/A
<p>a. 6.2.18 states that Policy 15 "seeks to encourage". That is a very neutral statement. We cannot comprehend why even such innocuous statements require evidence. Again such severe standards appear to be being applied to our Plan that it would prove impossible to have a meaningful made plan if we were to adhere to every such requirement.</p>					
Agreed resolution / status: DONE AT REV 4					
151	p44, Policy 16, P16.2	See comments (101) re p28, P9.11 re decision making.			N/A
<p>a. See our response to comment 101.</p>					
Agreed resolution / status: DONE AT REV 4					
152	p45, Policy 16, P16.3/4	Some of the planning issues are not appropriate for small scale development.	Planning practise.	Revise policy wording.	N/A
<p>a. This comment is a case of double standards! Earlier comments told us we could not specify small scale development but now that terminology is being used to neuter another of our policies.</p> <p>b. Assuming, as we firmly believe, that we are allowed to limit development to small scale only, please explain which specific planning issues are not appropriate for that case.</p> <p>c. Yaxham is also a rural settlement with small scale development. Please justify why it was allowed a similar policy in its made plan but Saham Toney's similar policy is deemed to contravene planning practice.</p>					

Agreed resolution / status: DONE AT REV 4					
153		Hygiene is not a planning issue; however air & water pollution, noise & odour is.	Planning practise.	Revise policy wording.	N/A
<p>a. Agreed. Will be updated at the next revision.</p> <p>b. We note this type of comment is far more helpful than almost all the others, since it not only tells us what we can't say, but what we should say instead.</p>					
Agreed resolution / status: DONE AT REV 4					
154	p45, 6.2.19	Breckland Council has an Infrastructure Position Statement, which addresses a number of these issues.	http://www.breckland.gov.uk/article/4313/Documents-Library-Publications		N/A
<p>a. We will review the referenced document and extract relevant information for possible inclusion in the next update.</p> <p>b. We note that a position statement is not a planning policy, hence issues must still be addressed in our plan.</p>					
Agreed resolution / status: UPDATED AT REV 4					
155	6.2.19	The statement about consultation evidence needs to be qualified.	Evidence required.	Need to make clear how many supported this view and by what means.	
<p>a. Parishioners raised concerns about infrastructure in consultations undertaken before the Plan was prepared. Such consultations were necessarily of a preliminary nature.</p> <p>b. The issues raised in the preliminary consultations, have been, in our opinion, adequately explained in section 4 of the Plan.</p> <p>c. We consider that should we receive positive support for our policies in the Reg. 14 consultation that would constitute sufficient evidence. If this is not the case much more specific guidance is required on what evidence is needed.</p> <p>d. As noted in other responses we seek guidance as to whether full evidence is required at Reg. 14 or whether it can be submitted only at the Reg. 16 stage.</p>					
Agreed resolution / status: DONE AT REV 4					
156	p46, 6.2.20 a) & b)	Spacing in this section is narrower than the rest of the page.	Consistency	Amend to be consistent with the rest of the document.	N/A
<p>a. We can find no such problem in our original Word file. No action required.</p>					
Agreed resolution / status: DONE AT REV 4					
157	p46, Parish Action Points, 7.1	Planning is also about spacial development, not just land-use.	<i>Spatial planning can be defined as the coordination of practices and policies affecting spatial organisation. Wikipedia</i>		N/A
<p>a. Please "translate" the definition given into simple layman's language.</p>					

b. Please advise if this fact has any other impact to the rest of our Plan?

c. Please advise if we are being asked to change any text in 7.1 or is this just for information?

Agreed resolution / status: **NOT DONE** Comment has no relevance but is just a statement of fact

158	p46, Parish Action Points, 7.3	Need to make clear what the issue is.	Clarification	The closure of a village shop?	
------------	---------------------------------------	--	----------------------	---------------------------------------	--

a. Preliminary consultations highlighted that a reasonable number of villagers would like to see a village shop reinstated. However parish councillors have previously investigated this and found it would not be viable for a variety of reasons. Hence it was decided not to include a village shop as an action point as that would simply raise false expectations.

b. Villages will have two opportunities to comment on this: (i) a questionnaire at the village fete on 30 July 2017; (ii) during the Reg. 14 consultation, and in advance of those we wanted to make them aware that their earlier opinions had not simply been ignored.

c. We consider it is not a requirement to include in our Plan every idea raised in consultation, but that each must be considered, which is what we have done in this case.

d. Given that parish action points carry no weight and do not directly involve Breckland DC we are unclear of the intent of comments relating to them.

Agreed resolution / status: **DONE AT REV 4**

159	p46, Parish Action Points 1-7	Not commented on.			
------------	--------------------------------------	--------------------------	--	--	--

a. We assume this to mean "no comments", rather than "there will be comments later". On that basis no further action required.

Agreed resolution / status: **NO COMMENT THEREFORE NO ACTION TAKEN !**

160	1, 2, 4, 7 (not 3, 5 or 6)	Spacing in these sections is narrower than the rest of the page.	Consistency	Amend to be consistent with the rest of the document.	N/A
------------	-----------------------------------	---	--------------------	--	------------

a. This is due to Word's default table settings. Although we could adjust it at the next revision, other tables in the Plan have similar spacing but have not attracted the same comment. No further action proposed.

Agreed resolution / status: **DONE AT REV 4**

161	5	Red text	Consistency	Amend red text into black.	
------------	----------	-----------------	--------------------	-----------------------------------	--

a. Our mistake, agreed.

Agreed resolution / status: **DONE AT REV 4**

	APPENDIXES				
--	-------------------	--	--	--	--

162	p51, Appendix 1	Useful method of showing references, but	Accessibility	Consider comments.	N/A
------------	------------------------	---	----------------------	---------------------------	------------

		could be developed to be on the bottom of each page.			
<p>a. We do not see any benefit in such a change, and consider references throughout the text would be less noticeable.</p> <p>b. Also see response to other comments regarding references in Policy or justification text.</p> <p>c. We do not agree to this change.</p>					
<p>Agreed resolution / status: NOT AGREED. All references dealt with in a different way at REV 4</p>					
163	p52, Appendix 2	<p>Useful flowchart, but too small font size to easily read. Also need to clarify:</p> <p>Why reference to SA rather than SEA?</p> <p>Are these deadlines still accurate?</p> <p>May need more time b/t Reg.14 & Reg.16 e.g. up to 2 months.</p> <p>Should read 15 Submission, not 16.</p> <p>Section re LPA involvement has not been discussed or agreed with LPA & will need amending in light of this.</p>	Accessibility	Amend subject to deadlines being agreed with LPA.	N/A
<p>a. The flowchart is easy to read electronically but we agree it is difficult to read at A4. However it will have served its purpose at the Reg. 14 stage and will be deleted before Reg. 16 submission.</p> <p>b. We will attempt to improve this but do not wish to introduce a single A3 page in an otherwise A4 document.</p> <p>c. SA was our understanding of what was required. We have stated in our Sustainability Appraisal that we do not consider an SEA is required and stated reasons for that.</p> <p>d. We respectfully note our Sustainability Appraisal has not been reviewed, otherwise specific comments could have been made.</p> <p>e. Prior to receipt of these comments we have discussed with you by phone amending the title of our sustainability appraisal to "Sustainability Statement" and referring to it in our Basic Conditions Statement.</p> <p>f. With the greatest respect, given the sheer volume of the comments to our revision 3 Plan, the vagueness of many of them and the consequent need for much greater explanation on Breckland planning's part, and the fact that we are not yet in agreement on the majority of them, it is difficult to state with certainty that the dates given in the flowchart remain accurate. What can be said is that they were accurate and realistic at the time of submitting our revision 3 plan and were based on a very detailed schedule.</p> <p>g. Our current schedule allows approximately 4 months between the closure of Reg. 14 consultation and Reg. 16 submission so we do not understand the comment relating to this period.</p> <p>h. We were not aware we must agree our own schedule with the LPA. We understood there are statutory periods within which an LPA must undertake its obligations regarding a Neighbourhood Plan and we have taken account of those.</p> <p>i. We have also consulted with the Yaxham Neighbourhood Plan team and concluded that our schedule allows more time than their actual time frame to reach made status, and that their plan needed a public hearing at examination and a resubmission of their Consultation Statement as a result of examiner's comments, both of which added time to their schedule, and neither of which we anticipate.</p> <p>j. We are willing to discuss our schedule with Breckland DC as a courtesy but other than gathering more information about its administrative time scales we must advise we will not be willing to have a schedule dictated to us.</p> <p>k. We will take what appropriate account we can of Breckland's schedule for its Local Plan, but cannot guarantee to respond to further changes in that schedule.</p>					

Agreed resolution / status: **DONE AT REV 4**

164	p51, Appendix 3	Photograph's are useful, but could be made larger on the page.	Accessibility		N/A
------------	------------------------	---	----------------------	--	------------

- a. We do not wish to take up more space with the photos, they are perfectly usable at the size presented. We will not change that size.
- b. We note with interest and some frustration, that other comments our photos were deemed unjustified but here they are said to be useful!

Agreed resolution / status: **NOT AGREED NO ACTION TAKEN** Reader can enlarge on screen or when printing

165	p51, Appendix 5	Maybe more useful on a website rather than in a plan that has already been produced.			N/A
------------	------------------------	---	--	--	------------

- a. We do not yet have an operating website, but do propose a very simple one by the time of the Reg. 14 consultation. It is already our intention to make this list available on that site.
- b. However not every reader has access to the internet so we do not agree to delete the list from the Plan.

Agreed resolution / status: **DELETED AT REV 4**