

## Saham Toney Neighbourhood Plan

### Breckland Council comments for 2<sup>ND</sup> Regulation 14 Consultation

Page and Policy/ Paragraph No	Comment <b>STNP RESPONSE</b>	Justification	Suggested Amendments <b>STNP ACTION</b>
Whole Plan	<p>While it is evident that the plan has been subject to a significant level of research, there remains concern that some policies are too restrictive and will have negative implications for viability.</p> <p><b>See individual responses</b></p>	Viability.	<p>See individual comments.</p> <p><b>See individual responses</b></p>
Whole Plan	<p>All references to NPPF (2018) should be NPPF (2019).</p> <p><b>See separate table at the end of these comments for checks</b></p> <p><b>The Plan makes 40 references to the NPPF. One of those (non-paragraph specific) requires correction to 2019, and one other while correct, will benefit from the addition of an NPPF paragraph reference. As agreed in discussion it will be noted that the Plan takes account of the June 2019 update to the NPPF (no specific changes are required for that)</b></p>	Factual update.	<p>As advised.</p> <p><b>P6.2 text will be amended from “NPPF (2018) or any of its successors” to “the most up to date version of the NPPF”</b></p> <p><b>T7D.6: The general reference to the NPPF will be improved by adding a reference to paragraph 170d</b></p>
Whole Plan	<p>Format — a number of paragraph's look like they have narrower line spacing (1 rather than 1.15) than the rest of the plan e.g.; T2H.3; T2L.6-7; T2P.6-10 (also worth checking throughout the plan).</p> <p><b>Will check and update as necessary</b></p>	Consistency.	<p>As advised.</p> <p><b>To be updated when final revisions are made prior to the Reg 15 submission</b></p>
Whole Plan	<p>Maps — a few include text that is too small to easily read and the font size varies throughout.</p> <p><b>Will check and update as necessary but where maps are taken from other sources, it is not possible to amend text</b></p>	Clarity.	<p>Review format to standardise for the Reg.16 version.</p> <p><b>To be updated when final revisions are made prior to the Reg 15 submission</b></p>

Page Cover	Format — Typo on front cover regarding the name of the Parish.  <b>Agreed</b>	Clarity.	As advised.  <b>Corrected</b>
Contents Page	The format of the previous Reg.14 presented better and is easier to use than the current version e.g. Maps in a smaller font size.  <b>Agreed</b>	Clarity.	Revert to previous Reg.14 format. <b>To be updated when final revisions are made prior to the Reg 15 submission</b>
p14, Figure 8	Format -breaking up of text - it would look better if these graphics were placed where they were relevant in the preceding three pages.  <b>Agreed that this is an optional change that may improve readability, and if so, it will be incorporated</b>	Better presentation.	As advised.  <b>Potential improvement in readability to be assessed</b>
p19, 6.3.4	Format -This para No appears twice.  <b>Agreed</b>	Typo.	Amend remaining 5 para no's in the chapter. <b>Will correct</b>
p19, 6.3.6 (c)	MM 15 refers to HOU 03 and there is no MM162. Policy HOU 02 does not give ST its own target. MM159 provides ST with the 33 figure as a modification to Appendix 5 of the Plan.  <b>Agreed</b>	Factual update.	"c) Main modification 159 to Appendix 5 of the emerging Local Plan sets out a housing target of <b>33 additional dwellings in Saham Toney</b> between the date the Local Plan is approved and 2036"; <b>To be corrected accordingly</b>
<b>POLICY 1: SERVICES, FACILITIES &amp; INFRASTRUCTURE</b>			
p21, P1.1	Policy contains unnecessary wording.  <b>Agreed. In discussion it was further agreed that the possibility of a development proposal providing additional infrastructure will be emphasised in supporting text. It was also agreed that policy text relating to walking, cycling etc. will be moved to supporting text</b>	Tautology.	"... proposals will be supported where there is or is provided as part of the proposal sufficient social...".  <b>To be corrected accordingly</b>

p25, Evidence Map 1	<p>Format — Would recommend removing text on Map (B) &amp; (C) as it can't be read or add as a footnote to the maps.</p> <p><b>Agreed.</b></p> <p><b>In discussion it was clarified that the comment refers to copyright text on the OS map original used as a background. There is no text on Maps B &amp; C other than that on the OS original, which cannot be removed</b></p>	Clarity.	<p>As advised. For readability the three maps will be presented on separate pages.</p> <p><b>A general note will be added at the start of the Plan thus: "Copyright: The Saham Toney Neighbourhood Plan uses Ordnance Survey copyrighted material as backgrounds to its maps and is entitled to do so by the Parish Council's PSMA registration No. 0100057926"</b></p> <p><b>If practical the OS note on background maps will be hidden to avoid doubt as it is not relevant to the map contents.</b></p> <p><b>Susan will advise about the general issue of copyright references</b></p>
<b>POLICY 2A: RESIDENTIAL HOUSING ALLOCATION</b>			
p26	<p>Concern over phasing of the developments e.g. If an application that is acceptable in planning terms, is submitted on STNP15 a refusal solely on the grounds of phasing would be difficult to sustain at appeal.</p> <p>This also applies to references to phasing in subsequent housing allocation policies.</p> <p><b>See discussion points below.</b></p> <p><b>In discussion the principle that NPPF para 73 allows a Neighbourhood Plan to phase development was agreed, but Susan would like to confirm that outside the meeting</b></p>	There is no national guidance that would permit the phasing of small sites to be delivered in this way.	<p>Amend to simply set out the housing allocations in the neighbourhood plan i.e. remove phasing from the policy.</p> <p>This could however be listed as a Parish preference in the support text for individual sites.</p> <p><b>Pending Susan's final confirmation, phasing of sites will be retained.</b></p> <p><b>Strengthening of Policy 1 will be considered to highlight the need for phasing to allow delivery of adequately improved infrastructure. This will include checks as to whether there is capacity / planned upgrades for gas and electricity services</b></p>
<p><b><u>DISCUSSION POINTS:</u></b></p> <p><b>NPPF paragraph 67:</b></p> <p>Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and</p>			

likely economic viability. Planning policies should identify a supply of:

- a) specific, deliverable sites for years one to five of the plan period; and
- b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.

*In discussion it was agreed that applies to strategic policies so is not relevant to STNP*

#### NPPF paragraph 73

Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, **and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites.**

#### NPPF Glossary

**Deliverable:** To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

**Developable:** To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

#### Other discussion points

Phasing is not just a preference, but follows agreements with landowners.

Development of all allocated sites without phasing is not sustainable, for example if that were to be 83 houses in the first 3 years of the plan

Considering both of the above, some allocated sites must remain developable, but not confirmed as deliverable at the start of the plan period

Allocation policies provide flexibility by stating “development is expected between ...”

P2A.1	Allocation numbering system is unclear. Why are there no STNP3, 8, 10, 11, 12. <b>Agreed.</b> These were sites put forward in the call for sites but which it was decided not to allocate after the site assessment and selection processes. Will be clarified in supporting text	Numbering issue.	Requires clarification in the supporting text. <b>It will be clarified in supporting text that 16 sites were put forward, of which 12 were identified as suitable for allocation following a rigorous process of site assessment and site selection. Inclusion of a map showing all sites put forward will be considered. A direct reference to the Site Assessment and Site Selection Reports will be added</b>
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T2A.2	<p>The use of 'within' is too prescriptive.</p> <p><b>See discussion points below</b></p> <p><b>Following discussion, it was agreed that the extensive site assessment and selection work and the fact STNP allocates approximately 2.5 times more housing than required by the Local Plan, justify limiting the total allocation, and that greater flexibility of allocation numbers is more appropriate to a Local rather than Neighbourhood Plan. Revised wording will be used to make the statement less overtly prescriptive, but the limit will apply when implementing the Plan</b></p>	Suggests that the 83 figure is a maximum.	<p><i>"....controlled, within the number allocated in this Plan in accordance with Policy P2A.1."</i></p> <p><b>Text will be revised to "...the level of new residential development permitted will be managed within the number allocated in this Plan"</b></p>
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#### **DISCUSSION POINTS:**

The intention is indeed to suggest/set a maximum, and justification for that is that the total allocation exceeds the Local Plan target by 50 (i.e. by about 150%)

The individual and total housing allocation takes into accounts numerous factors that reflect sustainability, most particularly flood risk, infrastructure, and landscape impact. In some cases higher allocations were examined and shown to be not sustainable – see site assessment and site selection reports

Use of the term "controlled" gives Saham Toney no say over how many houses would be developed on individual sites

The Local Plan itself (Policy HOU 04) limits development in Villages with Boundaries to "not significantly more than 5%" (of the number of dwellings within the settlement boundary) and itself uses the term "not significantly more than..."

How would the terms "not significantly more than" and "controlled" be applied in practice

We have landowners who instead of 38 houses on their allocated sites wish to develop at least 62. With the proposed wording would that be allowed?

First comment to allocation policies 2G-2Q would be acceptable, i.e. "*Development at (site name) & include ref No & Map ref in brackets for x new dwellings, will be permitted subject to meeting the following criteria...*"

#### **POLICY 2C: RESIDENTIAL DEVELOPMENT OUTSIDE THE SETTLEMENT BOUNDARY**

p29, P2C.1	<p>a) It would be more appropriate to refer to Policy 2a, which already lists these sites.</p> <p><b>Agreed</b></p>	Duplication of policy.	<p><i>"Outside the settlement boundary, in addition to those sites listed in Policy 2A, the following residential developments will be supported:."</i></p> <p>&amp; delete a) (as covered above).</p>
	<p>b) What is meant by 'for people with a Saham Toney connection'?</p> <p><b>Agreed</b></p>	Clarity.	Refer to Policy 2D to clarify this approach.

p30, P2C.3	<p>It would be better if such brownfield sites were also 'immediately adjoining' the settlement boundary, as it could be seen as supporting less sustainable sites.</p> <p><b>Agreed</b></p>	Consistency to reflect P2C.2.	<p>"<i>In circumstances described in P2C.2, p Proposals for the development of brownfield sites proposals on land outside the sites but immediately adjoining the settlement boundary, will be looked....</i>".</p>
p30, T2C.2	<p>The reference to a hierarchy is not consistent with the policy as this currently gives equal weighting to criteria a.—c. and P2C.2 &amp; 3 are 'exceptional'.</p> <p><b>Agreed</b></p>	Consistency.	Amend text to reflect the approach to be consistent with the policy.
p31, T2C.7	<p>It would be useful to make reference to the site assessment documentation.</p> <p><b>It is referenced below the supporting text where relevant evidence base documents are listed, but could be added more explicitly if required. Please advise</b></p>	Clarity.	<p>As advised.</p> <p><b>A specific reference to the Evidence Base will be added to supporting text</b></p>
<b>POLICY 2D: AFFORDABLE HOUSING</b>			
p31, P2D.1	<p>Revised wording is required to include reference to mix and type and the threshold for affordable housing.</p> <p><b>Agreed</b></p>	To be consistent with national guidance.	<p>Replace 1<sup>st</sup> part of sentence with "<b>Affordable housing provided as part of the development of additional sites On allocated sites comprising 10 or more dwellings, where affordable housing of an appropriate mix and type to meet the identified local need, is to be provided, this shall be made available by preference...</b>"</p>

P2D.2	This should follow Breckland's allocations policy.  <b>Agreed</b>	Allocation of affordable housing is not a matter that should be left to discretion when there is an adopted policy in place.	Amend final line to ' <i>...prioritisation of other candidates will be at the discretion of the Local Housing Authority, in accordance with Breckland Council's allocations policy</i> '.
P2D.3 [AD]	Suggest additional criterion.  <b>Agreed</b>	To ensure that a qualifying allocated site provides	<i>"Where a site is, or has been, in a single ownership, artificial sub-division to avoid provision of affordable housing will not be permitted".</i>
p34 <sup>2</sup> , T2D. <sup>78</sup> & <sup>89</sup>	Format - A line space is missing between these two paragraphs.  <b>Agreed, but with reference to corrected paragraph numbers</b>	Presentation.	As advised.
<b>POLICY 2E: HOUSING MIX</b>			
p33, P2E.1	Cannot require affordable housing on smaller allocated sites as suggested in criterion d.  <b>Agreed</b>	Although para 63 (NPPG) makes reference to 'designated' rural areas of 5 units or less providing affordable	<i>"On qualifying sites, social and affordable housing for those who cannot afford market prices".</i>
<b>POLICY 2E: HOUSING MIX /POLICY 2F: COMMON CRITERIA FOR ALLOCATED SITES</b>			
p33/37	It is not clear how this policy and P2F.1 be applied to STNP 2 for only 4 dwellings and other smaller allocations? These would appear to need to: <ul style="list-style-type: none"> <li>• Include smaller homes of 3 bedrooms or less (2F)</li> <li>• include housing specifically designed for the older adults, suitable for independent living</li> <li>• include one, two and three-bedroom homes for</li> </ul>		2E and 2F would benefit by being combined into a single policy.  <i>"All residential development proposals shall have regard to the following considerations:</i> <i>P2FE.31 Dwellings shall be drained by an adequate individual and/or communal sustainable drainage system.</i>

	<p>parishioners who wish to downsize</p> <ul style="list-style-type: none"> <li>• include higher proportion of one and two-bedroom starter homes for first time buyers</li> <li>• include social and affordable housing for those who cannot afford market prices</li> </ul> <p>There also appears to be some duplication on housing size in both b policies.</p> <p><b>See discussion points below</b></p> <p><b>Susan clarified that this comment is an optional suggestion</b></p> <p><b>It was agreed that Policy 2E, as worded, does not require a proposal to meet each and every criterion, but rather to address each in the application</b></p> <p><b>STNP will give further consideration to merging Policies 2E and 2F, but if that is implemented the merged policy will apply to all housing development, not just that on allocated sites</b></p>	<p><i>P2FE.42 A full ecological appraisal shall be provided with the planning application, and shall include details of any mitigation measures necessary to preserve biodiversity on the site.</i></p> <p><i>P2FE.53 Satisfactory biodiversity and wildlife-friendly measures shall be incorporated into the design of the dwellings, gardens and public areas.</i></p> <p><i>P2FE.64 Each dwelling shall have off-road parking in accordance with the guidance given in Appendix 2 of the emerging Local Plan and the most up to date version of Norfolk County Council's document "Parking Standards for Norfolk".</i></p> <p><i>P2FE.75 Development shall include positive measures commensurate with the site size to enhance green infrastructure.</i></p>
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P33/37 (continued)			<p>P2E.16 "Residential development proposals shall A housing mix and tenure which responds to local housing need having particular regard to the demographic characteristics of the Parish of Saham Toney, and as set out in the Saham Toney Housing Needs Assessment, May 2019. The following .....proposals. <b><i>including:</i></b></p> <ul style="list-style-type: none"> <li>I. a. Housing specifically designed for the older adults, suitable for independent living, in accordance with Lifetime Home Standards;</li> <li>II. b. <u>More a majority of</u> one, two and three-bedroom homes for parishioners who wish to downsize but to continue to live in the Neighbourhood Area, and others c. a higher proportion of one and two-bedroom starter homes for first time buyers, and others;</li> </ul> <p>P2E.7 Standards shall meet those set out in emerging Local Plan Policy HOU 10, or any future update to that policy.</p> <p>2FE.28 a <b>For sites that will deliver On sites of</b> 10 or more dwellings d. social and affordable housing for those who cannot afford market prices.</p>
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## DISCUSSION POINTS:

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

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

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

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

## POLICY 2F: COMMON CRITERIA FOR ALLOCATED SITES

p37	Welcome the introduction of Policy 2F. <b>Noted</b>		
	Reference to "visibility splays" could also be included in this policy as it is included in all of them.  <b>Agreed providing Highways do not request different splays for different sites</b>	Consistency.	"P2E.x - Visibility splays no less than 2.4m x 59m to each side of the access where it meets the highway".  <b>This will be included in the general policy. Should Highways require other criteria on splays for a particular site that will be included in the site-specific policy</b>

## POLICY's 2G -2Q

	All these site allocate policies would benefit from re phrasing as policy, rather than statements, at the start & criteria a) of the policy.  <b>Agreed</b> Also requiring all the criteria to be complied with could be considered too restrictive.  <b>See discussion points below</b> <b>Agreed that since these are site specific policies, a requirement to comply with all criteria is relevant and</b>	Clarity.	"Development at (site name) & include ref No & Map ref in brackets for x new dwellings, will be permitted subject to meeting the following criteria..."  <b>Proposed revised text will be implemented</b>
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	acceptable		
<b><u>DISCUSSION POINTS:</u></b>			
Amending this approach could result in an extreme case in a proposal that meets only one policy criterion being deemed acceptable, while it contravened many important policy features			
The proposed policy rephrasing above also requires all criteria to be complied with			
Which specific criterion does the Council consider should not be obligatory?			
All site based policies (P2*.2)	See comments re Policy 2A re phasing.  <b>In discussion it was agreed that para 73 of the NPPF allows phasing in a Neighbourhood Plan</b>	Ability to enforce.	As advised.  <b>No change required</b>
P2H.3; P2K.3; P2L.3; P2M.3; P2N.3; P2O.3; P2P.3.	All these criteria outline what is not required, rather than was is, and therefore should be removed from the policy criteria. This applies to all policies where there is a reference to this.  <b>Agreed</b>	Consistency.	Either moved to the supporting text for each site or make a general statement made under <b>POLICY 2F: COMMON CRITERIA FOR ALLOCATED SITES.</b>
P2G.3; P2I.3; P2J.3; P2Q.3	"Therefore, under no circumstances shall viability be accepted as a reason to vary those criteria".  This is considered to be prescriptive as there may be unforeseen changes to costs / market conditions etc. This applies to all policies where there is a reference to this.  <b>Agreed</b>	Not in line with the NPPF.	"Therefore, <del>under no</del> only under exceptional circumstances will be viability be..."
T2G.1; T2I.1; T2L.1; T2K.1; T2L.1; & T2J.1	If there is an issue about the deliverability of these sites, they should not be allocated.  <b>In discussion it was agreed that the NPPF allows "developable" sites outside the first 5 years of a Plan</b>	Para 16 requires sites to be deliverable (NPPF).	Remove allocation if not deliverable.  <b>No change required (but Susan would like to confirm the interpretation of deliverable and developable)</b>

POLICY 2G: SITE ALLOCATION STNP1: GRANGE FARM, CHEQUERS LANE			
p40, P2G.1	<p>Suggest 'maximum' be replaced with 'approximately'.</p> <p><b>In discussion it was agreed that given the weight of evidence provided for allocated sites the flexibility implied by use of "approximately" is not appropriate. Hence it will not be added. It was further agreed that the word "maximum" is superfluous</b></p>	Policy is too prescriptive.	<p>"...for the provision of a maximum approximately 10 new dwellings on predominantly brownfield land at Grange Farm..."</p> <p><b>To be amended to "...for the provision of 10 new dwellings on predominantly brownfield land at Grange Farm..."</b></p>
	<p>e) — g) could these not be combined as they are not separate issues?</p> <p><b>Agreed</b></p>	Addresses similar issues.	As advised.
P2G.1 h)	<p>A full LVIA would not be reasonable on a development of 6 units; a landscape impact compliance statement would be more appropriate.</p> <p><b>See discussion points below. STNP is unable to respond to the use of the suggested impact statement without seeing an example which makes clear what requirements it imposes on developers. Susan will provide this and clarify</b></p> <p><b>The cumulative effects of sites STNP4-7 in particular were discussed and reference was made to those sites being in the ownership of one family, who contrary to emerging policy, seek to develop all 4 sites together</b></p>	Viability.	<p>Breckland Council will provide this.</p> <p><b>Susan will research what the Plan may specify with regard to cumulative impact and advise accordingly</b></p>

## DISCUSSION POINTS:

What precisely is the statement suggested? We would not wish to accept a simple statement from a developer that its proposal has no landscape impact. That fact has to be clearly demonstrated, and particularly make detailed reference to the Saham Toney Parish Landscape Character Assessment, January 2019, which is a material consideration in planning decisions

It does not matter if a development is for 6 or 60 dwellings; it could still have harmful landscape impact if not sited / designed in an acceptable way

The site selection report shows that cumulatively sites STNP4-7 particularly and individually site STNP5 are only borderline acceptable in landscape terms. Previous (larger scale) applications at STNP16 have been refused on landscape impact grounds. Hence this is a sensitive issue

POLICY 2H: SITE ALLOCATION STNP2: DISUSED PIGGERY, OFF HILLS ROAD			
p43 P2H.1	An exact measurement of the site should be undertaken.  <b>During discussion reference in the NPPF to sites exceeding 0.5ha being required to deliver affordable housing was not found</b>	If the site is over 0.5ha then in line with current NPPF, affordable housing will be required.	Determine for certainty whether the site is under or over 0.5ha.  <b>Susan to clarify with Housing Dept colleagues who made this comment</b>
T2H.5	If there is a risk of asbestos why is there no requirement for a Ground Contamination Risk Assessment, when this is required for other sites with this issue?  <b>Will check with the landowner</b>	Consistency	As advised.  <b>To be advised</b>

## POLICY 2I: SITE ALLOCATION STNP4: LAND AT THE JUNCTION OF POUND HILL AND PAGE'S LANE

p45, P2I.1 f)	A full LVIA would not be reasonable on a development of 13 units; a landscape impact compliance statement would be more appropriate.  <b>See P2G.1h)</b>	Viability.	Breckland Council can provide this.  <b>See P2G.1h)</b>
<b>POLICY 2J: SITE ALLOCATION STNPs: LAND TO THE EAST OF POUND HILL</b>			

p48, P2J.1 g)	A full LVIA would not be reasonable on a development of 12 units; a landscape impact compliance statement would be more appropriate.  <a href="#">See P2G.1h)</a>	Viability.	Breckland Council can provide this.  <a href="#">See P2G.1h)</a>
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#### POLICY 2K: SITE ALLOCATION STNP6: LAND AT THE JUNCTION OF POUND HILL AND PAGE'S LANE

p50 P2K.3 [JH]	An exact measurement of the site should be undertaken.  <a href="#">See p43 P2H.1</a>	If the site is over 0.5ha then in line with current NPPF, affordable housing will be required.	Determine for certainty whether the site is under or over 0.5ha.  <a href="#">See p43 P2H.1</a>
p50, P2K.1 d)	A full LVIA would not be reasonable on a development of 6 units; a landscape impact compliance statement would be more appropriate.  <a href="#">See P2G.1h)</a>	Viability.	Breckland Council can provide this.  <a href="#">See P2G.1h)</a>
	e) & f) could these not be combined as they are not separate issues?  <a href="#">Agreed</a>	Addresses similar issues.	As advised.
TP2K.6 & 9	Are duplicate, with the latter containing more information.  <a href="#">Agreed</a>	Duplication.	Delete para TP2K.6.

#### POLICY 2L: SITE ALLOCATION STNP7: PAGE'S FARM

p53 P2L.1	The site is over 0.5ha. It is therefore required to deliver affordable homes in line with NPPF, as are all sites of over 0.5ha.  <a href="#">See p43 P2H.1</a>	Para 63 (NPPG) states affordable housing should not be sought on sites that are not major (0.5 hectares or more.	Change paragraph to reflect that affordable housing will be required on this site.  <a href="#">See p43 P2H.1</a>
P2L.1 i)	A full LVIA would not be reasonable on a development of 8 units; a landscape impact compliance statement would be more appropriate.  <a href="#">See P2G.1h)</a>	Viability.	Breckland Council can provide this.  <a href="#">See P2G.1h)</a>
	f) — h) could these not be combined as they are not separate issues?  <a href="#">Agreed</a>	Addresses similar issues.	As advised.
<b>POLICY 2M: SITE ALLOCATION STNP9: OVINGTON ROAD</b>			
p57, P2M.1	Concern has been previously expressed about the low density of this site. In response mention was made about " <i>part of the site being at high risk of surface water flooding</i> ".  <a href="#">Agreed. Also note this is a developer proposal and therefore must be deemed viable</a>		Reference to the low density should be made in para T2M.6.

	g) & h) could these not be combined as they are not separate issues?  <b>Agreed</b>	Addresses similar issues.	As advised.
<b>POLICY 2N: SITE ALLOCATION STNP13: HILL FARM</b>			
<b>POLICY 2O: SITE ALLOCATION STNP14: CROFT FIELD</b>			
p60	We welcome the realignment of this site.  <b>Noted</b>		<b>No action required</b>
P20.1	Criteria g) is also found in Policy 2F.  <b>Agreed</b>	Duplication.	Delete Criteria g).
<b>POLICY 2P: SITE ALLOCATION STNP15: 8 RICHMOND ROAD</b>			
P2P.1 f)	A full LVIA would not be reasonable on a development of 8 units; a landscape impact compliance statement would be more appropriate.  <b>See P2G.1h)</b>	Viability.	Breckland Council can provide this.  <b>See P2G.1h)</b>
<b>POLICY 2Q: SITE ALLOCATION STNP16: RICHMOND HALL</b>			
p64	The Plan may need to say more about the future management and maintenance of the large tract of amenity land (ie: who and for how long etc). This could result in viability challenges if combined with Affordable housing and other necessary developer contributions. as well as the mix and type of housing required by other policies in this Plan.  <b>See discussion points below.</b>	Clarity.	As advised.  <b>Susan will discuss possible approaches with the Council's legal team and any suggestions they make will be discussed with the landowner by STNP</b>  <b>STNP will confirm the amenity land area and if designation as a Local Green Space is appropriate will seek the landowner's agreement</b>

	<p>In discussion it was clarified that the amenity land will not be linked to the sale of the land allocated for housing, nor will it be gifted to the Parish Council. It will remain in the ownership of the landowner who will continue to live adjacent to the development site. As such continuance of public access could only be achieved via the deeds of the landowner's property. Neither party was sure how to address this</p> <p>At present access to the amenity land is limited to pedestrian access, no provisions are made for parking</p> <p>Dependent on the area of the amenity land and with the landowner's agreement, it could be designated as a Local Green Space to add protection</p> <p>It was confirmed that the site would still be allocated even if the amenity land could not be guaranteed in perpetuity</p>	<p>Provision of parking will be discussed with AECOM, who are undertaking masterplanning studies for the site</p>
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#### **DISCUSSION POINTS:**

The land will stay in the ownership pf the present owner, whereas STNP16 itself will be sold to a developer.

12 houses in this location are acceptable to the village because of the offer of amenity land.

The amenity land is thus linked with the existing property rather than the development site and so surely conditions would have to apply to the deeds of the property / land, which the Plan cannot dictate. What conditions, if any, could be applied to planning permission?

The Parish Council would not take on responsibility for the land, even were it to be offered to it (which it is not)

Please advise possible solutions to this and how we might suggest the landowner resolves it

How long is specified as "in perpetuity" in the policy

	<p>Criteria b) — reference has been made to the wrong Map. Agreed</p>	<p>Typo.</p>	<p>Amend Map reference to 2Q, not P.</p>
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P2Q.3	<p>Subject to viability.</p> <p><b>Clarified that this refers to the viability requirement in T2Q.2</b></p>	<p>Not in line with the NPPF.</p>	<p>Add, unless it is otherwise proven through a detailed and substantiated viability appraisal that this is proved unviable.</p> <p><b>To be amended as for comment to P2G.3; P2I.3; P2J.3; P2Q.3</b></p>
<b>POLICY 3A: DESIGN</b>			
p68	<p>While we support the principal of a design policy, concern remains about the lack of detail applicable to Saham Toney. This policy needs to be more self-contained e.g. include reference in the plan to Saham's actual '<i>distinctive character</i>' and '<i>vernacular styles</i>'. As a minimum, this should be provided in the supporting text rather than reference to supporting documents, which do not have the same planning status e.g. not part of the 'development plan'.</p> <p><b>Agreed and will request another review of the policy when revised. Will also take account of the new National Design Guide published under PPG</b></p>	<p>Clarity.</p>	<p>In the policy "... <i>in a manner that reflects the varied local context...</i>" and supporting text make reference to either the range or predominant styles in the villages to provide a context for the policy in the development plan itself.</p> <p>N.B. Guidance on material types is provided in the supporting text.</p> <p><b>Design policy to be revised and resubmitted for review (informal)</b></p>

	<p>Also it has been accepted that there is an overlap with the Local Plan policy, (GEN 2 Promoting High Quality Design Policy and Policy COM 01 Design).</p> <p>This should be removed so that the policy focuses on the unique elements that are relevant to the plan area.</p> <p><b>Agreed and will request another review of the policy when revised. Will also take account of the new National Design Guide published under PPG</b></p>	<p>Para 16 f) "... avoiding unnecessary duplication of policies that apply to a particular area...." (NPPF).</p>	<p>As advised.</p> <p><b>Design policy to be revised and resubmitted for review (informal)</b></p> <p><b>Separately to the comments Susan will find out if there is a possibility that Neighbourhood Plan groups could include a specific section relating to their design policy / guide in the Council's emerging Supplementary Planning Document on Design as that will carry more force than a village design guide</b></p>
P3A.1	<p>The policy should make it clear that this will be achieved how by the requirement in para T3A.2, 1st sentence. However, will the requirements of the rest of this policy, except those in P3A.5 &amp; P3A.8, be expected to be achieved?</p> <p><b>Will review as part of the overall policy update</b></p>		<p>Move requirement for a statement in the 1st sentence, from the supporting text to the policy.</p> <p><b>Design policy to be revised and resubmitted for review (informal)</b></p>
T3A.1	<p>A summary of the 'guiding principals' of the Saham Toney Village Design Guide (April 2019) should be included in the Plan to have more weight.</p> <p><b>Agreed</b></p>	Clarity.	<p>Include in an Appendix to the Plan.</p>
T3A.4	<p>Format: Amendment to the text is required.</p> <p><b>Agreed</b></p>		<p>Reference should be made to 'Policy 3A'.</p>
<b>POLICY 3B: DENSITY OF RESIDENTIAL DEVELOPMENTS</b>			

p71, P3B.1	1 <sup>st</sup> sentence has a word missing. Should it also clarify the density shall reflect the density of the areas adjacent to the site as identified in table and map 3B.1 of the policy? <b>Agreed</b>	Clarity.	Add 'area' after 'immediately surrounding'; and ".... and shall reflect the data on existing densities as set out in Table 3B.1 and Density Areas Map 3B.1."
Table, [AD]	The number of areas here is less than on the subsequent table T3B.5 and Map 3B.1 and it is not clear why? <b>It was clarified that there are 19 areas in both tables and on the map.</b>	Clarity.	Requires clarification. <b>To assist readers' understanding P3B.1 will be amended to "...existing densities provided for the 19 areas listed below in Table 3B.1"</b>
T3B.1a	See earlier comment on MM159 (p19, 6.3.6 (c)). <b>Agreed</b>		
<b>POLICY 3C: SITE ACCESS AND ON-SITE STREETS</b>			
	The title appears incomplete. <b>The title is as intended but we are willing to modify it</b>	Clarity.	Add 'Layout' to the end of the title.
T3C.9 10	Reference to use of conditions would be more appropriate if it was located in the implementation section (T3C.1-4). <b>Agreed</b>	Clarity.	As advised.
<b>POLICY 3D: PARKING</b>			
p78, P3D.1 d)	This would benefit from further clarification. <b>Agreed</b>	Clarity.	"Each individual bay in a cluster of parking bays should be designed for no more than be sized for a maximum of 4 or 5 vehicles
P3D.1 j)	This incorrectly appears to give equal status to both documents, and does not clarify that the emerging Local Plan holds more weight. Delete reference to County Council document in the policy & move to supporting text. <b>Agreed</b>	Clarity.	"...incorporated in accordance with the guidance given in Appendix 2 of the emerging Local Plan and the most up to date version of Norfolk County Council's document "Parking Standards for Norfolk";

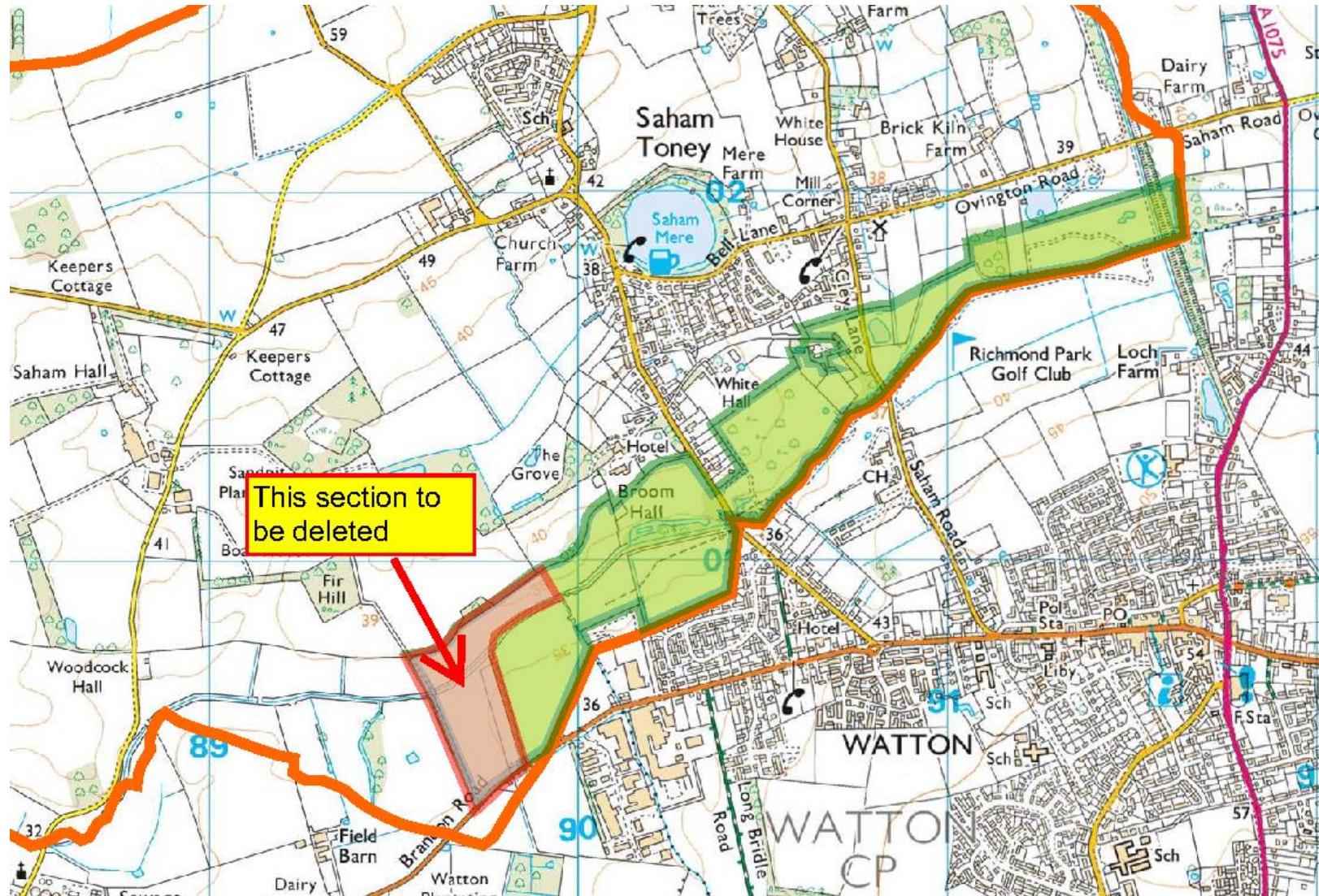
T3D.9	FORMAT - There is an extra line space in the para. <b>Agreed</b>		As advised.
<b>POLICY 3E: DARK SKIES PRESERVATION</b>			
P3E.1 c.	c) This is not appropriate to include in a development plan as this is an operational matter which the county has responsibility for.  N.B. This will have implications for the text in T3E.2 b) & c).  <b>Agreed</b>	Enforceability.	Delete criteria.
	Format - to be consistent with the rest of the plan, in the criteria, replace the full stops with a right hand side bracket.  <b>Agreed</b>	Format.	As advised.
T3E.6	N.B. This text is not consistent with, and less restrictive than, Policy 3E c).  <b>Agreed</b>		
<b>POLICY 4: NON-RESIDENTIAL DEVELOPMENT</b>			
p81, P4.1	The use of the word 'severe' is not typical planning phrasing, so it is not clear what this means.  <b>Agreed</b>	Clarity.	Replace with 'significant'.  <b>Note: Outside the Council's comments Susan will advise if recent third-party correspondence with Jon Berry results in any changes to Policy 4A</b>
P4.4	This is a statement, not policy and should be moved to the supporting text.  <b>Agreed</b>	Phrasing.	As advised.
<b>POLICY 5: SAHAM TONEY RURAL GAP</b>			

p83, P5.1	<p>While we support the principal of the Strategic Gap, there remains concern about the extent of the gap on the west side in relation to the evidence provided.</p> <p><b>See discussion points below. It was agreed that STNP's amended extent of the gap may be acceptable if evidence can be provided of development pressure in that area</b></p>	There is limited no development pressure in this area.	<p>Reduce Strategic Gap on the west side to the commercial site on Brandon Road.</p> <p><b>Development pressures to be further researched</b></p>
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#### **DISCUSSION POINTS:**

We would consider reducing it to the western most extent of the Saham / Watton boundary, and to the west of the commercial site, limit its northward extent to Watton Brook, as illustrated below.

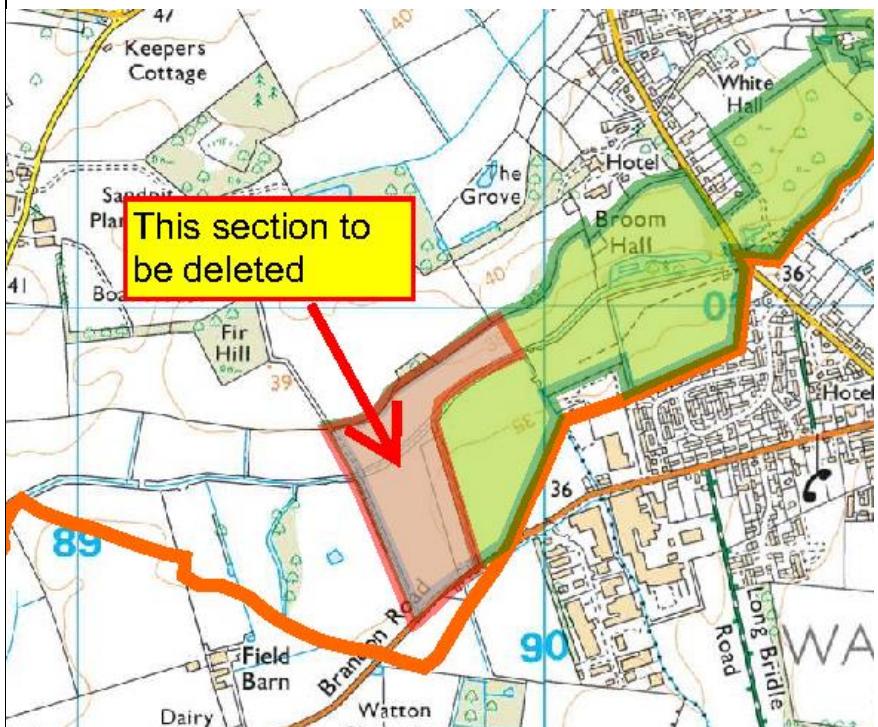
There is a triangle of land immediately to the west of the commercial site that is on the Watton site of the Parish boundary and an obvious candidate as a future infill site, most likely for commercial expansion. Were that to be put forward it would be highly likely to include land on the Saham side since it is all one tract of land. Hence that area is proposed to be retained in the gap. This is evidenced by the fact that the Watton commercial site has already encroached on Saham Toney land



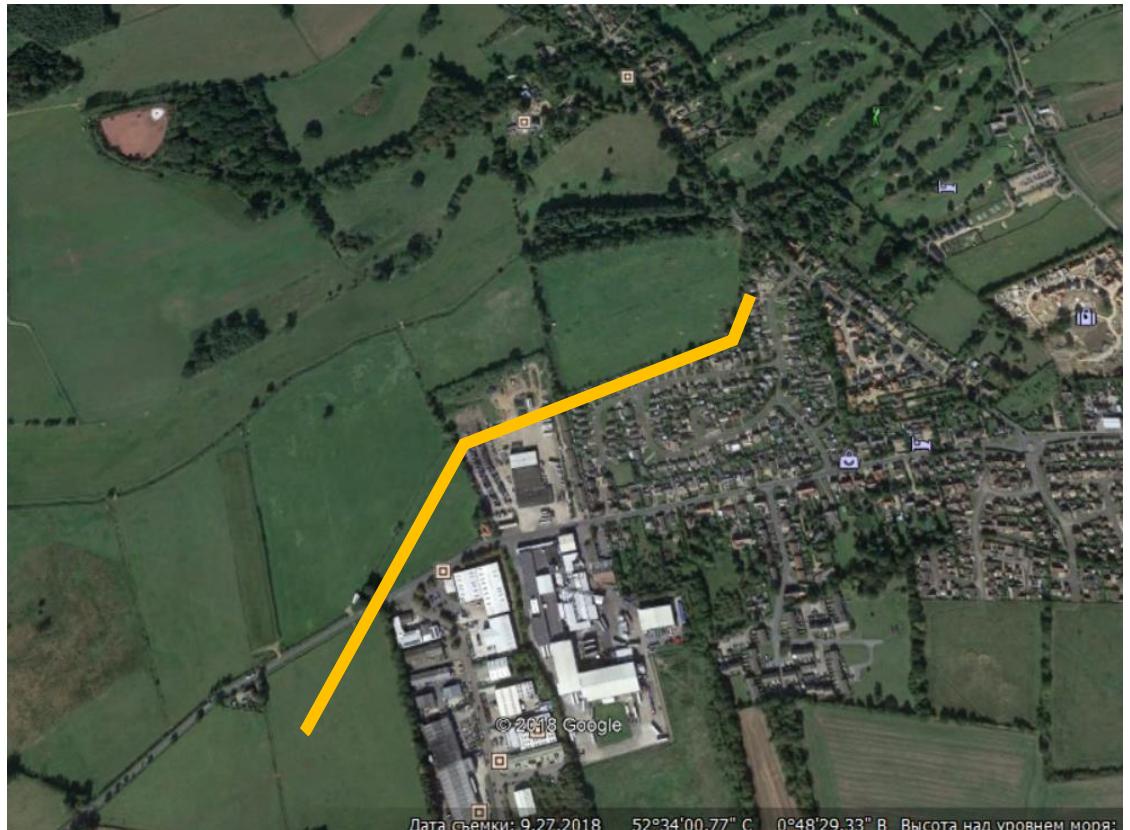
Evidence Map 5.4	The Commercial site (in blue) on Brandon Road extends further north ( $\frac{3}{4}$ up the site) rather than half way up as	Accuracy.	Amend as advised.
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indicated on the map — see site on Google Maps.

In discussion it was agreed that the Plan map is correct but for consistency will be substituted by a Google Earth background



From Policy Map



From Google Earth (Parish boundary: ——— )

POLICY 6: HERITAGE ASSETS			
p92, P6.5	Clarification is required regarding who makes the decision. <b>Agreed</b>	Clarity.	"Where a need for field evaluation is identified by Breckland Council, a planning condition shall be agreed..."
p93, T6.1-4	The text needs to be clear about what type of heritage asset is being referred to as occurs in T6.6 e.g. designated or non-designated or both. <b>Agreed</b>	Clarity.	As advised.
p95, T6.11	The archaeological interest of an asset is already known; but not that of a site or area, as it may not have been previously assessed. <b>Agreed</b>	Clarity.	"Where <b>an asset</b> a site or area, is thought to have archaeological interest, the potential knowledge..."
p95, T6.16 Glossary of terms	'Heritage Asset' should read 'non-designated heritage asset'. <b>Agreed</b> Also it would be useful to have a Glossary for the whole plan and not just the Heritage assets. <b>Will consider this</b>	Clarity.	Amend as advised.
p99, Policy Map 6A-C	Why is numbering 52 -59 and 22 - 258 etc? Does this reflect the County Council register? <b>This matches the Saham Toney Heritage Asset Register, which has blocks of unused numbers set aside for possible additions in future</b>		Requires clarification. <b>To be noted in supporting text</b>

POLICY 7A: LANDSCAPE CHARACTER PRESERVATION AND ENHANCEMENT			
p101, P7A.5	A full LVIA would not be reasonable for small developments in this location. On small sites a landscape impact compliance statement would be more appropriate. <b>See P2G.1h)</b>	Viability.	Breckland Council can provide this. <b>See P2G.1h)</b>
POLICY 7B: KEY VIEWS			
p108, P7B.1	1" sentence is a statement and add nothing to the policy. <b>Agreed</b>	Phrasing.	<i>"Key views shall be respected."</i>
T7B.2	Why has no strategy been provided for views 2, 3, 6 & 9; are they less significant? <b>Will consider additions</b>	Clarity.	Consider providing advice.
POLICY 7C: LOCAL GREEN SPACES			
p121	Include the evidence for the Local Green Spaces against the requirements in para 100 (NPPF) in a table in the supporting text. <b>Agreed</b>	Previous independent examiners requirement.	As advised.
POLICY 7D: BIODIVERSITY AND HABITATS			
p124	N.B. There is concern that there should be a greater clarity between the different types of natural environment designation and the protection awarded. <b>Agreed to add clarification to supporting text (Ref NPPF para 171)</b>	Clarity.	As advised.
p126-32, Maps	Most of the Keys on these maps are too small to read and need increasing in size.	Clarity.	As advised.

	<p>These are NBIS maps, so will liaise with them as to what's possible. Some maps may be replaced in any case. Will consider amending maps to A3 size</p>		
<b>POLICY 7E: GREEN INFRASTRUCTURE</b>			
p133, P7E.4	Criterion P7E.4 & 5 would be better placed in Policy 3A Design. <b>Agreed</b>	Clarity.	As advised.
<b>POLICY 7F: TREES AND HEDGES</b>			
p135, P7C.6	All parts of the retained trees should be protected, not just the roots. <b>Agreed</b>	As Per recommendations BS5837:2012.	<i>"All retained trees and hedges that could be implicated by the development shall be protected as defined in item 5.5 of BS5837:2012 Trees in relation to design, demolition and construction".</i>
<b>MONITORING AND UPDATE OF THIS NEIGHBOURHOOD PLAN</b>			
	Title would benefit from amending. <b>Agreed</b>		<b>MONITORING AND UPDATE OF THIS NEIGHBOURHOOD PLAN</b>
	N.B. As monitoring is the responsibility of <b>Breckland Council</b> , it would be useful if the Indicators and Targets were checked to be consistent with those in the Annual Monitoring Report. <b>See discussion points below</b> <b>In discussion it was agreed that STNP may monitor the Plan to criteria it deems appropriate and that the Council will continue its own work with respect to its Annual Monitoring Report</b>	Consistency.	As advised. <b>Text will be added to clarify the difference between the monitoring proposed and that already carried out by the Council</b>

#### **DISCUSSION POINTS:**

A qualifying Body has a right to request update of the Plan (Ref: PPG Paragraph: 085 Reference ID: 41-085-20180222, Revision date: 22 02 2018), and must therefore carry out its own monitoring to help its decision making in this respect. The intention of the monitoring proposed is to facilitate review of the Plan's effectiveness, and to a degree to hold Breckland Council to account in how it applies the Plan's policies.

The objective of monitoring is to establish the effectiveness of the Neighbourhood Plan policies. Indicators and targets must therefore be specific to the Neighbourhood Plan policies, not those of the Core Strategy or emerging Local Plan.

As we understand Breckland Council AMR indicators and targets are based on its Core Strategy and Development Control Policies , and are therefore not appropriate to the Neighbourhood, which confirms with the more up to date emerging Local Plan. We are not aware that the Council has published new indicators and targets based on the Local Plan.

Breckland Council already monitors on a district-wide basis to the AMR indicators and targets, so it is unclear how doing the same specifically for Saham Toney would add value.

Even if Saham Toney Parish Council wished to use the AMR indicators and targets it would not have the resources to gather and collate much of the information included in the AMR.

## APPLICABILITY OF NPPF REFERENCES (2<sup>nd</sup> comment to whole plan)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

